

2025

EUPHIA ANNUAL REPORT



Masthead

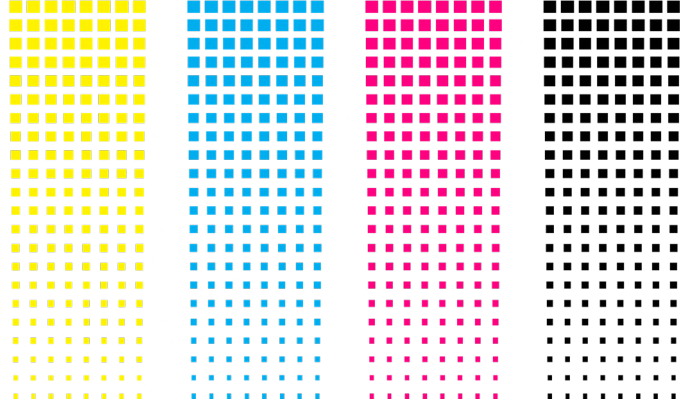
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Dear Members,

It is our pleasure to offer you the second edition of our Annual Report. 2025 has been a very successful year for EuPIA.

Highlights include the release of the 5th edition of the Good Manufacturing Practice (GMP), progress on a sustainable Exclusion Policy, the launch of a Functional Coatings group, and video recordings with most of our chairs.

This second edition of our Annual Report gives you all the details and insight into our activities, but also looks ahead to the next year. There will be new challenges and opportunities in 2026, and we look forward to engaging with you and would like to thank all our EuPIA members for their continued support to our association.

Best regards,



Cornelia Tietz
Director



Nicolas Wiedmann
Chair

What is EuPIA?

EuPIA, the European Printing Ink Association, is the trade association representing the over 80 printing ink manufacturers in Europe.

It was founded in 2003 as a sector of CEPE, the European Council of the Paint, Printing Ink and Artists' Colours Industry.

What are our activities?

EuPIA has more than 15 different working groups and taskforces focused on regulatory issues, stakeholder engagement, and implementing projects.

Next to promoting our activities and raising awareness about the role printing inks play in our society, we provide support to our member companies on regulatory topics and technical aspects, develop common positions on issues affecting the industry, and engage in research projects of commons interest – and this also in close collaboration with our 13 National Associations.

Vision

Advocate the needs of the printing ink industry and champion its progress

Mission

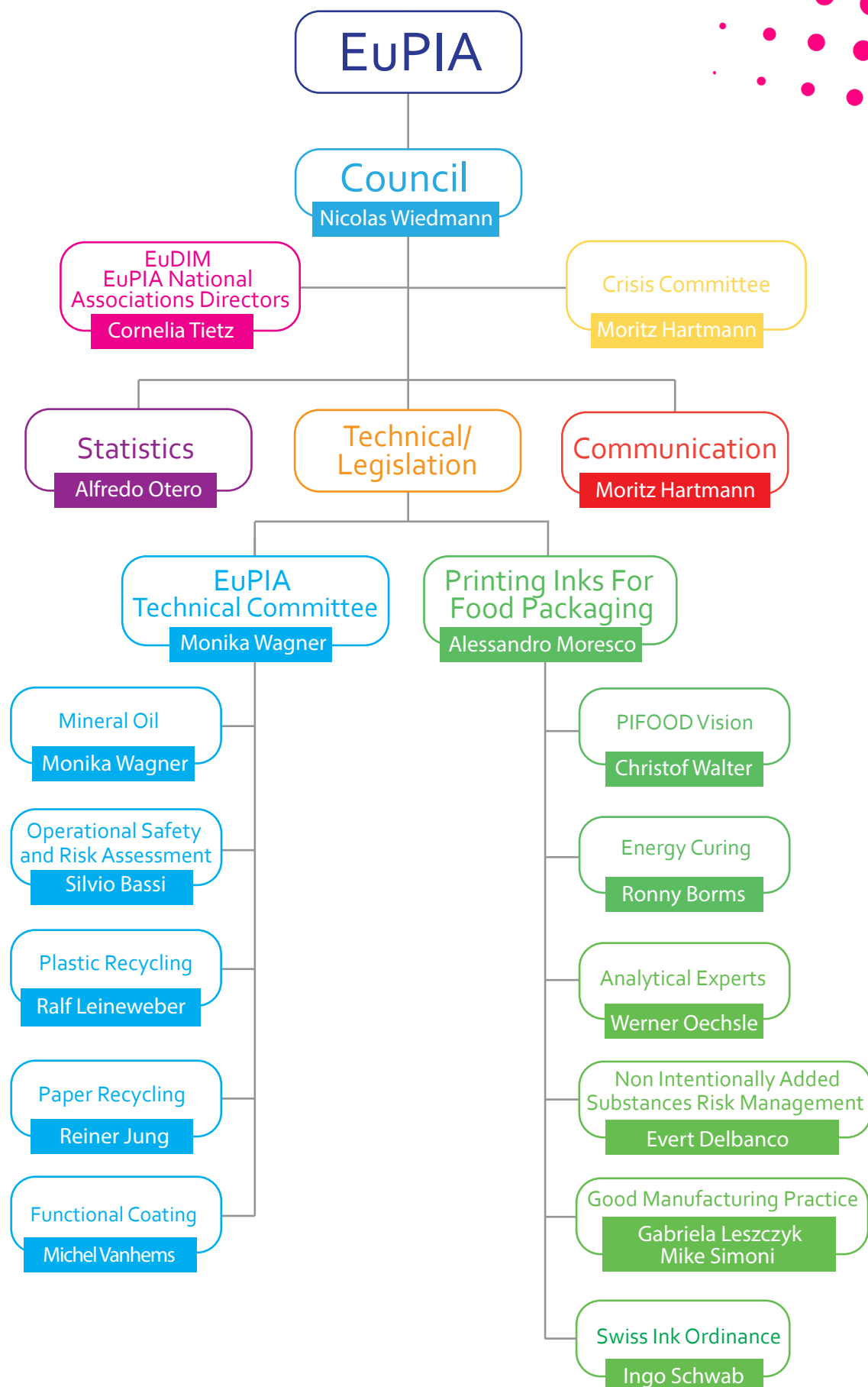
EuPIA supports its member companies by:

- promoting the development of safe, sustainable, and colourful printed products,
- providing regulatory and scientific advice to all stakeholders to encourage innovation.



Source: Pexels-Mornie Jeremiah

Organisational chart



What have we achieved?

The main field of activities for the printing ink industry in 2025 clustered around sustainability and regulation, raw material and cost pressure.

The big regulatory files this past year have been the Packaging and Packaging Waste Regulation, Food Contact Material legislations and impacts from the Classification, Labelling and Packaging (CLP) Regulation.

Food Contact Materials

Situation in the EU

The European Commission seems to be intensifying its intent to review the food contact framework regulation. An expert workshop took place at the end of October to which our Food Contact manager was invited as an individual expert. This was a great honour, as the circle was highly selective.

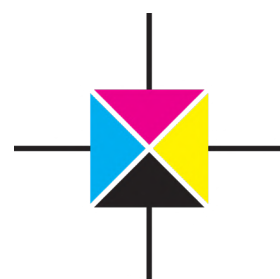
Before the workshop, the European Commission had finally issued a long-anticipated scoping paper that served as the basis for the exchange, which the PIFOOD Vision group thoroughly analysed.

The principles for the revised regulation have been repeatedly presented by the European Commission.

1. Rebalance focus on safety of final food contact articles (FCAs)
 - Requirements to share information throughout supply chain
 - Transparency on composition of final articles and on migratable substances
 - Accountability – clarity over business operators' responsibilities
 - Final responsibility with producers of final FCAs who should have all necessary information
2. Establish agreed principles for risk assessment and level of safety for all FCMs (and how to demonstrate this)
3. In general, rules to apply equally regardless of materials types; some distinctions and adapted approaches may be needed (e.g. recycled materials)
4. Improve rules on GMP and identity of materials
5. Prioritise risk assessment and risk management at EU level accordingly. Aim to ban the most harmful substances and increase uptake of more benign substances and materials.
6. Promote inertness of FCMs
7. Ageing and foreseeable use; information and knowledge to consumers
8. Support sustainability of materials

Principles for the revisions of the food contact material legislation as presented by the European Commission

Source: pexels: Yankrukov - Pixabay/StockSnap - Shutterstock: voronaman





EuPIA welcomes the more risk-based approach. Our industry positions and concepts have been ready and aligned across the value chain in the Packaging Ink Joint Industry Task force (PIJITF). This is especially valid for the information sharing and transparency in the supply chain. Each actor in the supply chain needs to provide the information, the next actor needs for his compliance work and PIJITF has provided a guidance on what is seen as adequate information in this supply chain. Although the broad lines seem obvious, detailed analysis and most likely the work on the details will be of utmost importance.



The Swiss and German Swiss Ink Ordinances

In Switzerland, the transition period for the updated Swiss Ink Ordinance (SIO) ends in February 2026. This includes the removal of the annex B and the introduction of a mandatory Declaration of Conformity (DoC). A Joint Industry Group (JIG) aimed to establish such a template DoC. EuPIA and the Swiss association VSLF are supporting and defending the principles established in the PIJITF. The EuPIA Statement of Composition (SoC) can serve as the main basis whilst each stakeholder in the supply chain has to add the information needed and available.

With the European Commission not moving, the so-called German Ink Ordinance was expected to become fully effective on 1st January 2026. However, this is now postponed for another year due to the fact that dossiers for all the necessary substances have not yet been submitted within the transition period, meaning that it has not been possible to evaluate them and possibly include them in Annex 14 of the Consumer Goods Ordinance.

Also, our industry has worked intensively over the last years on

the adaptation to the new rules, including extensive and resource- and cost-intensive reformulations. Although many important raw materials are still missing from the positive list, it was possible to develop and provide to the market in time suitable printing inks for almost all applications, with which the requirements of the regulation can be met. The postponement gives printing ink manufacturers and converters the opportunity to further refine and optimize the application process of printing inks that meet the requirements of the printing ink ordinance in terms of their composition. This should be particularly helpful for special applications (e.g. applications intended for direct food contact).

During the pilot project "Cost Sharing Companies" ("sandbox project"), under the umbrella of the VdL, EuPIA member companies, together with the Federal Ministry of Agriculture, Food and Regional Identity (BMLEH) and the Federal Institute for Risk Assessment (BfR), discussed various issues relating to dossier preparation and clarified open questions. Given that this project took longer than expected and that the final report was only published in 2025, the postponement also makes sense in this regard.



However, as the fundamental problems and shortcomings of the ordinance remain, particularly with regard to the lack of incentive for raw material suppliers to submit dossiers, there is a slight doubt whether the positive list will be substantially completed within this additional year. A few substances could still be added to the list, especially based on the findings of the pilot project, but will this significantly change the overall picture?

EuPIA's engagement stayed focused on informing customers, talking to raw material suppliers, such as photoinitiators and being in exchange with associations of the value chain.

EuPIA, VdL and VSLF organised a webinar, which attracted over 600 attendees and included representatives from the respective regulators to explain the GIO and SIO to all stakeholders.

In this context, the Swiss authorities also made it clear that the EuPIA SoC is, in fact, a DoC as required.



Additionally, following the questions from the webinar, EuPIA and the VSLF published a Q&A document together with a Guidance on the SIO.

Good Manufacturing Practice

Good Manufacturing Practice (GMP) is a central pillar for ensuring the safety of food contact materials. Since 2009, the EuPIA GMP has set standards and helped to control food safety hazards in the design and manufacture of inks, varnishes and coatings designed to be printed onto FCM inks and formulated for use on either the non-food contact or the food contact surfaces of food packaging and articles intended to come into contact with food.

Products developed and manufactured in compliance with the GMP are supporting manufacturers of Food Contact Materials (FCM) in supplying products compliant with the applicable legislation in Europe for materials and articles intended to come into contact with food, such as the Framework Regulation (EC) No 1935/2004 and GMP Regulation (EC) No 2023/2006.

After some extensive work by two expert groups -on chemical and operational management- that completely reworked and updated the guidelines, we published its 5th Version in 2025.

The major changes include:

- Modification of the EuPIA GMP structure to be in line with the current ISO9001:2015,
- Expanded geographical scope of the GMP to recognise that many EuPIA member companies implement GMP globally
- Definition for a competent person including their training requirements,
- References to other relevant EuPIA documents including, for example, migration guidelines, Photoinitiator suitability list, Risk assessment for NIAS,
- Clarification of information included on raw material composition and on NIAS that the raw material may reasonably be expected to contain.



Analytical & research work

Since 2018, EuPIA has been conducting migration tests with food simulants and real foods for selected printing ink surrogates. It could be shown that for polyolefin substrates accelerated migration tests at 60 °C in combination with ethanolic simulants 50 % and 95 %, strongly overestimate migration in the real food for the analytes assessed in this study.

To better understand this effect, EuPIA conducted follow-up experiments that show that exposing polyolefin FCM films to ethanolic food simulants at elevated temperatures can increase the permeability of the film, quickly leading to penetration of simulant and ultimately in direct contact between the simulant and the non-food contact side of the FCM. As such simulant penetration does not occur when incubating at room temperature for 6 months the observed permeability change constitutes an



Spot On:

Photoinitiator Suitability List

The "EuPIA Suitability list for photoinitiators and photosynergists considered suitable for use in UV printing inks and varnishes for the non-contact surface of food contact materials" underwent a legal check.

Following a newly established process, two new photoinitiators, one proposed by a supplier and the other by a member company, were added after assessment by EuPIA toxicologists.

unacceptable physical change to the test specimen which does not occur under the worst foreseeable conditions of use. EuPIA is currently continuing its investigation and follow-up studies are on the way.



The results of the study were presented throughout the year as posters at different occasions (ILSI Symposium on Food Packaging, Eu and US RAtech) and also the European Coatings Journal featured an article about this.

Recycling and sustainability

During a strategic workshop, companies' recycling experts discussed challenges stemming from the Packaging and Packaging Waste Regulation (PPWR) and its still to be deployed over 30 implementing and delegated acts. Especially two points are highly relevant when it comes to the recyclability of packaging because



a package is not recyclable

- where substances of concern in printing inks hinder recycling (during recycling process & recycled article),
- when packaging material/component is not covered by a Design for Recycling (D4R) guidelines (2030)



In order to address the first one, a statement on the compatibility of printing inks in the recycling process was issued.

We also contributed to an ECHA consultation which was followed by an interview.

We want to have as many systems under D4R as possible and currently the Council sponsors test for three systems, more are planned with support from the BCF and CEPE.

Additionally, EuPIA member companies are represented in the respective standardization committees at CEN and in a number of recycling initiatives such as CEFLEX, Recyclass, Evergreen, and the European Paper Recycling Council (EPRC) where D4R are developed and discussed. During the meetings of the paper and plastic recycling taskforces, reporting is carried out and the completed work is assessed.

EuPIA as an association has engaged itself, next to some individual member companies, to support Colourcycle, a CORNET-project to increase the safety of polyolefin and polystyrene (PS) packaging with decorative and coloured components in recycling – this is a follow-up of two previous projects: SafeCycle and PolyCycle. The aim here is in the end to develop a «Challenge Test» for deinking processes. This should be done by generating quantitative data on the extent to which critical substances from printing inks are reduced by a deinking process.

This data should be used to convince EFSA, FDA or other competent authorities that a good deinking process removes the printing ink components to such an extent that they no longer play a role in the assessment. After attending the kick-off meeting, a dedicated phone call took place with the project institutes to discuss the concrete contributions from the printing ink industry.



Occupational Health and Safety

EuPIA Charter (former Exclusion Policy)

The EuPIA Exclusion Policy has been an important code protecting the health and safety of workers in the ink and printing industries, as well as the end users of printed materials. It is a voluntary initiative companies outside Europe can also adhere to.

Some history: In 1996, the European printing ink companies took over existing national stewardship initiatives to create the so-called "Exclusion list for printing inks and related products". It applied stricter rules to the manufacture and marketing of inks than existing legal requirements. In 2016, the in the meantime internationally acknowledged "Exclusion List" became the "Exclusion Policy".



Until 2016, the criteria of the then “Exclusion List” were entirely hazard-based. Between 1996, when the “Exclusion List” was established, and 2016 when the “Exclusion Policy” replaced it, regulations have rendered the use of chemicals much more secure. This resulted also in the fact that we see more and more substances falling under the Exclusion Policy - several updates were made since 2016 to accommodate regulatory changes and challenges and still create a level playing field. When only three changes took place within a couple of months, it became clear that a more sustainable approach is needed. In a dedicated workshop current and former signatories discussed cornerstones and principles for what will become the “EuPIA Charter on raw material selection and exclusion for printing inks and related products”.

The EuPIA Technical Committee (ETC) went through several rounds of amendments and adaptations on the Charter document and its accompanying Explanatory Note. It then underwent final approval by the Council and EuPIA members not represented in the ETC via the National Associations.

The Charter has been tested using two substances that were already subject to an extended use cycle when used in digital inks, as introduced in the Version 8 of the “Exclusion Policy”.

Substitution remains one of the key principles and control mechanisms are built into the Charter.

For non-threshold substances (chemicals that do not have a defined safe level of exposure (threshold) below which no health risk would appear, there is now mandatory substitution.

When in rare and well-defined use cases, approved by the EuPIA Technical Committee, replacement for a threshold substance is not immediately possible, continued use of two years is possible if a risk assessment taking specificities of printing ink industry into account shows safe use.

The Charter will not apply backwards, meaning all substances already having a human health hazard classification applicable to the former Exclusion Policy will not be re-evaluated as they are considered as being substituted.

The roll-out of the Charter is planned for the first half 2026. Targeted communication material will be available for internal and external audiences.

Guidance and Safety Alerts

Know-how and best practices in printing ink manufacturing sites with respect to occupational health and safety is shared by EuPIA members. The respective task force worked on several documents.

Spot On: Omnirad 184

When a reliable supplier self-classified a substance, the “Exclusion Policy” is expected to be triggered.

However, when the lead registrant of Hydroxycyclohexyl phenyl ketone (EC: 13-426-9 – CAS: 947-19-3) - also known as Omnirad 184 or 1HCPK, a photoinitiator used in UV-curing inks and coatings - self-classified this substance, adding a new hazard classification of reprotoxic 1B (H360) and updated the corresponding Safety Data Sheet, this was met with some surprise, because up until that point, all available data did not point to any such concerns.

After alerting the secretariat and following its intervention with the lead registrants, toxicologists from EuPIA companies were given the opportunity to look at the data of an

OECD 414 study on a second species (rabbit) whose results should have led to the aforementioned classification. However, the toxicologists did not see sufficient evidence to substantiate a self-classification as Reprotoxic Cat. 1B.

After a meeting with the contracted lab and experts from the side of the lead registrants, the main reasons for the diverging opinions could be explained and were taken on board. Additionally, there were also some concerns with the study performance and reporting, as well as missing information used in the interpretation of observed effects, the lead registrant followed our opinion, and the self-classification was again removed.

This case is a wonderful example of successful and efficient collaboration within EuPIA.

In 2025 a Mechanical Integrity Checklist was provided, an In-plant Safety Guidance was published and four safety alerts following incidents were issued.

Substance specific issues

Wherever needed and relevant, we provided input to consultations on dedicated substances such as the classification of rosin resins organised by ECHA or a socio-economic analysis for talc initiated by the suppliers. Currently, we closely follow developments with respect to the (biocidal) classification of ethanol. With respect to the UTC of the PCB in pigments, although this discussion seems to be closed as long as the delegated act is not published, we also follow the developments in the European Commission's POP expert group.

Communication

Our communication activities accelerated in 2025.

The website, our flagship, was reorganised to facilitate the finding of information and enhance the logic. Also, a new and more user-friendly intranet was rolled out.

As a special highlight, we interviewed the chairs of our working groups and task forces. These interviews provide insights into each group's activities and priorities, their achievements, how they interact with stakeholders, and offer a glimpse of the personalities behind the work.



About 3,000 people follow us via LinkedIn, where we give timely updates on activities, events or publications. In 2025, over 50 posts were published. We also worked on a brochure to explain our industry to a broader public. Its publication is imminent!

Last but not least, the cornerstones for the roll-out of the EuPIA Charter targeted to different audiences were prepared.

Membership & Stakeholder Engagement

Gaining visibility and being heard also require active engagement with stakeholders and above all with our members!

We welcomed two new members in 2025: Mankiewicz and Michelman International Belgium.

Our Annual Conference in Santiago de Compostela in April 2025 brought around 70 industry leaders together who enjoyed inspirational speeches and interesting exchanges with value chain representatives.

The secretariat undertook courtesy visits to several national associations, as well as member companies and presented our work and regulatory insight at several conferences amongst others, at our American sister association NAPIM. EuPIA was also present at the European Coatings Show.



Spot On:

Functional Coatings

The FCETF short for Functional Coatings EuPIA Task force is the new kid on the block. After its kick-off meeting in January 2025, participants have been very active to make sure that functional coatings are part of the game. Members are following implications of the Packaging and Packaging Waste Regulation (PPWR) for Functional Coatings and have edited some documents, including:



- a scoping paper on what Functional Coatings actually are,



- the revised EuPIA statement on the applicability of the Single-Use Plastics Directive (SUPD) and its Guidelines and extended it to Functional Coatings.

As a signatory of the Antwerp declaration, we attended "Antwerp II" and issued our key asks for the Clean Industrial Deal presented later this year by the European Commission.



In addition to these network-oriented activities, we also participated on a technical level in several public consultations organised by the European Commission, ECHA and supplier associations.

Our cooperation with the "European Coatings Journal" and the German "Farbe und Lack" resulted in the publication of two articles: on the mineral oil legislation in France (a topic which has not seen any decisive progress) and one about our analytical programme.



Source: Pexels: voitkevich

What are the remaining steps and projects?

Looking ahead to 2026, there are several projects we will be focusing on.

First of all, there will be the roll-out and promotion of the "EuPIA Charter on the Raw Material Selection and Exclusion for Printing Ink and Related Products" – this will be staged and tailored to different stakeholder groups.

We will stay in the pole position and further use our role as established and recognized expert stakeholder during the review process of the Food Contact Material Framework Regulation.

Our analytical "swelling" study will be further pursued, and several publications are planned already.

The brochure and e magazine on our identity, the value of printing inks and an explanation of the printing processes and applications will be published. With respect to the e magazine, we already plan to enhance this further to show the value of printing inks in everyday life.

The promotion of deinking in plastic recycling and conducting further tests for Design for Recycling guidelines as well as the contributions to Colourcycle will stay on the menu, too.

"The future of printing inks is one of innovation and adaptability. As the industry faces evolving demands - from sustainability and regulatory compliance to digital transformation and functional coatings - it continues to prove itself as a solution finder."



Source: shutterstock - Lisa



EuPIA Statistics



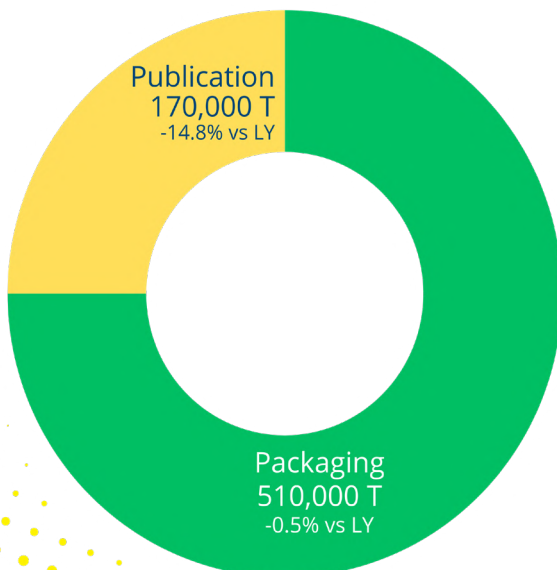
EuPIA publishes market statistics on an annual basis. The data can be accessed at [Statistics - EuPIA](#).

Internally, the statistics expert group analyses quarterly the printing ink sales based on the consolidated results of data supplied by EuPIA member companies on a standard basis to our independent trustee, who then compiles the data for EuPIA. It is estimated that the sample group accounts for about 90% of total industry sales in Europe. The results show sales volume in tonnes and value for the latest year: 2025.

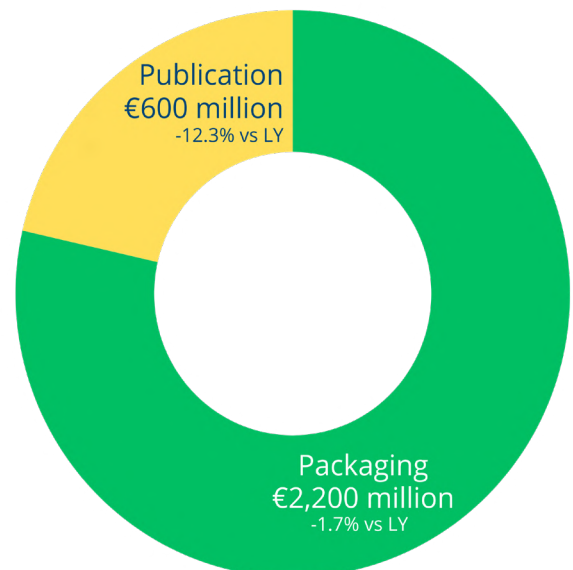
Key sectors shown

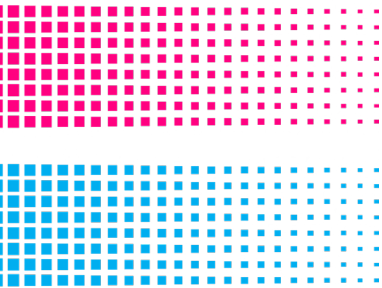
- Publication Inks comprise web offset inks (coldset and heat-set), sheetfed offset inks, publication gravure inks and related overprint varnishes. Examples of publications are newspapers, magazines, books, and commercial prints such as brochures and flyers.
- Packaging Inks comprise flexographic inks, specialty gravure inks, energy curing inks and related varnishes. Examples of packaging are flexible film packaging, rigid plastics, folding cartons and corrugated boxes (see figures below).

Sales volume for 2025

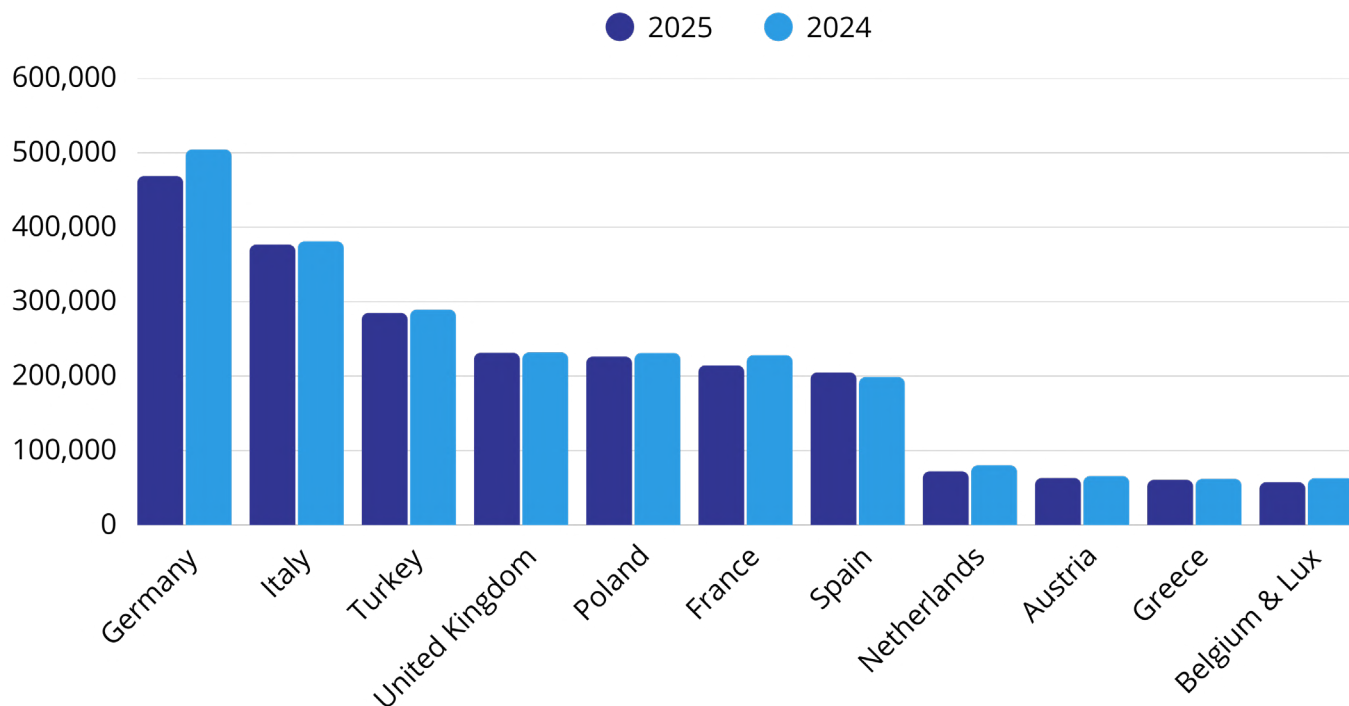


Sales value for 2025

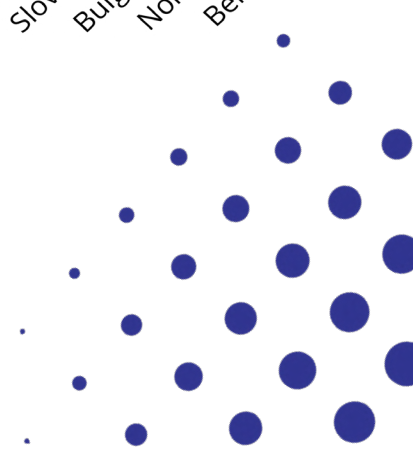
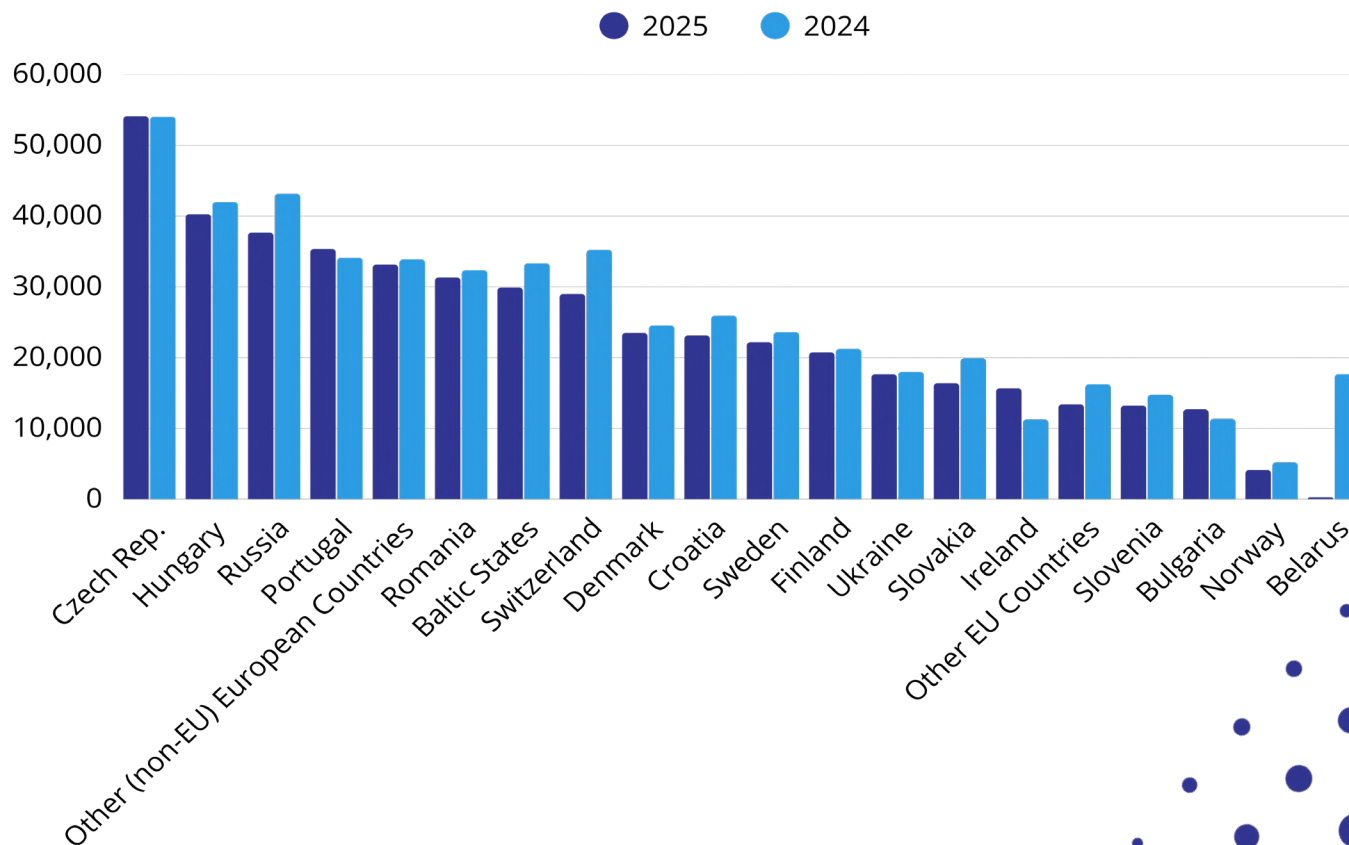




Sales value by country in €M



Sales value by country 2023 to 2024 in €M





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