Food packaging must be manufactured such that it does not transfer its constituents to the packed foodstuffs in quantities which could endanger human health, cause an acceptable change in the composition of the food or inadvertently affect foodstuffs in terms of odour and taste. These general requirements are laid down in the European Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food.

Exchange of information along the food packaging chain is vital to ensure compliant food packaging. Due to the complexity of the process, all members of the packaging chain must exchange relevant information – under appropriate confidentiality agreements if necessary – in order to ensure that products can be formulated to be fit for purpose, and thus be compliant with legal requirements. To this end EuPIA members are prepared to provide adequate information about the composition of their products by means of a standard Statement of Composition (SoC). This SoC will list those substances with a potential to migrate along with applicable migration limits and the amount of that substance in the print. The migration limits for a substance may come from the Plastics Regulation (EU) No 10/2011, from the Swiss Ordinance SR 817.023.21 or from another recognized authority such as an EFSA opinion.

Several guidelines available

A “EuPIA Customer Guidance Note for Using Ink Statements of Composition when Considering Compliance of Food Packaging” is intended to help packaging converters and end users assess the compliance of printed packaging using the information provided by the ink supplier. Moreover information relating to usage and application constraints will be provided in Technical Data Sheets or other recommendation leaflets. To assist its members, EuPIA makes available a “Technical Data Sheet Checklist”. In order to enable the ink manufacturers to provide adequate information to the packaging converters, relevant information from the raw material suppliers is needed. Raw material suppliers are therefore requested to provide such information by filling in so-called “Raw Material Compliance Questionnaires”. EuPIA issued an “Explanatory Note for Suppliers of Ink Raw Materials Regarding Regulatory Compliance of Printed Food Packaging” to assist suppliers of ink raw materials in understanding the need for, and the mechanism for regulatory disclosure to facilitate the communication of relevant information down the supply chain. Likewise, the ink manufacturer requires certain information from the packaging converter to propose suitable products for the communicated applications, and to undertake preliminary risk assessments. To this end, EuPIA assists its members by providing a “Food Contact Material Technical Enquiry Checklist for Communication of Information from Converter to Printing Ink Supplier”.

Assessing migration potential

When assessing potential migration transfer from printed packaging, it is important to consider the complete package, any barrier properties, the conversion process and the type of food. The Packaging Ink Joint Industry Task Force (PIJITF), composed of all European associations representing the members of the food packaging chain, has issued an Explanatory Note on the Assessment of Migration Potential from Food Packaging Inks and its Dependency on the Packaging Structure (www.fooddrinkeurope.eu/uploads/static_pages_documents/AT-PIJITF_Explanatory_Note_Migration_Potential.pdf). Seven different structural / risk combinations in conventional packaging designs are identified, and the document gives guidance regarding risk assessments and choice of suitable inks in each of these cases. Also, the document includes the EuPIA definition of “low migration ink”, and explains in which circumstances this term is used.

What is a “low migration” ink?

A “low migration” ink is an ink designed for use on food packaging that is formulated using selected components which should ensure that migration from the resultant printing ink film will be within accepted migration limits, provided that the packaging structure is suitable, and the packaging ink is applied under Good Manufacturing Practices in accordance with guidance given by the ink supplier for the intended application. The use of such inks should be supported by indicative analytical testing and/or relevant worst case calculations. As a result – assuming correct application and appropriate packaging type – any migration from the printed packaging should be within currently accepted limits. Low migration inks recommended to be used for food packaging made from paper and board “Low migration” inks are especially recommended to be used for food packaging made from paper and board. Further information is provided in the EuPIA Customer Information Note regarding the Use of Sheetfed Offset Inks/Varnishes and Water-based Coatings for the Manufacture of Food Packaging made from Paper and Board. This note includes an overview of types of sheetfed offset inks and varnishes available on the market as offered by EuPIA members, with an indication of the suitability for the manufacture of food packaging.
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