EuPIA, the European Printing Ink Association, working under the umbrella of CEPE, represents and protects the common interest of the European printing ink business and promotes the image of the industry to the public. EuPIA provides a forum for discussion and decision-making regarding issues of specific interest to the printing ink industry. EuPIA members also participate in CEPE working groups dealing with issues of general interest to the wider CEPE membership.

MARKET STATISTICS 2011
EuPIA publishes market statistics on an annual basis. The data can be accessed via the EuPIA website at euapia.org, section statistics. The aggregated figures displayed in the charts below summarize:
- Value per country total, per category Europe and Europe total
- Volume per category for Europe total

The figures comprise domestic ink data collected for 27 countries or country groupings in Western and Eastern Europe and represent the activity of 19 EuPIA members participating in the statistics. It is believed that this represents overall in excess of 90% of the total European market.

The global ink categories for which the aggregated figures are displayed, are defined as follows:
- Liquid inks, water borne (includes flexo and gravure inks, technological varnishes, extenders, primers, and overprint varnishes)
- Liquid inks, solvent borne (includes flexo, gravure and publication gravure inks, technological varnishes, extenders, primers, and overprint varnishes)
- Oil based inks (includes coldset and heatset offset as well as conventional sheetfed offset inks)
- All other inks
Less ups, more downs

**IS THE DEVELOPMENT OF THE EUROPEAN PRINTING INK MARKET AN INDICATOR FOR A NEW RECESSION? IN MOST EUROPEAN COUNTRIES, THE PRINTING INK INDUSTRY HAD TO COPE WITH SHRINKING MARKET VOLUMES IN Q4 2011.**

When looking at the full year 2011 in comparison to 2010, there have been two countries which have shown an especially positive development with regard to both volume and value: Turkey and Russia. Countries having to cope with the opposite trend were Germany, Spain, the Netherlands, the United Kingdom, Belgium and Luxemburg.

**GENERAL DOWNWARD TREND**

Comparing the period 2011 versus the year 2010 (excluding exports) there is an obvious downward trend: The overall volume has decreased by -5.7 %, while the value rose slightly by +0.9 %. In the same period of time, average prices became 6.9 % higher. It was reported that the average price of printing inks is currently at 3.25 EUR per kg. The long-term development of printing ink selling prices seems almost flat, and the number of employees in the year 2011 has already sunk by 4.1 %. Total sales volumes in 2011 (including exports) summed up to 1.06 million tons, standing for 17 product categories and 24 different country groupings. These printing inks had a value of EUR 3.46 billion. Total sales weight in tons by region was divided as follows: 75 % in EU 15 + EFTA, 9 % in Central Europe, 9 % in Turkey, Russia & other European countries, plus 7 % exports.

**PACKAGING UP, PUBLICATION DOWN**

In the market development from 2005 to 2011, it was striking that the Packaging sector (2011: 363,715 t, EUR 1,475 million) has become stronger over the years compared to the Publishing sector (2011: 623,000 tons, EUR 1,728 million). Comparing these figures with the year 2005, this means that Packaging has increased by +11 % in weight and +9 % in value, while Publication has shrunk by -15 % in weight and -2 % in value, which illustrates that “publications” is still the sector that allows bigger price increases. Looking at the technologies, only printing ink system that could grow its percentage of sales weight by +3 % were energy cured inks (sheetfed offset). The biggest downturn was visible in the two sectors overprint varnishes & primer, energy cured (wide web) with -11.5 % and publication gravure with -10.5 % of all sales weight. Up to now there have been 20 printing ink manufacturers submitting their figures to this statistics working group, thus representing 90 % of the market in volume. From now on, 5 more companies will be taking part, which will help to improve the coverage of the market. These and many more facts and figures about the latest developments in Europe’s printing ink markets were presented to nearly 80 attendants at EuPIA Annual Conference 2012 (15-16 March) in Venice/Italy.

**FORECAST FOR 2012/2013**

Even though some of the bigger markets like Belgium, Spain, France, and Italy will still experience negative growth, there are also first signs of recovery. However the printing ink industry will have to be patient, as even in the year 2013 there will only be moderate growth in most countries (e.g. 0.5 % in Germany) according to EuPIA’s forecast.

**NEW RESPONSIBILITIES**

EuPIA’s Chairman Dr Dirk Aulbert (Flint Group GmbH) sees a certain probability, that the current negative trend in the printing ink markets could be an early indicator for another upcoming recession, even if it will not last too long this time.

With ever new peaks in crude oil prices, increasingly margin-oriented raw material suppliers, and a further focus on consumer care and other legislative issues, Dr Aulbert is sure that challenging years lie ahead of the printing ink industry. However, he stressed that there was a downturn, too, when he became Vice Chairman 4 years ago and the industry will again manage to adapt to the changing market conditions. “I would love to see that our industry defends the value proposition for its products!”, Aulbert hopes.

After two years as Vice Chairman followed by another two years as Chairman of EuPIA, Dr Dirk Aulbert resigned from this position. Vice Chairman Thomas Hensel (MHM Holding GmbH) was nominated as next Chairman. Hensel’s successor as Vice Chairman is Felipe Mellado (Sun Chemical).

**COVERING THE MARKET**

Dr Martin Kanert Up gave an overview about upcoming legislative challenges and summed up EuPIA’s actions and publications to support its members in these tasks. Latest information on hot topics like European Declaration on Paper Recycling, “positive lists”, inventory lists, and Ink specifics for REACH, can be found on the EuPIA Website (www.euipa.org) which will be re-launched by July 2012 with new features. The next EuPIA Annual Conference will take place on 14-15 March 2013 in Dublin.

by Miriam von Barcode Leben

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ANNOUNCEMENT OF THE 10TH EUPIA ANNUAL CONFERENCE
The next Annual Conference will be held on 14-15 March 2013 in Dublin (Ireland).

Printing Inks and Varnishes for food Packaging
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 unacceptable change in the composition of the food or inadvertently affect foodstuffs in terms of colour 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.

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
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.

**GERMAN INITIATIVE TO REGULATE FOOD PACKAGING INKS**

Germany appears to be dissatisfied with the measures taken by the entire food packaging chain which are aimed at ensuring compliance of printed food packaging with the relevant provisions of food contact material legislation. In the absence of a specific EU legislation on food packaging inks, Germany exercises the option of adopting a "national specific measure" for food packaging inks. It is intended to implement this measure through an amendment to the German Consumer Goods Ordinance. The core element of this legislative initiative are lists of substances which only may be used in the manufacture of food packaging inks and varnishes ("positive list" for evaluated substances, "inventory list" for non-evaluated substances). End of 2011 the competent Federal Ministry of Food, Agriculture and Consumer Protection (BMELV) presented a second draft of the so-called "Printing Ink Ordinance". Although a number of EuPIA's initial concerns have been considered in this revised draft, EuPIA keeps up its basic objections:

- A national piece of legislation restricted to Germany does not make sense due to the complexity of the flow of goods; it is therefore essential to seek a European solution.
- There is a fundamental disproportionality between a specific regulation for food packaging inks and the packaging itself for which no such specific regulations exist (with the exception of plastics) although the packaging is intended to come into direct contact with food. Without prejudice to these basic objections, it is indispensable that essential changes are made to the draft in order to render it practicable.

EuPIA's most important requests are:

- **Definition of "printing ink":** There is still no distinction made between printing inks applied on the non-food contact surface of food contact materials and those inks that are intended to come into direct contact: Both types of inks are intended to be in scope. EuPIA and the entire food packaging chain believe this is unacceptable, as it contradicts the definitions in relevant official regulations as well as current industry practice.

- **Positive list:** The data collection for the positive list (substances as well as substance related toxicological data) is currently based on voluntary notifications of the printing ink and their supply industries; there is no legal basis for this activity. As the requirements on printing inks will be applicable to products currently on the market, it is essential that sufficient transitional periods are granted to sustain product conformity. Another important prerequisite is that the content of the ordinance is no longer subject to changes and is made known to all market partners before a final positive list is adopted. And finally the criteria for the inclusion of substances on the list must be clear before the list is "closed". Industry requests that the same procedure is followed as with the establishment of the positive list for plastic food contact materials: Creation of a provisional list, with a dead-

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**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
line until which substances can be notified for inclusion in the provisional list. A second deadline should then be set for the submission of relevant toxicological dossiers which allow evaluation of the substances and their inclusion in the positive list.

- **Written declaration:** New to the second draft are provisions for Written Declarations intended to facilitate the exchange of relevant information along the packaging chain. EuPIA and the entire food packaging chain object to these provisions as proposed. They are unclear with regard to the responsibility of each actor in the chain and do not at all adequately reflect the complexity of the information requirements. It is therefore suggested to waive detailed rules for Written Declarations, and to allow industry associations to develop recommendations for declarations of conformity which are specific to each actor in the chain.

**EuPIA TECHNICAL COMMITTEE**

Wider technical issues and non-food printing ink applications are addressed in the EuPIA Technical Committee (ETC) and its associated working groups.

The EuPIA Exclusion List for Printing Inks and Related Products represents a voluntary commitment to exclusion of certain hazardous raw materials from members’ products. In the spirit of continual improvement, a corrigendum to the List was issued in November 2011, and the accompanying Explanatory Note has been updated.

The Exclusion List is one of EuPIA’s tools to help members meet safety responsibilities in a number of applications, not least in the printing and decoration of toys where the safety of children is of paramount importance. This commitment is supported by a EuPIA statement on printing inks for toys, which has been updated by ETC to reflect the changes brought about by the Toy Safety Directive (TSD) 2009/48/EC. EuPIA members participated in the European Commission’s consultation on proposals to reduce the migration limits for lead in the TSD; it is not expected that any printing inks would fail to meet the proposed new limits, but greater difficulty and cost is foreseen in proving this since, due to natural impurities, raw materials are not normally certified to these lower levels.

Still in the field of toys, ETC has issued guidance for members on the Publishing Industry Safety Forum (PIPS), an initiative by publishers of children’s books to collect detailed information on the materials used in their production. A process has been established to enable disclosure of printing ink compositions to the designated PIPS consultant under confidentiality agreement, along with a simple questionnaire on the suitability of the ink which can be shared through the whole supply chain.

Environmental and sustainability considerations are also on the agenda of ETC, which has been developing a brochure on the environmental impacts of printing inks. EuPIA participates in and will benefit from the CEPE sustainability project (see separate article) through inclusion of typical ink raw materials in the LCI database.

ETC also monitors a number of specific substance issues for printing inks. The Community Rolling Action Plan (CoRAP) for substance evaluation under REACH has been reviewed by ETC for ink-relevant substances to identify issue managers where necessary. Ethanol is used in printing inks, so ETC is closely following the initiative by the Commission (DG Taxation and Customs Union) to develop “euro-denaturants”, and will participate in the second phase of the project to identify common denaturants for Partially Denatured Alcohol used in various industrial sectors.

EuPIA welcomes any initiative aimed at enhancing the recycling of recovered paper and continues to be an active member of the European Recovered Paper Council (ERPC). EuPIA is a supporter of the “European Declaration on Paper Recycling 2011-2015”, a voluntary cross-industry commitment to a sustainable increase in paper recycling. EuPIA has co-developed and supports a number of ERPC guidance documents, accessible via the ERPC website at [www.paperrecovery.org](http://www.paperrecovery.org).

EuPIA’s **Labelling and Safety Data Sheet (LSDS)** working group addresses hazard communication issues specific to the printing ink industry. This year the group has agreed a model of closer working with the CEPE Technical Committee LSDS, including one joint meeting per year, following full integration of EuPIA content into the CEPE Labelling/SDS Guides and Phrase Catalogue. The group has given input on various LSDS topics (see separate article in this report) and also provides support related to ink formulations and uses for the project on generic exposure scenarios.

**OPERATIONAL SAFETY AND RISK ASSESSMENT (OSRA)**

The objective of the OSRA working group is to support both member companies of EuPIA and CEPE, in
Artists’ Colours

Artists’ Colours (AC) are subject to the same general requirements as other CEPE sectors, for example those on labelling, REACH and transport of dangerous goods, but some specific issues apply in this sector. Like some paints and printing inks, AC are subject to the rules on safety of toys but is the only CEPE sector marketing products which are themselves regarded as toys, including children’s paints, finger paints and other drawing and modelling materials. The chemical safety provisions of the Toy Safety Directive (TSD) 2009/48/EC will apply from 20 July 2013. Before then however the European Commission is already proposing to reduce migration limits in the directive for lead: AC members participated in the public consultation, as the proposals could have a major impact on the ability to market some children’s products, due to natural impurities in raw materials. The TSD is supported by harmonised standards (EN 71), which are being revised by Technical Committee 52 of CEN (European Committee for Standardization) to align them with the new provisions. Some AC members participate in relevant working groups of TC 52, and CEPE monitors and communicates these activities for awareness and contribution where appropriate.

“TREATED ARTICLES”: USE OF PRESERVATIVES IN ARTISTS’ COLOURS

The use of preservatives is critical in achieving the required shelf life in artists’ colours. Under the new Biocidal Products Regulation, (EU) No. 528/2012, colours containing preservatives are “treated articles”, and from 1 September 2013 only products containing approved active substances may be placed on the market (including imports). Additional labelling will be required only if special conditions have been applied to the approval of the preservative (biocide), i.e. related to its risk. Toys, and therefore children’s paints, are excluded from the scope of the regulation since they are regulated by the TSD.

The sector continues its co-operation with ACMi (the Art & Creative Materials Institute, Inc.) and CEPE has a permanent representative in the ACMi board and committees. Important issues addressed by this liaison comprise the US CPSIA (Consumer Product Safety Improvement Act 2008), including restrictions on lead content in children’s products, state substance legislation and development of ASTM standards. The Sector Group held its 2012 Annual Meeting on 11 & 12 June in Düsseldorf, Germany. The aforementioned legislative and technical matters were reviewed along with the results of a questionnaire concerning the role of sustainability for Artist Colours. For AC users sustainability means predominantly safe use; the environmental footprint is less important. Producers are nonetheless interested in communicating on sustainability as a possible means of differentiating their products from imports. The meeting agreed to an “Environmental Responsibility Code”, which will be issued in the course of 2012.