

EuPIA Interview

Mike Simoni (Sun Chemical)

Chairman of the EuPIA Printing Inks for Food Packaging Technical Committee



What is the role of the PIFood Committee?

PIFood stands for Printing Inks for Food Packaging. EuPIA, The European Printing Ink Trade Association aims to be the voice of printing ink manufacturers in Europe, and PIFood is a key part of EuPIA, with interests in manufacturing printing ink for food packaging.

When supplying inks to be printed onto food packaging, special care needs to be taken in the selection of raw materials, in the formulation and manufacture, and in the information provided to printers to help ensure that the printed food packaging is considered safe and that consumers are protected.

The EuPIA PIFood community provides guidance to EuPIA members relating to current legislation and monitors potential future legislation, so that EuPIA member companies can be prepared for change.

What are the main challenges currently affecting the work of the committee?

A challenge for the ink industry in the last two years has been to manage raw material availability given substance reclassifications, supplier shortages, and logistical difficulties such as bottlenecks in ocean transport. This has put an additional workload on to technical development activities of EuPIA member companies. This, along with adapting to regulatory changes and innovating products with improved sustainability credentials, creates challenges for our industry.

In a landscape with significant regulatory changes, with an ever-increasing demand for new sustainability-driven innovations and with supply chain disruptions, EuPIA offers its members guidance and preparation for future regulatory changes, and EuPIA Member ink manufacturers

can offer products with high levels of consumer safety.

What are the main upcoming regulatory issues affecting the inks industry, and how does the committee plan to address them?

Many regulatory changes influence printing inks for food packaging in Europe. Germany has recently created a piece of national legislation known as the German Printing Ink Ordinance, which has in scope printed food contact materials and controls the substances which can be used in inks for food packaging in Germany. The German Ink Ordinance covers inks that are printed on both the inside (Direct-Food-Contact) and the outside (non-Food-Contact surface), and it controls the substances used by having a positive list of substances where each substance has an allowed Specific Migration Limit (SML). Although we refer to the ordinance as “printing ink ordinance”, it is actually an ordinance for printed food contact materials. By showing that substances are migrating at less than their allowed migration limits it is possible to demonstrate that packaging is compliant, and consumers are protected. There is now a four-year transition period during which this positive list of substances will be introduced, during which time the industry has the possibility to submit toxicological dossiers for additional substances that it would like to be added to the positive list. Typically, the dossiers are compiled and submitted by the raw material suppliers of the chemical industry, as they are usually the data-owners.



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EuPIA welcomes legislation that will improve consumer safety, but believes that this legislation should be established on a harmonised European level to meet the requirements of the single market. In addition, a problem with the German Ink Ordinance is that the process of submitting toxicological dossiers is long and cumbersome and so it is difficult to get new substances added to the German Ink Ordinance positive list. This is happening at a time when there is unprecedented innovation in the area of sustainability with raw material suppliers, ink manufacturers, printers, and brand-owners all working together to reduce the environmental impact coming from food packaging. These innovations include the use of bio-based raw materials (reducing dependence on limited fossil sources), inks and coatings that have improved performance benefits during their useful life – for example in reusable packaging, and inks and coatings that do not interfere with end-of-life recycling processes, whether this be by improved de-inking or by compatibility with the recycling process itself. This requirement for innovation results in the need for new substances. Difficulties in getting these substances onto the German Ink Ordinance positive list has the potential to stifle innovation and reduce the effectiveness of the printing ink industry in responding to requirements coming from global issues, such as climate change and marine litter reduction. EuPIA Members are working with their suppliers to get substance dossiers for substances missing from the positive list sent to the German Authorities.

There are also regulations that are in the process of changing outside of Germany. In Switzerland, there is discussion about potential future changes to the existing Swiss Ordinance (regulation managing printed food packaging safety in Switzerland). In this case, EuPIA, together with the Swiss national

association VSLF, has a good collaborative relationship with the Swiss Federal Food Safety and Veterinary Office (FSVO), and we have a dialogue so that EuPIA members can plan and be prepared for future changes to this regulation.

Other legislative changes that are likely to come about from the EU Commission's Chemical Strategy for Sustainability will also influence inks for food contact materials. The EU Chemical Strategy for Sustainability introduces new concepts such as the essential use concept, mixture assessment factors for substances, and cooperation between the European Chemicals Agency (ECHA) and the European Food Safety Authority (EFSA) in providing one assessment for one substance. EuPIA is working together with its umbrella trade association CEPE to provide industry feedback on these initiatives.

Can you give us an update on the status of the EU harmonized FCM legislation?

The European Commission is considering changes to the EC 1935/2004 Framework Regulation, which is the regulation that covers all food contact materials and articles. EuPIA welcomes that this regulation is being updated and through the collaboration of trade associations that is the PIJITF we have given direction for where industry feels that legislation should go. The work of DG Sante (the section of the EU Commission specifically tasked with responsibilities for the EU Commission's policies on health and food safety) may result in a European regulation that would supersede the German Ink Ordinance and provide a harmonised European legislative framework. However, the cautious approach that the EU Commission is taking in food contact material legislation means that this is challenging within the timeframe of the



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German Ink Ordinance transition period, and it is this caution that has resulted in the EU Member States such as Germany deciding to create national legislation as an interim step whilst waiting for harmonized European legislation.

The industry would far prefer to work with a harmonized European legislation as a patchwork of national regulations can potentially act as a barrier to trade with potentially different products being required for different legislations.

What other projects is the committee working on?

EuPIA is not only responding to legislative changes but is also involved in its own initiatives to improve consumer safety. EuPIA's PIFood committee understands that in addition to the substances that are intentionally added in printing inks, there are also non-intentionally-added-substances (often abbreviated to NIAS), which are present due to impurities in raw materials. EuPIA has developed a comprehensive approach to risk assessment for these NIAS. The hazard component of this looks at existing toxicological data, read across from chemically similar substances, and the use of software called (Q)SAR which predicts toxicology based on chemical structure following a Threshold of Toxicological Concern (TTC) approach. There is

also an understanding that the analytical test methods that are written into the EU 10/2011 Plastics Regulation are not always the best option when doing migration testing for non-plastic food packaging. To address this, EuPIA has created a group of analytical experts who have written a migration testing guidance¹ to cover these situations.

How does the committee collaborate with other industry partners to ensure consumer safety?

EuPIA also acts as a conduit where the industry can affect and give feedback to legislators on proposed future legislation in consultation processes. When giving this feedback, it is more effective if as much of the industry as possible comes together and speaks with a common voice to provide this feedback. For this reason, the Packaging Ink Joint Industry Taskforce (PIJITF) was created. The PIJITF represents a collaboration of trade associations covering those involved in the raw materials that ink manufacturers buy, ink manufacturing, those involved in printing and converting, and including the trade association representing food and drink brand owners. This collaboration represents the whole of the food contact material value chain and allows the industry to give feedback to legislators with one voice.

¹ https://www.eupia.org/fileadmin/Documents/Food_contact_material/2021-10-18_EuPIA_Guidance_on_Migration_Test_Methods.pdf