

## EuPIA Exclusion Policy for Printing Inks and Related Products – its Role and Value

### 1. How can the EuPIA Exclusion Policy be simply described?

The policy is about enhancing the safety of inks by excluding hazardous substances which have a serious adverse effect on human health. The EuPIA Exclusion Policy states that by default raw materials must not be used in inks, which are classified as toxic or CMR (to be exact: acutely toxic cat. 1, 2 or 3; carcinogenic, mutagenic or toxic to reproduction (CMR) cat. 1A or 1B; or specific target organ toxicity (STOT) cat. 1).

Originally designed to protect employees in the ink industry, the policy also protects printers and the end users of printed materials. A list of EuPIA members that commit to the Exclusion Policy is available on the [EuPIA website](#)

### 2. What is the difference between legal regulations for the use of chemical substances (e.g. REACH) and the EuPIA Exclusion Policy?

Modern chemical legislation such as REACH requires a chemical safety assessment, which follows a risk-based approach. Risk is defined as a combination of hazard and exposure. First, the hazard properties of the substance in question are determined and a DNEL (derived no-effect level) is set. Second, the potential exposure of workers handling the substance is evaluated. The marketer of the substance must provide information on handling requirements and precautions to be taken, to safeguard that the workers' exposure to the substance stays below the DNEL, the level below which the substance will not impair human health. All subsequent 'users' of the substance (the printing ink manufacturer - who uses the substance in the printing ink, and the printer - who applies the printing ink) have each the legal obligation to conduct their own risk assessments to determine whether during their activities the DNEL is not exceeded. Otherwise, they have to employ risk management measures, or even change the working environment and conditions accordingly. In some Member States of the European Union, the use of very hazardous materials requires additional, comprehensive paperwork via which the marketer has to satisfy himself that his customer is aware of the risk and is able to deal with it appropriately.

In contrast, the EuPIA Exclusion Policy is solely hazard based and does not consider the exposure. As soon as the hazard of a raw material is too high, i.e. if materials are classified as detailed above, their use is not allowed any more, regardless of the actual exposure to the material. This strict policy has the advantage that the risk assessment work is easier and EuPIA customers can be sure that all inks used have a comparably low hazard.

The other significant difference is that REACH and other European and national regulations are legally binding, whereas the EuPIA Exclusion Policy is a self-commitment of EuPIA member companies, which comes on top of the existing regulations.

### 3. What are the benefits of the EuPIA Exclusion Policy?

The application of the policy enhances the safe use of printing inks, and all users of inks as well as printed materials benefit from it. By avoiding the use of raw materials with high hazards,

the policy does not only support safe working conditions for employees at printing ink manufacturers, printers and brand owners, it ensures product safety for consumers who come into contact with printed matter.

The EuPIA Exclusion Policy is well respected across the market. Therefore, ink manufacturers can improve their reputation as responsible companies when dealing with printers, brand owners, and even politicians via a commitment to abide to the EuPIA Exclusion Policy. The exclusion of toxic and CMR substances reduces the risk of a crisis and any subsequent economic damage as committed EuPIA members act at the first indication of an upcoming change to hazard classification. Consequently, committed members have often eliminated critical materials before those components are restricted or have gained public awareness.

From a cost, risk and generic working environment perspective, adherence to the EuPIA Exclusion Policy reduces the need to adapt working practices considerably as materials with high hazards are not used.

Similarly, the policy is beneficial for printers and brand owners. Both stakeholder groups can rely on the fact that substances specified under number 1 are not used in printing inks supplied by committed EuPIA members. This simplifies and thereby supports safe product manufacturing. In effect, printers and brand owners' profit from reduced need to apply additional safety measures within their processes. Furthermore, by applying the EuPIA Exclusion Policy, ink manufacturers can help printers and brand owners to achieve their Corporate Social Responsibility (CSR) goals and enhance their brand equity.

#### **4. What are the challenges of the EuPIA Exclusion Policy?**

The EuPIA Exclusion Policy is stricter than the European chemicals legislation. In some cases, raw materials that are classified as very hazardous would in principle be usable, provided that the exposure could be kept low enough for the risk to be manageable. Nevertheless, EuPIA members who have committed to the Policy, do not use those materials. They must reformulate and use alternatives, which in some cases can be even more expensive. Consequentially, these companies might have a competitive disadvantage compared to those not complying with the Policy, if only the cost of the printing ink were considered and the cost of the risk management were ignored.

When substances are re-classified, printing ink manufacturers following the Exclusion Policy need to withdraw well-functioning formulas and put a lot of effort into replacing the affected raw materials. This situation can also create market turmoil as reclassified raw materials are no longer requested, whilst other raw materials are in high demand from one day to another. In many cases alternatives are expensive because their market availability is low.

#### **5. Is it possible to continue the use of an excluded substance on an exceptional basis for an interim period of time if substitution within the recommended grace period of 6 months is not possible?**

Yes, under certain circumstances, companies can apply for a temporary exemption from the Exclusion Policy. As a pre-requisite they need to conduct a risk assessment to demonstrate safe use. The policy divides the reclassified substances into two groups: A and B, based on their hazard. For group A substances, with a higher hazard, the risk assessment must be submitted to the EuPIA secretariat and it is evaluated on association level. Group B substances can be risk assessed by each individual company based on criteria predefined on association

level. The company is obliged to notify the existence of the risk assessment to the association. A clear phase-out time will be communicated, which will be followed-up on association level.

**6. Are there specific cases from the past, where the policy showed its strengths?**

There have been in the past many cases in which EuPIA's policy has shown its value: ban of lead-based pigments, elimination of some glycol ethers. Similarly, when phthalates came into disrepute, EuPIA members stopped using them immediately while other industries continued with their use. If EuPIA members had not stopped using phthalates promptly, printers would have had to modify their working environments to comply with the new regulations.

**7. What is the value of the EuPIA Exclusion Policy in a circular economy?**

The avoidance of toxic and CMR substances simplifies the evaluation of recycling processes and is an important step towards a circular economy.

EuPIA, 2021-06-01