

# EuPIA Annual Report 2023

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.



**Cornelia Tietz**  
Director as of 2024



**Martin Kanert**  
Executive Manager until 2023



## Market Statistics 2022

EuPIA publishes market statistics on an annual basis. The data can be accessed via the EuPIA website at [eupia.org](http://eupia.org), About Us - Statistics.

The following statistics show a summary of printing ink sales from EuPIA's more detailed Quarterly Market Sales Statistics. The findings are based on the consolidated results of data supplied by 26 EuPIA member companies, who have all submitted data on a standard basis to our independent trustee who compiles the data for EuPIA. The results show sales volume in tonnes and value in €m for the latest year, 2022.

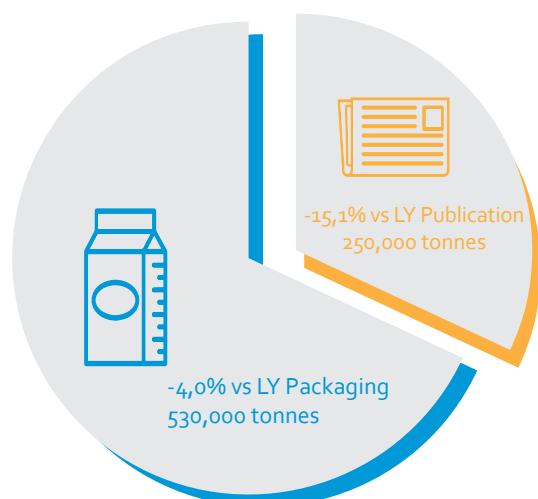
It is estimated that the sample group accounts for about 90% of total industry sales in Europe.

### Key sectors shown

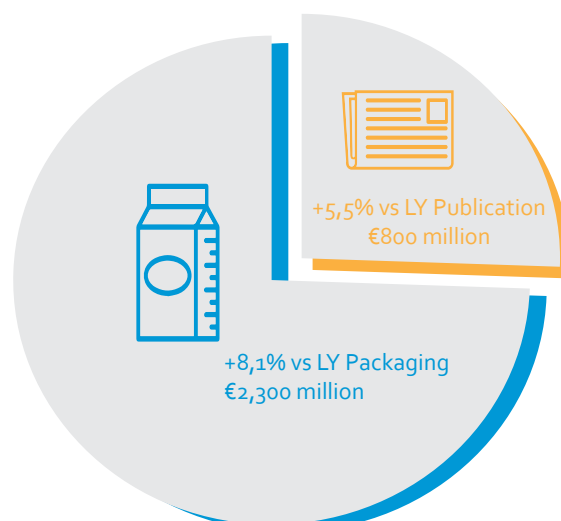
Publication Inks comprise web offset inks (coldset and heatset), sheetfed offset inks, publication gravure inks and related overprint varnishes. Examples of publications are newspapers, magazines, books, and commercial prints such as brochures and flyers.

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).

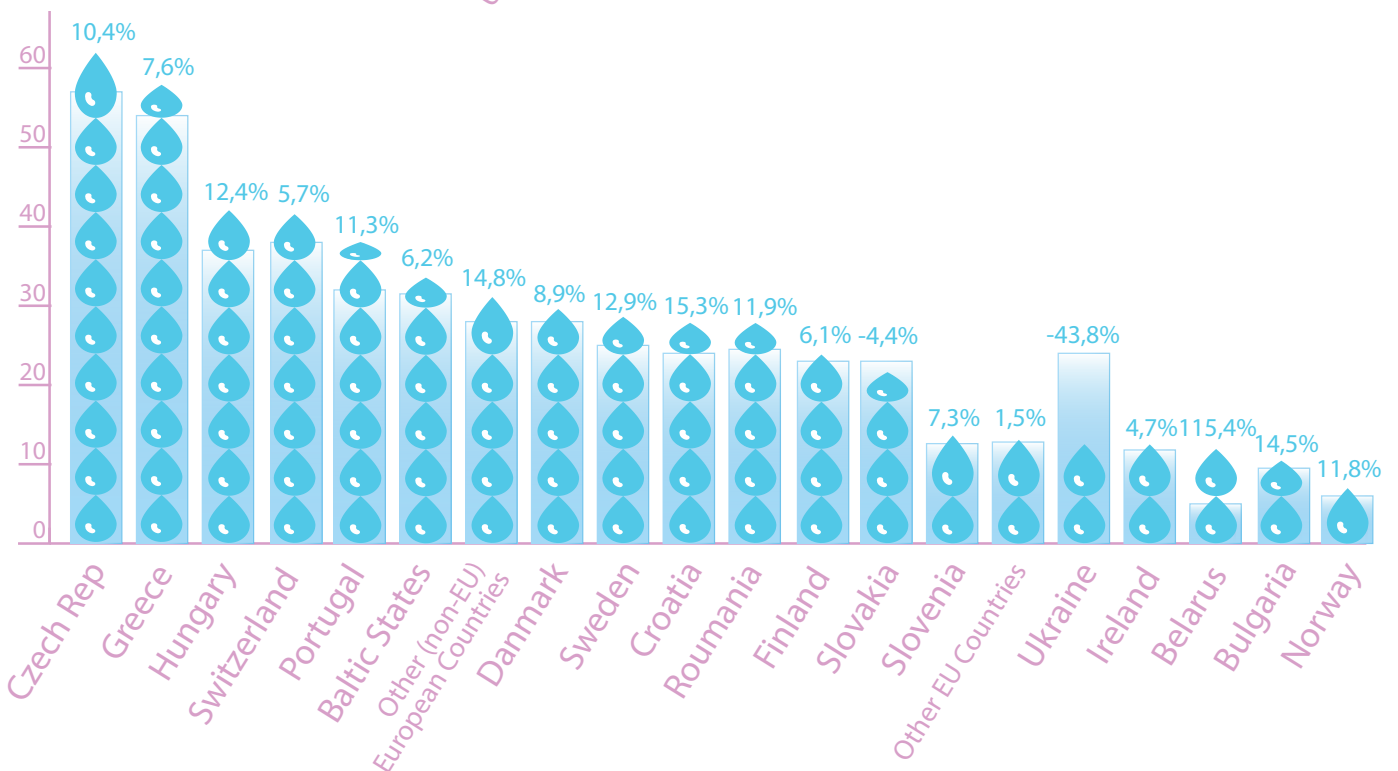
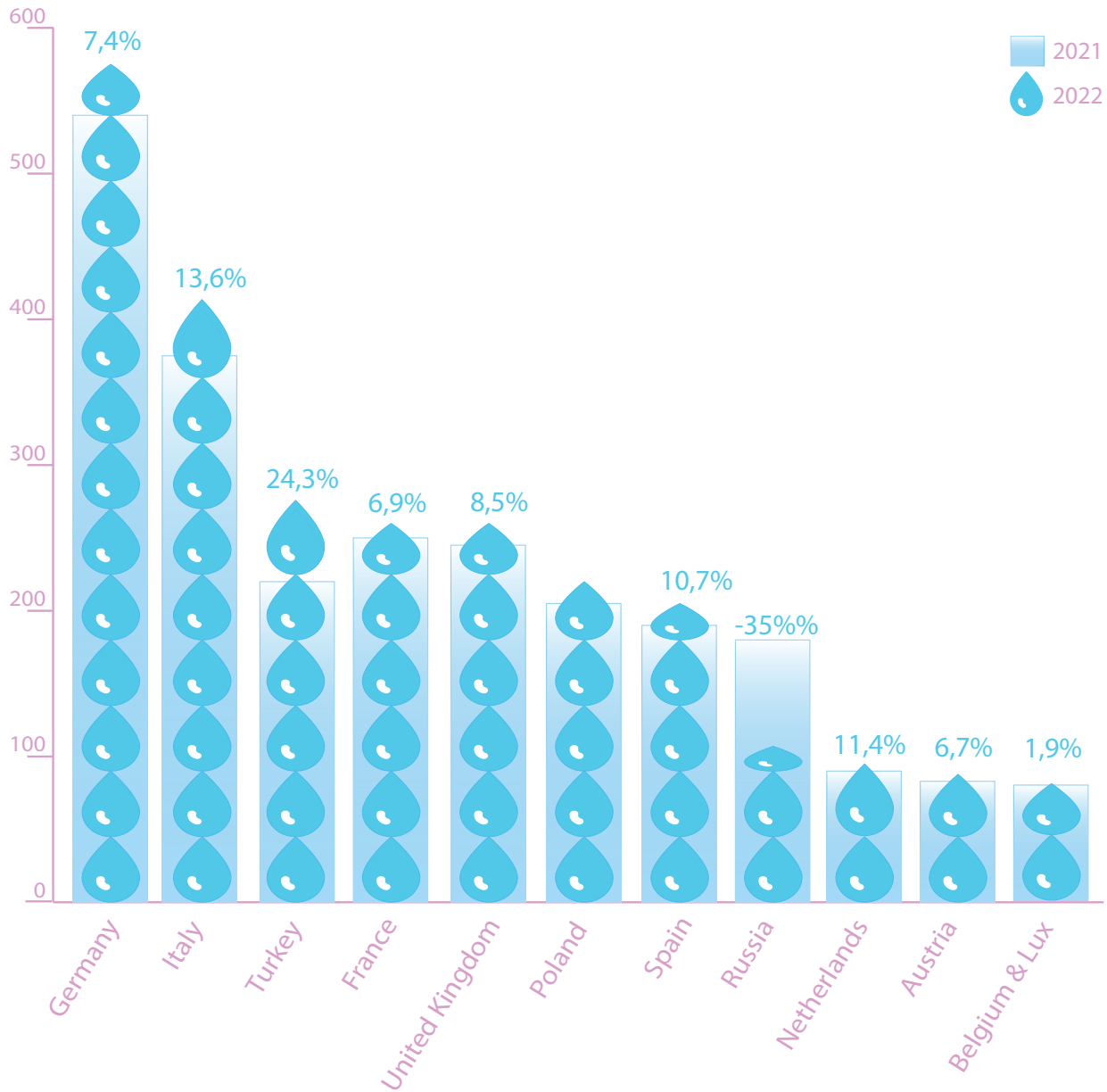
### Sales volume for 2022



### Sales value for 2022



Sales Value by country 2021 to 2022 in €m



## EuPIA Annual Conference

After three years of online conferences due to the Corona pandemic, the 2023 conference was finally held again in person, in the beautiful city of Bologna (Italy). Want to read more? Scan the QR code to see the article published in European Coatings Journal 05/2023.)



## The EuPIA Exclusion Policy for Printing Inks and Related Products

For the last 25 years, the EuPIA Exclusion Policy for Printing Inks and Related Products (and its predecessor, the EuPIA Exclusion List) has had a tremendous value for the printing ink industry, the printers/convertors, brand owners, retailers and consumers as it ensures the safety of inks used across Europe. In short, the policy is about excluding hazardous chemical substances which have a serious adverse effect on human health from the manufacture of and use in printing inks, protecting workers along the whole supply chain as well as customers. The EuPIA Exclusion Policy is THE product stewardship initiative of the ink industry in Europe and as such, is well respected across the market.

A revised 5th edition of the Policy was published in June 2023, along with a revised Explanatory Note, covering several changes including clarification of the scope of the policy (defining 'related products') and the inclusion of the agreed approach to two specific substances used in the digital inks sector (Solvent Black 29 and N-Vinyl Caprolactam). Two additional Group A substances were also added into Annex 2. The Explanatory Note was also extended to include clarification of the rules for new entrants (to EuPIA and to the Policy) and the approach to be taken in case of acquisition of non-Exclusion Policy business by a company committed to the Exclusion Policy.

The Policy continues to serve the European printing community well as an industry initiative, although additional modifications are already under discussion as more challenges appear on the horizon, especially with the introduction of the new hazard classifications (such as Endocrine Disruptor to Human Health) and the issues surrounding Substances of Very High Concern. Commitment to the Policy remains steady within the membership, as the next round of substances with new harmonized classifications enter the discussion due to the publication of the recent 21st and upcoming 22nd Adaptations to Technical Progress (ATPs).

## Printing Inks and Varnishes for Food Contact Materials

In 2023, printed food contact materials (FCMs) were again among the key priorities of EuPIA. EuPIA continued to adapt and improve its comprehensive concepts and guidelines, which detail out the general provisions of the Framework Regulation for printed food contact materials, thus supporting the converters and distributors of food contact materials in their compliance work.

## European Commission still working on the revision of the legal framework

EuPIA and the whole value chain for printed food packaging have advocated a specific regulation for printed food contact materials under the

so-called framework regulation for years. However, the European Commission (EC) decided to first evaluate the legal framework itself. Given that the framework which in its core is over 40 years old, has never been systematically evaluated, a thorough evaluation makes sense.

The current plans of the EC foresee a paradigm change by shifting the focus from intermediate materials (such as inks or coatings or plastics) to the final article. In this context the EC thinks about a new grouping approach, where inks would fall into the category of "synthetic organic type materials" together with adhesives, coatings, plastics and other "synthetic" materials. The risk management of substances will be based on a tiered approach, depending on the hazard of the substances: some will be banned, others will still be subject to an official evaluation, while a third class should be open for industry self-assessment. Furthermore, sustainability requirements are intended to be incorporated into the FCM Framework.

Since the new concept does not foresee a specific regulation for printed food contact materials, EuPIA together with other associations of the value chain organised in the so-called Packaging Ink Joint Industry Task Force (PIJITF, see below), now asks for the timely adoption of the revision of the framework and offers its expertise in working out the details of the regulation. Overall, EuPIA welcomes the plans of the EC, but whether the concept is workable in practice or not, very much depends on the details yet to be defined.

The original timetable of the EC as set out in the Farm-to-Fork Strategy of the Green Deal foresaw that the final legislation should be presented end of 2022. However, the EC is significantly lagging behind its schedule and is currently communicating "2025 and beyond" for the adoption.

End of 2022/beginning of 2023, the public consultation on the revision was conducted as part of the impact assessment in the form of a rather intricate questionnaire. EuPIA was one of the first associations to position itself and was hence able to contribute its ideas to the alignment process of the FCM value chain at an early stage. In addition to the consultation, stakeholder interviews regarding the exchange of information along the supply chain took place and EuPIA already had the opportunity to share its views in two interviews.

Since the public consultation, the presentations from the EC held at various occasions were the main source of information and provided the basis for EuPIA's positions and strategy. The EC announced that there would be a discussion document issued early in 2024, which will provide new insights.

## The Packaging Ink Joint Industry Task Force - Activities of the whole Value Chain

Already in 2018, the Packaging Ink Joint Industry Task Force (PIJITF), in which all associations of the value chain for packaging inks come together, has proposed a blueprint for a harmonised legislation for printed food contact materials. Since then, the PIJITF has proven to be a very active platform for the exchange between the different associations of the value chain and to provide a voice for their common interests. Following the plans of the EC, the PIJITF had updated its position and provided it to the EC in the cause of the public consultation early 2023. Currently, the position is again revised based on the latest updates from the EC.



## Germany: The so-called Printing Ink Ordinance

On 7 December 2021, the so-called German «Printing Ink Ordinance» was published in the Official Journal. Despite massive criticism from the entire food packaging chain and although the EC had already taken action, the regulation was thus launched as a unilateral national measure for which there was no need from industry's point of view. The relevant provisions apply after a transitional period of four years, from 1 January 2026.

EuPIA and the entire food packaging chain strongly believe that only a European regulation can satisfy the functioning of the European internal market and ensure a uniform level of consumer protection. In principle, the German Federal Government also recognises the priority of a European regulation. Thus, an extension of the transitional period is envisaged should the EC present a corresponding measure on printed food contact materials within the transitional period. A fundamentally revised framework could provide the basis for discussions with the German government for a prolongation of the transitional period. However, with the EC more and more lagging behind its schedule, the odds are high that the industry will have to live with the German Ordinance.

The transitional period was set by the Federal Government to take into account that the positive list is incomplete and to give the raw material suppliers time to submit the relevant dossiers. The raw material suppliers are continuing to work on completing the list and are supported by the printing ink industry in this task. Nevertheless, it is becoming apparent that the positive list will not be significantly completed by 1 January 2026. Although many important raw materials are still missing on the list, it should be possible for most applications to offer suitable printing inks in good time, with which the requirements of the regulation can be fulfilled. This is due to the fact that, under certain conditions, substances which are not listed, can still be used for printing inks that are not intended for direct food contact. However, in order to fulfil the requirements of the ordinance, resource-intensive and costly reformulations are necessary in these cases. EuPIA's German National Association, the VdL, issued an updated customer information note that provides more details.

## Revision of the Swiss Consumer Goods Ordinance

The Swiss Consumer Goods Ordinance sets out provisions specific to food contact material inks. Substances which only may be used in the manufacture of printing inks in scope of the Ordinance are listed in the positive list in Annex 10. The so-called part A lists evaluated substances, while part B contains substances, which have not been fully evaluated, but which may be used under certain conditions, and which do not migrate with a detection limit of 10 ppb. Already some time ago the Swiss authorities had announced that they are planning to completely remove Part B in the future. A draft of the provisions was put to public consultation in 2023 and EuPIA, in close collaboration with the Swiss National Association VSLF, provided a detailed contribution to the corresponding public consultation. Furthermore, experts from the VSLF have been working closely with the Swiss authorities. The new revised legislation was published early in 2024 with a transitional period till January 31st, 2026. As expected, part B is deleted and non-listed substances may be used, provided they do not possess CMR-properties (based on Chemicals legislation) and do not migrate with a detection limit of 10 ppb. Moreover, the Swiss authorities are introducing a mandatory declaration of compliance for food contact material inks.

## EuPIA's Energy Curing Working Group

This group of EuPIA members, who are involved with the supply of UV and EB curing inks and varnishes, continued their regular discussions on a number of key topics impacting these technologies. One key achievement was the April 2023 publication of a revised version of EuPIA's Photoinitiator (PI) Suitability List for use in Food Contact Material applications. A tightening up of the requirements was necessary in response to market expectations and to reflect the changes in national food contact legislation, such as the loss of Swiss Ordinance Part B, and the future German Ink Ordinance. This List remains a key reference document for many stakeholders in Europe and beyond, assuring EuPIA members, printers, brand owners and retailers that those photoinitiators listed may be used without concern for food packaging applications. Other concerns are now being addressed through a revision of the procedure for adding new photoinitiators to the list.

An additional topic that also remains a concern is the continued reluctance by the UK paper association to rectify the false statements made about energy curing print technology and its negative impact on the processing of waste paper as part of recycling activities. This has led to several major supermarket chains (in the UK and globally) blacklisting UV printing from use in the production of packaging for their own-branded products. The position taken by the Confederation of Paper Industries (CPI) in their guidelines is not justifiable, and has been challenged numerous times. More recent evidence from visits to paper recycling facilities have reinforced EuPIA's position on this issue.

## Printing Inks and Toy Safety

The revision of the Toy Safety Directive during the course of 2023-2024 is expected to have a significant impact on the use of printing inks for applications which fall into scope of this legislation. The intention from the authorities is to convert the Directive into a Regulation and to tighten up the rules on the materials and mixtures that can be used in the production of toys. This includes the removal of concentration limits and thresholds, and the application of the Toy Safety Regulation regardless of the age of the child. Additional proposed requirements include those relating labelling, where there is the intention to follow the cosmetics legislation and disclose full compositions used in the manufacture of a toy. The Toy Safety Regulation also appears to be the first legislation from the authorities where some of the new elements proposed for other legislation are being introduced e.g. the Generic Risk Management Approach (GRA) that will be introduced into the revision of REACH, and the advent of the Digital Product Passport.

## Printing Inks and Circular Economy

### Task Force Paper Recycling

All aspects regarding the circularity of graphic paper and fiber-based packaging and inks are in the remit of EuPIA's Task Force Paper Recycling. It organises the exchange with all relevant stakeholders, for instance via the European Paper Recycling Council (EPRC), which is an industry initiative that monitors the progress towards meeting the paper recycling targets. EuPIA is a supporter of the EPRC and is actively involved in many of its activities. In 2022 the recycling rate for paper was 70.5 %, which demonstrates that paper is already a very well-functioning circular economy. The task force also monitors the work of the 4evergreen alliance, where EuPIA is a member of the Industry Association Advisory Board.

The Task Force is also involved in activities related to the different eco-labelling schemes. In 2023 the task force has been working closely together with the responsible committee of the German National Association (VdL) on the revision of the Blue Angel, which will be finalised in 2024.

Also in 2023, mineral oils in publication inks and packaging were an issue on the agenda of several member states and hence also the Task Force. Especially regarding the regulations in France, many practical questions are still open. To solve these issues, EuPIA is working in close collaboration with the French National Association, AFEI. On the EU level regulatory measures have been expected for quite some time. After the updated scientific opinion of the European Food Safety Authority (EFSA), the EC published a draft of a new regulation end of 2023 setting binding maximum levels for aromatic hydrocarbons (MOAH) in food in conjunction

with monitoring recommendations and provisions regarding analysis. Furthermore, the TF Paper Recycling has been following the impact on paper and board in the revision of the packaging and packaging waste regulation (PPWR).

### Task Force Plastics Recycling

The year 2023 marked a crucial time for the Plastics Recycling TF as the proposal for the revision of PPWR (Packaging and Packaging Waste Regulation) underwent various inter-institutional negotiations. As we know, one of the major overhauls of this dossier is to convert the PPW Directive into a Regulation. This has led to questioning various definitions, methods, and mechanisms of how this regulation can work in practice. Many of EuPIA's concerns were taken into account in recent drafts; however, one major concern remains to date i.e. the regulation would still allow member states to go beyond requirements set in the PPWR; this has the potential to distort the functioning of the single market.

In 2022, the EC suggested some rules that could endanger the current efforts of the packaging industry, one of them being the inclusion of a negative list. This list contained substances or packaging characteristics that stresses eliminating from the packaging value chain. In 2023, the EC conducted a workshop in which members of the two EuPIA Recycling Task Forces actively participated. The outcome of the resulting study is yet to be published and is foreseen in 2024.

Some of the achievements that the EuPIA Plastics TF was able to achieve, alongside other industrial stakeholders are as follows:

- EuPIA, through the Task Force, is represented in CEN TC 261 WG 10 which focusses on developing recycling criteria for plastics.
- The Task Force issued a EuPIA position paper on the deinking of plastic packaging waste. This is an important new element in the recycling of post-consumer plastic packaging waste in order to ensure that recycles are of good quality and can be used for the purposes outlined in the PPWR.

Another important topic that is in scope of the EuPIA Plastics Recycling TF is the Extended Producer Responsibility (EPR), which is also a hallmark feature under the new PPWR proposal. Here, EPR fees are developed based on the performance criteria (A-E scores) based on the recyclability of different substrates (mainly for plastics). This can have some consequences for printing inks as they may influence the recycling quality of a substrate.



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Further, in the light of the EU Circular Economy Action Plan (CEAP), there are stringent measures that focus on improving the overall quality of plastic recycling and curbing wastage. The Task Force covers all the aspects of inks regarding the circularity of plastic-based packaging. One important focus of this group includes monitoring activities around CEFLEX (A Circular Economy for Flexible Packaging) that bring a wide range of industry stakeholders to represent the full flexible packaging value chain.

Initiatives related to ink behavior in mechanical recycling and smart testing methodology for ink recyclability are being overseen where EuPIA members are represented under the sub-group 9 of CEFLEX. Similarly, the Task Force co-ordinates the activities around programmes such as RecyClass and Safe Cycle which focus on the recyclability of plastic packaging and products through the development of recycling methodology and testing methods.

The Task Force constantly monitors the scope of inks in the definitions and interpretation of different national and EU legislation and policies related to plastics.

## Environmental Footprint of Printing Inks (EFPI)

In recent years, there has been an increase in discussions regarding measuring the environmental performance of various products. This momentum has been particularly driven by the EC's initiative for a single market for green products and the Environmental Footprint methods. In the past, EuPIA had published a virtual ink reference that represented printing inks for all print processes that were currently in use. This served as a useful ink input into the life cycle assessment (LCA) for printed matter for different stakeholders downstream.

As LCA is a dynamic tool, it requires periodic updates to ensure that the methods, data availability, and technology representativeness remain valid, even as time and progress change situations and values. To this end, EuPIA commissioned a working group, called EFPI, to investigate the LCA requirements for printing inks, allowing the customer base and stakeholders to take into account the impacts arising from inks within their LCA calculation.

EFPI successfully published a guidance document for calculating LCA for printing inks. The working group will monitor any updates in the LCA methods or printing ink technology to update the same in its guidance document. Further communication strategy for this guidance document is foreseen in 2024.

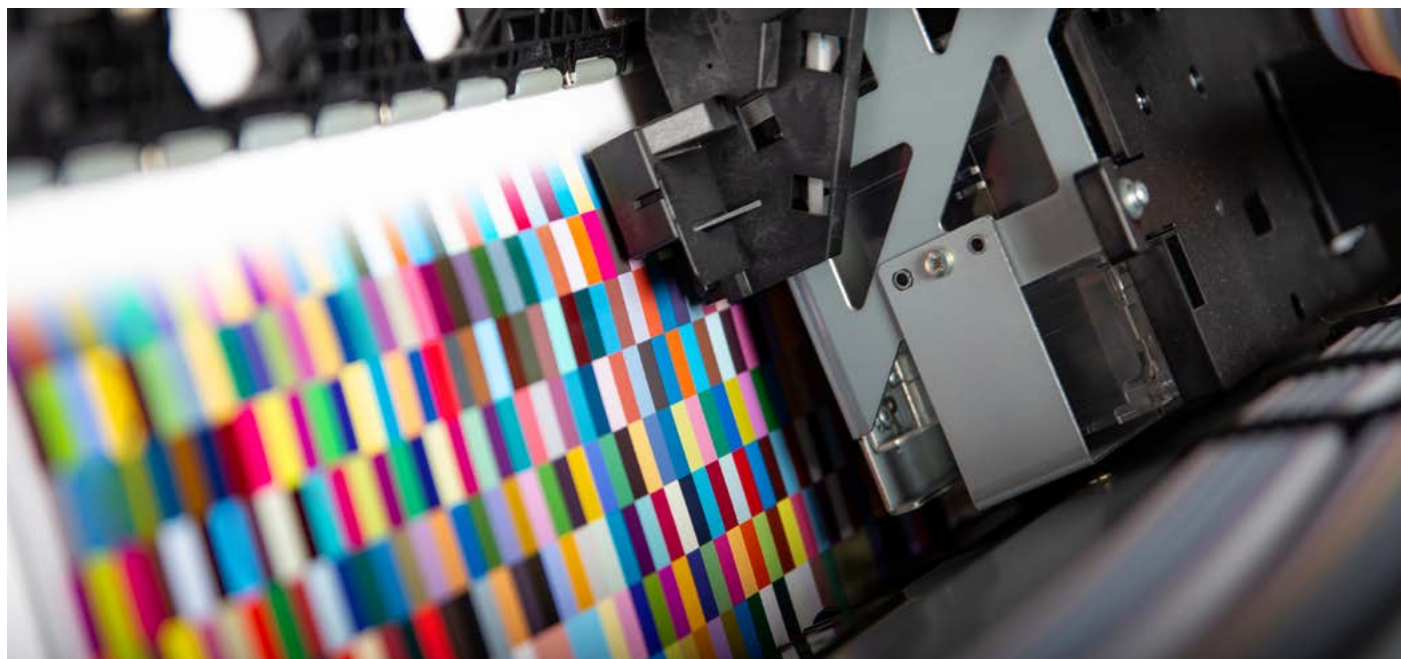
## EuPIA's Occupational Safety and Risk Assessment (OSRA) Working Group

The OSRA WG continues to provide a platform for EuPIA members to share knowledge, expertise and experiences relating to occupational safety and accidents in a confidential manner. It is also the EuPIA forum that reviews the annual safety statistics that are derived from a survey of members, prompting discussions as to what further actions and initiatives can be introduced to maintain safe working in European printing ink manufacturing operations.

The OSRA Safety Alerts provide specific details of incidents where lessons can be learned, ranging from fire-risk situations due to e.g. electrostatic discharge, through to possible accidents due to the incorrect operation of Fork-Lift Trucks. These are now available in four languages (English, French, Spanish and Italian). In addition, the WG develops, issues and revises guidance documents for the membership. Recent topics have included guidance on IBCs, Laboratory working practices, and safe handling of UV curable raw materials and finished inks.

## EuPIA's PPP ad-hoc Working Group

A new WG was set-up in the Spring of 2023, to tackle the issue of the new proposals for an Ultimate Trace Contaminant (UTC) Limit for Polychlorinated Biphenyls (PCBs) under the Persistent Organic Pollutants (POPs) Regulation (EU) 2019/1021. Although our efforts managed to persuade the authorities to reconsider a November 2022 proposal, and thus avoid an immediate problem, a revised proposal presented in November 2023 has led to even more concerns, with the possible future ban of 15-20 essential pigments. This WG has now been opened up to all CEPE-EuPIA-EuACA members as the issue affects all sectors very significantly. Efforts are now underway to persuade the EC that their current proposal is completely unworkable, and that they need to take industry concerns into consideration. <



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