



## European Printing Ink Regulation must be designed to be workable

- **Announced: European regulation on printed food contact materials**

The German Federal Ministry of Food and Agriculture (BMEL) has suspended its draft for a German ordinance regarding print on food contact materials (e.g. food packaging) – after the European Commission announced in December 2016 its intention to adopt relevant European regulation by 2018. The German “Druckfarbenverordnung” was intended to include a list of substances permitted for the manufacture of printing inks for food contact materials (positive list), laying down maximum limits for the transfer of such substances to foods. Within the European TRIS procedure, eight Member States raised concerns about the compatibility of the proposal with the free movement of goods within the EU, pointing to the importance of harmonised regulation.

- **Printing inks are indispensable for food contact materials**

Printing inks on food packaging and other food contact materials serve for information to consumers, the protection of foodstuffs and the distinction of products. Through manifold measures, the printing ink industry has been contributing for a long time to the safe use of printed food packaging in Europe.

- **European regulation should take an integrated approach**

At present, most rules regarding food contact materials are based on positive lists. We speak for the planned European regulation to take an integrated approach: For example, it should be possible to resort to the existing substance evaluations of the European Commission and the Member States. For substances that have not undergone official evaluation, modern risk assessment approaches should be used; these can be carried out by the printing ink industry itself. This would ensure a high protection level for consumers – without work-intensive and costly procedures for an inclusion of substances in positive lists.

### We are calling for the following:

1. **Limit European regulation to outside print**

The scope of the regulation should be limited to applications with the highest consumer exposure, i.e. the outside print on food packaging.

2. **Rules need to be intelligent, lean and flexible**

The European regulation only needs to prescribe the fundamental principles that safeguard the safety of printed food contact materials. Detailed questions can be regulated in guidance documents. It should be possible to use existing substance evaluations. The printing ink industry itself should have the possibility to carry out risk assessments.

3. **No national go-it-alone action**

Printed food contact materials need to be regulated at the European level, in order to prevent distortions of competition in the European single market and to ensure a uniform level of consumer protection. We reject any national unilaterally action.