



# Printed Food Contact Materials

## The German “Printing Ink Ordinance”

### National go-it-alone action in the regulation of printing inks

The German Federal Ministry of Food and Agriculture (BMEL) intends to issue a German “Printing Ink Ordinance”. This piece of legislation shall apply to all printed food contact materials (e.g. food packaging) that are manufactured, used and placed on the market in Germany. The draft ordinance includes a list of permitted substances for the manufacture of printing inks for food contact materials. For these, maximum quantities are laid down for the migration to food (“positive list”).

### Printing inks for food contact materials are indispensable

Printing inks on food packaging and other food contact materials serve for consumer information, food protection

and product differentiation. They are manufactured in accordance with the guidelines of the European Printing Ink Association (EuPIA).

This ensures that printed food contact materials can be used safely in Europe and comply with the relevant European legislation. Currently, there is no evidence of health risks and, therefore, no need for action to adopt a national ordinance.

### No obstruction of the internal market and priority for European regulation

Irrespective of the demonstrably successful concepts implemented across Europe, the printing ink industry speaks for specific legal requirements: However, these must be science-based, proportionate and workable in practice – and above all, they must apply throughout the EU.

National go-it-alone action distorts these principles and, moreover, ignores the reality of complex flows of goods in the internal market. Nationally, the costs for the chemical raw materials industry and the printing ink industry in Germany alone are enormous at ca. €160 million. Within the TRIS notification of the planned ordinance in 2016, many EU Member States rejected the project as contrary to the internal market. In response, the EU Commission stated that it would develop specific EU legislation on printed food contact materials. At present, the existing legal framework is being evaluated first; only after that working on specific legislation makes sense.

This is  
what  
we are  
calling  
for

#### ✓ Printing inks should be regulated at European level

We reject national go-it-alone action. To maintain the European internal market and to ensure a uniform level of protection for consumers, printed food contact materials must be regulated at a European level. The EU Commission should be given the necessary time to develop specific legislation.

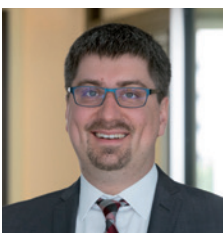
#### ✓ Rules must be shaped intelligently

At present, most of the provisions on food contact materials are based on positive lists. European legislation should use more modern approaches of risk assessment which ensure a high level of consumer protection – without having to resort to elaborate and costly lists of substances. Such approaches have already been prepared by the European food packaging chain and have been welcomed by the European Commission.



## The supply chain for printed packaging is interlinked in Europe

The European internal market is safeguarded only by regulation that applies across the EU



**Dr. Christof Walter**  
+49 (0) 69 2556 1719  
walter@vci.de  
www.WirSindFarbe.de