



Food packaging: Timely Revision of the European Legal Framework

Although the general rules for food packaging at EU level apply also to printed food packaging, specific provisions are lacking. In order to close this gap, the European Printing Ink Association (EuPIA) has developed and successfully implemented its own comprehensive concepts. Nevertheless, the entire food packaging chain in Europe has long been calling for a harmonised European regulation for printed food packaging. The EU Commission is currently working on revising the legal framework, but the timetable is being pushed back further and further.

Regulating food packaging at EU level

The supply chain for printed packaging is fully interlinked across Europe. Therefore, the European single market can only be safeguarded by EU-wide harmonized regulations. National measures, such as the so-called German Printing Ink Ordinance, are fundamentally unable to fulfil this requirement.

The practicability of the new legal framework depends on the details

The EU Commission had already announced in 2016 that it would issue a regulation for printed food packaging. However, in the course of its work, it identified fundamental shortcomings in the existing legal framework, which is why it shall be revised. The Commission's current plans envisage a paradigm shift in which the focus is to be shifted from intermediates (such as printing inks or plastics) to the final product. In this context, the Commission is considering a new grouping approach in which printing inks would fall into the category of „synthetic organic materials“ together with adhesives, plastics and other „synthetic“ materials.

The risk management of substances is to be based on a tiered concept that depends on the hazard properties of the substances: some are to be banned, others are to undergo an official evaluation, while a third class is to be risk-assessed by the industry. It is worth mentioning that the Commission is moving away from the outdated concept of regulation solely via positive lists. Overall, the VdL welcomes the Commission's plans. However, whether they can be implemented in practice depends on the details that still need to be defined (limit values, differentiation between the tiers, etc.).

Revision of the legal framework must be finalised quickly

Originally, the Commission had planned to present a legal text in 2022; it now expects to do so in 2025. From an industry perspective, it is crucial that there are no further delays. The time pressure is also increasing in light of the so-called German Ink Ordinance. The German Federal Government also recognises the priority of a European regulation and has therefore offered to extend the transitional period (01/2026) if the EU Commission presents a corresponding European regulation within this period.

**This is
what we
are calling
for**

Quickly finalise the revision of the legal framework

Only an EU-wide harmonised regulation can ensure a uniform level of protection for consumers and safeguard the European internal market. A timely revision of the legal framework for food packaging is the basic prerequisite for postponing the national „German Printing Inks Ordinance“.

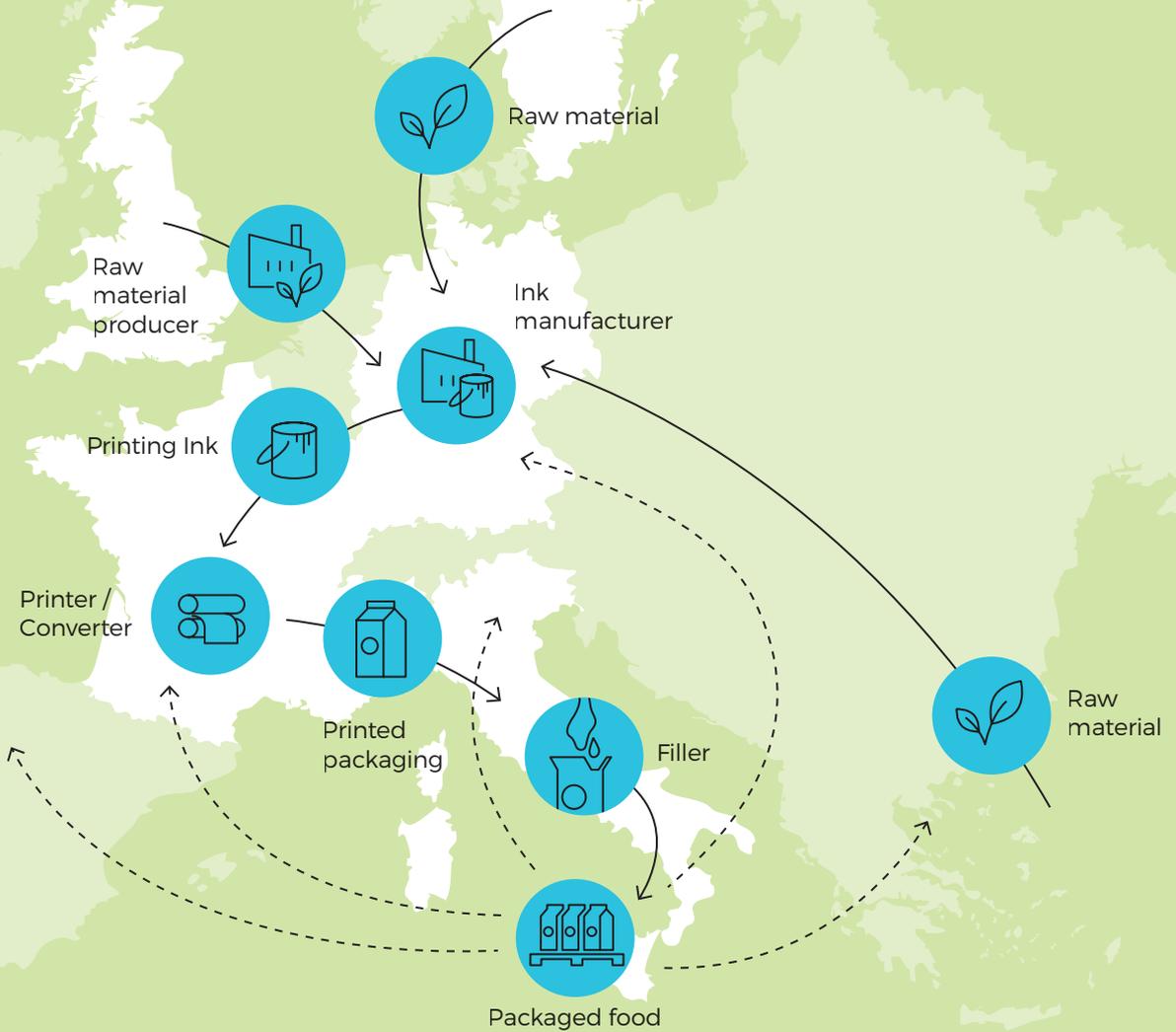
Making the Commission's plans work in Practice

The EU Commission's plans are very ambitious and envisage a paradigm shift. Overall, the VdL welcomes the Commission's proposals, but their practicability depends heavily on the details yet to be defined. The established concepts of EuPIA and the proposals of the food packaging chain, which is organised in the Packaging Ink Joint Industry Task Force (PIJITF), should be taken into account here.



The supply chain for printed packaging is interlinked across Europe

The European single market is only be safeguarded by EU-wide regulations



The so-called „Packaging Ink Joint Industry Task Force“, which represents the value chain from the manufacturers of the printing ink raw materials to the food companies, has presented concepts for the revision of the legal framework and for the specific regulation of printed food packaging, which could be implemented quickly and are based on modern, risk-based approaches:



Dr. Christof Walter

+49 (0) 69 2556 1719

walter@vci.de