

Food Packaging

Timely revision of the European legal framework



Although the general rules for food packaging are applicable to all printed food packaging in the EU, specific provisions are lacking. In order to close this loophole, 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 advocating a harmonized European regulation for printed food packaging. The EU Commission is currently working on revising the legal framework, but the timeframe is continually being pushed back.

Regulating food packaging on EU level

The supply chain for printed packaging is fully interconnected across Europe. Therefore, the European single market can only be protected by EU-wide regulations. National initiatives, such as the "German Printing Ink Ordinance", are fundamentally unable to do justice to these requirements.

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. In the process, however, it identified fundamental shortcomings in the existing legal framework, which is why it should be updated first. The Commission's current plans foresee 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 along with adhesives, plastics and other synthetic materials. The risk management of substances would be based on a tiered system depending on the hazard properties of the substances: some would be

banned, others would be subject to an official evaluation, while a third class would be risk-assessed by the industry on its own responsibility. It is worth mentioning that the Commission is rejecting the outdated concept of regulation based solely on positive lists. Overall, VdL supports the Commission's plans. However, whether they can be realized in practice depends on the remaining details that have yet to be defined (limit values, differentiation between tiers, etc.).

Revision of the legal framework needs to be concluded quickly

Initially, the Commission had planned to present a legal text in 2022; it is now more likely to be between 2027 and 2028. From an industry perspective, it is crucial that there are no further postponements. This also applies with regard to the German Printing Ink Ordinance. Its transitional period has been extended on a one-off basis by one year, until the end of 2026. Even if it is unlikely that the European Commission will present its revision within this time-frame, it remains important to protect the integrity of the European single market through harmonized legislation and to avoid a patchwork of regulations.



**What we
advocate for**

Finalize the revision of the legal framework quickly

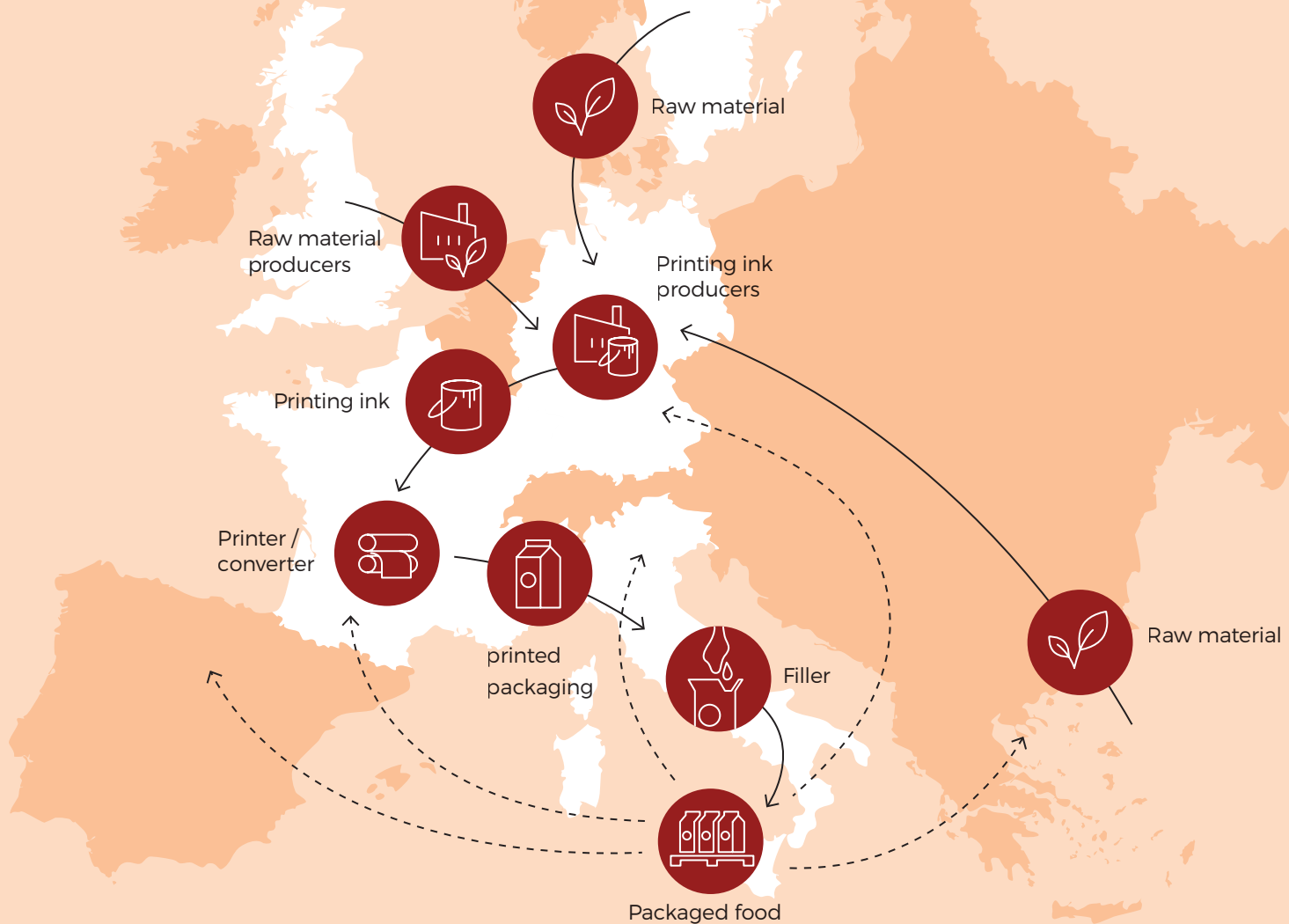
Only a harmonized EU-wide regulation can ensure a uniform level of protection for consumers and preserve the European single market. A swift revision of the legal framework for food packaging is the fundamental prerequisite to avoid a patchwork of national regulations.

Making the Commission's plans feasible

The European Commission's plans are very ambitious and foresee a paradigm shift. Overall, VdL supports the Commission's proposals, but their practicability depends heavily on the details yet to be defined. The well-established concepts of the EuPIA and the proposals of the packaging chain, which is organized in the „Packaging Ink Joint Industry Task Force“ (PIJITF), should be taken into account.

The supply chain for printed packaging is interconnected across Europe

The European single market is only protected by regulations that apply at EU level



The „Packaging Ink Joint Industry Task Force“, which represents the value chain from the manufacturers of printing ink raw materials all the way to the food companies, has submitted concepts for revising the legal framework and for the specific regulations of printed food packaging. These can be implemented quickly and are based on modern, risk-based approaches.



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