



Customer Communication

Siegwerk Printing Inks for Food Packaging

EU Plastics Regulation No 10/2011

Siegwerk receives inquiries about the suitability of its printing inks for food applications. The purpose of this statement letter is to clarify many of the issues that arise, including those concerning the regulatory requirements in Europe.

Background:

Today, there is no specific EU legislation regulating printing inks for food packaging. The main specific regulation pursuant to the Framework Regulation is the “Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food” (OJ L 12 of 15.01.2011) with its subsequent amendments in the latest version.

This regulation covers plastic materials and articles in contact with food as defined in Article 2 No. 1 and is also applicable to printing inks, adhesives and coatings (Article 2 No. 3).

The “Union list of authorised substances” in Annex 1 comprises all substances that are allowed to be intentionally used in the manufacture of plastic layers. For each substance, there is a restriction, which in most cases is a limit for the allowed migration, either a specific migration limit (SML, between 0.01 mg/kg and 60 mg/kg) or the overall migration limit (OML) applies, which is laid down in Article 12: the migration to food simulants must not exceed 10 milligrams of total constituents released per dm² of food contact surface (or 60 mg constituents per kg food simulant in case of intended contact with food for infants and young children).

Packaging inks:

Several substances used in the manufacture of printing inks are **not** listed in the Annex.

Nevertheless, printing inks can contain substances which are regulated by the Plastics Regulation. Those may add to the migration of the final packaging. Therefore the relevant restrictions, such as specific migration limits (SMLs) or maximum content (QM) have to be complied with by the complete final article.

SUMMARY

In Europe, all inks supplied by Siegwerk for food packaging applications are formulated in such a way that the applicable limits laid down in the Plastics Regulation can be met.

However, Siegwerk cannot guarantee the compliance of the final article, as that depends on many parameters which are not under control of the ink manufacturer, like additive effects with the substrate, design of the final article, printing process or drying process.

The verification of compliance of the final article is under the responsibility of the printer / converter.