

ECMA Statement - German Ink Ordinance

In 2014, Germany announced its intention to regulate the use of printing inks for food contact materials. This work was paused when the European Commission started work on measures to harmonize the regulation of printed food contact materials, but this was put on hold when the Commission announced a more general review of food contact legislation. Accordingly, Germany proceeded with the regulation and the German Ink Ordinance was adopted in the Bundesrat (Federal Council of Germany) in November 2021 and published in the Official Journal in December 2021.

Whilst printing inks are usually applied to the non-food contact surface of packaging, migration can occur through the substrate or through airspace between packaging layers – accordingly, the Ordinance contains an approved list of substances that can be used in inks for food contact materials, together with migration limits – in order to demonstrate compliance, all potential sources need to be taken into account; this will require particular attention from substrate, ink and adhesive suppliers. If the same substances can be present in the substrate and/or adhesives used, all migration which may occur from the different sources, needs to remain below the Ink Ordinance specified limits.

Importantly, the Ordinance includes a transition period of 4 years (5 years for some pigments) before the regulations are implemented; this transition period will enable the supply chain to ensure compliance – in the interim, German authorities have confirmed that inks manufactured according to guidelines developed by the European Ink Manufacturers Association (EuPIA) are considered safe.

ECMA fully supports all efforts to improve the safety of folding carton and cartonboard packaging, but we are not in favour of a patchwork of national food safety legislations – indeed we fully support the initiative of the Packaging Ink Industry Taskforce towards the EU Commission, on the need for a European harmonised Ink measure.

End

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ECMA, the European Carton Makers Association

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About the European Carton Makers Association

The Association brings together folding carton converters, cartonboard mills, national associations and suppliers to the folding carton industry. ECMA represents over 500 carton producers with a current workforce of 50,000 located across nearly all countries in the European Economic Area – this equates to over 80% of the €12 bill European folding carton market.