



## **Standardisation Activity on Washes in Offset Printing – I&P Europe supports EU wide food packaging regulation**

February 2013

I&P Europe – Imaging and Printing Association e.V. is the European association of product manufacturers and technology providers for the imaging and printing industry. The products of I&P Europe members include conventional and digital materials and their processing solutions. The main focus of the association's activities is on regulatory compliance issues in health, safety and environment.

One important topic is printing on food packaging applications. As a responsible-minded association, I&P Europe is constantly and carefully monitoring the ongoing legislative discussion as well as developments in the market. In general, the current regulatory situation in the EU is not satisfactory, with a weak Framework Regulation and lacking standards for food contact materials (FCM).

The Framework Regulation (EC) No 1935/2004 lays down the general rules and principles for FCM. This Regulation requires FCM that are safe, do not transfer their components into food in quantities that could endanger human health, or do not bring about an unacceptable change in the composition of the food or a deterioration in its organoleptic characteristics. Furthermore, Regulation (EC) No 2023/2006 demands manufacturing according to Good Manufacturing Practice.

Annex I to the Framework Regulation establishes 17 groups of materials and articles which may be covered by specific measures: active and intelligent materials and articles, adhesives, ceramics, cork, rubbers, glass, ion-exchange resins, metals and alloys, paper and board, plastics, printing inks, regenerated cellulose, silicones, textiles, varnishes and coatings, waxes, wood – as well as combinations of these materials.

At EU level, specific measures are in place for ceramics, regenerated cellulose, plastics, recycled plastics, and active and intelligent materials and articles. For the other above-listed materials, there is no specific EU legislation at the time being.

Some Member States have their own national legislation for certain types of materials. Obviously, this patchwork of national laws causes unnecessary complexity. The absence of one single standard for the declaration of conformity (including the relevant test procedures) leads to much confusion within the printing industry and its supply chain. Moreover, it is not easy to obtain the necessary items of information from the supply chain, especially when information about NIAS (non-intentionally added substances) is requested.



Therefore, I&P Europe welcomes the recently launched roadmap initiative of the European Commission. The aim is to evaluate the current legislative situation in the EU and to check whether the current structure and principles of the FCM legislation are satisfactory and where they can be improved.

I&P Europe takes this opportunity to point out that an EU harmonised approach is needed to ensure consistency and to avoid distortions of the internal market. Specific requirements and details are necessary to aid safety compliance and enforcement. Also, standardisation would be helpful e.g. for certificates of conformity in the EU market, migration testing by the independent test institutes in the European Union, and EU Good Manufacturing Practice for FCM.

As a positive example of standardisation by industry, I&P Europe and its member companies have recently conducted an Investigation Report about Washing Agents in cooperation with the German test institute FABES Forschungs-GmbH, Munich. The Investigation Report shows that under intended and correct use, the verification limit of 10 ppb (=10 µg/kg) for food packaging applications is not exceeded.

Washes are not part of the above-named 17 groups listed in Annex I to the Framework Regulation, because they are not intended to come in contact with food. For this reason, one goal of I&P Europe's initiative is to discontinue unnecessary and non-standardised individual declarations with no legal basis.

The category of Washes, which have been investigated by the test institute FABES, is defined as follows:

“Conventional washes with D60 (in general a description for Naphtha [petroleum], CAS 64742-48-9) as main constituent (≥80%) on basis free of aromatic hydrocarbons.”

The FABES "Certificate of Conformity" declares this product group as compliant with existing European food contact legislation. The Investigation Report about Washing Agents is a good starting point for further joint standardisation activities of I&P Europe and its members.