E info@etad.com P.O. Box W etad.com
CH-4005 Basel T +41 (0) 61 690 99 66
Switzerland F +41 (0) 61 691 42 78

## Introduction

The recent activities of EuPIA (European Printing Ink Association) on the establishing of an inventory list for printing inks in collaboration with the Swiss Federal Office of Public Health, seem to have led to a little confusion by the affected suppliers and customers. ETAD, also a contributor to the list, had the opportunity to discuss and clarify some crucial points with EuPIA. With this communication we would like to outline the background and the current status of the EuPIA work, especially its impact on the suppliers of colorant products to the printing ink industry.

## **Background**

The Swiss Federal Office of Public Health (FOPH) was assisted by EuPIA in the compilation of a complete list of substances used in the manufacture of food packaging inks (i.e. printing inks that are applied on the outer, non-food contact surface of food packaging). This list will become a positive list under the Swiss Ordinance of Materials and Articles Coming into contact with Food (Bedarfsgegenständeverordnung).

The list will only be an inventory of substances that are currently in use, without implying any toxicological evaluation.

EuPIA organized its compilation work in separate groups:

- information about colourants (both dyes and pigments) was gathered internally, based on the knowledge of EUPIA members;
- information about additives used in pigment preparations needed to be completed through feedback from the pigment industry. For this purpose, EUPIA contacted companies' associations (among others ETAD) to obtain consolidated information, while at the same time preparing an IT tool which would allow single companies to input data directly the so-called "DOL tool" (Data on-Line)

## Current status

The most important points for ETAD member companies as well as other suppliers and customers of printing inks can be summarized as follows:

- At present no colorants are required to be registered via DOL. The function that concerns colorants, even though present, was only introduced in order to have the option of forming joint interest groups at a later point in time.
- From ETAD members point of view DOL only affects the part of the final list concerning additives. Colorants have been already dealt with by EuPIA members and submitted to the Swiss authorities.

E info@etad.com P.O. Box W etad.com
CH-4005 Basel T +41 (0) 61 690 99 66
Switzerland F +41 (0) 61 691 42 78

- Swiss authorities communicated to EuPIA that their final list will only contain additives used to produce printing inks, but not additives contained in the pigment preparations used as starting materials.
- EuPIA will close the DOL inventory during the first quarter of 2009, in order to produce the list of currently used additives. It is planned to open the inventory again later in order to allow a constant updating.
- A final EuPIA list, including all inks components, will result from the merging of the gathered information. An incomplete list has already been compiled and is available.
- Listed substances give no indication about specific companies having provided the information. Therefore, interested companies only need to check whether their printing ink constituents are present.
- Since Swiss authorities will revise the received information before including it in their legislation, the final EuPIA list, when published, will have no official regulatory status. The inventory of substances to be used as reference when complying with the Swiss Ordinance will be the one officially provided by the corresponding authorities.
- An open communication will be maintained between EuPIA, ETAD and the Swiss Authorities in order to guarantee future updates of the official Swiss list.