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Color & Comfort

Regulatory Newsletter
Autumn 2025

This newsletter provides updates on important regulatory issues and developments of interest to Sun Chemical customers.

Industry Associations – Opinions And Positions

32nd POPs Competent Authorities Meeting – Discussion on PCB UTC Limit Amendment

During the 32nd Meeting of the Competent Authorities (CA) on Persistent Organic Pollutants (POPs), held on 11 June 2025, the current draft proposal, setting a UTC limit value of 0.2 ppm with a derogation for organic pigments and dyes, was presented again. Stakeholder such as industry, member states and associations like Eurocolour and ETAD were invited to participate online. It was noted, noted that after two years of discussions, they had considered this the final draft before adoption.

As part of the adoption process, the public consultation had recently been closed, with 25 comments submitted by stakeholders from other sectors. The main feedback was that the 0.2 ppm limit is not feasible for many sectors. Concerns were also raised that some analytical methods lack a sufficiently low detection limit, and that no standardised method is currently available. The EU Commission (COM) and ECHA need more time to review the comments before taking a decision meaning that the process will be further delayed. COM also expressed its disappointment about the fact that these concerns surfaced so late and indicated to revise the process. It is now up to COM and ECHA to prepare a new draft that shall be discussed in one of the next CA POP meetings.

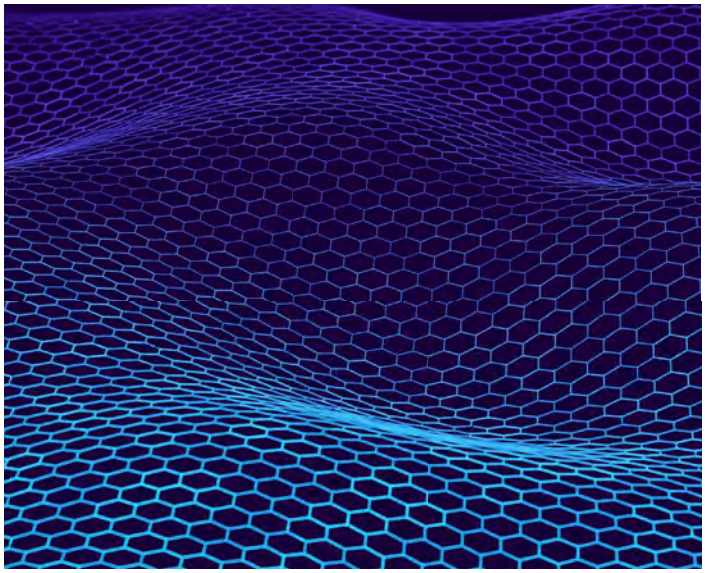
Leading scientists urge European Commission to retain original MAF plan in REACH revision

A group of 22 scientists from various universities and institutes (e.g. ETH Zurich, Goethe University Frankfurt, Helmholtz Centre) has written to the European Commission urging it to retain its original blueprint for the inclusion of a mixture assessment factor (MAF) in the forthcoming REACH revision.

The letter is addressed to Commission President Ursula von der Leyen, executive vice-president for prosperity and industrial strategy Stéphane Séjourné and commissioner for the environment Jessika Roswall. The scientists are "very concerned" that the REACH revision, expected by the end of the year, may not consider the significant risks that chemical mixtures pose to ecosystems, biodiversity and human health. MAF would be pragmatic, feasible and would not unduly increase the regulatory burden on industry and regulatory authorities, they said.

The current approach to chemical risk assessment is typically carried out on a compound-by-compound basis, which the group said is based on the "unrealistic assumption that every single chemical is released into its own, pristine environment". This approach systematically underestimates real risk, they added. "The science is clear: even if each compound is present at levels deemed safe on its own, the combined effects of a large number of chemicals will pose a risk," they said.

However, industry research body ECETOC pointed out that "complex problems require nuanced solutions". Secretary general Blanca Serrano said the MAF is often presented as a straightforward fix for the complex issue of combined exposure to unintentional mixtures of chemicals. "Such a broad approach is unlikely to resolve the true areas of concern," she said, adding that it has been demonstrated that risk from unintentional environmental mixtures in EU surface waters is dominated by a limited number of substances, most of which are already banned or subject to risk management. ECETOC instead recommended a "layered, science-driven approach for mixture risks to efficiently identify and prioritise those that genuinely require intervention to manage risk". The trade association CEPE challenges the MAF approach stating that this concept has no strong scientific basis and that individual chemicals are risk assessed with already sufficient safety factors embedded in the system.



Joint Eurocolour and VdMi position on German BfC Report on nanomaterials

The report "Assessment of the enforceability of the rules for nanomaterials in REACH – review five years after entry into force" provided by the German BMUV and other German authorities (BfC-Report) aims to describe why the European approach on nanomaterials has failed and what needs to be improved.

The recent BfC-report calls for additional information requirements for substances in nanoform and furthermore for a registration requirement for downstream users. Previous discussions between the VdMi together with the German VdL and the BAuA have unfortunately not been able to rule out authorities' concerns. Industry explained that nanomaterials are produced by bottom-up processes e.g. manufacturing and that a break-down of bulk-material or splitting of agglomerates in down-stream processes for articles is very unlikely due to the high amount of energy required. Authority however sees a discrepancy between the number of registered nano-forms and the number of registrations predicted by ECHA and concludes that downstream users produce inadvertently nano-materials that are subject for registration.

In a joint position paper the trade associations VdMI and Eurocolor point out that the REACH nano-dossiers are complete and that downstream user applications are already covered within the dossiers. Furthermore, the current concept of set of similar nanoforms should be redefined and simplified. The associations see no need for additional information requirements or even new animal studies because the available data are sufficient to assess the nanomaterials.

Cefic Particle Platform – PSLT Stakeholder Workshop

Europe's particle industry encompasses multiple sectors and generates a diverse array of products for various uses. The Particles Platform is an informal alliance of EU industry associations that represent manufacturers of Poorly Soluble, Low Toxicity particles (PSLT) such as titanium dioxide, carbon black, and pigments. The Particles Platform seeks to organize a stakeholder workshop in autumn 2025 with leading scientists, ECHA, member states (MS) agencies, industry representatives and European Commission as suggested participants or speaker. Building on the results of a former event in 2024 and in preparation for ECHA and MS discussions on classification initiatives and OEL setting for PSLT, the workshop aims to exchange newly generated science to pave the way for an adequate EU regulatory framework for particles.

Particle Platform representatives invited by DG GROW and ENV presented the workshop program foreseen at the CARACAL-55 meeting on July 3rd in Brussels, to encourage MS to participate actively.

CPMA – 100th Anniversary

The Color Pigments Manufacturer Association (CPMA) was established in 1925 and is now celebrating its 100th anniversary. The association is planning a special event to celebrate a century of color, innovation, and advancement for the industry in September.

The associations agenda for 2025 comprises several projects and regulatory issues such as the US EPA TSCA Risk Management Rule (RMR) for Pigment Violet 29 or Canadas Proposed Risk Management Approach for PFAS. In case of Pigment Violet 29 CPMA seeks to persuade EPA to rescind the proposed RMR and to amend their risk evaluation conclusions based on industry science (e.g. CPMA Particle Size Study). Canada`s proposed Risk Assessment Approach for PFAS however could impact organic pigments used in printing inks because substances designated as PFAS could be subject to the pursued risk assessments regulations. CPMA worked with Health Canada and Environment & Climate Change Canada by providing toxicological studies information for color pigments identified for assessment during Phase I and Phase II of the Chemicals Management Plan (CPM). So far, the contribution resulted in only one minor restricted use for a single color pigment out of hundreds of color pigments evaluated. The association will continue to engage Canadian Ministries in the assessment of the remaining color pigments by identifying and providing appropriate technical information and data for review by regulators.

Food Contact Materials

Comments on the BfR NIAS guidance by VdL and EuPIA

Stakeholders of the BfR Committee for Consumer Products were invited to comment on the draft guidance document on a risk assessment strategy for NIAS. VdL (German Association of Lacquer- and Printing inks) and EuPIA (European Printing Ink Association) compiled their comments together with the experts of the NIAS Risk Assessment Task Force and the Analytical Experts Working Group.

A general recommendation was to point out that the NIAS assessment "in accordance with internationally recognized scientific principles on risk assessment" for food contact materials (FCM) aside from dossier submission remains in the responsibility of industry.

One of the main technical comments referred to the use of the TTC (toxicological threshold of concern) which shall not be applied (according to BfR) for substances that require the submission of toxicity data. The associations argued that the TTC approach can be useful for the assessment of NIAS in these substances when there is limited chemical-specific toxicity data and where human oral exposure can be estimated to be relatively low.

Another technical comment referred to the depicted decision tree which was not only too small but also too complex and not easy to understand. It was recommended to split it into two charts and to refine the wording.

EFSA`s re-assessment of styrene present in plastic food contact material

In June EFSA published the re-assessment of the risks to public health related to the genotoxicity of styrene (CAS 100-42-5) present in plastic food contact materials.

EFSA was requested by the European Commission to re-evaluate the genotoxic potential of styrene after oral exposure and its safety for use in plastic food contact materials with a specific migration limit (SML) of 40 µg/kg food. A rigorous assessment of the in vivo genotoxicity studies was performed. The results demonstrated that the oral administration of styrene in mice and rats up to the maximum tolerated dose did not induce genotoxic effects. For substances demonstrated to be non-genotoxic, according to the EFSA Note for Guidance for FCM, an SML up to 50 µg/kg food would not be of safety concern. Consequently, the use of styrene in the manufacture of FCM respecting the SML of 40 µg/kg food proposed by the European Commission is not of safety concern.

European Food Contact Material revision

The European Commission's efforts to simplify legislation are, to an extent, already being applied to the ongoing revision of the food contact materials (FCM) laws, but they could involve industry trade-offs such as fewer derogations, a senior official has said. Speaking at a recent conference, Bastiaan Schupp, team leader for FCMs at the Commission's health directorate (DG Sante), said "simplification was already part of our work" largely by harmonising rules and doing away with national measures. Harmonisation "would simply not be manageable" otherwise, he said. However, Schupp added that simplification "will also come with more generic rules, which other people [in industry] might not like because that will then mean that there might not be certain possibilities for derogations". Another way of simplification in the FCM revision is via the risk assessment approach, Schupp told delegates at Chemical Watch Events & Training's Sustainable Food Contact Materials Europe conference on 19 June. By taking a risk assessment approach, the Commission "will leave much more to industry [and that would mean] probably fewer rules". However, it would also require more transparency and communication along the supply chain.

On another subject, the Commission's latest (19th) amendment to the plastics FCMs regulation introduced a new definition of 'high degree' of purity, which has made things "much clearer," Schupp said. "In the legislation you will need to comply with the requirements to assess NIAS [non-intentionally added substances]. We will follow up on [...] how businesses are implementing it [to see] what is needed, including possible further guidance" or changes. Industry had earlier bemoaned the definition, claiming it "raises serious concerns about practical compliance" due to analytical testing challenges. When asked if the Commission has addressed this issue, Schupp said the EU executive would respond to all concerns once the public consultation has ended.

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India proposes minimum recycled content requirements for plastic FCMs

India's Ministry of Environment, Forest and Climate Change (MoEFCC) has issued a draft notification that would require manufacturers of recycled plastic for use in food contact materials (FCMs) to meet recycled content targets. The notification, part of the Plastic Waste Management (Second Amendment) Rules, 2025, was published in the Gazette of India on 3 June.

The draft specifies minimum recycled content targets, set to increase gradually over four years, as part of the country's efforts towards extended producer responsibility (EPR) for packaging. The required percentages of recycled content, based on the volume or weight of plastic packaging used in FCMs sold annually, are planned to increase every two years until 2029 up to 85% for e.g. rigid plastic packaging (Category I) with volume of weight equal or more than 4.9 litres or kg used for packaging of drinking water.

Producers using Category I (rigid) plastic packaging must meet the recycled content targets as outlined and will be subject to regulations from India's Food Safety and Standards Authority (FSSA), the draft says. Where the targets cannot be met due to technical limitations, the Central Pollution Control Board (CPCB) may grant exemptions on a case-by-case basis.

Europe – Upcoming Chemicals Legislations And Guidance Documents

ECHA-Industry Meeting in June

The bi-annual ECHA-Industry-Meeting was held on June 17th and 18th in Helsinki with representatives from ECHA, European Commission and OECD as well as Cefic, Eurometaux, CONCAWE and Eurocolour.

The Agenda of day 1 comprised majorly technical topics such as the new ECHA CHEM platform, IUCLID and REACH IT. Industry sees several points for improvement. One of the main concerns was the display of the Classification&Labelling inventory which is now part of ECHA CHEM. Furthermore, information on impurities affecting the classification would be missing, as well as the distinction between boundary and legal entity composition for nanomaterials as well as various searching functionalities. The ECHA Portal Product Team gave a status update on the planned Industry Portal which is intended to replace REACH IT. The Go Live date had to be postponed because priorities have changed, and the focus is now on other tasks. A new transition date was not announced.

The second day was marked by grouping of chemicals, testing methods and the Assessment-of-Regulatory-Needs reports (ARN). Cefic challenged ECHA`s grouping approach and identified a lack of a definition ("grouping") in REACH and CLP legal texts. The association pointed out that the acceptance of read-across in registration dossiers is still low while there is on the other hand a rapid increase in use of group assessments for regulatory processes (ARN, SEV, Restriction, CLH). Cefic mentioned that the burden of proof for authorities to justify their grouping is lower than for Industry and asked if there will a minimum standard be established for authorities to scientifically justify their grouping approaches.

Item 5 of the agenda – Information on REACH revision – presented by the European Commission was lively discussed because of some proposals such as ad-hoc completeness checks or the removal of the lighter registration requirements for substances notified under the previous chemical legislation (NONs).

The last topic of day 2 was ECHA`s update on their work on ARNs. A large number of groups and substances (majorly high tonnage chemicals) was assessed over past years, and the number of publications is expected to slow down in 2025. At this point industry mentioned again that the grouping approach is far-fetched in certain cases and covers too different materials.

EU cosmetics regulation simplification: industry to benefit in several key areas

The European Commission (COM) proposed significant changes to parts of the Cosmetics Products Regulation (CPR) to address compliance obligations raised by the chemicals industry. The EU executive's proposal and explanatory memorandum, forming part of the highly anticipated chemicals omnibus package, was presented on 8 July by COM.

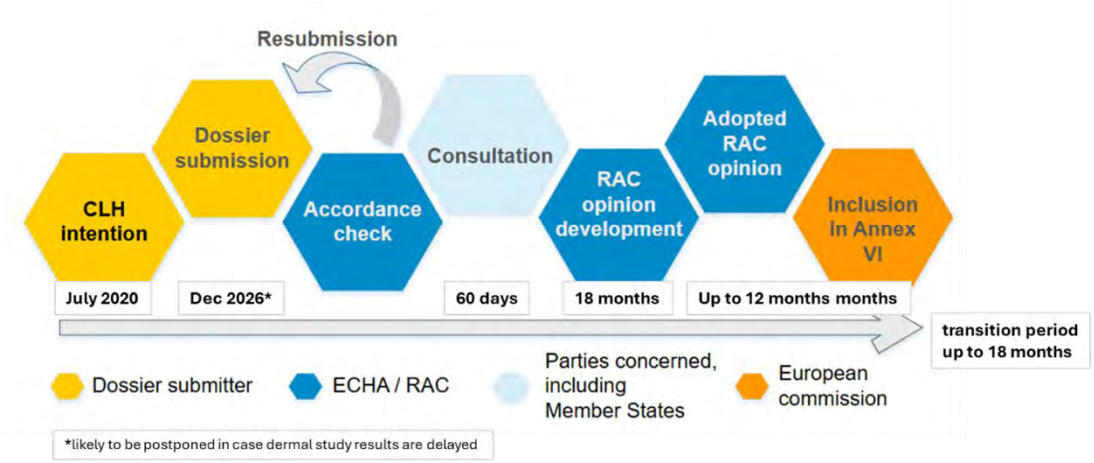
As part of its simplification agenda, COM said it aims to "relieve the cosmetics manufacturers, especially SMEs, from the unnecessary compliance and administrative burden" by addressing core concerns raised during an industry workshop in May.

A major focal point is a revision of Article 15 of the CPR. This provision prohibits substances classified as carcinogenic, mutagenic or reprotoxic (CMR) under CLP Annex VI from being used in cosmetic products unless an exemption is granted. The proposed changes would streamline the derogation criteria for CMR category 1A or 1B chemicals by merging the current criteria with the new requirement that the application must be made for a specific use with a known exposure. It also establishes a link between the route of exposure used for a substance's CMR classification and its prohibition in cosmetics. If for example a pigment would be classified as Carc. 2 only via inhalation – and not via dermal exposure – it would not be banned under Article 15 if only dermal applications were specified.

The Commission also plans to address the absence of a specific procedure for adding colorants, preservatives and UV filters to Annexes IV-VI of the CPR. Its proposal outlines the steps of the procedure, clarifies the Commission's role, and reaffirms the SCCS's responsibility for assessing the safety of any proposed colorant, preservative or UV filter.

Under Article 16 – nanomaterials prenotification – companies must currently notify the Commission six months before placing products containing nanomaterials on the market (excluding e.g. colorants). To "reduce unnecessary burden", the Commission now proposes abolishing Article 16 obligation. To maintain "the same level of consumer safety and appropriate enforcement, the requirements related to the provision of the relevant pieces of information will be transferred to Annex I, so that the cosmetic product safety report contains the adequate description of the nanomaterials used in a given cosmetic product", the Commission said. The European Parliament and Council of Ministers will scrutinize the proposals, although no timeline has been set.

Proposed reclassification of Ethanol



Steps of the CLH process. Image. ECHA, <https://echa.europa.eu/regulations/clp/harmonised-classification-and-labelling>.

Industry's concerns over a proposal to reclassify ethanol under the CLP regulation are growing, while a parallel assessment under the EU Biocidal Product Regulation (BPR) is likely to place restrictions on its use in disinfectants. EU member state Greece proposed to classify ethanol as reprotoxic 2 under the CLP regulation which was due for submission by July 31st 2025. A parallel assessment under the BPR is likely to place severe restrictions on the use of ethanol in disinfectants. The date for submission of the CLH intention is however postponed to December 31st 2026 because new data on dermal studies are expected.

The Biocidal Products Committee (BPC) Working Groups (WG) have in autumn 2024 proposed classifying Ethanol as Carcinogenicity and Reproductive Toxicity Category 1 and, a potential classification on Mutagenicity which is still under discussion. As a result, Ethanol is now identified as a Candidate for Substitution (CfS) according to Article 10(1) of the BPR. ECHA will consequently have to determine if viable substitutes exist before the Biocidal Product Committee Plenary will decide on its approval at the end of 2025.

The use of ethanol as a raw material for biocidal products demands a harmonized classification under CLP and BPR. The health hazard identified would lead to a classification as CMR with far-reaching effects on chemical, cosmetics and also ink industry where it is used as a common solvent or acting as a carrier for colorants for e.g. inkjet inks. The conclusions of the WG base however on oral exposure and subsequent metabolization to degradation products that can cause adverse effects. This route of exposure is not relevant for technical applications and also not allowed due to the EU-wide tax-regulations. Moreover, the use as hand sanitizer as well as the use in industrial processes was considered safe by various institutions including WHO and ANSES as long as the chemical is not taken up orally. Split entries might have been a way out of this regulatory dilemma but were rejected by EU Commission in 2024 and ECHA in 2025.

Industry bodies are campaigning heavily against the reclassification. In a letter to Commission President Ursula von der Leyen, Commissioner Stella Kyriakides and Commissioner-designate Stéphane Séjourné, the European cleaning and maintenance products association (AISE) called it "a matter of major importance for public health". Concerns have also reached the European Parliament. In March, a written question was submitted to the European Commission asking how it expects the reclassification of ethanol to impact on EU competitiveness. The question was signed by 26 MEPs. So far, regulators have been silent.

The Court of Justice upholds the annulment of the classification of titanium dioxide

In 2016, the French National Agency for Food, Environmental and Occupational Health and Safety (ANSES) submitted a proposal for classification of titanium dioxide as a carcinogen by inhalation. The following year, the Committee for Risk Assessment (RAC) adopted an opinion stating that the classification of that substance was justified. On the basis of that opinion, in 2019, the European Commission (COM) adopted a regulation, proceeding with the classification and labelling of specific titanium dioxide forms.

Various manufacturers, importers, downstream users and suppliers of titanium dioxide challenged that classification and labelling before the General Court of the European Union. By judgment of 23 November 2022, the General Court annulled the contested classification and labelling. France and the COM appealed to the Court of Justice against that judgment of the General Court. By the judgment of August 1st, the Court of Justice dismisses those appeals and thus upholds the judgment of the General Court and the annulment of the contested classification of titanium dioxide as a carcinogen.

According to the Court of Justice, even though the General Court exceeded the limits of its judicial review, the annulment of the contested classification and labelling is nevertheless justified. The General Court was fully entitled to hold that the RAC had failed to take into account all the relevant factors for the purposes of assessing the scientific study in question.

The annulment of the TiO_2 classification means that there is from now on no longer a legal requirement to classify and label certain powder forms of TiO_2 as suspected carcinogens.

Existing and upcoming classification of Silica-species

ECHA's Risk Assessment Committee (RAC) has concluded in March that so-called SAS (synthetic, amorphous silica, EC 231-545-4) used in a wide range of applications warrants harmonised classification for category 1 specific target organ toxicity, with repeated dose (STOT RE 1, H372, inhalation). The CLH report recommended furthermore that the classification should be unlimited regarding particle size. In contrast, the titanium dioxide classification is limited to forms containing 1% or more particles with an aerodynamic diameter of 10 micrometres or less. The RAC conclusion has not yet been fully published, deadline is November 5th, 2025. The proposed STOT RE 1 classification is based primarily on multiple studies in rats showing inflammation and adverse effects in the respiratory organs following inhalation. In a next step the classification would be discussed in CARACAL in 2026 for inclusion in ATP followed by a transition period of 18 months.

The public consultation on the proposed classification attracted 71 comments from 42 organisations, the majority from companies and trade associations. One of the key arguments was that the observed toxicity is not intrinsic to SAS, as required by CLP, because it arises from physical properties, rather than chemical ones, and would apply for many other solid substances in particle form. Furthermore, most of the SAS forms placed on the market would not be respirable. And a third point they made was that rats are more sensitive to particles than humans, meaning the observed toxicity would not be relevant to humans.

With regard to the use as a raw material in printing inks a classification as STOT RE 1 would lead to a listing in Group B of the EuPIA Exclusion Policy and SAS must therefore be avoided in the formulation. If, after technical investigation, it is found not to be possible to replace a raw material in the short term for a specific application, a temporary exemption from substitution can be granted if the individual member company conducts a risk assessment and is able to demonstrate safe use. SAS is also approved as a food additive in the EU and has the identification number E551. The substance functions as an anti-caking agent. The European Food Safety Authority (EFSA) concluded in 2024 that SAS does not raise a safety concern in any population group, including infants of under 16 weeks.

Pyrogenic, surface treated SAS (HMDZ-SAS, EC 272-697-1) is considered causing adverse effects after repeated inhalation and was classified as STOT RE 2 which was adopted within the 18th ATP in February 2022. The Lead registrant however filed an appeal for annulment in July 2022 at the European Court of Justice. The action for annulment has however been dismissed by the Court whereupon the Lead Registrant lodged objection. For the time being the classification is still in place. An additional harmonised classification for acute tox. 2 (inhalation) was also discussed and not pursued by RAC because the Lead registrant was able to show that the animals died because of suffocation and not because of the intrinsic toxicity of the chemical.

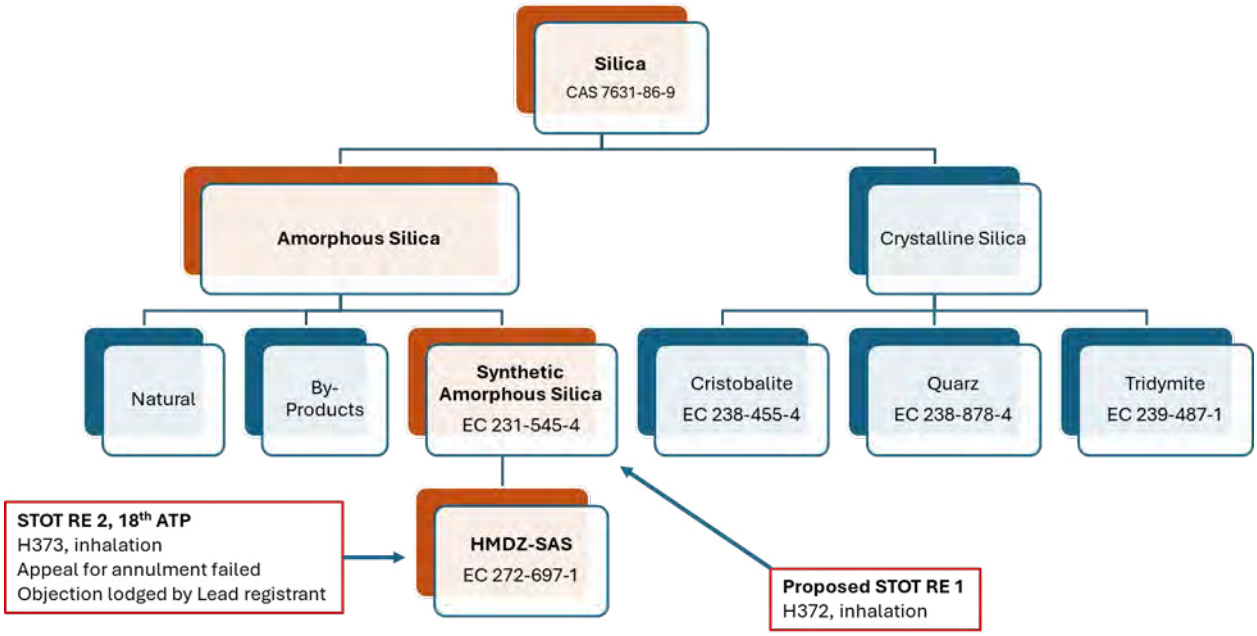


Image from ASASP downstream user webinar

RAC Mandate on occupational exposure limits for Poorly soluble, low toxicity particles

A call for evidence on Poorly soluble, low toxicity substances (PSLT) related to the scientific evaluation of exposure limits at the workplace has started on June 26th with deadline for providing input until September 29th 2025. Calls for evidence allow parties to signal their interest and express their views and concerns in the early phases of developing a scientific report on occupational exposure limits (OELs) on a substance or chemical agent at the workplace. A call for evidence is additional to and does not take the place of the consultation on ECHA's OEL scientific report developed to support the derivation of OELs at the workplace.

ECHA has been tasked by the European Commission (COM) to prepare a scoping study aimed at grouping PSLTs for hazard identification and clarifying the definition of the term PSLT. The findings of this scoping study may be used to support further regulatory initiatives on occupational exposure limit values for the protection of workers from chemical risks. This call intends to collect any new and existing scientific information on PSLTs, including already existing definitions for insoluble, granular materials, identification of representative substances, approaches for occupational exposure limits, exposure, health effects, toxicology, epidemiology and modes of action, as well as any other relevant information. The information gathered will be considered in the evaluation when preparing the scoping study report. Target group for contribution are Industry, Academia, MSCAs, NGOs, Trade associations and other stakeholders.

The Cefic Particle Platform as well as Eurocolour are already in progress to provide scientific input as an OEL would have far-reaching impact on manufacturing and downstream uses of organic and inorganic pigments, fillers and various natural, insoluble minerals.

European Commission`s Chemicals Simplification Omnibus

The European Commission (COM) has unveiled plans to reverse recently introduced labelling requirements for hazardous chemicals – rules it now deems overly burdensome – as part of a regulatory simplification package designed to bolster its industry amid intense global competition. The 'chemicals simplification omnibus', announced July 8th alongside an action plan for the sector, seeks to balance competitiveness with the EU's green transition goals.

The CLP proposals seek to roll back additional mandatory requirements for hazard label formatting, including minimum font sizes and line spacing to improve readability, that were laid down in a 2024 revision of the regulation. These were deemed "particularly burdensome and costly" for businesses, the executive said. Other proposed changes include:

- simplifying and clarifying rules on derogations from labelling requirements for small packages, especially containers under 10ml, and those containing less hazardous substances or mixtures;
- removing a six-month deadline for updating the label, and maintaining the more flexible requirement to ensure the label is updated without undue delay; and
- broadening the use of digital labelling, to allow more information to be provided on the digital label only.

The omnibus proposals will be subject to the ordinary EU legislative procedure, although the Commission did not specify the timeline. The first presentation in the Council's simplification group was on 11 July. A Commission spokesperson said the executive could not indicate whether further simplification packages were planned for other chemicals legislation.

REACH restriction on intentionally added microplastics – upcoming reporting requirements

On 27 September 2023, the EU Commission adopted Regulation (EU) 2023/2055 which prohibits the sale of microplastics as such, and of products to which microplastics have been added intentionally and that release those microplastics when used. This ban is subject to a phased implementation timeline per category of products, depending on the impact of the environment, the necessity of use in products and the lack of alternatives for industries.

The REACH microplastics restriction also establishes new information and reporting requirements for manufacturers, suppliers and industrial downstream users of microplastics and products containing them. For example, as of 17 October 2025, suppliers of microplastics (e.g. masterbatches) for use at industrial sites will have to provide use and disposal instructions to professional users and the public (consumers), detailing how to prevent microplastics from being released into the environment. The information "shall be provided in the form of clearly visible, legible and indelible text or, […], in the form of pictograms. The text or pictograms shall be placed on the label, the packaging, or the package leaflet of the products […] or, […] on the safety data sheet." Moreover, manufacturers and industrial downstream users of microplastics in the form of pellets, flakes and powders used as feedstock in plastic manufacturing at industrial sites will be required to comply with new annual reporting obligations, from May 2026 onwards. The requested information has to be submitted to ECHA by 31 May of each year.

EUPIA informed their members in a letter, that printing inks and varnishes are exempted from the sales ban (according to paragraph 4(a) of the Regulation) as they are exclusively used at industrial sites. They are, however, not exempted from reporting.

Safe, Sustainable, and Vibrant - Unlock the Potential of Printing Direct Food Contact (DFC)

SunVisto AquaSafe Waterbased Ink for film, paper & board is a commitment to safety, sustainability, and superior quality.

Environmental consciousness and health safety are paramount. SunVisto AquaSafe helps brand owners and print converters reduce or eliminate single-use plastic packaging and plastic in fibre-based packaging, while maintaining safety and visual appeal.

Food safe ingredients: Sun Chemical has carried out an extensive regulatory review and risk assessment to ensure that all components of SunVisto AquaSafe, including special pigments, are carefully selected for their suitability for direct food contact and safe migration levels, and meet all relevant EU standards.

Learn more about SunVisto AquaGreen and SunVisto Inks at sunchemical.com/packaging_product_sunvisto/

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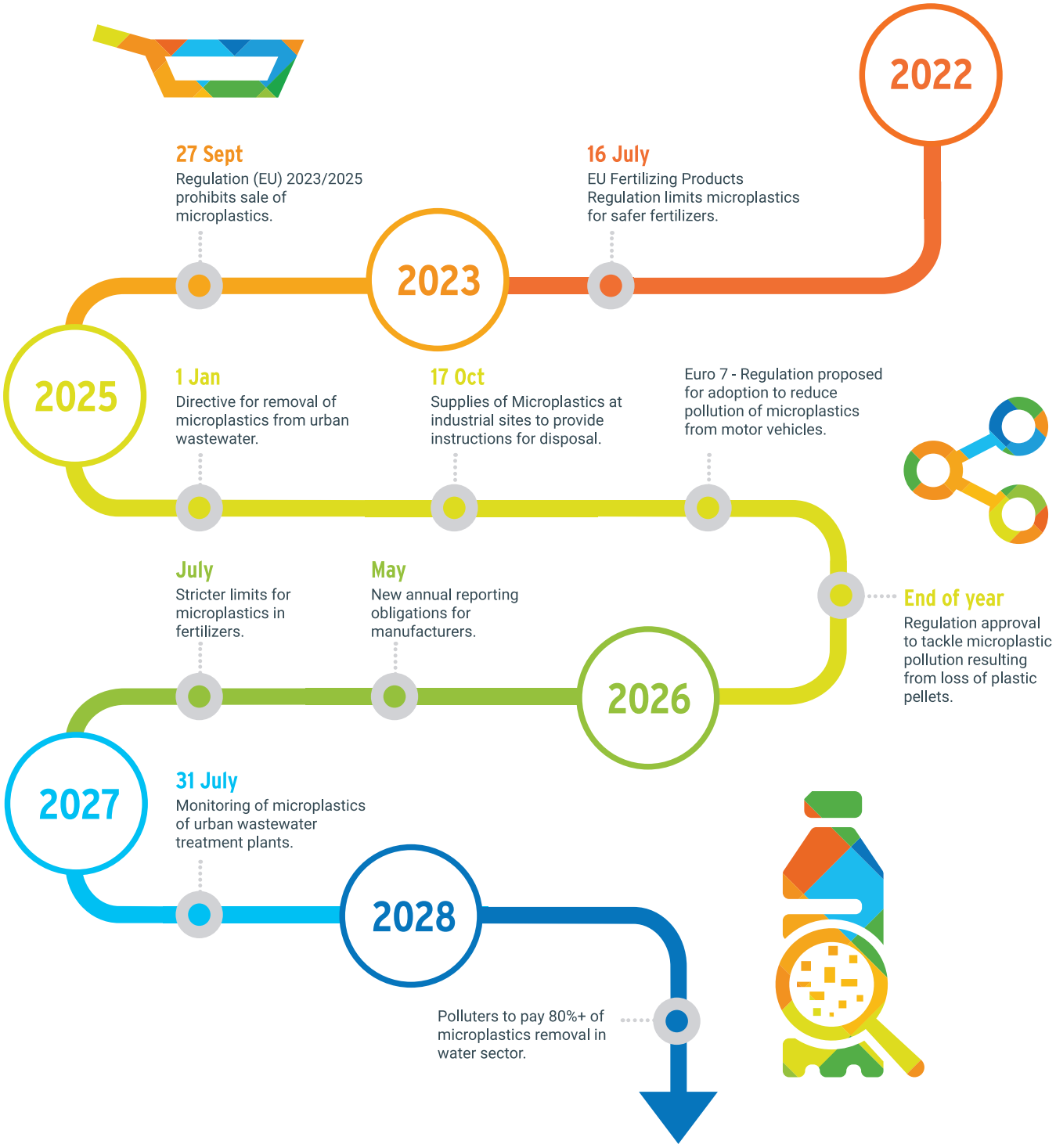

Main sources of unintentional microplastics release to the EU environment. Infographic, <https://www.enhesa.com/resources/article/microplastics-restrictions-in-the-eu/>.

Global Regulations – Upcoming Changes

Washington State Safer Products

On May this year the Washington State Department of Ecology (DoE) released their Safer Products for Washington Cycle 2 Phase 2 report. DoE has been reviewing inadvertently added Polychlorinated Biphenyls (iPCB) contained in certain chlorine containing pigments used in printing inks. The Departments concern is that when printed materials are recycled or disposed, PCBs could contaminate wastewater and may reach the environment. In this phase 2 report DoE has indicated that they will continue to investigate whether non-iPCB containing pigments and inks are "feasible and available".

The National Association of Printing Ink Manufacturers (NAPIM) has previously indicated that the initial work that DoE conducted on this topic was inadequate and they assured to stay tuned to this topic.

Proposed packing material bill New York State

Companies that place packaging, such as PET, metal, paper etc., on the market could be required to participate in a packaging reduction organization if the New York State Legislature's proposed Bill S1464/A1749 (Bill) is signed into law. If the bill is adopted, companies would be required to register and participate in a packaging reduction and recycling organization which would require producers to follow a packaging reduction and recycling plan and meet packaging reduction goals. The proposed bill would also prohibit packaging materials containing certain substances, such as bisphenols, heavy metals or PFAS, from being placed on the market. Intentionally added substances would be prohibited 3 years after promulgation and non-intentionally added substances after 5 years while no levels are defined so far.

The proposed Bill would require producers to comply at the eventual implementation date of the program and no more than 3 years after the program implementation to stop selling, offering for sale or distribute into the state a product contained, protected, delivered, presented, or distributed in packaging unless the producer is registered with an organization and in full compliance with all requirements in the Bill. The Bill would also require the producer to provide the organization with contact information and a comprehensive list of the categories and brands as well as the total amount, in units and weight, of each category of packaging material sold, offered for sale, or distributed for sale into the state by the producer in the prior calendar year.

Exemptions are foreseen for producers that realize less than 5 million US Dollar per year or distribute less than 2 tons packaging material per year.

Push for TSCA framework revision

Republican members of Congress have told US EPA Administrator Lee Zeldin that the agency should make "crucial" changes to the TSCA risk evaluation 'framework' rule to ensure it uses the 'best available science' in assessing chemical risks. The 10 June letter, co-signed by 21 Republicans in the House of Representatives, follows an EPA announcement in March that it plans to reopen the 2024 risk evaluation procedural rule, which locked in place several Biden-era policies for conducting reviews of high-priority existing chemicals.
The EPA already indicated in recent court filings that it plans to revisit the rule's requirements to make risk determinations on a 'whole-chemical' basis and not to presume the use of personal protective equipment (PPE).

In addition, they urged the EPA to also consider several other areas, many of which industry groups have similarly flagged in the past, including:

- amending the scoping process to focus on uses with the highest potential for risk and to "de-prioritise uses with negligible exposures";
- expanding the collaboration between federal agencies during TSCA risk evaluations, taking into account existing workplace protections from the Occupational Safety and Health Administration (OSHA) and understanding critical uses by the Department of Defense (DOD) and the National Aeronautics and Space Administration (NASA);
- changing evaluation requirements to avoid "overly conservative values from the Integrated Risk Information System" (IRIS), echoing long-held industry and Republican criticism of the EPA's non-regulatory risk assessment programme;
- improving definitions of terms like 'best available science', 'weight of scientific evidence', 'conditions of use' and 'potentially exposed or susceptible subpopulations'; and
- ensuring "appropriate expertise and process" in peer reviews, citing concerns about past scientific reviews they said have been "inconsistent and, in some cases, poorly managed".

The EPA has not yet set out a specific timeline for revisiting the 'framework' rule, but told the US Court of Appeals for the DC Circuit in March it expects the process to take between 9 and 14 months.

Australia delays proposed packaging EPR fees to 'refine' model

The Australian Packaging Covenant Organisation (APCO) will not introduce the extended producer responsibility (EPR) fee model in fiscal year 2027 after receiving industry feedback calling for more time to prepare, more regulatory clarity and a 'proportionate' fee model. Despite overall support for a national EPR scheme in Australia, responses expressed the need for more details on how fees would be used and the oversight mechanisms. Consequently, the organisation's proposed model of 'base fee' plus 'EPR fee' will not be activated next year as initially proposed, APCO said on 6 June, and fees for fiscal year 2027 will continue to be charged using the current turnover-based method.

The organization said it will work with industry and government to refine the model and ensure it is fair, practical and well-designed for future implementation. It will share a full consultation summary and more information on the next steps in the coming months.

Proposal for removable labels in Brazil

In the future, companies manufacturing, importing, or placing thermoformed packaging (not defined) in the market could be required to ensure that their adhesive labels can be easily and completely removed during recycling, either mechanically or by washing with water. These companies would have 6 months from the publication date to adapt their manufacturing and packaging processes, eliminate non-compliant stocks, and ensure all new product packaging complies with this requirement. This would follow from the adoption of Law Proposal 499/2025, although there is no information on whether or when the proposal would be adopted

Malaysia's import requirements for POPs

Malaysia's Department of Environment (DOE) has announced that companies must obtain 'annual certification' when importing persistent organic pollutants (POPs). The move is aimed to align with the requirements of the Stockholm Convention and international best practices to ensure the safety and responsible management of POPs.

Importers must provide the following information in their applications:

- details about the chemical and its intended use, including SDSs;
- handling, storage, transportation and disposal methods of the chemical;
- monitoring mechanisms; and
- measures to ensure the safety of workers and to promote public awareness, where appropriate.

Upon approval, the DOE will issue the certificate to the importer who must then forward it with other relevant documents to the exporter. The exporter must then submit the certificate to their government agency within 60 days prior to exporting to Malaysia.

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