## Legislation – Food Packaging – EU - Printed FCM measure

The European Commission has announced that it plans to introduce a harmonised Union measure on printed food contact materials. This follows **notification** of the proposed German Ordinance on printing inks and pressure coming from the **European Parliament** for more food contact materials to be included in harmonised EU legislation.

Although the plans were to introduce the Union measure in 2018, little progress appears to have been made since. The Commission has decided to give priority to an **evaluation of the existing EU food contact materials legislation** to address what it considers to be potential inefficiencies in the present regulatory model (e.g. functioning of positive lists, information in the supply chain, and enforcement issue relating to legal certainty, lack of resources and missing analytical methods). Work on the printed food contact materials measure is not expected until after completion of this work.

Meanwhile, the Packaging Ink Joint Industry Task Force (PIJITF) has been very active, producing a **proposal for the regulation of printed food contact materials**, supported by the supply chain, which addresses the potential inefficiencies identified by the Commission. Whilst industry pushes for progress on the printed FCM measure, and continues to promote and discuss it with Member States, the ball is very much with the Commission, for whom this appears to be less of a priority.

This is particularly relevant since the Germany suspended work on its draft printing inks ordinance, following the announcement that the Commission would bring in an EU harmonised measure. The longer the Commission delays, the greater the fear that Germany will recommence work on the national measure. Fortunately, Germany would still have to address the adverse comments submitted by other Member States during the consultation phase to bring a revised proposal, and the Commission has indicated that it will maintain contact to learn about how the national measure is intended to be progressed, with the aim to limit the impact on the internal market.

In anticipation of the German Printing Ink Ordinance and with increased emphasis on direct food contact applications, EuPIA released a new, updated version of its **Good Manufacturing Practice (GMP) document**. This latest edition of the GMP guide has been fully updated and expanded to cover the manufacture of all varnishes, coatings and inks intended to be printed onto food contact materials (FCM), including all non-food contact and food contact surfaces of packaging and containers. The 47-page document includes references to EU regulations and opinions of the European Food Safety Authority (EFSA), as well as national regulations such as the Swiss Ordinance on printing inks for food packaging. It also provides a comprehensive reference document which clearly outlines all steps required to ensure compliance in relation to food packaging and safeguard against potential hazards.

The information contained herein is based on data believed to be up-to-date and correct at the time writing. It is provided to our customers in order that they are able to comply with all applicable health and safety laws, regulations, and orders. In particular, customers are under an obligation to carry out a risk assessment under relevant Good Manufacturing Practices (GMP) in line with legislation and as a result take adequate measures to protect consumers.