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## **Conformity of HP Indigo ElectroInk with European Food Legislation**

### **Inks: Cyan, Magenta, Yellow, Black, Orange, Violet FP, Green, Premium White Standard White, Silver and Invisible Yellow for use with HP Indigo Digital Presses WS6000 Series**

#### **Introduction**

The HP Indigo Digital Presses WS6000 series can be used for printing labels and shrink sleeves, and primary and secondary flexible packaging, including surface (overprinted) and reverse (“sandwich”) printing. However, customers must determine that for their specific applications and conditions of use regulatory compliance is met, including any relevant migration limits.

#### **1) European Union (EU) food legislation**

HP Indigo ElectroInk for use with HP Indigo Digital Presses WS6000 series, printed on the non-food-contact side of certain polymeric food packaging, is in compliance with Article 3 of the EU Framework Regulation Nr. 1935/2004 for food contact materials.

The following food-contact layers were selected for testing on the basis of their wide-spread use:

- (1) Low-density polyethylene (LDPE) 40 microns thick;
- (2) Polypropylene 20 microns thick; and
- (3) Polyester 12 microns thick.

The testing that was conducted took both migration from the package and invisible set-off into consideration.

The thicknesses and materials tested are indicative and representative only, and additional film thicknesses and materials may also be suitable subject to appropriate testing or other suitable means of risk assessment.

The resulting packages may be used to hold all types of food for long term storage at room temperature and below including heating up to 70°C for up to two hours or heating up to 100°C for up to 15 minutes. This includes microwave reheating as well.

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When printing on folding cartons or paperboards, as good practice it is advisable to have a polymeric layer or other layers between the paperboard inner surface and the food, as recommended by government agencies such as the German Federal Institute for Risk Assessment (BfR).

Based upon the formulation of the inks, the intended conditions of use, the results of evaluation at an accredited European laboratory, advice and opinion of our independent consultants and advisors, and to the best of our knowledge, we are pleased to confirm that the various inks described above may be used as intended. Such use may properly be described as complying fully with the applicable provisions of European food legislation.

Please note that this document supports the EU Plastics Implementation Measure ('PIM' Regulation 10/2011) migration testing conditions which became effective as of 1/1/2016.

## 2) EU Regulation 2023/2006

HP Indigo ElectroInk is manufactured in accordance with the Good Manufacturing Practice (GMP) Regulation 2023/2006 for materials and articles intended to come into contact with food.

## 3) EuPIA Guidelines

HP Indigo ElectroInk complies with the Inventory List of the European Printing Inks Association (EuPIA) Guidelines on Printing Inks applied to the non-food contact surface of food packaging materials and articles, December 2013 version. Furthermore, HP Indigo ElectroInk does not contain any chemical substances as described in the EuPIA Exclusion List for printing inks and related products, 3<sup>rd</sup> edition from November 2016.

## 4) Swiss Ordinance RS 817.023.21

All HP Indigo ElectroInk ingredients are included on the Positive List (Parts A & B) of the Swiss Ordinance on Materials and Articles in Contact with Food (RS 817.023.21) (Swiss "Bedarfsgegenständeverordnung") articles 33ff.

The Ordinance provides: "Printing inks may only be manufactured from the substances listed in Annexes 2 and 10 in compliance with the preconditions set forth therein."

For evaluated substances (Part A) without a numerical SML value, the value of the global migration of 60 mg/kg is considered as the limit value. HP Indigo ElectroInk ingredients included in Part A are in compliance with the specific migration limits.



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For the petroleum hydrocarbon with CAS No. 90622-58-5, a dossier to move this material from Part B to Part A has been submitted and received by the Swiss Federal Department of Home Affairs FDHA. Pending review and acceptance of the dossier, the proposed Specific Migration Limit (SML) of 5 ppm can be used *ad interim*.

### Disclaimer and Additional Information

HP Indigo is not responsible for materials and processes that are beyond its control. In all cases, HP Indigo recommends that its customers perform their own risk assessment and regulatory compliance determination of their product. A proper risk assessment will include considering both migration from the package and any invisible set-off that might occur. HP Indigo can supply information to customers to allow them to perform the necessary risk assessment to determine regulatory compliance.

Additional information can be obtained from the HP Indigo for Food Packaging Printing Regulatory Overview and from HP Indigo representatives.

Very truly yours,

A handwritten signature in cursive script that reads "Becky B."

Becky Bossidan  
Senior Regulatory Scientist  
HP Indigo Ltd.  
Israel