

Marabu GmbH & Co. KG · Postfach 1152 · D-71730 Tamm

Your reference	Our reference, email	Phone	Fax	Date
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TPX – printing on food contact materials

To whom it may concern,

Our ink series TPX (basic shades = shades according technical data sheet), is primarily designed for printing onto food contact materials. Therefore, the TPX fulfills specific requirements for printing on food contact materials, and can be used for compliant food contact materials if used under the recommended conditions.

This applies to the ink series TPX and the recommended auxiliaries (G - TPV, G - TPV 2, G - TPV 8, G - GLV, G - H 2, G - UR 5) according to the TechInfo and manufactured and filled in Tamm from week 18/2023, this means from week code 318.

A migration test, to confirm our EuPIA GMP process and our recommendation of the TPX, have been carried out for the following application:

Baby bottle (PP >1mm)
Drying 2h 50°C + 7 days RT
Repeated use (3 x 24 h / 40°C)
Simulants B and D1

The TPX passed the migration test, which means no migration of the known/intentionally added substances above the individual SML or the 10 ppb limit. The result is, of course, only valid for the test conditions under which we have conducted the migration test (see above and TechInfo). But as the application and the test conditions have been selected to represent the worst-case scenario, our tested parameters should cover a wide range of real-life examples and parameters.

Outside of this analysis the testing for compliance with all legal requirements must be done by a migration test of the final food contact material. Marabu cannot take over any liability thereof.

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York Boeder (Vors.)

Handelsregister: Amtsgericht Stuttgart, HRA 300662
Marabu Beteiligungs-GmbH, 71732 Tamm: Amtsgericht Stuttgart, HRB 30031

Framework Regulation (EC) 1935/2004

This regulation is applicable for articles intended to come into contact with foodstuff. Although printing inks are not covered by the scope of this regulation; in order to assist our customers to comply with their obligations under this regulation, we provide you with the applicable information.

Regulation (EC) No 2023/2006 (GMP)

Marabu GmbH & Co.KG is accredited to ISO 9001. Therefore, Marabu has established a quality assurance system and a quality control system which is in compliance with the requirements of regulation (EC) No 2023/2006 in the food packaging supply chain. Additional to this, Marabu is in compliance with the requirements for indirect food contact of the "EuPIA-GMP".

Regulation (EU) No. 10/2011 (and amendments)

This regulation, related to plastic materials and articles intended to come into contact with foodstuffs, consisting exclusively of plastics, contains positive lists of monomers and additives allowed to be used in manufacturing such materials and articles. According to article 5, these lists do not include substances used only in the manufacturing of printing inks – and for this reason, printing inks are not under the scope of this regulation.

However, if a printing ink, used for printing on a food contact material, contains substances included in the positive lists, the restrictions set for these substances (in the directive) e.g. specific migration limits or maximum allowable residual content, must be complied with. Corresponding information is available for an appointed testing laboratory after signing a confidentiality agreement.

That the ink series TPX can fulfill the applicable migrations limits has been shown by our migration test, see first page.

But the final compliance of the printed product of course has to be checked by the manufacturer of the final printed food contact material.

Directive 94/62/EC:

We herewith confirm that we do not use any cadmium or cadmium compounds, chrome VI compounds, lead or lead compounds or mercury or mercury compounds in manufacturing of our ink series TPX, nor any raw materials containing these substances, according to their chemical constitution. Therefore, the ink series TPX complies with the requirement of directive 94/62/EC not to exceed a total limit value of 100 ppm for these four heavy metals.

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Swiss Ordinance SR817.023.21 on Materials and Articles in Contact with Food:

We hereby confirm that all the ingredients used in the our ink series TPX are listed in the latest version of the "Verordnung des EDI über Bedarfsgegenstände, SR 817.023.21", or excluded from listing.

Dual additives (Regulations (EC) No 1333/2008 and 1334/2008):

Our ink series TPX can contain, depending on the shade, the following dual-use additives:

Regulation (EC) No 1333/2008 - Annex II

Substance	E-Number
Titanium dioxide	E 171
Aluminium	E 173
Sorbitan oleate	E 494
Silicon dioxide	E 551
Bentonite	E 558
Aluminium silicate	E 559
Dimethyl polysiloxane	E 900

Regulation (EC) No 1334/2008 - Substances listed in Annex I

FL No.	Chemical Name	CAS	JECFA-No	CoE-No
02.079	Propan-2-ol	67-63-0	277	
09.004	Butyl acetate	123-86-4	127	194
09.647	Methyl methacrylate	80-62-6	1834	

EuPIA "Good Manufacturing Practices for the Production of Packaging Inks formulated for use on the non-food contact surfaces of food packaging and articles intended to come into contact with food":

We hereby confirm that our ink series TPX, manufactured by Marabu GmbH & Co.KG in Tamm (Germany), is produced in accordance with the requirements for indirect food contact of the "EuPIA-GMP".

Council of Europe Resolution AP (89)1 re. Colorants in plastic materials coming into contact with food:

All pigments used in manufacturing of our products the our ink series TPX are in compliance with the requirements of AP (89).

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"EuPIA Suitability List of photoinitiator for Low Migration UV inks and varnishes":

As our ink series TPX is a solvent based ink, there are no photoinitiators contained. Therefore this requirement is not applicable for the TPX.

Nestlé Standard "Printing Inks for Food Packaging":

We hereby confirm that in the manufacture of our ink series TPX, no substances are used as intentionally added ingredient which are prohibited in their use or the use should be minimized according to the latest Version.

Kind regards,

i.A.
Dirk Friedrich
Senior Manager
Product Safety

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