



CANADIAN PRINTING INK MANUFACTURERS ASSOCIATION

STATEMENT ON PACKAGING INKS AND FOOD SAFETY

MANAGEMENT PROGRAMS

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Food packagers, whether federally regulated or not, must ensure that the safety and integrity of their products meet consistently high standards. There are many industry initiated food safety management programs available to food packagers. In addition, federally regulated meat and poultry packagers must conform to CFIA regulations and HACCP (Hazard Analysis Critical Control Point) criteria.

Each management program has a section on packaging, some also have different levels of compliance. In general the programs include:

- a) *Specifications for all packaging materials that impact on finished product safety shall be provided and comply with the relevant legislation.*
- b) *The functionality of packaging materials shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose and suitable for use. Validation shall include: Certificates of conformance for all packaging in direct contact with food; and Tests and analyses to confirm the absence of potential chemical migration from the packaging to the food contents.*
- c) *A register of packaging specifications and label approvals shall be maintained and kept current.*

Most general purpose packaging inks can be used to print the exterior of food packaging if a suitable impermeable barrier is present to prevent any migration of ink components to the food from the printed material.

Low migration inks may be used for printing the outside surface of primary packaging. It is the converter's responsibility to select the appropriate substrate and ensure the ink film is dry and no marking or set-off occurs during nesting and stacking operations. Under the Food Safety Management Programs the food packager must conduct migration tests on the specific package to confirm that migration levels are acceptable. Migration levels are dependent on the package substrate, foodstuff and the food processing conditions.

Division 23 of the Canadian Food and Drugs Act and Regulations Section B.23.0001 prohibits the sale of food in packages that may impart harmful substances to their contents. This regulation puts the onus clearly on the food seller (manufacturer, distributor, etc.) to ensure that any packaging material that is used in the sale of food products will meet that requirement." (<http://www.hc-sc.gc.ca/fn-an/secure/packag-emball/index-eng.php>).

There is no North American government agency that approves printing ink. The U.S. FDA approves individual chemicals for food use in the United States. The Canadian Food Inspection Agency (CFIA) and Health Canada Food Directorate examine the complete package to determine if chemicals will migrate from the ink, coating, substrate and glue to the food in amounts that may exceed government

maximum acceptable levels. The amount of migration depends on the food type, processing and storage conditions.



Ink manufacturers do not manufacture inks to be food ingredients, therefore ink manufacturers cannot be certified under any food industry programs. Ink manufacturers will assist printers in their packaging submissions by providing ink component information directly to CFIA or Health Canada upon receipt of the agency's Project Reference Number.

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CANADIAN GOVERNMENT WEBSITES

CFIA > Packaging Materials

<http://www.inspection.gc.ca/english/fssa/reference/refere.shtml>

Health Canada > Food Packaging

<http://www.hc-sc.gc.ca/fn-an/securit/packag-emball/index-eng.php>