

Customer Information Note: Raw Materials for UV inks under the EuPIA Exclusion Policy

In its press release “Potential short supply of photoinitiators used in printing inks” of 4th May 2018, EuPIA describes the current situation with the supply of photoinitiators which continues to remain critical.

Recently, and obviously in connection with the third REACH registration deadline on 31st May 2018, a number of key raw materials used in UV inks have undergone re-classification such that they now fall under the criteria of the EuPIA Exclusion Policy.

In accordance with this Policy, EuPIA members are committed to make every effort to substitute such materials with less hazardous ones. Under normal circumstances, the Exclusion Policy regards a time frame of six months as appropriate.

EuPIA members know which alternative raw materials to use in the re-formulation of their UV inks. However, for the reasons outlined in the press release mentioned above, the alternative materials are currently not available in quantities that would satisfy the entire market demand for UV inks.

Therefore, in order not to stop supplies of UV inks, EuPIA members are forced in certain cases to continue to use materials that now fall under the criteria of the Exclusion Policy, until such time as the supply situation for alternative raw materials relaxes.

As the tense supply situation is expected to persist for a longer period of time, it is foreseeable that EuPIA members will not be able to have their UV ink portfolio completely re-formulated within the timeframe of six months normally regarded as appropriate. In such cases, the Exclusion Policy temporarily allows for a continued use provided that safe use can be demonstrated by adequate risk assessment.

Affected UV inks will be re-classified and re-labelled according to the CLP Regulation, irrespective of the final timing of re-formulation.

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