

July 2022

Ban of mineral oils in printed products intended for the French market

In 2020, France published Decree No. 2020-105 on the 'Fight Against Waste and the Circular Economy'.¹ Article 112 to this law regulates the use of mineral oils on packaging and free advertising. The article prohibits mineral oil containing substances that interfere with waste recycling.

The decree with criteria for printing ink was issued in January and subsequently amended in May 2022.² following comments during the TRIS notification period. The result is a longer implementation time than initially proposed and clarification on definitions.

The requirements apply to all packaging and unsolicited flyers and catalogue letters from January 1st, 2023, and then for all printed products after January 1st 2025 intended for the French market.

Mineral Oil Substance	Requirement	Effective Date
MOH containing MOAH consisting of 1 to 7 Aromatic Rings	<1% in Inks	January 1 st 2023
	<0.1% and <1 ppm MOAH compounds containing 3 to 7 aromatic rings	January 1 st 2025
MOSH consisting of 16-35 carbon atoms	< 0.1%	January 1 st 2025

MOH = Mineral Oil Hydrocarbons

MOAH = Mineral Oil Aromatic Hydrocarbons consisting of 1 to 7 aromatic cycles

MOSH = Mineral Oil Saturated Hydrocarbons consisting of 16 to 35 carbon atoms

If any of the limits are reached, the inks are not compliant and must not be used.

The compliance status of our ink series are as follows:

HEATSET

SunFashion BE and **SunOne BE** inks are compliant to the limits which will apply from January 1st 2023.

The inks are not compliant to the limits which will apply from January 1st 2025. Until then significant changes in raw material sourcing and production processes will be needed to meet the criteria.

REGULATORY AFFAIRS AND PRODUCT STEWARDSHIP DEPARTMENT

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COLDSET

Newspapers and books are not in the scope of the law until January 1st 2025. If products within the scope of the law are coldset printed, then only mineral oil free **SunNews V** inks can be used. The formulations of **SunNews V** inks are already compliant to the limit which will apply from January 1st 2025.

COLDSET Waterless

Newspapers and books are not in the scope of the law until January 1st 2025. **SunNews AF WP** inks are already compliant to the limits which will apply from January 1st 2023. Therefore, products within the scope of the law can be printed with this ink set.

The inks are not compliant to the limits which will apply from January 1st 2025. Until then significant changes in raw material sourcing and production processes will be needed to meet the criteria.

PUBLICATION GRAVURE

The French authorities consider toluene as a MOAH with one ring, because it is derived from petroleum feedstocks. Therefore, inks containing more than 1% of toluene are not compliant to the criteria which will apply from January 1st 2023.

Lab evaluations on alternative solvents and discussions with the French authorities about potential derogations due to the low toluene content in the final product and the toluene recycling process are ongoing.

1. <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000041553759/>
2. <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000045733481>