

# Embracing the Future of Food Contact Materials



# A Commitment to Clarity and Safety



iGM Resins' commitment to forward-thinking solutions is integral to our DNA. At iGM Resins, we are embracing the upcoming changes in Food Contact Material (FCM) legislation. We view regulations like the German Printing Ink Ordinance (GIO)\* as critical steps that will bring more clarity, lead to a safer industry, and ultimately ensure a safer society for consumers.

We are ready to support our partners in the Printing and Packaging industries as they navigate the implementation of the German Printing Ink Ordinance.

# Our Recommendations and Compliance Support

iGM Resins is providing comprehensive support to customers in Printing and Packaging to perform better Risk Assessments on our Photoinitiators.

This commitment to safety extends even to our materials that are not explicitly positive listed under the new German legislation or the existing Swiss Ordinance\*\*.

This dedicated support aligns with the highest industry standards for raw material documentation, as explained in the new technical guide on documentation supporting Compliance and Safety of Food Contact Materials and articles\*\*\*.



This guide, which helps business operators produce FCMs in accordance with the Council of Europe principles, underscores the necessity of deep material knowledge.













### **iGM's Product Recommendation**

Product	CAS Number	German Ink Ordinance	EuPIA Suitability List (table)	Swiss Ordinance 817.023.21	CMR	NIAS data
Omnicat 270	953084-13-4	Positive listed	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	N	Q2 26
Omnirad 819	162881-26-7	Recommended	Y SML 3.3 mg/kg	Y SML 3.3 mg/kg	N	Ready available
Omnipol 910	886463-10-1	Recommended	Y >1000 g/mol	N	N	Ready available
Omnipol BP	515136-48-8	Recommended	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	N	Ready available
Omnipol TX	813452-37-8	Recommended	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	N	Ready available
Esacure 1001M	272460-97-6	Recommended	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	N	Ready available
Esacure KIP 160	71868-15-0	Recommended	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	N	Ready available
Omnirad 127 (D)	474510-57-1	Recommended	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	N	Ready available
Omnirad 2959	106797-53-9	Recommended	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	N	Ready available
Omnipol TP	1834525-17-5	Recommended	N SML 0.01 mg/kg, >1000 g/mol	N SML 0.01 mg/kg	N	Ready available
Omnipol 2702	1246194-73-9	Recommended	N SML 0.01 mg/kg	N SML 0.01 mg/kg	N	Ready available
Esacure 3644	Proprietary	Recommended	N SML 0.01 mg/kg	N SML 0.01 mg/kg	N	Q1 26
Omnirad 754	Multiconstuents containing 211510-16-6 & 442536-99-4	Recommended	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	N	Ready available
Esacure A198	925246-00-0	Positive listed	Y SML 0.05 mg/kg	Y SML 0.05 mg/kg	Ν	Q1 26
Omnipol ASA	71512-90-8	Recommended	N SML 0.01 mg/kg	N SML 0.01 mg/kg	Ν	Ready available

All GIO recommended products have a default SML of 0.01 mg/kg. EuPIA suitability list and Swiss Ordinance listing are supported by either positive listing, molecular weight, evaluated Tox assessment, or other available tox data and being free of CMR classification.

Demonstrating regulatory compliance is crucial. For our Photoinitiators, we offer supporting

documents necessary to perform thorough Risk Assessments, which are available to our customers. These documents cover details that go beyond what can be found on standard Safety Data Sheets (SDS) or Product Data Sheets (PDS), including information on substances, impurities, and potential reaction products. Access to this highly sensitive data is provided under a Non-Disclosure Agreement (NDA).

# Driving Compliance: New Product Development and Data



iGM Resins is driving compliance forward by focusing our new product developments on the Food Contact Material (FCM) market. We are actively developing and validating a pipeline of specialty Photoinitiators to ensure GIO compliance.

We are pleased to confirm that we have already several products in the pipeline that we recommend for FCM applications, including Omnipol® BL 582, Omnipol® 612 and Esacure® 803, which are expected to be available at industrial scale beginning of next year. Regarding these

new offerings, iGM Resins will provide the same comprehensive supporting documents as our current portfolio in time, once the products are produced on an industrial scale on a regular basis. iGM Resins is focused on compliance, and we actively work to help our customers meet existing regulatory requirements.

Product	CAS Number	German Ink Ordinance	EuPIA Suitability List (table)	Ordinance 817.023.21	CMR	NIAS data
Omnipol BL 582	Proprietary	Recommended	N SML 0.01 mg/kg, >1000 g/mol	N SML 0.01 mg/kg	N	Q4 2025
Omnipol 612	Proprietary	Recommended	N SML 0.01 mg/kg, >1000 g/mol	N SML 0.01 mg/kg	N	Q2 2026
Omnirad 803	Proprietary	Recommended	N SML 0.01 mg/kg	N SML 0.01 mg/kg	Ν	Q1 2026

# Next Steps for Compliance and Support

To discuss your compliance needs, request a statement on GIO compliance, or initiate the process for obtaining the detailed supporting documents under NDA, please reach out to our team.

Our regulatory and commercial teams are ready to partner with you to ensure a smooth transition and continued success in the evolving food packaging landscape.

## Contact Us

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<sup>\* 21</sup>st Ordinance amending the German Consumer Goods Ordinance, otherwise known as the German Printing Ink Ordinance

<sup>\*\*</sup> Anhang 10 der Verordnung des EDI über Materialien und Gegenstände, die dazu bestimmt sind, mit Lebensmitteln in Berührung zu kommen

<sup>\*\*\*</sup> Resolution CM/Res(2020)9 on the safety and quality of materials and articles for contact with food