

FOOD CONTACT

BYK Regulatory Information

BYK-024

Summary

BYK-024 is suitable according to the following compositional provisions for food contact applications as indicated below:

Adhesives		
Europe	Regulation (EU) No. 10/2011	Yes - max. 0.5%
	German BfR XIV 'Polymer Dispersions'	Yes
USA	21 CFR 175.105 'Adhesives'	Yes - max. 0.44%
China	GB9685-2016, table A.5 'Adhesives'	No
Coatings		
Europe	Regulation (EU) No. 10/2011	Yes - max. 0.5%
USA	21 CFR 175.300 'Resinous and polymeric coatings'	Yes - max. 0.44%
China	GB9685-2016, table A.2 'Coatings'	No
Printing inks		
Europe	21 st Amendment to Consumer Goods Ordinance (GIO)	Yes - max. 0.5%
	Swiss Ordinance 817.023.21	
Industry	Nestlé Standard "Printing Inks for Food Packaging"	Yes
	EuPIA Charter	Yes

This summary only reflects conducted evaluations on existing regulations. It does not exclude compliant use in additional regions or applications.

Please refer to the explanation section below for detailed information on the regulations and assessment criteria considered.

Explanation

Adhesives

EUROPE

Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food

This product is authorized for use as an additive or as a polymer production aid.

Polymer production aids and/or aids to polymerization other than those included in the Union list are either listed in national legislation or subject to risk assessment in accordance with Article 19 of this Regulation.

The table below lists only substances that are used or known to be present and that are relevant for compliance with the specific migration limits (SML) and/or any restrictions set out in Annex I of Regulation (EU) No 10/2011 or in national legislation. For additional information on substance concentrations, please refer to the Safety Data Sheet (SDS), where applicable.

FCM No.	CAS-No.	Name	SML / SML(T) [mg/kg]	Restrictions / Specifications
315	128-37-0	2,6-di-tert-butyl-p-cresol	3	/

This product contains the following substance, which is also authorized for use as a food additive under Regulation (EC) No 1333/2008:

- 2,6-di-tert-butyl-p-cresol, E 321

Based on the current knowledge of the product composition, product specifications, and information provided by raw material suppliers, residues of substances listed in Annex II with restrictions and/or substances for which genotoxicity has not been ruled out are not known or expected to be present in concentration exceeding the specific migration limits established by this regulation. Testing is not routinely performed for substances that are neither identified nor reasonably expected to be present.

In accordance with our role as a manufacturer of substances, non-intentionally added substances (NIAS) which have become known to us are assessed in accordance with internationally recognized scientific principles of risk assessment to ensure compliance with the requirements of Article 3(1)(a) of Regulation (EC) No 1935/2004. The assessments are carried out under the assumption that this product is used in accordance with BYK's recommendations for food contact applications and/or under normal or foreseeable conditions of use, and considering the following parameters: 100% migration, 1kg food in contact with 6 dm² of packaging, substrate weight of 15 g/m².

German BfR XIV 'Polymer Dispersions'

This product may be used in accordance with BfR Recommendation XIV, as it is manufactured with substances authorized under Regulation (EU) No. 10/2011.

German BfR XXXVI 'Paper and board for food contact'

This product may be used as a sizing agent in accordance with BfR Recommendation XIV. Polymer Dispersions, and as a surface refining or coating agent subject to the requirements of Regulation (EU) No. 10/2011.

USA

Adhesives 21 CFR 175.105

The product complies with the compositional requirements of 21 CFR 175.105 Adhesives. This product includes components that are listed in 21 CFR 175.105 and substances which are Generally Recognized As Safe (GRAS) allowing use in adhesives in accordance with 21 CFR 175.105 under the following use conditions:

- Max. use level of 0.44% in wet coating formulations.
- For formulations with a solid content of 40% and a dry thickness of 12 µm.
- The use level can be adapted for deviating thickness and solid content.

Therefore, the product can be recommended for use in food contact adhesives in compliance with 21 CFR 175.105 Adhesives. As per the limitations outlined in that regulation, the final adhesive must either be separated from the food by a functional barrier or used subject to the following additional limitations:

- In dry foods: The quantity of adhesive that contacts packaged dry food shall not exceed the limits of good manufacturing practice.
- In fatty and aqueous foods:
 - The quantity of adhesive that contacts packaged fatty and aqueous foods shall not exceed the trace amount at seams and at the edge exposure between packaging laminates that may occur within the limits of good manufacturing practice.
 - Under normal conditions of use the packaging seams or laminates will remain firmly bonded without visible separation.

To assure safe usage of adhesives, the label of the finished adhesive container shall bear the statement “food-packaging adhesive”.

This product contains a solvent, xylene, which is not considered in the food contact evaluation, and is the responsibility of the downstream user to remove prior to use in food contact application.

China

GB9685-2016, table A.5 ‘Adhesives’

The active components are not all listed in GB9685-2016 table A5 for adhesive applications. Therefore, this product cannot be recommended for use in food contact adhesives in China.

Coatings**EUROPE**

Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food

This product can be considered suitable for use in food contact coatings. Additional information is available in the 'Adhesive' section.

Please note that the assessments for coatings are based on a maximum use level of 0.3% in wet coating formulations, assuming a dry coating thickness of 12 µm and a solid content of 40% w/w. The use level may be adjusted to reflect variations in coating thickness and solid content.

USA

21 CFR 175.300 'Resinous and polymeric coatings'

The product complies with the compositional requirements of 21 CFR 175.300 Resinous and polymeric coatings. This product includes components that are listed in 21 CFR 175.300 and substances which are Generally Recognized As Safe (GRAS) allowing use in coatings on metal substrates in accordance with 21 CFR 175.300 under the following use conditions:

- Max. use level of 0.44% in wet coating formulations.
- For formulations with a solid content of 40% and a dry thickness of 12 µm.
- The use level can be adapted for deviating thickness and solid content.

This product has been evaluated for use in food contact formulations for the general population and may not be appropriate for sensitive applications, such as infant formula and human milk or medical devices.

This product contains a solvent, xylene, which is not considered in the food contact evaluation, and is the responsibility of the downstream user to remove prior to use in food contact applications.

China

GB9685-2016, table A.2 'Coatings'

The active components are not all listed in GB9685-2016 table A2 for coating applications. Therefore, this product cannot be recommended for use in food contact adhesives in China.

Printing inks**EUROPE**

21st Amendment to Consumer Goods Ordinance (GIO)

Intentionally added substances in this product are either listed in Annex 14, Table 1 of the GIO, subject to derogation under §4, Abs. 5, Sentence 5 (“salt rule”), or are included in Regulation (EU) No 10/2011 without any restrictions indicated in columns 9 and/or 10.

In accordance with our role as manufacturer of substances, and based on information provided to us by raw material suppliers, non-intentionally added substances (NIAS) which have become known to us are assessed in accordance with internationally recognized scientific principles of risk assessment to ensure compliance with the requirements of Article 3(1)(a) of Regulation (EC) No 1935/2004.

The assessments are carried out under the assumption that this product is used in accordance with BYK’s recommendations for food contact applications and/or under normal or foreseeable conditions of use, and considering the following parameters: 100% migration, 1 kg of food in contact with 6 dm² of packaging material, substrate weight of 15 g/m².

Swiss Ordinance 817.023.21

Intentionally added substances in this product are either listed in Annex 2 and/or Annex 10 of Swiss Ordinance 817.023.21 (version January 1, 2026), subject to Article 35(b), or are not classified as carcinogenic, mutagenic, or toxic to reproduction (CMR).

Therefore, this product can be considered suitable for use in food contact packaging inks that are not in contact with food (non-direct food contact inks).

Industry

Nestlé Standard “Printing Inks for Food Packaging” (02/04/2024)

None of the intentionally added substances in the product are listed in the exclusion and/or minimisation lists of the Nestlé Standard “Printing Inks for Food Packaging” (version St-80.001-01 of 02/04/2024).

EuPIA Exclusion Charter (March 2026)

The product intentionally does not contain any of the substances listed in Annexes 1 and 2 of the ‘EuPIA Charter on Raw Material Selection and Exclusion for Printing Inks and Related Products’ (March 2026). The product itself as raw material is not classified and labeled with any of the Hazard Statements for Group I or Group II substances as defined in the section ‘Selection Criteria & Procedures’

General Remarks

Regulations apply within the context of respective regional framework regulations, e.g. Regulation (EU) No. 1935/2004 and FDA 21 CFR 174.5. Please note that it is the responsibility of both manufacturers of finished food contact articles and downstream business operators to ensure compliance with the applicable migration limits and restrictions of the finished materials or articles under specific real and/or foreseeable conditions of use.

Since traces of unknown processing aids cannot be fully excluded, compliance with general requirements is the responsibility of the end user.

BYK reserves the right to change or update the information without notice. At most, this letter is in effect for three years commencing the date of issue.

Food Contact Team
Regulatory Affairs
BYK-Chemie GmbH

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This issue replaces all previous versions

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