

FOOD CONTACT

BYK Regulatory Information

BYK-UV 3510

Summary

BYK-UV 3510 is suitable according to the following compositional provisions for food contact applications, as indicated:

Coatings		
	Suitable for food contact coatings	Yes
EU	Regulation (EU) No. 10/2011	Yes
	German BfR XIV 'Polymer Dispersions'	Yes
	CoE ResAP (2004) 1	Yes
	USA	21 CFR 175.300 'Resinous and polymeric coatings'
China	GB9685-2016, table A.2 'Coatings'	No
Printing inks		
Europe	Suitable for food contact printing inks	Yes
	Swiss Ordinance 817.023.21, Annex 10	Yes
Industry	Nestlé Printing Inks for Food Packaging (02/04/2024)	See explanation
	EuPIA Exclusion List (March 2024)	Yes

This summary only reflects conducted evaluations on existing regulations. It does not exclude compliant use in additional regions or applications. Explanations below show details on considered regulations and evaluations.

Explanation

Coatings

EU	<p><u>Regulation (EU) No. 10/2011</u> The product is covered by the compositional requirements of Regulation EU/10/2011.</p> <p><u>German BfR XIV 'Polymer Dispersions'</u> The product is covered by compositional requirements of the German BfR-Recommendation XIV "Polymer Dispersions".</p> <p><u>CoE ResAP (2004) 1</u> The active component is listed in the CoE ResAP (2004) 1, Version Feb. 2009.</p> <p><u>Dual use additive (restricted)</u> The product contains a 'dual use additive' (< 0.06%) for which restrictions apply: 2,6-Di-tert-butylp-cresol (BHT; CAS-No. 128-37-0, E321).</p> <p>Therefore, the product can be recommended for use in food contact coatings in the EU.</p>
USA	<p><u>21 CFR 175.300 'Resinous and polymeric coatings'</u> The product does not comply with Sec. 175.300 of Title 21 CFR (FDA) Regulations for indirect food additives.</p>
China	<p><u>GB9685-2016, table A.2 'Coatings'</u> The product does not comply with the National Food Safety Standard of the People's Republic of China, Standard for Uses of Additives in Food Contact Materials and Articles (GB9685-2016).</p>

Printing inks

Europe **Swiss Ordinance 817.023.21, Annex 10**

This product is manufactured from components listed in Swiss Ordinance 817.023.21 (Version of 1 February 2024) Annex 10, as well as non-listed components. The non-listed components are self-controlled substances with a Specific Migration Limit of 10 ppb. In addition, this product may contain Non-Intentionally Added Substances such as those listed on our product BRIEF which may be Risk Assessed in the final material.

If migration limits are respected, the product can be recommended for use in food contact printing inks in Europe. For additional information on applicable migration limits, please contact us via our webform: <https://www.byk.com/en/contact?topic=regulatory-affairs>

Therefore, the product can be recommended for food contact printing inks in Europe.

Industry **Nestlé Printing Inks for Food Packaging (02/04/2024)**

According to the recipe, the product does not intentionally contain any of the substances listed in Table 5 – Table 8 of the Nestlé Printing Inks for Food Packaging (02/04/2024). However, the product contains the SVHC-components D4 (CAS 556-67-2), D5 (CAS 541-02-6) and D6 (CAS 540-97-6), as mentioned under 4. 'General Nestlé Exclusions and Minimisations'.

EuPIA Exclusion List (March 2024)

According to the recipe, none of the substances listed in Annex 1 (Group C – G) of the EuPIA Exclusion List (March 2024) are intentionally present. The product itself is not classified and labeled with any of the Hazard Statements given in Group A and B.

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. 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 deems to be actual for three years commencing the date of issue.

Food Contact Team
Regulatory Affairs
BYK-Chemie GmbH

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