FOOD CONTACT

BYK Regulatory Information

CERAFLOUR 991

Summary

CERAFLOUR 991 is suitable according to the following compositional provisions for food contact applications, as indicated:

Adhesives		
Europe	Regulation (EU) No. 10/2011	Yes
	German BfR XIV ‘Polymer dispersions’	Yes
	BfR XXXVI ‘Paper and board for food contact’	Yes
USA	21 CFR 175.105 ‘Adhesives’	Yes
China	GB9685-2016, table A.5 ‘Adhesives’	Yes

Coatings		
Europe	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’	Yes
	21 CFR 175.320 ‘Resinous and polymeric coatings for polyolefin films’	Yes
China	GB9685-2016, table A.2 ‘Coatings’	Yes
Japan	Japan Food Sanitation Act Positive List System	Yes
MERCOSUR	GMC Resolution No. 39/19	Yes

Paper and paperboard		
Europe	Suitable for food contact paper and paperboard	Yes
	German BfR XXXVI ‘Paper and paperboard in contact with food’	Yes
USA	21 CFR 176.170 ‘Components of paper and paperboard in contact with aqueous and fatty foods’	Yes
	21 CFR 176.180 ‘Components of paper and paperboard in contact with dry food’	Yes
China	GB9685-2016, table A.6 ‘Paper’	Yes

Printing inks		
Europe	GIO – German Ink Ordinance, part of BedGgstV	Yes
	Swiss Ordinance 817.023.21	Yes
Industry	Nestlé Standard ‘Printing Inks for Food Packaging’	Yes
	EuPIA Exclusion Charter	Yes
China	GB9685-2016, table A.4 ‘Inks’	No

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

Adhesives

Europe

Regulation (EU) No. 10/2011

The product may be used for the manufacturing of materials and articles within the scope of Regulation (EU) N° 10/2011 and its amendments, since the components are fully listed in Annex I, table 1. Specific migration limits (SML) or restrictions do not apply.

BfR Recommendation XIV 'Polymer dispersions'

The product complies with the compositional requirements of BfR Recommendation XIV 'Plastics dispersions'.

BfR Recommendation XXXVI 'Paper and board for food contact'

The product complies with the compositional requirements of BfR Recommendation XXXVI 'Paper and Board for Food Contact '.

USA

21 CFR 175.105 'Adhesives'

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. 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".

China

GB9685-2016, table A.5 'Adhesives'

The product complies with the compositional requirements of table A.5 'Adhesives' of 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), since its components are listed in table A.5 (Additives for adhesives).

Coatings

Europe

Regulation (EU) No. 10/2011

The product may be used for the manufacturing of materials and articles within the scope of Regulation (EU) N° 10/2011 and its amendments, since the components are fully listed in Annex I, table 1. Specific migration limits (SML) or restrictions do not apply.

BfR Recommendation XIV 'Polymer dispersions'

The product complies with the compositional requirements of BfR Recommendation XIV 'Plastics dispersions'.

CoE ResAP (2004) 1 on coatings intended to come into contact with foodstuffs

The product complies with the compositional requirements of Council of Europe Resolution AP (2004)1.

USA

21 CFR 175.300 'Resinous and polymeric coatings'

This 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.

21 CFR 175.320 'Resinous and polymeric coatings for polyolefin films'

This product complies with the compositional requirements of 21 CFR 175.300 'Resinous and polymeric coatings for polyolefin films'. This product includes components that are listed in 21 CFR 175.320.

China

GB9685-2016, table A.2 'Coatings'

The product can be used in compliance with table A.2 'Coatings' of 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), since its components are listed in table A.2 (Additives for coatings).

Japan

Japan Food Sanitation Act Positive List System

The ingredients in this product are listed in Japan's Food Sanitation Act Positive List (PL) system under the Ministry of Health, Labour and Welfare (MHLW) Notification No. 370. The use limit by Synthetic Resin Group (%) is Dose as needed for all resin groups.

MERCOSUR

GMC Resolutions No. 39/19

The active components of this product are compositionally compliant with GMC Res. No. 39/19 MERCOSUR Technical Regulation on the positive list of additives for the

preparation of plastic materials and polymeric coatings that come into contact with food. As such, this product is recommended for use in coatings in MERCOSUR member states.

Paper and paperboard

Europe

Regulation (EU) No. 10/2011

The product may be used for the manufacturing of materials and articles within the scope of Regulation (EU) N° 10/2011 and its amendments, since the components are fully listed in Annex I, table 1. Specific migration limits (SML) or restrictions do not apply.

German BfR XXXVI 'Paper and Board for Food Contact'

The product complies with the compositional requirements of BfR Recommendation XXXVI 'Paper and Board for Food Contact '.

USA

21 CFR 176.170 'Components of paper and paperboard in contact with aqueous and fatty foods'

This product complies with the compositional requirements of 21 CFR 176.170 'Components of paper and paperboard in contact with aqueous and fatty foods'. This product includes components that are listed in 21 CFR 176.170.

21 CFR 176.180 'Components of paper and paperboard in contact with dry food'

This product complies with the compositional requirements of 21 CFR 176.180 'Components of paper and paperboard in contact with dry food'. This product includes components that are listed in 21 CFR 176.170, which may be cross-referenced for use under 21 CFR 176.180.

China

GB9685-2016, table A.6 'Paper'

The product complies with the compositional requirements of table A.6 'Paper' of 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), since its components are listed in table A.6 (Additives for paper).

Printing Inks

Europe

GIO – German Ink Ordinance, part of the Consumer Goods Regulation (BedGgstV)

The product may be used for the manufacturing of printing inks for packaging intended for direct and indirect contact with food as defined in the German BedGgstV – status 20 December 2025. The components are either fully listed in Annex 14, table 1 or in Regulation (EU) No. 10/2011, Annex I, table 1. Specific migration limits (SML) or restrictions do not apply.

Swiss Ordinance 817.023.21

The product may be used for the manufacturing of printing inks for packaging according to Swiss Ordinance 817.023.21 (Version as of 1 August 2026), since the components are fully listed in Annex 10. Specific migration limits (SML) do not apply.

Industry

Nestlé Standard 'Printing Inks for Food Packaging' (02 April 2024)

The product intentionally does not contain any of the substances listed in section 4. 'General Nestlé Exclusions and Minimisations' and sections 5. – 8. of the Nestlé Standard 'Printing Inks for Food Packaging' (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' (1st edition, 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'.

China

GB9685-2016, table A.4 'Inks'

The product does not comply with table A.4 'Inks' of 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).

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.

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