

FOOD CONTACT

BYK Regulatory Information

DISPERBYK-111

Solvent-free wetting and dispersing additive for solvent-borne and solvent-free coatings and printing inks for stabilizing inorganic pigments, in particular titanium dioxide. Strong reduction of millbase viscosity.

Summary

DISPERBYK-111 is suitable according to the following compositional provisions for food contact applications, as indicated:

Coatings		
EU	Suitable for food contact coatings	No
	Regulation (EU) No. 10/2011	No
	German BfR XIV 'Polymer Dispersions'	No
	CoE ResAP (2004) 1	No
USA	21 CFR 175.300 'Resinous and polymeric coatings'	No
China	GB9685-2016, table A.2 'Coatings'	No
Printing inks		
EU	Suitable for food contact printing inks	Yes
	Swiss Ordinance 817.023.21, Annex 10	Yes
Industry	Nestlé Printing Inks for Food Packaging (07/04/2022)	Yes
	EuPIA Exclusion List (March 2021)	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 **Regulation (EU) No. 10/2011**

This product does not comply with the Regulation (EU) No. 10/2011, since the components of the product, and/or their starting substances are not all listed in the regulation.

German BfR XIV 'Polymer Dispersions'

The components of this product are not fully covered by the German BfR-Recommendation XIV. "Polymer Dispersions".

CoE ResAP (2004) 1

For this product, not all components, or their monomers and starting substances used for manufacturing, are listed in the CEPE 'Code of practice for food contact coatings', Edition 4, Version Feb. 2009.

Therefore, the product is not recommended for use in food contact coatings in the EU.

USA **21 CFR 175.300 'Resinous and polymeric coatings'**

The product does not comply with Title 21 CFR (FDA) Regulations for indirect food additives. The components are not fully listed under section 175.300.

Printing inks

Europe **Swiss Ordinance 817.023.21, Annex 10**

This product is conform with the compositional requirements of the part for printing inks for packaging of the Swiss Ordinance 817.023.21 (Version of 1 October 2022). The monomers/starting substances for manufacturing the active components and all other components are listed in Annex 10. Specific migration limits apply.

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

Industry **Nestlé Printing Inks for Food Packaging (07/04/2022)**

According to the recipe, the product does not intentionally contain any of the substances listed in 4. 'General Nestlé Exclusions and Minimisations' and Table 5 – Table 8 of the Nestlé Printing Inks for Food Packaging (07/04/2022).

EuPIA Exclusion List (March 2021)

According to the recipe, none of the substances listed in Annex 1 (Group C – G) of the EuPIA Exclusion List (March 2021) are 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
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