

FOOD CONTACT

BYK Regulatory Information

DISPERBYK-192

Summary

DISPERBYK-192 is suitable according to the following compositional provisions for food contact applications, as indicated:

Adhesives		
Europe	Regulation (EU) No. 10/2011	Yes
USA	21 CFR 175.105 'Adhesives'	Yes
China	GB9685-2016, A.5 'Adhesives'	No
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
China	GB9685-2016, table A.2 'Coatings'	No
MERCOSUR	GMC Resolution No. 39/19	Yes
	GMC Resolution No. 02/12	Yes
Printing Inks		
Europe	Swiss Ordinance 817.023.21, Annex 10	Yes
	GIO – German Ink Ordinance, part of BedGgstV	Yes
Industry	Nestlé Standard 'Printing Inks for Food Packaging'	Yes
	EuPIA CHARTER	Yes
Paper and paperboard		
Europe	Regulation (EU) No. 10/2011	Yes
	German BfR XIV 'Polymer Dispersions'	Yes
	German BfR XXXVI 'Paper and board 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
MERCOSUR	GMC Resolution No. 40/15	No
	GMC Resolution No. 41/15	No
	GMC Resolution No. 42/15	No

GMC Resolution No. 39/19	Yes
GMC Resolution No. 02/12	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

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.

USA

21 CFR 175.105 'Adhesives'

The product complies with the compositional requirements of 21 CFR 175.105. This product includes components that are listed in 21 CFR 175.105.

China

GB9685-2016, table A.2 'Coatings'

The active components are not listed in GB9685-2016 A.5 for adhesive applications.

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.

German BfR XIV 'Polymer Dispersions'

The product is conform with the compositional requirements of the German BfR-Recommendations XIV. "Polymer Dispersions".

CoE ResAP (2004) 1

The components are listed in the CEPE 'Code of practice for food contact coatings', Edition 4, Version Feb. 2009.

USA

21 CFR 175.300 'Resinous and polymeric coatings'

The product complies with the compositional requirements of 21 CFR 175.300. This product includes components that are listed in 21 CFR 175.300.

China

GB9685-2016, table A.2 'Coatings'

The product does not comply with table A.2 "Coatings" 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).

MERCOSUR

GMC Resolutions No. 39/19 & 02/12

The product is authorized for use under MERCOSUR GMC Resolution n. 39/19 and MERCOSUR GMC Resolution n. 02/12. Specific Migration Limits and/or restrictions apply.

Printing Inks

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.

GIO – German Ink Ordinance, part of BedGgstV

The product may be used for the manufacturing of printing inks for packaging not intended for direct contact with food as defined in the German BedGgstV. Migration of single components must not exceed 10 µg/kg food.

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 either the components themselves or the monomers/starting substances are listed in Annex 10 or the components are not classified as CMR substances. Specific Migration Limits (SML) or Detection Limits in food or food simulants apply.

Industry

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

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 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'.

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 XIV 'Polymer Dispersions'

The product is conform with the compositional requirements of the German BfR-Recommendations XIV. "Polymer Dispersions".

German BfR XXXVI 'Paper and board in contact with food'

The product is conform with the compositional requirements of the German 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 176.210 Defoaming agents used in the manufacture of paper and paperboard, which may be cross-referenced for use in compliance with 21 CFR 176.170 for use as a defoamer.

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 176.210 Defoaming agents used in the manufacture of paper and paperboard, which may be cross-referenced for use in compliance with 21 CFR 176.170 for use as a defoamer.

China

GB9685-2016, table A.6 'Paper'

The active components of DISPERBYK-192 are listed in GB9685-2016 table A6 for paper applications.

MERCOSUR

GMC Resolutions No. 40/15, 41/15, 42/15, 39/19 & 02/12

The product does not meet the compositional requirements of MERCOSUR GMC Resolutions n. 41/15 or n. 42/15.

According to MERCOSUR GMC Resolution n. 40/15, dispersions of plastic materials that comply with MERCOSUR GMC Resolution n. 39/19 and MERCOSUR GMC Resolution n. 02/12 are allowed for use as a surface and internal gluing agent in cellulosic material for general use with no thermal treatment.

The product does not meet the compositional requirements of MERCOSUR GMC Resolution n. 40/15, but the product is authorized for use under MERCOSUR GMC Resolution n. 39/19 and MERCOSUR GMC Resolution n. 02/12. Specific Migration Limits and/or restrictions apply.

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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This issue replaces all previous versions

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