

# FOOD CONTACT

## BYK Regulatory Information

### DISPERBYK-2155

VOC and solvent-free wetting and dispersing additive for solvent-borne and solvent-free coating systems, floor coatings, and printing inks. Particularly recommended for the manufacture of pigment concentrates with broad compatibility. The 100 % active substance makes it particularly suitable for high-solid and solvent-free systems.

#### Summary

DISPERBYK-2155 is suitable according to the following compositional provisions for food contact applications, as indicated:

Coatings		
	Suitable for food contact coatings	No
Europe	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		
Europe	Suitable for food contact printing inks	Yes
	Swiss Ordinance 817.023.21, Annex 10	Yes
Industry	Nestlé Guidance Note on Packaging Inks (October 2016)	Yes
	EuPIA Exclusion List (November 2016 - Corrigendum Dec. 2018)	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

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**EU**

**Regulation (EU) No. 10/2011**

This product does not comply with Regulation (EU) No. 10/2011.

**German BfR XIV ‘Polymer Dispersions’**

The product does not comply with the German BfR-Recommendation XIV. “Polymer Dispersions”.

**CoE ResAP (2004) 1**

The product does not comply with the CoE ResAP (2004) 1.

Therefore, the product cannot be recommended for use in food contact coatings in the EU.

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**USA**

**21 CFR 175.300 ‘Resinous and polymeric coatings’**

The product does not comply with Sec. 175.300 of Title 21 CFR (FDA) Regulations for indirect food additives.

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**China**

**GB9685-2016, table A.2 ‘Coatings’**

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).

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**Printing inks**

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**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 December 2019). 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 the EU.

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**Industry**    **Nestlé Guidance Note on Packaging Inks (October 2016)**

According to the recipe, the product does not contain any of the substances listed in Table 1 – Table 7 of the Nestlé Guidance note on Packaging Inks (dated October 2018).

**EuPIA Exclusion List (November 2016 - Corrigendum Dec. 2018)**

According to the recipe, none of the substances listed in Annex 1 (Group C – G) of the EuPIA Exclusion List (November 2016 - Corrigendum Dec. 2018) are present. The product itself is not\_classified and labeled with any of the Hazard Statements given in Group A and B.

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## 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  
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*This issue replaces all previous versions*

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