

FOOD CONTACT

BYK Regulatory Information

DISPERBYK-2205

Wetting and dispersing additive for solvent-borne and solvent-free liquid coatings, printing inks and inkjet inks to stabilize inorganic and organic pigments.

Summary

DISPERBYK-2205 is suitable according to the following compositional provisions for food contact applications, as indicated:

| Coatings | | |
|----------|--|-----|
| EU | Suitable for food contact coatings | Yes |
| | Regulation (EU) No. 10/2011 | No |
| | German BfR XIV 'Polymer Dispersions' | Yes |
| USA | 21 CFR 175.300 'Resinous and polymeric 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 (Oct.'18) | Yes |
| | EuPIA Exclusion List (Nov.'16 – Corrigendum Dec.'18) | 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**

The active component of this product is a polymer and manufactured using monomers/starting substances which are listed in Annex I – Table I of COMMISSION REGULATION (EU) No. 10/2011 of 14 January 2011 (PIM) on plastic materials and articles intended to come into contact with food. Migration limits apply. The active component as such is not listed as a “polymeric additive” in a.m. REG. (EU) No. 10/2011 (PIM), and therefore the product can formally not be used as an additive in compliance with this regulation.

German BfR XIV ‘Polymer Dispersions’

This product is conform to the compositional requirements of the German BfR-Recommendation XIV “Polymer Dispersions”.

Therefore, the product can be recommended for food contact coatings in the EU.

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, since not all components are fully listed.

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 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 food contact printing inks in Europe.

Industry **Nestlé Guidance Note on Packaging Inks (Oct.'18)**

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 (Nov.'16 – Corrigendum Dec.'18)

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.

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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This issue replaces all previous versions

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