

FOOD CONTACT

BYK Regulatory Information

SCONA TPPP 2112 GA

Summary

SCONA TPPP 2112 GA is suitable according to the following compositional provisions for food contact applications as indicated below:

Adhesives		
EU	Regulation (EU) No. 10/2011	Yes
USA	21 CFR 175.105 'Adhesives' and 21 CFR 177.1390 'Laminate structures for use at temperatures of 250 °F and above' as an adhesive	Yes - See explanation
Plastics		
Europe	Regulation (EU) No. 10/2011	Yes
USA	21 CFR 177.1520 'Olefin polymers.'	No
Japan	Japan Food Sanitation Act Positive List System	Yes
China	GB9685-2016, table A.1 'Plastics'	No
MERCOSUR	GMC Resolution n. 02/12	Yes
	GMC Res. No. 39/19	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

Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food

This product can be considered suitable for use in food contact adhesives. For further information, please refer to the “Plastics” section.

Please note that the assessments for adhesives are based on a maximum use level and 100% migration, 1kg food in contact with 6 dm² of packaging, substrate weight of 15 g/m².

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 well as components which are cleared under 178.2010 Antioxidants and stabilizers for polymers, which may be cross-referenced for use in compliance with 21 CFR 175.105.

Therefore, the product can be recommended for use in food contact adhesives in compliance with 21 CFR 175.105 Adhesives. 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”.

This clearance also allows the use of this product in accordance with 21 CFR 177.1390 ‘Laminate structures for use at temperatures of 250 °F and above’ as an adhesive under 21 CFR 177.1390(c)(2)(ii).

Plastics
EUROPE

Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food

This product is manufactured with monomers/other starting substances and additives listed in Annex I - Table I of Regulation (EU) No 10/2011 or subject to derogation as per Article 6(3).

Aids to polymerization used in this product are either authorized under national legislation or have been risk assessed in accordance with Article 19 of this Regulation.

The table below lists only substances that are used or known to be present and that are relevant for compliance with the specific migration limits (SML) and/or any restrictions set out in Annex I of Regulation (EU) No 10/2011 or in national legislation. For additional information on substance concentrations, please refer to the Safety Data Sheet (SDS).

FCM No.	CAS-No.	Name	SML / SML(T) [mg/kg]	Restrictions / Specifications
			30	
234	108-31-6	Maleic anhydride	expressed as maleic acid	-

To the best of our knowledge and understanding, additives authorized for use in both food contact plastics and as direct food additives according to Regulations (EC) No 1333/2008 are not present in this product.

Based on the current knowledge of the product composition, product specifications, and information provided by raw material suppliers, residues of substances listed in Annex II with restrictions and/or substances for which genotoxicity has not been ruled out are not known or expected to be present in concentration exceeding the specific migration limits established by this regulation. Testing is not routinely performed for substances that are neither identified nor reasonably expected to be present.

In accordance with our role as a manufacturer of substances, non-intentionally added substances (NIAS) which have become known to us are assessed in accordance with internationally recognized scientific principles of risk assessment to ensure compliance with the requirements of Article 3(1)(a) of Regulation (EC) No 1935/2004. The assessments are carried out under the assumption that this product is used in accordance with BYK's recommendations for food contact applications and/or under normal or foreseeable conditions of use, and considering the following parameters: 100% migration, 1kg food in contact with 6 dm² of packaging, film thickness 1mm.

USA

21 CFR 177.1520 'Olefin polymers.'

This product does not comply with the compositional requirements of 21 CFR 177.1520 Olefin polymers for use as an additive to polymers.

China

GB9685-2016, table A.1 'Plastics'

The active components of this product are not listed in GB9685-2016 table A1 for plastic applications.

Japan

Japan Food Sanitation Act Positive List System

The ingredients 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, published by MHLW. Please contact separately for use Limit by Synthetic Resin Group (%).

MERCOSUR

GMC Res No 02/12 and GMC Res. No. 39/19

The active components of this product are compositionally compliant with GMC Res. No. 39/19 with the polymer components complying with GMC Res No 02/12. The table below lists only the substances used or known to be present which are relevant to be considered for compliance with the specific migration limits (SML) laid down in GMC Res. No. 39/19 and GMC Res No 02/12:

Ref. No.	CAS-No.	Name	SML
19960	108-31-6	Maleic anhydride	30 expressed as maleic acid

The assessments are carried out under the assumption that this product is used in accordance with BYK's recommendations for food contact applications and/or under normal or foreseeable conditions of use, and assuming 40% solid content and the following parameters: 100% migration, 1 kg of food in contact with 6 dm² of packaging material, dry film thickness 12 µm. The use level may be adjusted to reflect variations in coating thickness and solid content.

Therefore, this product can be considered suitable for use in food contact coatings. 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:

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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