

# FOOD CONTACT

## BYK Regulatory Information

### BYK-356

Polyacrylate-based surface additive for solvent-borne and solvent-free coatings and powder coatings to improve leveling. Solvent-free version of BYK-355.

#### Summary

BYK-356 is suitable according to the following compositional provisions for food contact applications, as indicated:

Adhesives		
Europe	Suitable for food contact adhesives	Yes
	Regulation (EU) No. 10/2011	No
	German BfR XIV 'Polymers Dispersions'	Yes
	German BfR XXXVI 'Paper and board for food contact'	Yes
USA	21 CFR 175.105 'Adhesives'	Yes
China	GB9685-2016, table A.5 'Adhesives'	Yes
Coatings		
Europe	Suitable for food contact coatings	Yes
	Regulation (EU) No. 10/2011	No
	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
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 (dated October 2018)	Yes
	EuPIA Exclusion List (November 2016 - Corrigendum Dec. 2018)	Yes

Formulation aids are not covered by the food contact status.

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

### Adhesives

#### Europe

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

The active component of this product is a poly acrylate polymer and manufactured using monomers which are fully evaluated as SCF-list 0-4 and directly 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 (including all amendments). Restrictions 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.

##### **German BfR XIV ‘Polymer Dispersions’**

The product is conform with the compositional requirements of the German BfR-Recommendation XIV ‘Polymer Dispersions’.

##### **German BfR XXXVI ‘Paper and board for food contact’**

The product is conform with the compositional requirements of the German BfR-Recommendation XXXVI “Paper and board for food contact”. Therefore, the product can be recommended for use in food contact adhesives in the EU.

#### USA

##### **21 CFR 175.105 ‘Adhesives’**

The active component of this product is listed in Sec. 175.105 of 21 CFR FDA.

Therefore, the product can be recommended for food contact adhesives as described in Sec. 175.105.

#### China

##### **GB9685-2016, table A.5 ‘Adhesives’**

The active components are listed in GB9685-2016 table A5 for adhesive applications.

## Coatings

### Europe

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

The active component of this product is a poly acrylate polymer and manufactured using monomers which are fully evaluated as SCF-list 0-4 and directly 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 (including all amendments). Restrictions 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.

#### **German BfR XIV ‘Polymer Dispersions’**

The product is conform with the compositional requirements of BfR-Recommendation XIV ‘Polymer Dispersions’.

#### **CoE ResAP (2004) 1**

The components themselves or the monomers and starting substances used for manufacturing are listed in the Council of Europe Framework Resolution ResAP (2004) 1 on coatings intended to come into contact with foodstuffs.

In summary, the product can be recommended for food contact coating applications in the Europe.

### USA

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

The active component of this product is listed in Sec. 175.300 of 21 CFR FDA.

Therefore, the product can be recommended for food contact coatings as described in Sec. 175.300.

### China

#### **GB9685-2016, table A.2 ‘Coatings’**

The product does not comply with table A.2 ‘Coatings’ of 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).

## 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) since all components are listed in Annex 10. Specific migration limits apply.

### Industry Nestlé Guidance note on Packaging Inks (dated October 2018)

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.

## 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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