FOOD CONTACT

BYK Regulatory Information

BYK-3760

Summary

BYK-3760 is suitable for food contact applications under the following compositional provisions, provided that its use does not exceed the maximum concentration as indicated below:

Adhesives		
Europe	Regulation (EU) No. 10/2011	Yes – max 1%
	German BfR XIV ‘Polymer Dispersions’	
USA	21 CFR 175.105 ‘Adhesives’	Yes – max 0.1%
Coatings		
Europe	Regulation (EU) No. 10/2011	Yes – max 1%
	German BfR XIV ‘Polymer Dispersions’	
USA	21 CFR 175.300 ‘Resinous and polymeric coatings’	Yes – max 0.1%
China	GB9685-2016, table A.2 ‘Coatings’	No
Paper and paperboard		
Europe	German BfR XXXVI ‘Paper and board for food contact’	Yes – max 1%
Printing inks		
Europe	21st Amendment to Consumer Goods Ordinance (GIO)	Yes – max 1%
	Swiss Ordinance 817.023.21	
Industry	Nestlé Standard “Printing Inks for Food Packaging”	Yes
	EuPIA Charter	Yes

This summary reflects only the regulations assessed to date and does not preclude permitted uses in other 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, as amended as of the date of this document

This product may be used as an additive or polymer production aid. 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:

FCM No.	CAS-No.	Name	SML / SML(T) [mg/kg]	Restrictions / Specifications
315	128-37-0	2,6-di-tert-butyl-p-cresol	3	/

This product contains the following substance, which is also authorized for use as a food additive under Regulation (EC) No 1333/2008:

- 2,6-di-tert-butyl-p-cresol, E 321

Based on the current knowledge of the product composition, product specifications, and information provided by raw material suppliers, presence of substances listed in Annex II with restrictions and/or substances for which genotoxicity has not been ruled out is not known or expected. The products are not regularly tested for substances that are neither identified nor reasonably foreseen to be present.

In accordance with our role as manufacturer of substances, and based on information provided to us by raw material suppliers, 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, 1 kg of food in contact with 6 dm² of packaging material, substrate weight of 15 g/m².

German BfR XIV 'Polymer Dispersions'

This product may be used in accordance with BfR Recommendation XIV by reference to substances already permitted under Regulation (EU) No. 10/2011.

USA

Adhesives 21 CFR 175.105

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 and substances which are Generally Recognized As Safe (GRAS) allowing use in adhesives in accordance with 21 CFR 175.105 under the following use conditions:

- Max. use level of 0.1% in wet coating formulations

- For formulations with a solid content of 40% and a dry thickness of 12 µm
- The use level can be adapted for deviating thickness and solid content.

This product has been evaluated for use in food contact formulations for the general population and may not be appropriate for sensitive applications, such as infant formula and human milk or medical devices.

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”.

China

GB9685-2016, table A.5 ‘Adhesives’’

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).

Coatings

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 coatings. Additional information is available in the 'Adhesive' section.

Please note that the assessment is conducted under the assumption that this product is used in accordance with BYK's recommendations for food contact applications in formulations with a solid content of 40% w/w, and considering the following parameters: 100% migration, 1 kg of food in contact with 6 dm² of packaging material, dry film thickness of 12 µm.

USA

21 CFR 175.300 'Resinous and polymeric coatings'

The product complies with the compositional requirements of 21 CFR 175.300 Adhesives. This product includes components that are listed in 21 CFR 175.105 and substances which are Generally Recognized As Safe (GRAS) allowing use in adhesives in accordance with 21 CFR 175.300 under the following use conditions:

- Max. use level of 0.1% in wet coating formulations
- For formulations with a solid content of 40% and a dry thickness of 12 µm
- The use level can be adapted for deviating thickness and solid content.

This product has been evaluated for use in food contact formulations for the general population and may not be appropriate for sensitive applications, such as infant formula and human milk or medical devices.

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).

Paper and board

EUROPE

German BfR XXXVI 'Paper and board for food contact'

This product may be used as a sizing agent in accordance with BfR Recommendation XIV. Polymer Dispersions, and as a surface refining or coating agent subject to the requirements of Regulation (EU) No. 10/2011.

Printing Inks

EUROPE

21st Amendment to Consumer Goods Ordinance (GIO)

This product may be used in the manufacture of printing inks for packaging intended to come into direct contact with food in accordance with the requirements laid down in the German Consumer Goods Ordinance (Bedarfsgegenständeverordnung). Its components are either listed in Annex 14, Table 1 of the GIO, subject to derogation under §4, Abs. 5, Sentence 5 ("salt rule"), or are included in Regulation (EU) No 10/2011 without any restrictions indicated in columns 9 and/or 10.

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 the German Ink Ordinance and/or Regulation (EU) No 10/2011:

FCM No.	CAS-No.	Name	SML / SML(T) [mg/kg]	Restrictions / Specifications
315	128-37-0	2,6-di-tert-butyl-p-cresol	3	/

In accordance with our role as manufacturer of substances and based on information provided to us by raw material suppliers, 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, 1 kg of food in contact with 6 dm² of packaging material, substrate weight of 15 g/m².

Swiss Ordinance 817.023.21

This product may be used in the manufacture of printing inks for packaging that are not intended to come into direct contact with food according to Swiss Ordinance 817.023.21 (as of 1 January 2026) since intentionally added substances in this product are either listed in Annex 2 and/or Annex 10 of this Ordinance, subject to Article 35(b), or are not classified as carcinogenic, mutagenic, or toxic to reproduction (CMR).

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 2 and/or Annex 10 of this Ordinance.

FCM No.	CAS-No.	Name	SML / SML(T) [mg/kg]	Restrictions / Specifications
721	128-37-0	2,6-di-tert-butyl-p-cresol	3	/

Industry

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

Based on the current knowledge of the product composition and manufacturing process, this product does not intentionally contain any substances listed in Section 4 ("General Nestlé Exclusions and Minimisations") or Tables 5–8 of the Nestlé document Printing Inks for Food Packaging.

EuPIA Exclusion 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' (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'

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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