

FOOD CONTACT

BYK Regulatory Information

AQUACER 2650

Wax emulsion based on carnauba wax for aqueous thermal transfer systems, car care products and aqueous leather coatings.

Summary

AQUACER 2650 is suitable according to the following compositional provisions for food contact applications, as indicated:

Adhesives		
	Suitable for food contact adhesives	Yes
Europe	Regulation (EU) No. 10/2011	Yes
	German BfR XIV 'Polymer Dispersions'	Yes
	German BfR XXXVI 'Paper and board in contact with food'	Yes
	USA	21 CFR 175.105 'Adhesives'
China	GB9685-2016, table A.5 'Adhesives'	Yes
Coatings		
	Suitable for food contact coatings	Yes
Europe	Regulation (EU) No. 10/2011	Yes
	German BfR XIV 'Polymer Dispersions'	Yes
	CoE ResAP (2004) 1	Yes
	USA	21 CFR 175.300 'Resinous and polymeric coatings'
China	GB9685-2016, table A.2 'Coatings'	Yes
Paper and paperboard		
	Suitable for food contact paper and paperboard	Yes
Europe	Regulation (EU) No. 10/2011	Yes
	German BfR XXXVI 'Paper and paperboard in contact with food'	Yes
	USA	21 CFR 176.170 'Components of paper and paperboard in contact with aqueous and fatty foods'
21 CFR 176.180 'Components of paper and paperboard in contact with dry food'		Yes
China	GB9685-2016, table A.6 'Paper'	Yes

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 (07/04/2022)	See explanation
	EuPIA Exclusion List (March 2021)	See explanation
China	GB9685-2016, table A.4 'Inks'	No

Solvents and 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**

All components of this product are directly listed in Annex I – Table I of Regulation (EU) No. 10/2011 (including all amendments). Specific Migrations Limits and/or restrictions apply.

German BfR XIV ‘Polymer Dispersions’

The product is covered by the compositional requirements of BfR XIV ‘Polymer Dispersions’.

German BfR XXXVI ‘Paper and board in contact with food’

The product is covered by the compositional requirements of BfR 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 product is covered by the compositional requirements of Sec. 175.105.

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

The active components are listed in table A.5 ‘Adhesives’ 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.

Therefore, the product can be recommended for use in food contact adhesives in China.

Coatings

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

All components of this product are directly listed in Annex I – Table I of Regulation (EU) No. 10/2011 (including all amendments). Specific Migrations Limits and/or restrictions apply.

German BfR XIV ‘Polymer Dispersions’

The product is covered by the compositional requirements of BfR XIV ‘Polymer Dispersions’.

CoE ResAP (2004) 1

The product is covered by the compositional requirements of the CoE ResAP (2004) 1.

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

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

The product does not comply with the compositional requirements of Sec. 175.300.

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

The active components are listed in 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.

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

Paper and paperboard

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

All components of this product are directly listed in Annex I – Table I of Regulation (EU) No. 10/2011 (including all amendments). Specific Migrations Limits and/or restrictions apply.

German BfR XXXVI ‘Paper and paperboard in contact with food’

The product is covered by the compositional requirements of BfR XXXVI ‘Paper and board for food contact’.

Therefore, the product can be recommended for use in food contact paper and paperboard in the EU.

USA **21 CFR 176.170 ‘Components of paper and paperboard in contact with aqueous and fatty foods’**

The product complies with the compositional requirements of 21 CFR FDA Sec 176.170.

Therefore, the product can be recommended for use in food contact paper and paperboard, in regards to 21 CFR FDA Sec. 176.170.

USA **21 CFR 176.180 ‘Components of paper and paperboard in contact with dry food’**

The product complies with the compositional requirements of 21 CFR FDA Sec 176.180.

Therefore, the product can be recommended for use in food contact paper and paperboard, in regards to 21 CFR FDA Sec. 176.180.

China **GB9685-2016, table A.6 ‘Paper’**

The active components are listed in table A.6 ‘Paper’ 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.

Therefore, the product can be recommended for use in food contact paper in China.

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 2020) since all components are listed on the A-list in Annex 10. Specific migration limits apply.

Therefore, the product can be recommended for use in food contact printing inks in the EU.

Industry **Nestlé Printing Inks for Food Packaging (07/04/2022)**

According to the recipe, the product contains 2-butoxyethanol (CAS No. 111-76-2, amount: $\geq 1\%$ – $< 3\%$) listed in Table 7 'Minimize list for Solvents'. Minimizing depends on the technical feasibility in the final ink. Additionally, The product contains CMIT/MIT (3:1) [CAS no. 55965-84-9] ($< 0.01\%$), which itself is classified with the Hazard Statements given in Group A and B of the EuPIA Exclusion Policy, as mentioned under 4. 'General Nestlé Exclusions and Minimisations'. The product itself is not classified with the Hazard Statements given in Group A and B of the EuPIA Exclusion Policy.

EuPIA Exclusion List (March 2021)

According to the recipe, none of the substances listed in Annex 1 (Group C – G) of the EuPIA Exclusion List (March 2021) are intentionally present. The product itself is not classified and labeled with any of the Hazard Statements given in Group A and B, although the product contains CMIT/MIT (3:1) [CAS no. 55965-84-9] ($< 0.01\%$), which itself is classified with the Hazard Statements given in Group A and B.

China **GB9685-2016, table A.4 'Inks'**

The product does not comply with table A.4 'Inks' 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.

Solvents

The product contains a significant amount of 2-butoxyethanol [see SDS for more information]. It is expected to evaporate from the finished product so that only residues or traces of no toxicological concern should remain. Evaporation needs to be monitored by the manufacturer of the final product. Article 3 of the Framework Regulation (EC) 1935/2004 should be fulfilled.

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.

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