

FOOD CONTACT

BYK Regulatory Information

BYK-3771

Silicone surface additive for solvent-free, radiation curable, and solvent-borne coatings, adhesives, and printing inks with a strong reduction of surface tension. Hydroxy-functional and solvent-free.

Summary

BYK-3771 is suitable according to the following compositional provisions for food contact applications, as indicated:

| Adhesives | | |
|---------------|--|-----|
| | Suitable for food contact adhesives | Yes |
| EU | Regulation (EU) No. 10/2011 | Yes |
| | German BfR XIV 'Polymer Dispersions' | Yes |
| USA | 21 CFR 175.105 'Adhesives' | Yes |
| China | GB9685-2016, table A.5 'Adhesives' | 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 (October 2018) | Yes |
| | EuPIA Exclusion List (November 2016 - Corrigendum Dec. 2018) | 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

| Adhesives | |
|-----------|---|
| EU | <p><u>Regulation (EU) No. 10/2011</u> The product complies with the compositional requirements of EU/10/2011.</p> <p><u>German BfR XIV 'Polymer Dispersions'</u> The product complies with the compositional requirements of BfR XIV 'Polymer Dispersions'.</p> |

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

USA **21 CFR 175.105 'Adhesives'**

The product complies with the compositional requirements of Sec. 175.105 of 21 CFR FDA.

Therefore, the product can be recommended for use in food contact adhesives in regards to Sec. 175.105 of 21 CFR FDA.

China **GB9685-2016, table A.5 'Adhesives'**

Not all components are listed in table A.5 of the GB9685-2016.

Therefore, the product cannot be recommended for use in food contact adhesives 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 2019) since all components are listed in Annex 10. Specific migration limits apply.

Additional note: the non-listed D4 (CAS 556-67-2) is present, as an impurity. Its amount is referred to in our BRIEF document.

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

Industry **Nestlé Guidance note on Packaging Inks (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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