

FOOD CONTACT

BYK Regulatory Information

BYK-3900 P

Polyacrylate-based powdered standard anti-cratering and leveling additive for powder coatings. Leveling additive with improved tolerance to impurities.

Technically recommended use level: 0.5 – 1.5%

Summary

BYK-3900 P is suitable according to the following compositional provisions for food contact applications, as indicated:

Coatings		
EU	Suitable for food contact coatings	Yes
	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'	Yes
China	GB9685-2016, table A.2 'Coatings'	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

Coatings

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

The active component of this product is an acrylate copolymer 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) (as amended), however the polymeric additive is identical to a polymer that can form the main structural component of a plastic material and therefore the risk from the polymeric additive can be regarded as evaluated as the monomers have already been evaluated and authorized (REG. (EU) No. 10/2011; Art. 6 No.(3) c.)).

German BfR XIV ‘Polymer Dispersions’

The product is conform to the compositional requirements of the German BfR-Recommendation XIV “Polymer Dispersions”.

CoE ResAP (2004) 1

For this product either the components themselves or the monomers and starting substances used for manufacturing are listed in the CEPE ‘Code of practice for food contact coatings’ (Edition 4, Version Feb. 2009).

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

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

The product complies with the compositional requirements of Sec. 175.300 of 21 CFR FDA. Restrictions apply.

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

The active components of BYK-3900 P are listed in GB9685-2016 table A2 for coating applications.

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
Regulatory Affairs
BYK-Chemie GmbH

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