

FOOD CONTACT

BYK Regulatory Information

BYK-3902 P

Polyacrylate-based, powdered standard anti-cratering and leveling additive for powder coatings. Particularly suited to thin-layer powder coatings.

Summary

BYK-3902 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 components of this product, or the monomers and starting materials used for manufacturing the components of the product, are listed directly in Annex I – Table I of Regulation (EU) No 10/2011. Specific Migration Limits and/or restrictions apply.

German BfR XIV ‘Polymer Dispersions’

For this product, either the components themselves or the monomers and starting substances used for manufacturing are covered by 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.

Dual use additive

The product contains a ‘dual use additive’: Silicon dioxide (CAS-No. 7631-86-9, E551).

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 complies with the compositional requirements of Sec. 175.300 of 21 CFR FDA.

Therefore, the product can be recommended for use in food contact coatings in regards to Sec. 175.300.

China

GB9685-2016, table A.2 ‘Coatings’

The active components of BYK-3902 P are listed in GB9685-2016 table A2 for coating applications.

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

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
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