

# FOOD CONTACT

## BYK Regulatory Information

### BYK-A 530

Silicone and polymer-containing defoamer/air release additive for solvent-borne and solvent-free coatings, for plastic systems (ambient-curing and pultrusion applications), adhesives and sealants. Particularly recommended for epoxy resin systems.

#### Summary

BYK-A 530 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	No
	BfR Recommendation XV 'Silicones'	Yes
USA	21 CFR 175.300 'Resinous and polymeric coatings'	Yes
China	GB9685-2016, table A.2 'Coatings'	No
MERCOSUR	GMC Resolution n. 39/19	No
	GMC Resolution n. 02/12	No
Printing inks		
Europe	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
China	GB9685-2016, table A.4 'Inks'	No

Solvents and other 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

### Coatings

#### EU

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

The active components as such are not listed as a “polymeric additive” in a.m. REG. (EU) No. 10/2011 (PIM), and therefore the product can formally not be used as an additive for plastics application.

##### **BfR Recommendation XV ‘Silicones’**

The active silicone ingredient is covered by the compositional requirements of BfR XV ‘Silicones’.

##### **Dual use additive**

This product contains the ‘dual use additive’ (< 0.5%) for which restrictions apply: 2,6-Di-tert-butyl-p-cresol (BHT; CAS-No. 128-37-0, E 321).

Since the active silicone ingredient is covered by the compositional requirements of BfR XV ‘Silicones’ and the additional components (monomers/starting components) are covered by listings in EU/10/2011, we can recommend the product for use in food contact coatings in the EU.

Solvents and other formulation aids are not covered by the food contact status.

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#### USA

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

The product is covered by 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 of 21 CFR FDA.

Solvents and other formulation aids are not covered by the food contact status.

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

The active components of BYK-A 530 are not listed in GB9685-2016.

Therefore, we cannot recommend the product for use in food contact applications in China.

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**MERCOSUR**     **GMC Resolutions n. 39/19 & 02/12**

The product does not comply with the compositional requirements of MERCOSUR GMC Resolution n. 39/19 and MERCOSUR GMC Resolution n. 02/12.

Therefore, the product is not authorized for use in coatings.

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**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). The monomers/starting substances for manufacturing the active components and all other 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.

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**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.

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**China**     **GB9685-2016, table A.4 ‘Inks’**

The active components of BYK-A 530 are not listed in GB9685-2016.

Therefore, we cannot recommend the product for use in food contact applications in China.

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## Solvent

The product contains a significant amount of petroleum solvent [boiling range from 238°C – 257°C]. Solvents are currently not regulated by food contact positive lists as it is assumed that solvents 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 and FDA 21 CFR 174.5 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.

## Food Contact Team

Regulatory Affairs  
BYK-Chemie GmbH

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