

FOOD CONTACT

BYK Regulatory Information

DISPERBYK-192

VOC and solvent-free wetting and dispersing additive for aqueous coating systems, printing inks and liquid color masterbatches for thermoplastics and to manufacture pastes for unsaturated polyester resin systems or gel coats. Particularly suitable for producing stable effect pigment dispersions.

Summary

DISPERBYK-192 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'	No
MERCOSUR	GMC Resolution n. 39/19	Yes
	GMC Resolution n. 02/12	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 (Oct.'18)	Yes
	EuPIA Exclusion List (Nov.'16 – Corrigendum Dec.'18)	Yes
Paper and paperboard		
EU	Suitable for food contact paper and paperboard	Yes
	Regulation (EU) No. 10/2011	Yes
	German BfR XIV 'Polymer Dispersions'	Yes
	German BfR XXXVI 'Paper and board in contact with	Yes
USA	21 CFR 176.170 'Components of paper and paperboard in contact with aqueous and fatty foods'	Yes
	21 CFR 176.180 'Components of paper and paperboard in contact with dry food'	Yes
China	GB9685-2016, table A.6 'Paper'	Yes

	GMC Resolution n. 40/15	No
	GMC Resolution n. 41/15	No
MERCOSUR	GMC Resolution n. 42/15	No
	GMC Resolution n. 39/19	Yes
	GMC Resolution n. 02/12	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 and the components used for manufacturing the active component, are fully evaluated as SCF - list 0-4 and 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.

German BfR XIV ‘Polymer Dispersions’

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

CoE ResAP (2004) 1

The active component of this product and the components used for manufacturing are listed in the Coating Resolution AP(2004)1 and in the CEPE “Code of practice for Food contact coatings”, Edition 4, Version Feb. 2009.

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 active component of this product is listed under §175.300.

General restrictions to coatings with regard to §175.300 (a): The coating is applied as a continuous film or enamel over a metal substrate, or the coating is intended for repeated food-contact use and is applied to any suitable substrate as a continuous film or enamel that serves as a functional barrier between the food and the substrate.

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

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

The product does not comply with table A.2 “Coatings” 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).

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

The product is authorized for use under MERCOSUR GMC Resolution n. 39/19 and MERCOSUR GMC Resolution n. 02/12. Specific Migration Limits and/or restrictions apply.

Therefore, the product can be recommended for use in food contact coatings in MERCOSUR member states.

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.

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

Industry **Nestlé Guidance Note on Packaging Inks (Oct.'18)**

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 (Nov.'16 – Corrigendum Dec.'18)

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.

Paper and paperboard

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

The active component of this product and the components used for manufacturing the active component, are fully evaluated as SCF - list 0-4 and 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.

German BfR XIV ‘Polymer Dispersions’

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

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

The product is conform with the compositional requirements of the German BfR-Recommendation XXXVI ‘Paper and board for food contact’.

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

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

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

§176.180 ‘Components of paper and paperboard in contact with dry food’

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

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

The active components of DISPERBYK-192 are listed in GB9685-2016 table A6 for paper applications.

MERCOSUR GMC Resolutions n. 40/15, 41/15, 42/15, 39/19 & 02/12

The product does not meet the compositional requirements of MERCOSUR GMC Resolutions n. 41/15 or n. 42/15.

According to MERCOSUR GMC Resolution n. 40/15, dispersions of plastic materials that comply with MERCOSUR GMC Resolution n. 39/19 and MERCOSUR GMC Resolution n. 02/12 are allowed for use as a surface and internal gluing agent in cellulosic material for general use with no thermal treatment.

The product does not meet the compositional requirements of MERCOSUR GMC Resolution n. 40/15, but the product is authorized for use under MERCOSUR GMC Resolution n. 39/19 and MERCOSUR GMC Resolution n. 02/12. Specific Migration Limits and/or restrictions apply.

Therefore, the product can be recommended for use in food contact cellulosic materials for general use with no thermal treatment in MERCOSUR member states.

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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This issue replaces all previous versions - Printed in Germany.

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