FOOD CONTACT

BYK Regulatory Information

AQUACER 531

Summary

AQUACER 531 is suitable according to the following compositional provisions for food contact applications, as indicated:

Adhesives		
Europe	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’	Yes

Printing inks		
Europe	GIO – German Ink Ordinance, part of BedGgstV	Yes
	Swiss Ordinance 817.023.21	Yes
Industry	Nestlé Standard ‘Printing Inks for Food Packaging’	Yes
	EuPIA CHARTER	Yes

This summary only reflects conducted evaluations on existing regulations. It does not exclude compliant use in additional regions or applications.
Please refer to the explanation section below for detailed information on the regulations and assessment criteria considered.

Explanation

Adhesives

Europe

Regulation (EU) No. 10/2011

The product may be used for the manufacturing of materials and articles within the scope of Regulation (EU) N° 10/2011 and its amendments. Components not listed in Annex I, table 1, or not considered polymeric additives under the regulation, may be used as PPAs subject to national legislation. Not to be used for articles in contact with fatty food. Specific Migration Limits (SML) or restrictions apply.

BfR Recommendation XIV 'Polymer dispersions'

This product may be used for polymer dispersions for coating commodities intended to come into contact with foods (e.g. adhesives or paper coatings), as its component(s) are listed by reference to Commission Regulation (EU) No 10/2011. Not to be used for articles in contact with fatty food. Specific Migration Limits (SML) or restrictions apply.

USA

Adhesives 21 CFR 175.105

The product complies with the compositional requirements of 21 CFR 175.105 Adhesives. This product includes components that are listed in 21 CFR 175.105 as well as components which are cleared under 21 CFR 178.3710 Petroleum wax, which may be cross-referenced for use in compliance with 21 CFR 175.105.

Therefore, the product can be recommended for use in food contact adhesives in compliance with 21 CFR 175.105 Adhesives. As per the limitations outlined in that regulation, the final adhesive must either be separated from the food by a functional barrier or used subject to the following additional limitations:

- In dry foods: The quantity of adhesive that contacts packaged dry food shall not exceed the limits of good manufacturing practice.
- In fatty and aqueous foods:
    - The quantity of adhesive that contacts packaged fatty and aqueous foods shall not exceed the trace amount at seams and at the edge exposure between packaging laminates that may occur within the limits of good manufacturing practice.
    - Under normal conditions of use the packaging seams or laminates will remain firmly bonded without visible separation.

To assure safe usage of adhesives, the label of the finished adhesive container shall bear the statement "food-packaging adhesive".

China

GB9685-2016, table A.5 'Adhesives'

The active components are listed in GB9685-2016 table A5 for adhesive applications.

Printing Inks

Europe

GIO – German Ink Ordinance, part of BedGgstV

The product may be used for the manufacturing of printing inks for packaging intended for direct and indirect contact with food as defined in the German BedGgstV – status 20 December 2025. Not to be used for articles in contact with fatty food. The components are either fully listed in Annex 14, table 1 or in Regulation (EU) No. 10/2011, Annex I, table 1. Specific Migration Limits (SML) or restrictions apply.

Swiss Ordinance 817.023.21

The product may be used for the manufacturing of printing inks for packaging according to Swiss Ordinance 817.023.21 (Version as of 1 January 2026), since the components are fully listed in Annex 10. Not to be used for articles in contact with fatty food. Specific Migration Limits (SML) apply.

Industry

Nestlé Standard 'Printing Inks for Food Packaging' (02/04/2024)

The product intentionally does not contain any of the substances listed in section 4. 'General Nestlé Exclusions and Minimisations' and sections 5. – 8. of the Nestlé Standard 'Printing Inks for Food Packaging' (02/04/2024).

EuPIA CHARTER (March 2026)

The product intentionally does not contain any of the substances listed in Annexes 1 and 2 of the 'EuPIA Charter on Raw Material Selection and Exclusion for Printing Inks and Related Products' (1st edition, March 2026). The product itself as raw material is not classified and labeled with any of the Hazard Statements for Group I or Group II substances as defined in the section 'Selection Criteria & Procedures'.

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. Please note that it is the responsibility of both manufacturers of finished food contact articles and downstream business operators to ensure compliance with the applicable migration limits and restrictions of the finished materials or articles under specific real and/or foreseeable conditions of use.
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 is in effect for three years commencing the date of issue.

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