

FOOD CONTACT

BYK Regulatory Information

BYK-154

Ammonium polyacrylate-based dispersing additive for pigment stabilization in aqueous emulsion paints and emulsion adhesives as well as thinner for water-based drilling fluids.

Summary

BYK-154 is suitable according to the following compositional provisions for food contact applications, as indicated:

Adhesives		
EU	Suitable for food contact adhesives	Yes
	Regulation (EU) No. 10/2011	Yes
	German BfR XIV 'Polymer Dispersions'	Yes
	German BfR XXXVI 'Paper and board for food contact'	Yes
USA	21 CFR 175.105 'Adhesives'	Yes
China	GB9685-2016, table A.5 'Adhesives'	No

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

Adhesives

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

The main active component as such is not listed as a “polymeric additive” in a.m. REG. (EU) No. 10/2011 (PIM), however, the components themselves or the monomers and starting substances used for manufacturing are listed in the Regulation (EU) No. 10/2011. 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 covered by the compositional requirements of the BfR XIV ‘Polymer Dispersions’.

German BfR XXXVI ‘Paper and board for food contact’

The product is covered by the compositional requirements of the BfR XIV ‘Paper and board for food contact’.

Therefore, the product can be recommended for use in food contact adhesives in the EU.

USA **21 CFR 175.105 ‘Adhesives’**

The product is covered by the compositional requirements of 21 CFR Sec. 175.105 “Adhesives”.

Therefore, a use in adhesives in regards to Sec. 175.105 can be recommended.

China **GB9685-2016, table A.5**

The product does not comply with table A.5 ‘Adhesives’ of 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).

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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This issue replaces all previous versions

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