

FOOD CONTACT

BYK Regulatory Information

BYK-352

Polyacrylate-based surface additive for solvent-borne and solvent-free systems. Standard leveling additive with air release properties.

Technically recommended use level: 0.2 – 0.5%

Summary

BYK-352 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
	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

Solvents and 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 component of this product is a poly acrylate polymer and manufactured using monomers which are fully evaluated as SCF-list 0-4 and directly 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 (including all amendments). Restrictions apply. The active component as such is 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.

German BfR XIV ‘Polymer Dispersions’

The product is conform to the compositional requirements of the German BfR-Recommendation XIV ‘Plastic Dispersions’.

CoE ResAP (2004) 1

The composition of the product is listed in the Council of Europe Framework Resolution ResAP (2004) 1 on coatings intended to come into contact with foodstuffs.

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

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

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

The product complies with the compositional requirements of 21 CFR Sec. 175.300.

Therefore, the product can be recommended for food contact coatings as described in Sec. 175.300 of 21 CFR FDA.

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

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

The product does not comply with table A.2 ‘Coatings’ 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).

Solvents

The product contains a significant amount of solvent [see SDS for more info]. 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 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
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