

FOOD CONTACT

BYK Regulatory Information

RHEOBYK-H 3300 VF

VOC-free associative thickener (HEUR) for aqueous systems to generate a slightly pseudoplastic flow behavior.

Technically recommended use level: 0.3 – 2 %

Summary

RHEOBYK-H 3300 VF is suitable according to the following compositional provisions for food contact applications, as indicated:

Adhesives		
	Suitable for food contact adhesives	Yes
Europe	Regulation (EU) No. 10/2011	No
	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
Coatings		
	Suitable for food contact coatings	Yes
Europe	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'	No
China	GB9685-2016, table A.2 'Coatings'	No
Paper and paperboard		
	Suitable for food contact paper and paperboard	Yes
Europe	Regulation (EU) No. 10/2011	No
	German BfR XXXVI 'Paper and board for food contact'	Yes
	USA 21 CFR 176.170 'Components of paper and paperboard in contact with aqueous and fatty foods'	No
USA	21 CFR 176.180 'Components of paper and paperboard in contact with dry food'	No
	China	GB9685-2016, table A.6 'Paper'

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 – Corr. Dec. '18)	Yes

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

Adhesives

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

Either the components themselves or the monomers and starting substances used for manufacturing are listed in Regulation (EU) No. 10/2011 (PIM). The main active component is not listed as a “polymeric additive” in Regulation (EU) No. 10/2011, and therefore the product can formally not be used as an additive in compliance with this regulation.

German BfR XIV ‘Polymer Dispersions’

Either the components of this product themselves or the monomers and starting substances used for manufacturing them are covered by the German BfR-Recommendation XIV. “Polymer Dispersions”.

German BfR XXXVI ‘Paper and board for food contact’

The product complies with the compositional requirements of BfR XXXVI ‘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 complies with the compositional requirements of 21 CFR 175.105.

Therefore, the product can be recommended for use in food contact adhesives according to 21 CFR 175.105.

China **GB9685-2016, table A.5 ‘Adhesives’**

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.

Coatings

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

Either the components themselves or the monomers and starting substances used for manufacturing are listed in Regulation (EU) No. 10/2011 (PIM). The main active component is not listed as a “polymeric additive” in Regulation (EU) No. 10/2011, and therefore the product can formally not be used as an additive in compliance with this regulation.

German BfR XIV ‘Polymer Dispersions’

Either the components of this product themselves or the monomers and starting substances used for manufacturing them are covered by the German BfR-Recommendation XIV. “Polymer Dispersions”.

CoE ResAP (2004) 1

Either the components of this product themselves or the monomers and starting substances used for manufacturing them are listed in the Council of Europe Policy statement concerning ‘Coatings intended to come into contact with foodstuffs’, Version 3, 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 product does not comply with the compositional requirements of 21 CFR 175.300.

Therefore, the product cannot be recommended for use in food contact coatings according to 21 CFR 175.300.

Paper and paperboard

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

Either the components themselves or the monomers and starting substances used for manufacturing are listed in Regulation (EU) No. 10/2011 (PIM). The main active component is not listed as a “polymeric additive” in Regulation (EU) No. 10/2011, and therefore the product can formally not be used as an additive in compliance with this regulation.

German BfR XXXVI ‘Paper and board for food contact’

The product complies with the compositional requirements of BfR XXXVI ‘Paper and board for food contact’.

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

USA **21 CFR 176.170 ‘Components of paper and paperboard in contact with aqueous and fatty foods’**

The product does not comply with the compositional requirements of 21 CFR 176.170.

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

The product does not comply with the compositional requirements of 21 CFR 176.180.

Therefore, the product cannot be recommended for paper and paperboard in contact with food.

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

The product does not comply with table A.6 ‘Paper’ 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.

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) since all components are listed in Annex 10. Specific migration limits apply.

Therefore, the product can be recommended for use in 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 – Corr. 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.

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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