

April 9, 2024

SILIKOFTAL® HTL 3/MPA

Food Contact Information

Food Contact legislation pertains to the end product, such as food packaging and kitchen utensils. While information on raw materials can aid in compliance, ultimate legal adherence can only be confirmed upon completion of the finished product. The following conformities are contingent upon the product being utilized in accordance with technical data sheet specifications, such as its use as an additive or co-binder, and at the designated usage level.

Silicone polyester resins represent a special type of chemistry used for heat-stable, decorative and functional coatings, e.g. applied for cook and bakeware, and for which specific food contact regulations neither exist nor existing legislation does apply. In order to achieve compliance with Food Contact Framework Regulations, for example Art. 3 of EC 1935/2004, existing positive lists may be used as supporting evidence, however, final compliance can only be verified by testing the finished food contact article.

BfR Recommendation XV

The active ingredient of SILIKOFTAL® HTL 3/MPA is listed in BfR Recommendation XV (silicone).

SILIKOFTAL® HTL 3/MPA may be used in compliance with BfR Recommendation XV (silicone) under the following provisions:

- a. Proper curing of the resin system
- b. Complete evaporation of the solvent

The BfR-Recommendation XV is the only European positive list covering silicone resins for food contact. Since raw materials change significantly during the high temperature curing, compliance with BfR-XV can only provide supporting evidence for finished product conformity with EC 1935/2004.

EU: Regulation 10/2011

Switzerland: SR 817.023.21

Nestlé Guidance Note on Packaging Inks (latest published version)

German Ink Ordinance (GIO) / Consumer Goods Regulation (BedGgStV)

The components in SILIKOFTAL® HTL 3/MPA are not listed in above mentioned regulations since silicone resins are not covered by these regulations or silicone resins are not used as raw materials of the regulated application (i.e. printing ink).

China GB 4806.10 – 2016

Safety testing with SILIKOFTAL® HTL 3/MPA have been conducted in order to evaluate concerns about migration of unwanted substances into food. The tests were run in a third party laboratory.

The test methods specified in GB 4806.10 National Food Safety Standard Paint and Coating for Food Contact have been followed. Based on these test results and the composition of the products we consider the use of SILIKOFTAL® HTL 3/MPA in food contact coatings as safe.

USA: FDA

We have considered the compositional information of SILIKOFTAL® HTL 3/MPA and have determined that the majority of the reactants are properly regulated for use in food contact coatings under 21 CFR 175.300. Based on the available toxicity data and estimated dietary exposure to the components of SILIKOFTAL® HTL 3/MPA, we conclude that SILIKOFTAL® HTL 3/MPA is GRAS for use as a coating on the food-contact surface of cookware, bakeware and domestic kitchen appliances.

Mercosur:

SILIKOFTAL® HTL 3/MPA is not in compliance with Mercosur Regulations.

Japan: Japanese Positive List (PL) for Direct Food Contact

The Japanese positive list of substances used in synthetic resins for utensils, containers and packaging (UCP) in accordance with the implementation of the amended Food Sanitation Act came into force *on 1 June 2020. Since then*, Japan's Ministry of Health, Labour and Welfare (MHLW) published several draft versions of revised and restructured lists and continues to amend the lists and provisions during the granted five-year grace period. Therefore, the status of our products varies with the activities of MHLW and cannot be confirmed finally. Please, do not hesitate to ask for a temporary status in urgent cases.

EUPIA EXCLUSION LIST FOR PRINTING INKS AND RELATED PRODUCTS*

(6th Edition of March 2024)

For Selection Criteria A and B: Please refer to Safety Data Sheet (Chapter 3).

We would like to confirm that we do not expect the presence of substances listed in the EUPIA "Exclusion List for Printing Inks and Related Products", in Selection Criteria C and Substances Lists D to G in SILIKOFTAL® HTL 3/MPA.

Detailed information of the guidance can be found under the following Link:

[EUPIA Exclusion List for printing inks](#)

Finished food contact materials or articles containing this product as a component, need to comply inter alia with migration and/or extraction limits or any other restrictions – as specified in the applicable regulations. Verification of compliance with above mentioned limits/restrictions should be carried out in accordance with the respective rules. We would like to point out that it is in the sole responsibility of the manufacturer of the final material or article to assure the compliance under actual and foreseeable conditions of use, and to check it on a regular basis. The manufacturer of food contact materials or articles, containing this product as a component, must in particular ascertain that these finished materials or articles meet the general regulatory requirement that they do not endanger human health, or bring about an unacceptable change in the composition of the food or deterioration in the organoleptic characteristics thereof.

*The given information is based on and represents our current compositional knowledge (based on the knowledge of the production process, supplier information for raw materials and analytical data where applicable). In case of provided values these are considered to be typical concentrations and are not part of product specification.

Furthermore, the given information is intended for persons having the required skill and know-how and it does not relieve you from verifying the suitability of the information given for a specific purpose prior to use by testing, which should be carried out only by qualified experts. Use or application of such information is at your sole responsibility and risk, without any liability on the part of Evonik Operations GmbH.

All provided information is based on our present knowledge and experience and is true and complete to the best of our knowledge and belief. However, no warranty, whether expressed or implied, or guarantee of product properties in the legal sense is intended or implied.

In case of any questions concerning the provided information or if you need additional advice you are welcome to contact us:

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