

June 28, 2023

SURFYNOL® 2502

Food Contact Information

EU: Regulation 10/2011

BfR Recommendation IV, XXXVI, XXXVI/1, XXXVI/2

China: GB 9685 – 2016

Mercosur: GMC/RES. N° 39/19 and GMC/RES. N° 02/12

SURFYNOL® 2502 is not in compliance with above mentioned regulations.

Switzerland: SR 817.023.21 (latest published version)

SURFYNOL® 2502 is in compliance with the “Ordinance of the FDHA on Materials and Articles (SR817.023.21)”. All components (additives and / or monomers) are listed in Annex 10 in the lists for evaluated (A) with one SML.

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

SURFYNOL® 2502 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 2 December 2021. 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 from column 8 of Annex 14 apply.

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.

USA: FDA

SURFYNOL® 2502 may be used in compliance with the following FDA regulations:

21 CFR 175.105 – Adhesives

21 CFR 176.180 – Components of paper and paperboard in contact with dry food.

The above clearances are subject to the end-use and extractive limitations cited in the specific regulations.

EUPIA EXCLUSION LIST FOR PRINTING INKS AND RELATED PRODUCTS

(latest published version)

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 (listed substances in the table) in SURFYNOL® 2502.

| Substances |
|--|
| Pigments and substances based on: <ul style="list-style-type: none">• Antimony• Arsenic• Cadmium• Chromium (VI)• Lead• Mercury• Selenium |
| Pigment colourants: <ul style="list-style-type: none">• Auramin (Basic Yellow 2 – CI 41000)• Chrysoidin (Basic Orange 2 – CI 11270)• Fuchsin (Basic Violet 14 – CI 42510)• Indulin (Solvent Blue 7 – CI 50400)• Kresylen (Basic Brown 4 – CI 21010) |
| Solvents: <ul style="list-style-type: none">• 2-Methoxyethanol 109-86-4• 2-Methoxyethyl acetate 110-49-6• 2-Ethoxyethyl acetate 111-15-9• 2-Ethoxyethanol 110-80-5• Monochlorobenzene• Dichlorobenzene• Volatile chlorinated hydrocarbons, such as trichloroethylene, perchlorethylene and methylenechloride• Volatile fluorochlorinated hydrocarbons• 2-Nitropropane• Methanol |

| |
|--|
| Plasticisers: <ul style="list-style-type: none"> • Chlorinated naphthalenes • Chlorinated paraffins • Monocresyl phosphate • Tricresyl phosphate • Monocresyl diphenyl phosphate |
| Various Compounds: <ul style="list-style-type: none"> • Diaminostilbene and derivatives • 2,4-Dimethyl-6-tertiary-butylphenol • 4,4 Tetramethyldiaminobenzophenone (Michler's Ketone) • Hexachlorocyclohexane |

Nestlé Guidance Note on Packaging Inks (latest published version)

We do not expect the presence of following substances within SURFYNOL® 2502:

General exclusions

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|---|
| Titanium Acetyl Acetonate (TAA) |
| <i>Ortho</i> -Phthalate plasticizers |
| Bisphenol A (BPA) and materials manufactured from or incorporating BPA in reacted form as part of the chemical structure |
| Nitrocellulose resins |
| Vegetable oils/fatty acid esters with strong odours |
| Heavy/Toxic metal in amounts exceeding the respective limits mentioned in the Swiss ordinance |
| Solvents and other chemicals which give off-odour or taint to the food |
| Perfluoro compounds must not be used, except for PTFE waxes |
| Mineral oils containing aromatic substances (MOAH) must not be used |
| Mineral oils containing saturated hydrocarbons (MOSH) must be minimised, and their residual value must be below 0.1% of the dry film |
| Photoinitiators mentioned in the "EuPIA Suitability List of Photoinitiators and Photosynergists for Food Contact Materials - October 2020 |

Odour: Specific to the product

Table 1: Exclusion list for pigments

| Pigments | Color index | CAS number | Swiss Ordinance |
|------------------|-------------|------------|-----------------|
| Pigment Red 81 | 45160:1 | 12224-98-5 | B |
| Pigment Red 81:1 | 45160:3 | 80083-40-5 | B |
| Pigment Red 81:5 | 45160:4 | 63022-06-0 | B |
| Pigment Red 169 | 45160:2 | 12237-63-7 | B |
| Pigment Green 1 | 42040:1 | 1325-75-3 | B |
| Pigment Blue 1 | 42595.2 | 1325-87-7 | B |
| Pigment Violet 1 | 45170:2 | 1326-03-0 | B |

| | | | |
|-------------------|---------|-------------------------|---|
| Pigment Violet 2 | 45175:1 | 1326-04-1 | B |
| Pigment Violet 3 | 42535:2 | 1325-82-2 67989-22-4 | B |
| Pigment Violet 27 | 42535:3 | 12237-62-6 | B |
| Pigment Violet 39 | 42555:2 | 64070-98-0 | B |

Table 2: Exclusion list for Photo-Initiators

| PI Name | CAS Number | Swiss Ordinance |
|--|------------|-----------------|
| 2-Hydroxy 2-methyl propiophenone | 7473-98-5 | B |
| 2-(Dimethylamino)ethyl benzoate | 2208-05-1 | B |
| - Benzophenone | 119-61-9 | A |
| - 2-Methyl benzophenone | 131-58-8 | A |
| - 4-Methyl benzophenone | 134-84-9 | A |
| - 2,4,6-trimethylbenzo- phenone | 954-16-5 | B |
| 1-Hydroxycyclohexyl phenylketone | 947-19-3 | B |
| 2,2-Dimethoxy 2-phenyl acetophenone | 24650-42-8 | B |
| 2-Methyl 4'-(methylthio) 2-morpholinopropiophenone | 71868-10-5 | B |
| - 4-Isopropyl 9H-thioxanthen-9-one | 83846-86-0 | A |
| - 2-Isopropyl 9H-thioxanthen-9-one | 5495-84-1 | A |
| 2,4-Diethyl 9H-thioxanthen-9-one | 82799-44-8 | B |
| Diphenyl (2,4,6-trimethyl benzoyl) phosphine oxide | 75980-60-8 | A |

Table 3: Minimize list for Photo-Initiators

| PI Name | CAS Number | Swiss Ordinance |
|--|-------------|-----------------|
| Irgacure | 119313-12-1 | A |
| Other monomeric Benzophenones (not forbidden above) benzoate | various | A / B |

Table 4: Exclusion list for acrylates

| Chemical name | CAS number | Swiss Ordinance |
|--------------------------------------|------------|-----------------|
| Butanediol Diacrylate (BDDA) | 1070-70-8 | B |
| Diethylene glycol diacrylate (DEGDA) | 4074-88-8 | B |
| Isodecyl acrylate (IDA) | 1330-61-6 | B |
| Octyl acrylate (ODA) | 2499-59-4 | A |
| Phenoxy ethyl acrylate | 48145-04-6 | B |

Table 5: Minimize list for acrylates

| Chemical name | CAS number | Swiss Ordinance |
|---|------------|-----------------|
| Trimethylol propane triacrylate (TMPTA) | 15625-89-5 | B |
| Dipropylene glycol diacrylate (DPGDA) | 57472-68-1 | B |
| 1, 6-Hexanediol diacrylate (HDDA) | 13048-33-4 | B |
| 2-Ethyl hexyl acrylate (2EHA) | 103-11-7 | A |
| Mixtures of pentaerythritol tri- and tetra-acrylates (PETA) | 3524-68-3 | B |
| Tetraethylene glycol diacrylate (TEGDA) | 17831-71-9 | B |

Table 6: Exclusion list for solvents

| Chemical name | CAS number | Swiss Ordinance |
|------------------------|------------|-----------------|
| Monochlorobenzene | 108-90-7 | A |
| Toluene | 108-88-3 | A |
| 1-methyl-2-pyrrolidone | 872-50-4 | A |

Table 7: Minimize list for solvents

| Chemical name | CAS number | Swiss Ordinance |
|-----------------------------|------------|-----------------|
| Methanol | 67-56-1 | A |
| Cyclohexane | 110-82-7 | A |
| Methylethylketone (MEK) | 78-93-3 | A |
| Methylisobutylketone (MiBK) | 108-10-1 | A |
| Hexanol | 111-27-3 | A |
| 2-Ethyl-1-hexanol | 104-76-7 | A |
| n-Octanol | 111-87-5 | A |
| Butylglycol | 111-76-2 | A |
| Butyldiglycol | 112-34-5 | A |
| Ethyldiglycol | 111-90-0 | A |
| Hexyleneglycol | 107-41-5 | A |
| Butoxypropanol | 5131-66-8 | A |
| Butoxypropoxypropanol | 29911-28-2 | A |
| Ethandiol | 107-21-1 | A |
| Diethyleneglycol | 111-46-6 | A |
| Triethyleneglycol | 112-27-6 | A |
| Butylglycolacetate | 112-07-2 | A |
| 1-Methoxy-2-propylacetate | 108-65-6 | A |
| Ethylbenzene | 100-41-4 | A |
| 1-Pentanol | 71-41-0 | A |

Finished food contact materials or articles containing this product as a component, need to comply inter alia with Overall Migration Limit (OML) requirements – as specified in the regulations. Verification of compliance with migration limits (OML and SML) should be carried out in accordance with the rules laid down there. 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 with the OML/SML requirements 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 information given above 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.

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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