

March 6, 2023

SILIKOFTAL® HTW 3

Food Contact Information

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® HTW 3 is listed in BfR Recommendation XV (silicone).

SILIKOFTAL® HTW 3 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® HTW 3 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® HTW 3 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® HTW 3 in food contact coatings as safe.

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

This product may be used in compliance with the following sections and may be subject to any applicable limitations:

FDA 21 CFR 175.300

Mercosur:

SILIKOFTAL® HTW 3 has not been evaluated regarding Mercosur 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 SILIKOFTAL® HTW 3:

Substances
Pigments and substances based on: <ul style="list-style-type: none">• Antimony• Arsenic

<ul style="list-style-type: none"> • Cadmium • Chromium (VI) • Lead • Mercury • Selenium
<p>Pigment colourants:</p> <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)
<p>Solvents:</p> <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
<p>Plasticisers:</p> <ul style="list-style-type: none"> • Chlorinated naphthalenes • Chlorinated paraffins • Monocresyl phosphate • Tricresyl phosphate • Monocresyl diphenyl phosphate
<p>Various Compounds:</p> <ul style="list-style-type: none"> • Diaminostilbene and derivatives • 2,4-Dimethyl-6-tertiary-butylphenol • 4,4 Tetramethyldiaminobenzophenone (Michler's Ketone) • Hexachlorocyclohexane

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:

Evonik Operations GmbH
Goldschmidtstraße 100
45127 Essen
Germany
www.evonik.de
www.coating-additives.com

Please contact for region Europe, Middle East, Russia and Afrika
regulatory-coating-additives-europe@evonik.com

Please contact for region Americas
regulatory-coating-additives-americas@evonik.com

Please contact for region Asia, Australia and New Zealand
regulatory-coating-additives-asia@evonik.com