



Whitford Pte. Ltd.,  
No. 1 Tuas Basin Close, Singapore 638803  
Tel: (65) 6861-6877 • Fax: (65) 6861-6577  
Email: salessgp@whitfordww.com  
Business Registration No. 199103553E

29 July 2019

**Subject: Food Contact Status of a Non-stick Coating:  
XYLAN® 8610S/K4299 Black Metallic**

Dear Mr Stephen

As required by e.g. Commission Regulation (EC) 2023/2006 of 22 December 2006, as amended, all food contact coatings by Whitford are produced according to good manufacturing practice based upon forty-nine years' experience of the Whitford Worldwide companies.

This letter provides our assurances that the subject coating system is formulated to fully comply with Commission Regulation (EC) 1935/2004 of 27 October 2004, as amended, on "*Materials and articles intended to come into contact with food.*" Most Whitford coatings are applied to metal substrates, hence Commission Directive 2002/72/EC and the more recent update Commission Regulation 2011/10/EU, both better known as the Plastics Directive/Regulation, are not fully applicable to Whitford's coatings, as stated in the latter document:

"Adhesives, coatings and printing inks are not necessarily composed of the same substances as plastics. Regulation (EC) No 1935/2004 foresees that for adhesives, coatings and printing inks specific measures can be adopted."

"Coatings, printing inks and adhesives are not yet covered by as specific EU legislation and therefore not subject to the requirement of a declaration of compliance."

Additionally, the type of resin used in this coating system is specifically excluded by 2011/11/EU. Hence to comply with the compositional requirements of EC/1935/2004 Whitford use EU guidelines e.g. Synoptic Document, Resolution AP (2004) 5 and 2008(1) etc. or National Legislation like Chapter L1 of Germany's Kunststoffe im Lebensmittelverkehr of the Bundesinstitut für gesundheitlichen Verbraucherschutz und Veterinärmedizin (Kunststoffempfehlungen des BfR Recommendation L1) on Temperature Resistant Polymer Coating Systems for Frying, Cooking and Baking Utensils or XV - Silicones.

In the absence of EU legislation on migration testing of the constituents of coatings, adhesives and inks, any item coated with this coating system, should meet the migration requirements of Commission Regulation (EU) 10/2011 of 14 January 2011,

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29 July 2019

Page 2 of 2

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as amended, "*on plastic materials and articles intended to come into contact with food*" for all food types.

Thus, provided it is processed in accordance with Whitford's instructions, this coating system is specifically permitted in all EU Member States for use on food contact articles, including, but not limited to articles such as baking trays, frying pans, dishes, cooking utensils and electrical appliances. Whitford can confirm that when used to coat food contact surfaces temperatures equal to or less than 230°C (445°F) continuously and/or 260°C (500°F) intermittently, the subject coating system meets the requirements of EC/1935/2004.

Under Article 28 (formerly Article 30) of the Treaty Establishing the European Community, which permits the free movement of goods among EU Member States, products containing this coating system may be used as intended in all EU Member States since it has first been lawfully marketed in another European Union (EU) Member State.

This letter of assurance is applicable only to the non-stick coating system described herein. It is not applicable to material(s) from other vendors to which the non-stick coating system is applied, i.e., metal pre-treatments, platings, primers, or metal substrata. Documentation as to the appropriateness of metal pre-treatments, plating, primers, or metal substrata for use in food-contact applications must be obtained from the manufacturers or vendors of these materials, or their scientific and / or legal counsel.

We trust this letter provides adequate assurance as to the regulatory status of this coating system under the relevant EU Directives as well as the national laws and regulations of the individual EU Member States. If you require any additional information, please contact your local sales office or Mr. Campbell Wilson, Regulatory Manager (includes REACH), Whitford Ltd, [cwilson@whitfordww.com](mailto:cwilson@whitfordww.com) or Hilda Tan, AP Regulatory Manager, Whitford Pte Ltd, [hitan@whitfordww.com](mailto:hitan@whitfordww.com)

For the Whitford Worldwide companies,

Sincerely,



Hilda Tan  
AP Regulatory Manager

Copy: Whitford Ltd, Hong Kong, Whitford Corporation, USA