



## Statement Regarding Circulaire No. 176 of 2 December 1959 (December 2021)

France does not currently maintain legally binding legislation specifically regulating colorants used in plastics, or in any other type of food contact material or article. In the past, Circulaire No. 176 of 2 December 1959 on pigments and colorants intended for use in plastic materials and packaging, was the reference text in France for assessing whether colorants used in plastic materials and articles complied with French food contact legislation. However, this text must now be deemed to be repealed (see footnote 1).

The Packaging Law article below explains the repeal of Circulaire No. 176:

<https://www.packaginglaw.com/ask-an-attorney/please-explain-details-surrounding-french-positive-list>

Although the Council of Europe (CoE) Resolution AP(89)1 on the use of Colorants in Plastic Materials Coming into Contact with Food is not legally binding, it has become industry guidance identifying purity criteria. Resolution AP(89)1 permits the use of carbon black as a coloring additive in plastic consumer articles coming into contact with food. Himadri's carbon black products meet the requirements as follows:

- Toluene extractable: maximum 0.15 %
- Metals shall not exceed certain limits (Sb: 0.05%, As: 0.01%, Ba: 0.01%, Cd: 0.01%, Cr: 0.1%, Pb: 0.01%, Hg: 0.005%, and Se: 0.01%)
- Aromatic amines shall not exceed 500 ppm

In addition, regulation EU 10/2011 has harmonized the purity criteria applicable to carbon blacks (Ref. No. 42080) used in plastics coming into contact with food. The same purity criteria and restrictions are applicable to carbon black in all the countries of the European Union as follows:

- Primary particles of 10 – 300 nm which are aggregated to a size of 100 – 1200nm which may form agglomerates within the size distribution of 300nm – mm
- Toluene extractable: maximum 0.1 %, determined according to ISO 6209 method
- UV absorption of cyclohexane extract at 386 nm: < 0.02 AU for a 1 cm cell or < 0.1 AU for a 5 cm cell, determined according to a generally recognized method of analysis
- Benzo(a)pyrene content: max 0.25 mg/kg carbon black
- Maximum use level of carbon black in the polymer is 2.5% w/w

Select Himadri carbon black products meet the purity criteria of EU 10/2011. Please contact your sale representative for further information.



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