



Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

January 7, 2013

Alan Shaw
Plastic Recycling Inc.
2015 S Pennsylvania St.
Indianapolis, IN 46224

Re: Prenotification Consultation (PNC) 1237

Dear Mr. Shaw:

This letter is in response to your electronic submission (PNC 1237), received on November 27, 2012 on behalf of Plastic Recycling Inc. (PRI), requesting an agency's no objection letter to confirm the capability of your proposed recycling process in producing recycled polystyrene (R-PS) and recycled polypropylene (R-PP) suitable for use at a level of up to 100% recycled content in the manufacture of food contact articles for non-alcoholic foods and beverages, and alcoholic beverages for food services, such as cold and hot fill drink cups, stir sticks and spear sticks, and containers for hot baked goods. This follows the previous submission logged in under PNC 1225.

You provided for our review the detailed description of the proposed recycling process (i.e., a secondary recycling process) and the specifications of the recycled material. The proposed recycling process emphasizes strict source control and sortation of the feedstock. The feedstock is composed of post-industrial and post-consumer materials, including 1) PS scraps retrieved from the manufacture of CD jewel boxes, 2) PS from unsold CD jewel boxes, and 3) mixed PS and PP clothes hangers, all of which do not enter the solid waste stream. The feedstock of cloth hangers and CD jewel boxes is sorted and separately recycled. The PS and PP material and adjuvants are food grade complying with all applicable authorizations. The recycled material does not contain any new additives added during the recycling process.

We have reviewed the information you have provided, and found that because of strict source control, there is little likelihood of unacceptable contaminant levels in your R-PS and R-PP. Therefore, we have determined that the proposed secondary recycling process, as described in the subject submission, would produce R-PS and R-PP material that may be suitable for use at a level of up to 100% recycled content in the manufacture of articles for non-alcoholic foods and beverages, and alcoholic beverages for food services, under the conditions of use as described in all applicable authorizations.

The resultant recycled material must comply with all applicable authorizations including 21 CFR § 174.5 General provisions applicable to indirect food additives. For example, in accordance with section 402(a)(3) of the Federal Food, Drug and Cosmetic Act, use of the recycled PP material should not impart odor or taste to food rendering it unfit for human consumption.

If you have any questions concerning this matter, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Vane Komolprasert". The signature is written in a cursive, flowing style.

Vane Komolprasert, Ph.D., P.E.
Consumer Safety Officer
Division of Food Contact Notifications, HFS-275
Office of Food Additive Safety
Center for Food Safety
and Applied Nutrition