



May 28, 2019

Martha Marrapese
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Re: Prenotification Consultation PNC 2305

Dear Ms. Marrapese:

This letter is in response to your electronic submission (PNC 2305), received November 19, 2018 and amended April 16, 2019, on behalf of Plastic Recycling Inc. (PRI), requesting an Agency's no objection letter to confirm the capability of PRI's recycling process to produce recycled polypropylene (R-PP) that is suitable for food contact. The R-PP is intended for use at a level of up to 100% recycled content in the manufacture of articles for contact with all food types under the conditions of use as described in all applicable authorizations.

You provided for our review the description of the proposed recycling secondary recycling process, which emphasizes strict source control and sortation of the feedstock. The feedstock is composed of unused DVD cases and clothes hangers from retail stores in the U.S. The sourced PP material complies with 21 CFR 177.1520 (olefin polymers) and that the adjuvants comply with 21 CFR 178.2010 (antioxidants and/or stabilizers for polymers). No additives are added to the PP during PRI's recycling process. The proposed recycling process is the subject of our review and a no objection letter dated January 7, 2013.

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-PP. Therefore, we have determined that the proposed secondary recycling process would produce R-PP material that may be suitable for use at a level of up to 100% recycled content in the manufacture of articles for contact with all food types 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 material should not impart odor or taste to food rendering it unfit for human consumption.

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

U.S. Food and Drug Administration
Center for Food Safety & Applied Nutrition
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Sincerely,

Vanee Komolprasert, Ph.D., P.E.
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