

February 18, 2025

Martha E. Marrapese
Wiley Rein LLP
2050 M St NW
Washington, DC 20036
mmarrapese@wiley.law

RE: Prenotification Consultation (PNC) 003202

Dear Ms. Marrapese:

This letter is in response to your submission, received on January 13, 2025, on behalf of Plastic Recycling Inc. (PRI), requesting a no objection letter (NOL) confirming the capability of PRI's secondary recycling process to produce recycled polypropylene (rPP) or recycled polystyrene (rPS) that is suitable for food-contact applications. The rPP or rPS is intended for use up to 100% recycled content for the manufacture of articles for contact with all food types under the conditions of use as described in all applicable authorizations. Your submission was logged as Prenotification Consultation (PNC) No. 3202.

We have reviewed the proposed recycling process and the provided supporting information, and we have determined that PRI's control of the feedstock and recycling process as described in PNC 3202 is expected to produce rPP or rPS of a suitable purity for the intended use specified above, provided that the PP or PS feedstock complies with 21 CFR 177.1520 or §177.1640, respectively, and all other applicable authorizations.

The rPP or rPS material should 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.

Sincerely,

Stevie N. Walters, Ph.D.
Regulatory Review Scientist
Division of Food Contact Substances
Office of Pre-Market Additive Safety
Office of Food Chemical Safety, Dietary Supplements, and
Innovation
Human Foods Program