PLASTIC RECYCLING, INC.

ENGINEERED RECYCLED COMPOUNDS

PRI WHITEPAPER · REGULATORY

FDA-GRADE RECYCLED RESIN.

Navigating the regulatory pathway for food-contact PCR — how the FDA reviews recycled plastic for food contact, what a Letter of No Objection means, and why so few domestic recyclers hold one.

PUBLISHED

June 2026

AUDIENCE

Quality · Regulatory · Food Packaging

WHY IT'S HARD

FOOD CONTACT IS THE HIGHEST BAR IN RECYCLED PLASTICS

Using recycled plastic in a food-contact application is one of the most demanding things a recycler can do. The concern is straightforward: recycled material has a prior life, and regulators must be satisfied that no contaminants from that prior life can migrate into food at levels that matter.

That is why food-contact recycled resin is governed by a rigorous FDA review process — and why very few domestic recyclers can credibly supply it. For a quality or regulatory lead at a food packaging company, sourcing compliant recycled content is not a matter of finding any recycler with PCR material. It is a matter of finding one whose material and process have actually cleared FDA review.

> *"In food contact, 'recycled' isn't a marketing word — it's a regulatory position you either can or cannot defend. The FDA review process is what separates a supplier who says their material is food-safe from one who can prove it."*
>
> **— THE PRI OPERATING PHILOSOPHY**

THE CORE CONCEPT

WHAT A LETTER OF NO OBJECTION IS

The FDA evaluates recycled plastic intended for food contact through its review of the recycling **process**. When the FDA reviews a specific recycling process and the data demonstrating that it adequately removes potential contaminants, it may issue a **Letter of No Objection (LNO)** — a written response stating the agency has no objection to the use of recycled material from that process in food-contact applications under defined conditions.

The crucial detail for buyers: an LNO is tied to a **specific process** and to **specific conditions of use**. It is not a blanket "this company is FDA-approved" stamp. It is a precise, evidence-based clearance — which is exactly what makes it credible.

THE PATHWAY

HOW A RECYCLED RESIN CLEARS FDA REVIEW

While every submission is specific, the path to a Letter of No Objection follows a recognizable shape. Understanding it helps a buyer judge whether a supplier's claim is real.

1

Define the process and feedstock

The recycler characterizes the source material (for example, curbside post-consumer PP or PS) and the specific decontamination process the material goes through.

2

Demonstrate decontamination

Testing — often including a surrogate contaminant challenge — shows the process reduces potential contaminants to levels the FDA considers acceptable for the intended use.

3

Submit to the FDA for review

The recycler submits the process description and supporting data to the FDA, which evaluates whether the recycled material is suitable for food contact under specified conditions.

4

Receive the Letter of No Objection

If satisfied, the FDA issues an LNO covering that process for defined conditions of use — the documentation a food-contact buyer can rely on.

DECODING THE FINE PRINT

"CONDITIONS OF USE" — WHAT THEY MEAN

FDA Letters of No Objection reference **conditions of use**, identified by letter (A through H). These describe the temperature and application conditions under which the food-contact material is intended to be used — ranging from high-heat applications through frozen storage and room-temperature use.

For a buyer, the conditions of use matter because they define **where the material can be used**. A resin cleared for a broad range of conditions can serve more applications. When evaluating a supplier, the question isn't just "do you have an LNO?" — it's "**which conditions of use does it cover, and do they match my application?**"

WHERE PRI FITS

FOUR LETTERS OF NO OBJECTION — A RARE CREDENTIAL

PRI holds **four FDA Letters of No Objection** for curbside post-consumer recycled PP and PS — one of the most limited credentials in U.S. recycled plastics, covering conditions of use A–H (PP) and E–G (PS).

That credential is backed by something most recyclers can't match: an in-house laboratory with **GC/MS capability** for the volatile and semi-volatile analysis that food-contact compliance depends on. PRI doesn't outsource the testing that validates its food-contact claims — it performs it on-site, which means faster validation and tighter control over every claim it makes.

4×	A–H	E–G	GC/MS
FDA LETTERS OF NO OBJECTION	PP CONDITIONS OF USE	PS CONDITIONS OF USE	IN-HOUSE VALIDATION

WHAT IT MEANS FOR YOU

COMPLIANT CONTENT, WITHOUT THE COMPROMISE

For a food packaging converter or product manufacturer, PRI's FDA credential changes what's possible: you can pursue recycled-content goals in food-contact applications with material whose regulatory position is documented — not assumed.

- **Documented food-contact clearance.** Curbside PCR PP and PS covered by FDA Letters of No Objection for defined conditions of use.
- **In-house compliance validation.** GC/MS and full analytical capability on-site to support food-contact claims with data.
- **Certified recycled content.** ISCC PLUS mass-balance traceability layered on top of food-contact compliance.
- **Consistent, engineered material.** Variability absorbed upstream, so the compliant material also performs lot to lot.

EVALUATING RECYCLED CONTENT FOR FOOD CONTACT?

Request a sample and the supporting documentation. Confirm the conditions of use match your application — and validate the material on your specs.

REQUEST A SAMPLE AT PLASTIC-RECYCLING.NET →

Plastic Recycling, Inc. · 7601 Rockville Road, Indianapolis, IN 46214 · **+1 (317) 780-6100** · info@plastic-recycling.net · www.plastic-recycling.net