



April 14, 2020

Mitzi Ng Clark
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Re: Prenotification Consultation PNC 2463

Dear Ms. Clark:

This letter is in response to your submission, PNC 2463, received on January 21, 2020, requesting on behalf of SeaCa Plastic Packaging (SPP) an Agency's letter of no objection (LNO), confirming the capability of SPP's secondary recycling process to produce post-consumer recycled polypropylene (PCR-PP) material that is suitable for food contact. The PCR-PP material is intended for use at levels of up to 100% recycled content in manufacture of PP corrugated cartons for shipping of produce (raw fruits and vegetables) and seafood (shellfish and packaged cut fish) under Conditions of Use (COU) E through G, as described in Table 2.¹

You provided description of the proposed recycling process, which is a typical physical recycling process. The feedstock is comprised of PP corrugated cartons, which were previously used to package produce and seafood for shipping these commodities to food retailers. The feedstock is collected from food retailers only. Because of strict source control, there is little likelihood of unacceptable contaminant levels in the recycled PP material. Therefore, we concluded that the proposed recycling process as described in the subject submission may be used to produce PCR-PP for use in manufacture of PP corrugated cartons for shipping of produce (raw fruits and vegetables) and seafood (shellfish and packaged cut fish) under COU E-G, provided that the feedstock comes from PP corrugated cartons complying with 21 CFR 177.1520 (olefin polymers) and other applicable authorizations.

The finished PCR-PP material should also comply with 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.

¹ Table 2 (Conditions of Use) is available at <https://www.fda.gov/food/packaging-food-contact-substances-fcs/food-types-conditions-use-food-contact-substances>

Sincerely,

Vanee Komolprasert, Ph.D., P.E.
Consumer Safety Officer
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