



**PAPERBOARD PACKAGING COUNCIL**  
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September 13, 2005

Division of Dockets Management (HFA-305)  
 Food and Drug Administration  
 Room 1061  
 5630 Fishers Lane  
 Rockville, MD 20852

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RE: Draft Report of the Threshold Working Group, CFSAN: Approaches to Establishing  
 Thresholds for Major Food FDA Docket No. 2005N-0231  
 70 Fed. Reg. 35258 (June 17, 2005)

The Paperboard Packaging Council (PPC) appreciates the opportunity to comment on the Draft Report of the Threshold Working Group. PPC represents paperboard packaging converters who supply food packaging to most of the major food manufacturers in the United States.

PPC would like to comment on the possibility that allergens used in packaging manufacturing could be included in the new rules being developed by the FDA in support of the Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA). We do not believe it was the intent of Congress nor the FDA to include allergens used in the manufacturing of packaging in the new rules. However, unless specifically excluded, packaging using materials like soy-based inks and adhesives or corn and wheat starches may need their own allergen labeling.

Considering that no allergic reaction to food allergens in packaging has ever been reported it makes sense to formally exclude packaging. The addition of an allergen listing for packaging could obscure the more important listing for the actual food product. Further, it would be difficult to list allergens for packaging materials made from recycled paperboard since all the components may not be known.

We feel strongly that the FDA should use it's authority to formally exclude packaging from the scope of FALCPA.

Sincerely,

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 Director, Industry Information & Research  
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