



October 18, 2018

Naeem Mady
Intertek Health, Environmental & Regulatory Services
1060 Holland Drive, Suite G
Boca Raton, FL 33487

Re: Prenotification Consultation PNC 2231

Dear Mr. Mady:

This letter is in response to your submission (PNC 2231), received July 12, 2018, amended September 14, 2018, requesting on behalf of Aaron Industries Corporation (Aaron Industries) a letter of no objection (LNO), confirming the capability of Aaron Industries' secondary recycling process to clean and produce a blended post-consumer recycled (PCR) polypropylene (PP) and PCR high-density polyethylene (PCR-HDPE), and post-industrial recycled (PIR) PP material that is suitable for food contact. The finished blended PP and HDPE material is intended for use at levels of up to 100% recycled content in manufacturing single use food-contact articles, such as disposable cutlery and trays, caps, closures, and lids for food services. The finished articles may contact all food types under Conditions of Use C through G, as described in Table 2, which can be accessed from the Internet in the Ingredients & Packaging section under the Food topic at www.fda.gov.

We reviewed the proposed recycling process as well as analytical testing results, which were submitted to demonstrate the capability of the proposed recycling process in removing potential contaminants from blended PP and HDPE material. Based on our review of these data, we determined that the proposed recycling process, as described in the subject submission, is effective in cleaning and producing blended PP and HDPE material that is suitable for food contact. Therefore, the blended PP and HDPE material produced from the proposed recycling process may be used at levels of up to 100% recycled content in manufacturing single use food-contact articles, such as disposable cutlery and trays, caps, closures, and lids for food services. The finished articles may contact all food types under Conditions of Use C through G. This determination covers the use of blended PP and HDPE material derived from the feedstock that consists of PCR-PP, PCR-HDPE and PIR-PP material, complying with 21 CFR § 177.1520 and other applicable authorizations. The feedstock excludes industrial or chemical containers. If the proposed recycling process is modified, new data may need to be evaluated.

The finished blended PP and HDPE 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

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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,

Vanee Komolprasert, Ph.D., P.E.
Consumer Safety Officer
Division of Food Contact Notifications HFS-275
Office of Food Additive Safety
Center for Food Safety
and Applied Nutrition