



May 23, 2019

Mitzi Ng Clark
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Re: Prenotification Consultation PNC 2290

Dear Ms. Clark:

This letter is in response to your electronic submission (PNC 2290), dated November 13, 2018, requesting on behalf of Papier-Mettler KG (PMKG) an Agency's letter of no objection (LNO), confirming the capability of PMKG's secondary recycling process to produce recycled low-density polyethylene (r-LDPE) material that is suitable for use in the fabrication of reusable grocery bags (i.e., for repeat uses) at room temperature and less severe conditions.

You described that the feedstock to the proposed recycling process is LDPE transport packaging materials (e.g., shrink films, shrink hoods, and stretch films), supplied by retailers, supermarkets, and food markets. The feedstock is inspected and will be rejected if it does not meet the quality standard.

Based on our review of the proposed process and the intended use conditions for the finished r-LDPE, we determined that the proposed process resembles a typical secondary recycling process, which we previously reviewed and found to be effective to produce recycled plastic for food contact at room temperature and below. Because of strict source control, there is little likelihood of unacceptable contaminant levels in the r-LDPE material. Although the grocery bags made from the r-LDPE material may contact food, the food contact would be for short periods of time and usually at ambient temperatures. Most foods are already wrapped in approved food-contact packaging before being placed into the type of grocery bags. Because of this, we expect that there would be little likelihood that recyclable polymers used in grocery bags would significantly come into contact with food and/or become components of food. Therefore, we concluded that the recycling process as described in the subject submission may be used to produce r-LDPE material for use at levels of up to 100% recycled content in the fabrication of reusable grocery bags for use at room temperature and below. Provided that the r-LDPE material should come from food grade LDPE material, collected and processed under good manufacturing practices (GMP), and it complies with the specifications and limitations as described in all existing applicable authorizations.

U.S. Food and Drug Administration
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The finished recycled LDPE 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.

Sincerely,

Vanee Komolprasert, Ph.D., P.E.
Consumer Safety Officer
Division of Food Contact Substances HFS-275
Office of Food Additive Safety
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