



March 17, 2020

Martha E. Marrapese
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Re: Prenotification Consultation PNC 2411

Dear Ms. Marrapese:

This letter is in response to your electronic submission (PNC 2411), received September 11, 2019 and amended December 27, 2019, on behalf of EcoBlue Ltd., (EcoBlue), requesting an Agency's no objection letter to confirm the capability of EcoBlue's secondary recycling process to produce post-consumer recycled polyethylene terephthalate (PCR-PET) material that is suitable for food contact. The EcoBlue process produces three grades of finished PCR-PET material, referred to (b) (4), for the following proposed use conditions.

1. (b) (4) for use at levels of up to 100% recycled content in the manufacture of articles for contact with all food types under Conditions of Use (COU) B through H.¹
2. (b) (4) for use at levels of up to 100% recycled content in manufacture of articles for contact with all food types under COU C-G.¹
3. (b) (4) for use to produce a non-food-contact layer of a multilayer food package, provided that a food contact layer is virgin PET with a thickness $\geq 25 \mu\text{m}$ (~ 0.001 in) for use at room temperature and below (COU E-G),¹ and virgin PET with a thickness $\geq 50 \mu\text{m}$ (~ 0.002 in) for use at higher temperatures, including use as a dual-ovenable container for cooking food at 150°C for 30 min (COU A-H),¹ provided that only food containers are used in the feedstock to manufacture the recycled PET layer.

You provided for our review the description of the proposed secondary recycling process, which involves a conventional secondary process, followed by vacuum venting extrusion, and solid stating polymerization (SSP). The feedstock is composed of clear and blue food-grade PET beverage bottles only. The sourced PET material complies with all applicable authorizations.

We reviewed the information you provided and determined that the proposed secondary recycling process as described in the subject submission is effective to produce PCR-PET material that is suitable for food-contact. Therefore, the PCR-PET material generated from the

¹Food types and Conditions of Use for Food Contact Substances: <https://www.fda.gov/food/packaging-food-contact-substances-fcs/food-types-conditions-use-food-contact-substances>

subject process may be used in manufacture of articles for food contact according to the grades of finished PCR-PET and the use conditions as described, above.

The resultant PCR-PET recycled 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 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
Office of Food Additive Safety
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and Applied Nutrition