



April 16, 2020

Catherine R. Nielsen
Keller and Heckman LLP
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Re: Prenotification Consultation (PNC) 2459

Dear Ms. Nielsen:

This letter is in response to your submission, PNC 2459, received January 15, 2020, on behalf of Indorama Ventures (Indorama), requesting an Agency's non-objection letter (NOL) to confirm the capability of Indorama's tertiary recycling process (so-called "glycolysis") in cleaning and producing post-industrial (PI) and post-consumer recycled polyethylene terephthalate (PCR-PET) for use in the manufacture of food-contact articles that contact all food types under the conditions of use for which the PET is permitted.

Based on the description of the glycolysis you submitted for our review, we have determined that your process is similar to the glycolysis we have previously reviewed and found to be effective in cleaning and producing recycled PET of a purity suitable for food contact. Therefore, we conclude that your glycolysis as described in this submission would be effective in cleaning and producing the recycled PET of a purity suitable for food contact, provided that the resultant recycled PET complies with all existing authorizations. The resultant recycled PET may be used in contact with all food types under the conditions of use as authorized by all applicable existing authorizations, applied to both PET and/or adjuvant, if any.

The resultant recycled PET 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 questions concerning this matter, please do not hesitate to contact us.

Sincerely,

U.S. Food and Drug Administration
Center for Food Safety & Applied Nutrition
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Vanee Komolprasert, Ph.D., P.E.
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