

Memorandum

Date: January 30, 2026

From: Biologist, Environmental Team, Office of Pre-Market Additive Safety

Subject: Finding of No Significant Impact (FONSI) for Food Contact Substance Notification (FCN) 2477

Notifier: Exxon Mobil Corporation

To: Adriana Alexander, Ph.D., Consumer Safety Officer, Office of Pre-Market Additive Safety

Through: Mariellen Pfeil, Lead Biologist, Environmental Review Team, Office of Pre-Market Additive Safety

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Attached is the Finding of No Significant Impact (FONSI) for Food Contact Substance Notification (FCN) 2477, which explains how the Food and Drug Administration (FDA) has met the requirements under the National Environmental Policy Act (NEPA) for this FCN.

FCN 2477 is for the use of an Ethylene propylene copolymer (CAS Reg. No. 9010-79-1), as an article or component of an article in contact with food.

The FCS has a minimum number-average molecular weight of 10,000 Daltons. The FCS may be used in contact with all food types under Conditions of Use B through H, as described in Tables 1 and 2. The FCS is not for use in contact with infant formula and human milk. Such uses were not included as part of the intended use of the substance in the FCN.

After this notification becomes effective, copies of this FONSI, and the notifier's environmental assessment (EA), dated December 18, 2025 may be made available to the public. We will post digital transcriptions of the FONSI and the EA on the agency's public website.

Please let us know if there is any change in the identity or use of the food-contact substance.

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Brittany Ott

Attachment: Finding of No Significant Impact (FONSI)

File: FCN No. 2477

FINDING OF NO SIGNIFICANT IMPACT

Proposed Action: Food Contact Substance Notification (FCN) 2477, submitted by Exxon Mobil Corporation for the use of Ethylene propylene copolymer, an article or component of an article in contact with food, excluding contact with infant formula and human milk.

The Office of Food Additive Safety has determined that allowing this notification to become effective will not significantly affect the quality of the human environment and, therefore, an environmental impact statement (EIS) will not be prepared. This finding is based on information submitted by the notifier in an environmental assessment (EA), dated December 18, 2025. The EA was prepared in accordance with 21 CFR 25.40. The EA is incorporated by reference in this Finding of No Significant Impact (FONSI) and is briefly summarized below.

The FCS is expected to be entirely incorporated into and remain with the finished food-contact article and will be sold to manufacturers engaged in the production of the finished food contact articles. Any waste materials generated in this process, e.g. plant scraps, are expected to be disposed of as part of the manufacturer's overall non-hazardous solid waste in accordance with established procedures. The FCS is expected to be utilized in patterns corresponding to the population density and then disposed of nationwide. Items manufactured with the FCS are expected to be utilized in patterns corresponding to the population density and then disposed of nationwide via the disposal patterns described in the U.S. Environmental Protection Agency's (EPA) report, *Advancing Sustainable Materials Management: 2018 Fact Sheet*.¹ Articles containing the FCS are not expected to be recycled in any significant capacity. Therefore, the EA indicates that the fate of articles containing the FCS within MSW is as follows: approximately 80.9% of the materials will be deposited in land disposal sites, and about 19.1% will be combusted.²

The FCS does not readily volatilize during use; as such, it is unlikely to present any impact on the atmospheric environment. Virtually no leaching of potential migrants from the finished food-contact article into aquatic or terrestrial environments indicates that there is no anticipated significant impact on environmental concentrations of the FCS, including during combustion of the food-contact articles. Thus, no significant impact on the concentrations of and exposures to any substances in air, water, or soil are anticipated. Further, because of EPA's regulations governing emissions from MWCs, no significant impacts are expected from incineration of the FCS at MWCs.

Use of the FCS is not expected to result in a net increase in the use of energy and resources, because it is expected to replace, to a certain extent, other substances already in use. Manufacture of the FCS will consume energy and resources in amounts comparable to the manufacture and use of materials already in use.

No significant environmental impacts are expected from use and disposal of the FCS; therefore, mitigation measures have not been identified. The alternative of not allowing the FCN to become effective would be the continued use of the materials that the subject FCS would otherwise replace; such action would have no significant environmental impact.

¹ Advancing Sustainable Materials Management: 2018 Tables and Figures updated on December 2020 (https://www.epa.gov/sites/default/files/2021-01/documents/2018_tables_and_figures_dec_2020_fnl_508.pdf).

² The distribution of disposal may be re-calculated based on only the land disposal and combustion percentages from the EPA report as follows. % Combusted = $11.8\% \text{ combusted} \div (11.8\% \text{ combusted} + 50.0\% \text{ land disposed}) = 19.1\% \text{ combusted}$.
% Land disposed = $50.0\% \text{ land disposed} \div (11.8\% \text{ combusted} + 50.0\% \text{ land disposed}) = 80.9\% \text{ land disposed}$.

As evaluated in the EA, the proposed use of the FCS as described in FCN 2477 is not expected to significantly affect the human environment; therefore, an EIS will not be prepared.

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