

Memorandum

Date: February 9, 2026

From: Antonetta Thompson-Wood, Physical Scientist, Environmental Review Team, Office of Pre-Market Additive Safety

To: Sean Fischer, Ph.D., Regulatory Review Scientist, Office of Pre-Market Additive Safety, Division of Food Contact Substances

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

MARIELLEN PFEIL - Digitally signed by MARIELLEN PFEIL - S
Date: 2026.02.09 09:53:01 -05'00'

Subject: Finding of No Significant Impact (FONSI) for Food Contact Notification (FCN) 2482

Notifier: Arakawa Chemical Industries, Inc.

Attached is the Finding of No Significant Impact (FONSI) for Food Contact Substance Notification (FCN) 2482, which is for the use of Copolymer of acrylamide, 2-methacryloxyethyltrimethylammonium chloride, itaconic acid, and N,N'-methylenebis(acrylamide) (CAS Reg. No. 214495-32-6) as a wet and dry strength agent, and/or retention aid, added prior to the sheet forming process in the manufacture of paper and paperboard.

This FONSI explains how the Food and Drug Administration (FDA) has met the requirements under the National Environmental Policy Act (NEPA) for this FCN.

After this notification becomes effective, copies of this FONSI, and the notifier's environmental assessment (EA) dated September 10, 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.

Antonetta Thompson-wood -S

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Attachment: FONSI

File: FCN No. 2482

FINDING OF NO SIGNIFICANT IMPACT

Proposed Action: Food Contact Substance Notification (FCN) 2482, submitted by Arkawa Chemical Industries, Inc., for the use of Copolymer of acrylamide, 2-methacryloxyethyltrimethylammonium chloride, itaconic acid, and N,N'-methylenebis(acrylamide) (CAS Reg. No. 214495-32-6). The FCS is for use as a wet and dry strength agent, and/or retention aid, added prior to the sheet forming process in the manufacture of paper and paperboard. The FCS should not exceed 30 lbs/ton dry weight of the finished paper and paperboard in food-contact paper and paperboard. The finished paper and paperboard may be used in contact with all types of food under Conditions of Use A 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.

The Office of Pre-Market 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 September 10, 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 finished articles and will remain with the finished food-contact articles throughout the use and disposal. Any waste materials generated in this process, e.g. plant scraps, are expected to be disposed of as part of the finished article manufacturer's overall non-hazardous solid waste in accordance with established.

Finished food-contact articles containing the FCS will be utilized in patterns corresponding to the population density and will be widely distributed across the country. Disposal, recycling, and combustion rates of food contact articles manufactured with the FCS will correspond with The United States Environmental Protection Agency (US EPA) Advancing Sustainable Materials Management: 2018 Tables and Figures.¹

Post-consumer disposal of food-contact articles containing the FCS will be via landfill or incineration at municipal waste combustors (MWCs) complying with 40 CFR Parts 258 and 60, respectively. Due to EPA's regulations governing landfills at 40 CFR Part 258, leaching into the environment by food-contact articles manufactured with the FCS is not anticipated. Further, because of the regulations at 40 CFR Part 60, and others, no significant impacts are expected from incineration of the FCS at MWCs. No significant impact on the concentrations of and exposures to any substances in air, water, or soil are anticipated. Thus, the use of the FCS as proposed is not expected to result in significant environmental impacts.

Further, according to data cited in the EA, when combusted, there is nothing to suggest that the FCS would threaten a violation of 40 CFR 60 or other regulations governing MWCs.

Manufacture of the FCS will consume comparable amounts of energy and resources because the FCS is expected to compete with, and to some extent replace similar substances already on the market. Articles containing the FCS are expected to be disposed of according to the same patterns when used in

¹ https://www.epa.gov/sites/production/files/2020-11/documents/2018_tables_and_figures_fnl_508.pdf

place of current materials. Therefore, no net increase in the use of energy and resources from the use and disposal of food-contact articles manufactured with the FCS is expected.

Thus, there will be no impact on current or future recycling programs.

No mitigation measures are needed since no significant adverse environmental effects are expected from use and disposal of food-contact articles manufactured with the FCS, nor do we expect significant environmental impacts, which would necessitate alternative actions to those proposed in this FCN. The alternative to not allowing the FCN to become effective would be continued use of materials that the FCS would otherwise replace; therefore, this action would have no significant environmental impact.

As evaluated in the EA, the proposed use of the FCS as described in FCN 2482 is not expected to significantly affect the human environment; therefore, an EIS will not be prepared.

Antonetta Thompson-wood -S

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Prepared by _____

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Approved by _____

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