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**Via Hand Delivery**

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, Maryland 20852

**Re: Docket No. 01D-0583; Comments of the Food, Drug, and Cosmetic  
Packaging Materials Committee of The Society of the Plastics Industry, Inc.  
on Tamper-Evident Packaging for Food**

On behalf of the Food, Drug, and Cosmetic Packaging Materials Committee of The Society of the Plastics Industry, Inc. (SPI),<sup>1</sup> we respectfully submit the following comments concerning the guidance documents on food security issued by the Food and Drug Administration (FDA) on January 9, 2002. Specifically, SPI is responding to FDA's request for input on the use of tamper-evident packaging for food.

SPI first wishes to express its appreciation for FDA's initiative in recommending precautions to protect our food supply against attack by terrorists and other criminals. Current events certainly make such guidance appropriate, and FDA should be commended for taking the initiative to protect the public health.

The member companies of SPI are fully prepared to help protect the food supply in the United States and throughout the world by responding to the requirements of the food industry for appropriate packaging, including tamper-evident systems. It is our view, however, that

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<sup>1</sup> Founded in 1937, The Society of the Plastics Industry, Inc. is the trade association representing one of the largest manufacturing industries in the United States. SPI's 1,500 members represent the entire plastics industry supply chain, including processors, machinery and equipment manufacturers and raw material suppliers. The U.S. plastics industry employs 1.5 million workers and provides \$304 billion in annual shipments. The Food, Drug, and Cosmetic Packaging Materials Committee is composed of SPI members with particular interest and expertise in packaging for food and other FDA-regulated products. The Committee has a long history of working cooperatively with FDA on regulatory issues relating to packaging.

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companies in the food industry are in the best position to determine whether and how packaging may be most effective in assuring food safety.

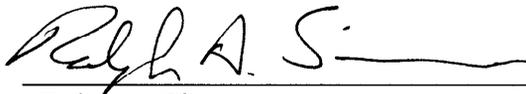
The universe of food products and packaging options is so extensive and diverse that generalizations as to the applicability of tamper-evident packaging are not possible. Some food products are sold in bulk, with no packaging, while others have packaging that already is tamper-evident. This is a subject which FDA properly can and should entrust to the judgment of the food and packaging industries.

In SPI's view, it is reasonable for FDA to add to its guidance on food security the recommendation that food processors consider packaging, including tamper-evident systems, as a possible element in protecting the security of the food supply. SPI does not believe that FDA should specify particular applications in which tamper-evident packaging would be appropriate or the packaging options that should be selected; this is best left to industry, which is more familiar with the range of food products and types of packaging.

SPI appreciates the opportunity to present these comments for consideration by FDA. We would be glad to respond to any questions that the Agency may have concerning this matter.

Respectfully submitted,

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

By:   
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Ralph A. Simmons