



THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

250 PARK AVENUE • NEW YORK, NEW YORK 10017 • 212/687-2675

7/10/70

December 30, 1970

T : Members, SPI Food, Drug and Cosmetic Packaging Materials Committee

Re: Next Meeting - Shoreham Hotel, Washington, D. C.

Gentlemen:

As you know from a communication sent under date of December 11 by Jerome H. Heckman, Esq. to our Chairman, Robert M. Miller, the next meeting of the Committee will take place on Wednesday, January 13, 1971 at the Shoreham Hotel, 2500 Calvert Street, N.W., Washington, D.C. 20008 beginning promptly at 9:00 a.m.

First off, may we ask that you kindly review the attached agenda prepared by Messrs. Heckman and Miller, which will point out the fact that we plan to complete the regular business session prior to luncheon, in order to afford us the opportunity in the afternoon of having an open discussion with Messrs. Delmore, Brown, and possibly additional FDA staff members.

Relative to the footnote on page 2 dealing with Mr. Miller's attendance at the Symposium in The Hague from February 16 to 18, 1971, attached to the agenda is a communication developed by Mr. Miller dated December 23 which states his requirements as to information he desires to obtain from members of the Committee which will fortify him to the fullest technical extent in representing our industry.

Also attached at the very end of this announcement is a form to be filled out and returned to the undersigned indicating whether you will be present.

We are certain you will agree that a very interesting and informative program has been planned and we look forward to our usual good attendance.

By the way, a block of rooms has been set aside at the Shoreham Hotel for those desiring sleeping accommodations the previous evening. Please be certain in communicating with Miss Ruth Jackson in Reservations to state that your request is in connection with a meeting of the SPI.

It is most important that those shown on the agenda as delivering a report either bring to the meeting or send in advance written reports in order to ease the preparation of the minutes by the Secretary.

Best wishes to you for a Happy and Prosperous New Year!

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

Charles L. Condit, Secretary

CLC:oms

Encl.

ASI 00000722



THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

250 PARK AVENUE • NEW YORK, NEW YORK 10017 • 212/687-2675

A G E N D A*

MEETING

SPI FOOD, DRUG AND COSMETIC PACKAGING MATERIALS COMMITTEE

The Shoreham Hotel
2500 Calvert Street, N.W.
Washington, D.C. 20008

Wednesday, January 13, 1971
TUDOR ROOM
Beginning promptly at 9:00 a.m.

- 1: Call meeting to order - Robert M. Miller, Chairman, Hercules, Inc.
- 2: Self-introductions
- 3: Consider minutes of last meeting (June 10, 1970)
- 4: Remarks of Committee Chairman - Robert M. Miller*
- 5: Report of SPI General Counsel - Jerome H. Heckman*, Keller and Heckman
 - (a) FDA's Proposed Revision of Section 121.3 of the Food Additive Regulations entitled "Eligibility for Classification as Generally Recognized as Safe (GRAS)"
 - (b) The Change in FDA's "No Migration" Policy
 - (c) Status of USDA Proposed Amendments to Meat Inspection Regulations
 - (d) Other Matters
- 6: Reports on liaison with other organizations
 - (a) Pharmaceutical Manufacturers Association - SPI Liaison Group - Status of Group's efforts to develop further Drug Applications Evaluation Approaches - W. B. Ackart*, Union Carbide Corp.
 - (b) Manufacturing Chemists' Association (Food, Drug and Cosmetic Chemicals Committee) - Taylor W. Hanavan*, E. I. du Pont de Nemours
 - (c) American Paper Institute - James R. S. McCartney*, Standard Packaging Corp.
 - (d) Can Manufacturers Institute - Charles J. Spiegl*, Continental Can Co., Inc.
 - (e) SPI Food and Drug Bottling Committee of the Plastic Bottle Division - M. E. Smith*, Owens-Illinois
 - (f) Others
- 7: Report of Technical Information Subcommittee - Willard M. Westveer*, Chairman, The Dow Chemical Co.
 - (a) Recently promulgated Food Additive Regulations, and related Regulatory Actions
 - (b) Other Matters
- 8: Report of Lawyers Advisory Committee - M. C. Stone*, Eastman Chemical Products, Inc.
 - (a) Legislative Outlook
 - (b) Recent Court Decisions
 - (c) Other matters

* PLEASE BRING WRITTEN REPORTS

- 9: International Developments: Special Report on a "Fact Finding Symposium" organized by the Netherlands Government and sponsored by the Council of Europe** - Robert M. Miller*
- 10: New Business
- 11: Plans for next meeting
- 12: Luncheon at 12:30 p.m.; open discussion period to follow:
As discussed in detail in Mr. Jerome H. Heckman's letter to the Committee dated December 11, 1970, General F. J. Delmore, FDA Industry Relations Coordinator in the Office of the Commissioner, and Mr. Thomas W. Brown, Director of FDA's Office of Compliance in the Bureau of Foods, have accepted an invitation to join the Committee for luncheon and participate in a post-luncheon discussion period on such topics as (1) the status of the Ramsey proposal; (2) the GRAS list revision proposal and its impact on packaging; (3) current Food Additive Petition problems, and (4) the colorants for packaging situation. As indicated in Mr. Heckman's letter, it is possible that other FDA staff members will also be on hand to meet with us.
- 13: Adjournment

* PLEASE BRING WRITTEN REPORTS

- ** This Symposium is the first one ever sponsored by the Council of Europe where industry representatives have been invited and will participate on an equal basis with officials from all European countries. The Symposium will be held at The Hague from February 16 to 18, 1971 and Mr. Miller has been invited to represent SPI. The prime objective of the Symposium will be to discuss migration data as it might relate to the future restructuring of European laws on food packaging. Our European contacts who arranged the invitation for Mr. Miller have advised that they are particularly anxious to have information regarding "true migration to foods" and its relationship to solvent extraction work. Thus, Mr. Miller is hopeful that some of those attending our meeting may be in a position to supply more information of this type than is presently available to him. A letter from Mr. Miller explaining his requirement in more detail is attached to this Agenda.



HERCULES INCORPORATED

MEDICAL DEPARTMENT

HERCULES TOWER • 310 MARKET STREET • WILMINGTON DELAWARE 19899 • (302) 656-9811

December 23, 1970

TO: SPI Food, Drug and Cosmetic Packaging Materials Committee

FROM: Robert M. Miller, Chairman

International Fact Finding Symposium

On February 16 to 18, 1971, the Dutch government under the auspices of the Council of Europe, is convening an international "Fact Finding Symposium" on food packaging materials with regard to the "true migration" of components into food. The Council of Europe, composed of the Common Market countries as well as the United Kingdom, Switzerland and the Scandinavian countries, will use the results of this symposium in their March, 1971 packaging committee meeting.

Although the Codex Alimentarius Committee on Food Additives constantly has placed consideration of indirect food additives in the future, some European experts believe packaging materials will be put on the agenda soon. And, because of this, these experts desire any resulting legislation or regulations to be as uniform and simplified as possible, and not the jungle of regulations and interpretations developed in this country. The objective of the symposium is to attempt to demonstrate that the true or real migration of food packaging materials to food is much less than that obtained by the use of food-simulating solvents, and, at the same time, much less than the various government officials believe. If this is true, and we believe it is, perhaps government officials can be persuaded to issue simplified regulations. If this happens, then perhaps we could use this to influence our FDA to simplify our indirect additive regulations, or at least adopt the so-called "Ramsey proposal".

This symposium is important too because it will be the first time in the history of the Council of Europe that representatives from industry will be admitted and can participate on an equal basis with government members.

Through some of our good friends in Europe, I have been invited to attend this symposium as a representative of SPI (and perhaps other areas of the packaging industry) from the U. S. I believe it is important to have someone from this country attend and do not think we should pass over the opportunity. Therefore, I am planning to attend this meeting.

Now I come to the big question: What data does the U. S. industry have which demonstrate "true or real" migration to food from packaging materials? And secondly, will industry release the information for use at this symposium? And even if we do have some data which you can contribute, do we have time, since the Dutch want a summary prior to the meeting?

ASI 00000725



SPI Food, Drug and Cosmetic
Packaging Materials Committee

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December 23, 1970

If we are to present information to the Council of Europe which will help our cause, I need your almost immediate assistance in furnishing any such data you might have. In presenting the information, I will not reveal the source so that individual companies or laboratories will remain anonymous. We have some data at Hercules, a portion of which Jack Frawley used to develop his famed "Frawley proposal". I plan to utilize all these data, including some obtained on plastics materials. We also have some published Monsanto data, plus that given by Eastman at the 1966 ACS symposium, but we need more. The information need not concern plastics but may cover any packaging material. Some of you may have data comparing simulating solvents with actual foods, particularly vegetable oils, which would be valuable. The COFACP petition has certain pertinent information which I will ask permission to use.

I certainly will appreciate your assistance in furnishing any available data which you may release. The data should include: the type packaging material; the additive or substance in question; its amount in the original packaging material; the analytical method used to determine the amount of migration; the size of the package (dimensions, thickness, surface in contact with food, weight of package in contact; type of food in contact; time and temperature of contact; and specific migration found.

Please send me any information as soon as possible; we plan to discuss further at our January 13 meeting, and you may wish to bring some data to the meeting. Timewise, that will be almost the deadline for receipt.

Thank you for your help.

Robert M. Miller, Chairman