

To

Bill Knapp
M-2

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FROM

B. T. McMillan
Plastics Division
Merristown PL- ME

DATE

C-323 (6-63) (E)

Manufacturing Chemists' Association, Inc.

(FOUNDED 1872)

1825 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20009

March 21, 1967

TO: Members of the Food, Drug, and Cosmetic Chemicals Committee

SUBJECT: Request for Data on Indirect Food Additives

Gentlemen:

Following up my letter of February 28 on the same subject, I am enclosing a copy of Dr. Frawley's letter which clarifies the type of information needed.

Sincerely yours,



Morgan M. Hoover

MMH:sjg

Enclosure



HERCULES INCORPORATED

MEDICAL DEPARTMENT

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March 17, 1967

Mr. Morgan M. Hoover
Manufacturing Chemists' Association, Inc.
1825 Connecticut Avenue, N. W.
Washington, D. C. 20009

Dear Mr. Hoover:

I have noticed from an exchange of correspondence between Bill McCormick and you that there is a bit of confusion regarding the type of information which I am collecting for added support to the thesis proposed last September at the ACS meeting.

I understand that Bob Miller sent you sufficient copies of my ACS paper for distribution to the FDCC Committee. In this presentation, the conclusion that anything used in food packaging at a level of 0.2% or less was safe, was based on two other scientific conclusions. I would welcome support from the industry for both of these conclusions.

The first of these conclusions; namely, that chemicals which might be used in food packaging would have a "no effect" level in experimental animals of 10 ppm or greater, was based on a compilation of published two-year chronic toxicity studies. A number of companies have sent me additional unpublished studies and I would welcome others from the industry. To include them in my tabulation I need the name of the compound, the species of animals used, and the highest level which caused no toxicity.

The second conclusion was based on the argument that rosin size would give the highest migration to food of any food packaging component. I would appreciate receiving supporting evidence from any companies who have conducted migration studies which demonstrate true migration to food. I expect that few studies of this nature have been conducted since most laboratories have used simulated solvents rather than food or vegetable oils. I am aware of several studies being conducted in this area, but if others have data on hand it would be very helpful.

I understand that Bob Miller received a warm reception by the FDCC Committee on January 25. From all indications my presentation of this concept

ASI 00002174

Mr. Morgan M. Hoover

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in England and The Netherlands was well received. There is even a suggestion that the concept might be adopted in the European countries before anything is done in the U. S.

If I can provide any other information which will clarify the type of supporting information which would be helpful, please let me know.

Sincerely,



John P. Frawley, Ph.D.
Chief Toxicologist

JPF/eaw

CC: Mr. W. E. McCormick



ASI 00002175