

American Meat Institute

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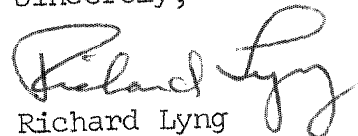
June 17, 1974

Hearing Clerk
Food & Drug Administration
Room 6-86
5600 Fishers Lane
Rockville, Maryland 20852

Dear Sir:

The attached information from a member of the American Meat Institute is in response to the April 22, 1974, Federal Register (p. 14215) request for data on the use of PVC in containers for food.

Sincerely,


Richard Lyng
President

RL:khk

Enclosure

74P-0001

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June 13, 1974

CLASS I - FLEXIBLE PACKAGES

This class of flexible packages is used largely for frankfurters and bacon. The package contains plasticized PVC in a laminated film less than 4 mils thick. The laminated film is composed of 2 or 3 plies, only one of which is plasticized PVC. The other one or two plies are composed of other USDA approved polymeric films. The food surface is always separated from the plasticized PVC ply by the other polymeric films.

Approximately 200,000,000 pounds of meat products in these packages are sold per year. They utilize 3.5 million pounds of PVC.

Analyses for vinyl chloride monomer in these films showed no detectable level, either by dissolving the entire film in a solvent or by extracting it with heptane.

June 13, 1974

CLASS III - RIGID PACKAGES

This class of rigid packages is used largely for luncheon meats. The upper half of the package is composed of calendered, transparent, thermoformed, rigid PVC between 10 and 21 mils thick. The lower half of the package is identical to that described for the lower half of Class II Semi-Rigid Packages.

Approximately 80,000,000 pounds of meat products in these packages are sold per year utilizing about 5½ million pounds of PVC.

The vinyl chloride monomer concentration in the lower half of these packages is identical to that described in the lower half of Class II - Semi-Rigid Packages.

The upper half of these packages showed vinyl chloride monomer concentrations ranging from 6 to 127 PPM and extractabilities in heptane from 2 to 357 PPB.

June 13, 1974

ANALYTICAL METHODOLOGY

Analyses were performed by two independent and separate laboratories -- Wisconsin Alumni Research Foundation Institute, Madison, Wisconsin, and Dow Analytical Laboratories, Midland, Michigan.

The former laboratory utilized B. F. Goodrich Chemical Company Procedure No. 937-A-S employing gas chromatography with flame ionization and N, N- Dimethylacetamide as a solvent.

The latter laboratory utilized Dow Procedure ML-AM-74-12 which employed mass spectrometry in addition to standard gas chromatographic analysis. Extraction analyses were made by exposing 100 square inches of film surface to 200 ml of heptane at room temperature for 72 hours.

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POSTMASTER: This Package Contains Merchandise—Fourth Class Matter—and
May Be Opened for Postal Inspection If Necessary.