

American Meat Institute

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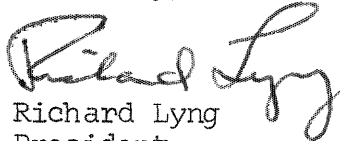
June 21, 1974

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

Dear Sir:

I submit the attached information detailing the use of poly-vinyl chloride in containers for food produced by a member of the American Meat Institute as requested in the Federal Register (April 22, 1974 - p. 14215).

Sincerely,


Richard Lyng
President

RL/mj
Attachment

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1. Heat Shrunk Vacuum Packages

These are film bags which were traditionally fabricated in part from polyvinylidene/polyvinyl copolymers. The polyvinyl content of these materials is a matter of some industry dispute.

The products involved are:

- a. Turkey, chicken, ducklings, and rock cornish hens, all frozen and sometimes boned or prefabricated.
- b. Boneless hams, chunk sausage, corned beef, and delicatessen meat loaves.
- c. Beef ribs and loins, institutional.
- d. Braunschweiger and sandwich spreads.

2. Pre-Stretched Film Bags

These are a vinyl-nitrile compound resin fabricated to an elastic film.

Product is:

- a. Frozen, boneless, prefabricated turkey roasts.

3. Wrapping Film

This is a soft, thin, and very flexible film, used only on some products for specialized markets.

Products are:

- a. Beef cuts, fresh.
- b. Pork ribs, frozen.
- c. Chickens, cut up and deep chilled.

4. Laminated Film

A three-ply laminated film whose outside layer is a semi-rigid polyvinyl sheet, fabricated into a vacuum package.

Products are:

- a. Sausage, sliced (specifically, bologna, souse luncheon loaf, summer sausage, and pickle & pimienta loaf).

In addition, almost all laminated films contain a thin layer of a product which is a mixture of polyvinylidene and polyvinyl chlorides. This is an internal section not in contact with the product or outside surface of the package.

Products are:

- a. Bacon, sausage, frankfurters, and similar cured meats.
- b. Cheese.

5. Coatings, Internal

These are of two classes. First, the internal can lacquers of many cans. Most of these are reported to be approved not only as packaging materials but also as food additives.

Products:

- a. Canned goods.

Second, the protective liner inside aluminum foil pans.

Products:

- a. Turkey roasts.
- b. Pork roasts.

6. Coatings, External

These are generally lacquers applied over printed labels and package surfaces to protect them. The polyvinyl is seldom a major component and the deposited total coating is very thin.

Products are:

- a. Can labels.
- b. Pressure sensitive package labels.
- c. Margarine wrappers.

We have no direct or original information on the polyvinyl chloride content of these materials nor have we conducted extraction tests with or without the various foods involved.

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FIRST CLASS MAIL

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American Meat Institute

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

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