DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Washington DC 20204

DEC 20 1993

Mr. Alex Malaspina
Senior Vice President
The Coca-Cola Company
P.O. Drawer 1734
Atlanta, Georgia 30301

Dear Mr. Malaspina:

This responds to your submission of March 22, 1993, concerning the use of by-product ethylene glycol in the manufacture of polyethylene terephthalate (PETE) resin intended for food-contact use. You stated that the ethylene glycol is reclaimed by the as a by-product from their manufacturing process for virgin polyester polymers that are currently regulated by FDA for food-contact use, under § 177.1630 of Title 21 Code of Federal Regulations (21 CFR 177.1630). You further stated that the by-product ethylene glycol is purified by using a procedure.

Based on our review of the data you provided, we believe that ethylene glycol, reclaimed as a by-product from the manufacturing process for polyester polymers complying with 21 CFR 177.1630 and re-purified by process, is of a suitable purity for reuse in the production of PET resins intended for food-contact use, in accordance with 21 CFR 174.5.

We trust this letter responds fully to your request on this matter. If you have any further questions, please do not hesitate to contact our Indirect Additives Branch at 202-254-9511.

Sincerely yours,

/S/

Eugene C. Coleman
Director
Division of Food and Color Additives
Center for Food Safety
and Applied Nutrition