

PRESS RELEASE - For Immediate Distribution

MAS Receives FDA No Objection Letter for Recycled Plastics Its Proposed Secondary Recycling Process Produces Post-Consumer Recycling Material Fit for Use in Packaging for the Food Industry

January 5, 2016 – eFACTOR3, LLC is pleased to announce an exciting, recent achievement for Austrian partner MAS.

MAS, manufacturer of innovative plastic processing and plastic recycling equipment, has received FDA approval confirming that its proposed secondary recycling process produces post-consumer recycling material fit for use in the manufacturing of packaging for the food industry.

Excerpts from FDA’s No Objection Letter for Recycling Plastics #185 [08/31/2015]

“ We have reviewed the proposed recycling process as well as the information you obtained from surrogate testing and migration modeling, which were submitted to demonstrate the capability of the proposed secondary recycling process to remove potential contaminants from PCR-PET. Based on our review of these data, ...

We concluded that the proposed secondary recycling process, as described in the subject submission would produce PCR-PET material that is suitable for use at levels of up to 100% recycled content in the manufacture of PET articles for contact with all food types under cold-filled and hot-filled conditions, ... ”

Link to the letter in its entirety:

<http://www.fda.gov/food/ingredientpackaginglabeling/packagingfcs/recycledplastics/ucm469332.htm>

Thanks to this determination, MAS machinery and systems can offer new options to the food packaging industry where a post-consumer recycled material is required, and introduce new opportunities for plastic recycling operations.



To learn more about this FDA approval and how MAS equipment can create value for your operation, contact eFACTOR3, LLC.

Hartmut Bendfeldt – President of eFACTOR3, LLC

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Website: www.efactor3.com

About eFACTOR3, LLC

Headquartered right outside the Greater Charlotte area, in Pineville, North Carolina, eFACTOR3, LLC brings together a keen understanding of environmental, engineering and equipment issues. The company offers a variety of pre-shredding, shredding and granulating equipment, along with conveying and separation equipment, systems integration and installation.

eFACTOR3 also represents MAS and their innovative plastic processing and plastic recycling equipment. Their product portfolio focuses on high product quality and very low energy consumption. It is comprised of 3 main components: Extruders, Continuous Disc Filtration and Dry Cleaning Systems.

Whatever is intended to be recycled or turned into an alternative fuel, eFACTOR3 can provide a custom solution.

For more information, contact Hartmut Bendfeldt at 1.877.801.3232, hbendfeldt@efactor3.com, and visit www.efactor3.com.

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No Objection Letter for Recycled Plastics #185

Return to inventory: [Submissions on Post-Consumer Recycled \(PCR\) Plastics for Food-Contact Articles \(http://www.accessdata.fda.gov/scripts/fdcc/?set=RecycledPlastics\)](http://www.accessdata.fda.gov/scripts/fdcc/?set=RecycledPlastics)

See also [Recycled Plastics in Food Packaging \(/Food/IngredientsPackagingLabeling/PackagingFCS/RecycledPlastics/ucm093435.htm\)](http://www.accessdata.fda.gov/scripts/fdcc/?set=RecycledPlastics)

August 31, 2015

Frank Welle, Ph.D.
Fraunhofer Institut für Verfahrenstechnik
und Verpackung
Giggenhauser Straße 35
85354 Freising
GERMANY

Re: Prenotification Consultation PNC 1666

Dear Dr. Welle:

This letter is in response to your electronic submission, received on June 16, 2015 (PNC 1666), requesting on behalf of MAS Maschinen-und Anlagenbau Schulz GmbH (Pucking, Austria), a no objection letter confirming the capability of their proposed secondary recycling process (a so-called “Super Clean”) to produce post-consumer recycled polyethylene terephthalate (PCR-PET) material that is suitable for use at a level of up to 100% recycled content in the manufacture of PET articles for contact with all food types under cold-filled and hot-filled conditions, i.e., Conditions of Use C through G, as described in Table 2, which can be accessed from the Internet in the Ingredients, Packaging & Labeling section under the Food topic of www.fda.gov (<http://www.fda.gov>).

We have reviewed the proposed recycling process as well as the information you obtained from surrogate testing and migration modeling, which were submitted to demonstrate the capability of the proposed secondary recycling process to remove potential contaminants from PCR-PET. Based on our review of these data, we have determined that the proposed secondary recycling process, as described in the subject submission, would be effective in reducing potential contaminants from PCR-PET to levels that result in dietary concentrations not to exceed 0.5 ppb, FDA's threshold of regulatory concern. This determination

covers the use of PCR-PET derived from the feedstock that consists of post-consumer food and non-food PET containers (excluding industrial/chemical containers), which complies with the existing applicable authorizations.

We concluded that the proposed secondary recycling process, as described in the subject submission would produce PCR-PET material that is suitable for use at levels of up to 100% recycled content in the manufacture of PET articles for contact with all food types under cold-filled and hot-filled conditions, i.e., Conditions of Use C through G, as described in Table 2, which can be accessed from the Internet in the Ingredients, Packaging & Labeling section under the Food topic of [www.fda.gov \(http://www.fda.gov\)](http://www.fda.gov). If the proposed recycling process is modified, new data may need to be re-evaluated.

The resultant recycled material must comply with all applicable authorizations including 21CFR § 174.5 General provisions applicable to indirect food additives. For example, in accordance with section 402(a)(3) of the Federal Food, Drug and Cosmetic Act, use of the recycled material should not impart odor or taste to food rendering it unfit for human consumption.

If you have any questions concerning this matter, please do not hesitate to contact us.

Sincerely,

Vanee Komolprasert, Ph.D., P.E.
Consumer Safety Officer
Division of Food Contact Notifications, HFS-275
Office of Food Additive Safety
Center for Food Safety and Applied Nutrition

[More in Recycled Plastics](http://www.fda.gov/food/ingredientspackaginglabeling/packagingfcs/recycledplastics/default.htm)
[\(/Food/IngredientsPackagingLabeling/PackagingFCS/RecycledPlastics/default.htm\)](http://www.fda.gov/food/ingredientspackaginglabeling/packagingfcs/recycledplastics/default.htm)