

POLLUTION

Monsanto Industrial Chemicals Company
St. Louis, Missouri

cc: R. W. Bucknell	B3NB
J. A. Cannon	1760
J. R. Darby	1760
D. J. Denby	B3NC
A. G. Eades	B3NH
M. W. Farrar	R2E
E. H. Fording	B3NJ
R. E. Lamkin	B3NC
A. W. Morgan	1760
J. H. Orem	B3ND
W. E. Schalk	B3NJ
N. W. Touchette	1760
df: U.S.D.A.	

COMMERCIAL DEVELOPMENT CALL REPORT NO. 72-67

U.S. DEPARTMENT OF AGRICULTURE
CONSUMER AND MARKETING SERVICE
WASHINGTON, D. C.

Date of Call: October 4, 1972

For U.S.D.A.: Mr. John W. Sloan

For Monsanto: K. W. Easley
P. R. Graham

- Objectives:
1. Clarify interaction of USDA with FDA relative to meat packaging regulations.
 2. Determine requirement for USDA approval for Santicizer 334F and Santicizer 160.

Summary:

The USDA regulates materials used in packaging for meat and poultry. The criteria for acceptance is essentially the same as those in FDA regulations. Sloan, however, regards the exterior ply of a multi-laminate film as requiring the same extraction resistance as the inside ply which contacts the food surface. The FDA considers the outside ply to require less severe extraction tests. This discussion was prompted by Oscar Mayer's request for clarification.

DSW 588179

STLCOPCB4093515

COMMERCIAL DEVELOPMENT CALL REPORT NO. 72-67

USDA CONSUMER AND MARKETING SERVICE

Page 2

USDA regulation of plasticizers can be obtained by providing a letter containing its chemical name or description and the FDA regulation under which it is covered. The USDA will then outline similar coverage under their rules via letter. We plan to obtain this additional regulation for Santicizer 334F and Santicizer 160.

Details:

The USDA considers compliance with the FDA regulations for food packaging materials to be the basis for USDA clearance for meat and poultry packaging. The mechanism is a letter from/to the USDA spelling out the chemical name and pertinent FDA regulation including any limitations. The letters are provided on an individual basis and no list of regulations such as those contained in the Federal Register are published.

Although the FDA regulations are used, in some instances these regulations are extended by the FDA. An example is multi-laminate film. The FDA considers the exterior ply, which does not come in contact with the food, to require less strenuous migration tests than the interior surface contacting the food. The USDA feels that the housewife does not always re-wrap the meat exactly as packed but may turn the package inside out. Oscar Mayer, uses multi-laminate films composed of Saran (inside) and plasticized PVC (DOA/S-160/ESO) as the outside layer. Depending upon the S-160/DOA ratio some question may arise as to the amount of migration which might occur if the outside layer was placed next to the meat.

The USDA classifies meat and poultry packaging as follows:

1. Room Temperature & Freezer storage (below 150°F.)
2. Boil in Bag (up to 250°F.)
3. Oven Temperature (above 250°C. or at oven temperature)

DSW 588180

STLCOPCB4093516

COMMERCIAL DEVELOPMENT CALL REPORT NO. 72-67

USDA CONSUMER AND MARKETING SERVICE

Page 3

The USDA uses FDA 121.2514 to cover continuous use applications such as conveyer belts and other meat processing equipment.

They have no immediate concern regarding the phthalate question.

They do not have any jurisdiction over milk tubing.

Action:

PRG - Request USDA coverage (via letter) for S-334F and S-160.


P. R. Graham

DSW 588181

STLCOPCB4093517