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WRITER'S DIRECT DIAL NUMBER

202/457-1110

April 7, 1983

Dr. Sanford Miller
Director, Bureau of Foods
HFF-1, Room 6819
Food and Drug Administration
200 C Street, SW
Washington, DC 20204

Re: Polyvinyl Chloride Packaging Materials;
Request for Marketing Data

Dear Dr. Miller:

In a letter dated August 31, 1982, signed by Mr. McCowin and addressed to Mr. Jerome H. Heckman, General Counsel for The Society of the Plastics Industry, Inc. (SPI), the Food and Drug Administration asked for any available current and projected future market data for vinyl chloride polymers as food contact materials. This request was repeated in your letter dated December 27, 1982. Since adequate data of the type you requested are not available, vinyl chloride resin manufacturers, through the SPI Vinyl Institute, have agreed to conduct a survey to obtain the requested information. In this connection a draft survey form has been developed. We are hereby requesting that the Food and Drug Administration review it and provide its recommendations for either improvement of the form or conduct of the project so that the results obtained may be of the maximum utility.

Attached hereto is a copy of the draft survey form. Our plan is to send it to the major resin manufacturers. You will note that it is intended to elicit estimates of current and projected future sales (in pounds of resin) for different categories of vinyl chloride polymers intended for use in contact with various classes of foods. This information will be supplemented by consultation with

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packaging experts to determine the weight of resin utilized in typical packaging configurations for the various combinations of polymer types and foods. Finally, utilizing the so-called market basket surveys, the relative proportion of food in each of the various classes packaged in PVC will be calculated leading to what we believe will be a useful consumption factor.

The industry is committed to a prompt response to the survey questionnaire. Accordingly, we hope your staff will be able to provide its recommendations now so that the information requested in Mr. McCowin's August 31, 1982, letter can be provided with no unnecessary delay.

Very truly yours,

A handwritten signature in cursive script, reading "Jerome H. Heckman". The signature is written in dark ink and is positioned above the printed name.

Jerome H. Heckman

Enclosure

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DO NOT COMPLETE--FOR COMMENT ONLY

DRAFT SURVEY FORM

General

For each class of foods, enter your estimate of the total market (not your company's share) for each of the PVC products shown. The estimate should be in pounds of resin only, not of formulated end-product. For example, if an end-product contains 18 parts per hundred of resin (phr) of additives, report only the 100 lbs of resin, not the 118 lbs of end-product. Please provide your estimate for the current market indicating the year to which "current" relates, and for the market 5 years after positive FDA action.

Please mark with an asterisk (*) those entries for which you expect to market resins.

Definitions

For this survey, use the following definitions:

"Rigid" means a product with a modulus greater than 100,000 lbs per square inch (psi).

"Semirigid" means a product with a modulus between 10,000 psi and 100,000 psi.

"Flexible" means a product with a modulus less than 10,000 psi.

"Plasticized" means a product with more than 10 phr of external plasticizer.

"Film" means a layered product less than 0.010 in. thick.

"Sheet" means a layered product 0.010 in. or thicker.

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Codes for Different PVC Products

<u>Product</u>	<u>Code</u>
Rigid and semirigid film	A
Rigid and semirigid sheet	B
Rigid and semirigid containers [All types: bottles, jars, cans, etc.]	C
Flexible, plasticized film	D
Flexible, plasticized sheet	E
Flexible, plasticized other	F
Flexible, unplasticized film	G
Flexible, unplasticized other	H
Coatings	J
Plastisols and organosols	K

Food Classes

Fluid Milk includes whole, low fat, skim milk.

Processed Milk Products includes fluid products such as butter-milk, yogurt, chocolate milk.

Cream includes half and half, light cream, heavy cream, sour cream.

Ice Cream includes sherbert, frozen yogurt, frozen custard.

Meat, Fresh includes all varieties (beef, pork, poultry) and cuts (steak, roast, ground).

Meat, Frozen includes all varieties (beef, pork, poultry) and cuts (steak, roast, ground).

Meat, Cured includes all types of wurst, smoked meats, hot dogs.

Fish includes fresh, frozen, cured (smoked).

Canned Meats and Fish includes Spam, canned tuna, canned corned beef.

Oil includes mayonnaise, salad dressing.

Butter includes margarine, other table spreads.

Shortening includes lard, hardened oils.

Non-Alcoholic Beverages includes cola, carbonated drinks, fruit drinks, juices (not frozen).

Alcoholic Beverages [low alcohol] includes beer, wine, fortified wine.

Alcoholic Beverages [high alcohol] includes whiskey, cordials (40-proof or greater).

Fruits and Vegetables, Fresh

Fruits and Vegetables, Frozen includes frozen juices.

Fruits and Vegetables [in cans or jars] includes meat-containing stews, chowders and soups, vacuum-packed nuts, ketchup, tomato juice.

Nuts, Shelled includes everything but "vacuum packed."

Powdered Dry Foods includes "instant" soup, bouillon, powdered milk, powdered chocolate drink, sugar, flour.

Cereal Grains includes oatmeal, farina, grits.

Cereal [Ready-To-Eat] includes corn flakes, shredded wheat, bran flakes, sugared flakes with raisins.

Bread includes all types of bread, biscuits, pasta, noodles.

Tea, Coffee, Cocoa includes tea leaves, ground and instant coffee, cocoa powder.

Desserts include cake, pastry, pie (including frozen), candy.

Preserves include jams, jellies, marmalade, peanut butter.

All Other Frozen Foods and Meals

Spices, Seasonings, Condiments includes pepper, salt, cinnamon, oregano, mustard.

Water includes spring water, mineral water.

Other [Please Specify]

DO NOT COMPLETE--FOR COMMENT ONLY

FOR EACH FOOD CLASS, ENTER YOUR ESTIMATE OF THE TOTAL MARKET (NOT YOUR COMPANY'S SHARE) UNDER THE APPROPRIATE PVC PRODUCT CODE IN THOUSANDS OF POUNDS OF RESIN PER YEAR. IF ALL THE "CURRENT" ESTIMATES ARE BASED UPON THE SAME TIME PERIOD, PLEASE STATE THE YEAR(S) AT THE BOTTOM OF THE TABLE. IF DIFFERENT TIME PERIODS ARE INVOLVED, PLEASE STATE THE YEAR(S) IN THE PARENTHESES. PLEASE MARK WITH AN ASTERISK (*) THOSE ENTRIES FOR WHICH YOU EXPECT TO MARKET RESINS.

MARKET ESTIMATE, M LBS OF RESIN PER YEAR

Food Class	Time Period	PVC Product Type									
		A	B	C	D	E	F	G	H	I	J
Fluid Milk	Current () 5 Year										
Processed Milk Products	Current () 5 Year										
Cream	Current () 5 Year										
Ice Cream	Current () 5 Year										
Meat, Fresh	Current () 5 Year										
Meat, Frozen	Current () 5 Year										
Meat, Cured	Current () 5 Year										

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Food Class	Time Period	FVC Product Type									
		A	B	C	D	E	F	G	H	J	K
Fish	Current () 5 Year										
Canned Meats and Fish	Current () 5 Year										
Oil	Current () 5 Year										
Butter	Current () 5 Year										
Shortening	Current () 5 Year										
Non-Alcoholic Beverages	Current () 5 Year										
Alcoholic Beverages [low alcohol]	Current () 5 Year										
Alcoholic Beverages [high alcohol]	Current () 5 Year										

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PVC Product Type

<u>Food Class</u>	<u>Time Period</u>	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>F</u>	<u>G</u>	<u>H</u>	<u>J</u>	<u>K</u>
Fruits and Vegetables, Fresh	Current () 5 Year										
Fruits and Vegetables, Frozen	Current () 5 Year										
Fruits and Vegetables [in cans or jars]	Current () 5 Year										
Nuts, Shelled	Current () 5 Year										
Powdered Dry Foods	Current () 5 Year										
Cereal Grains	Current () 5 Year										
Cereal [Ready-to-Eat]	Current () 5 Year										
Read	Current () 5 Year										

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PVC Product Type

<u>Food Class</u>	<u>Time Period</u>	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>F</u>	<u>G</u>	<u>H</u>	<u>I</u>	<u>J</u>	<u>K</u>
Tea, Coffee, Cocoa	Current () 5 Year											
Desserts	Current () 5 Year											
Preserves	Current () 5 Year											
All Other Frozen Foods and Meals	Current () 5 Year											
Spices, Seasonings, Condiments	Current () 5 Year											
Water	Current () 5 Year											
Other [Please Specify]												
_____	Current ()											
_____	5 Year											
_____	Current ()											
_____	5 Year											
_____	Current ()											
_____	5 Year											

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File: SPI

3/24/83

1. Ethyl - no Notified ahead of time (before filing)
2. 147 US 91 A due to reports made during the
warmer period for equip covered by warmer;
Ethyl reported anyway.
3. Ethyl will respond soon; have 30 days to do so.

Eff. Guidelines - FR 3/1/83.
SPI considering comments.

Shell, Hooker, PPG - say no review of
report allowed.

Hooker - asked who agent for service is.

How has request for area monitoring for
VCM to develop monitor.

658 CO 7:30 - 8:57A. → B.R.

909 CO 5:00 - 5:56. → 1604.

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