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March 20, 1972

TO: All Members of the SPI Food, Drug and Cosmetic Packaging Materials Committee

RE: PCB Tolerances Matter

Gentlemen:

~~Ku B~~
PBG

Following up on the report on the PCB situation which I gave you at the Food, Drug and Cosmetic Packaging Materials Committee meeting last week, I am herewith enclosing reproductions of pages 5705 and 5706 from the March 18 Federal Register. As you will see, the Food and Drug Administration has now issued a Notice of Proposed Rule Making on the PCB question. The most important part of the Notice is the proposal to establish tolerances for PCB content in foods and food packaging materials.

The proposal does not reference specific methodology whereby compliance with the tolerances may be determined but this omission is not unusual and merely implies that FDA will allow the use of any methodology deemed appropriate in specific cases to determine PCB content.

You will recall that, at our meeting, the Technical Information Subcommittee was given the task of considering and possibly developing additional suitable methodology for the testing of packaging materials for PCB content. Obviously, this was a timely move on the part of the Committee and it is to be hoped that it will be productive.

We would recommend that all members of the Committee review the enclosed Notice of Proposed Rule Making promptly and advise us as soon as possible if they believe that formal comments of any type should be

filed with respect to the same. Our understanding is that comments will be received for a period of 60 days under the new general Food and Drug Administration comment procedural rules.

We shall be looking forward to having your thoughts on this matter at your convenience.

Cordially yours,

George A. Dickman

Enclosure

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