

March 18, 1987

Elaine A. Mertz
ALTC

WRIGLEY'S THUMBSUCKER APPLICATION

Please reference 10-29-86 memo to Jim Gray (copy attached) regarding this application.

The compound you submitted would not be acceptable for this application. Use limitations for Rhodistab L-50, Mark 1500 (709622) and Santicizer 334F (709137) do not fall within this use.

Rhodistab L-50 is limited to use not to exceed 0.5% by weight rigid or semirigid acrylic modified PVC homopolymers at temperatures not to exceed 212°F.

Mark 1500 is limited to use at levels not to exceed 1% by weight in rigid PVC in contact with foods, except milk, not to exceed 150°F.

Santicizer 334F is limited to use at a level not to exceed 33% by weight of PVC, not to exceed room temperature and not to exceed 0.05" thickness.

I am enclosing a copy of Tables 1 and 2, 21CFR176.170 explaining food types and use conditions. I believe the hard candy would be a type VIII food and the applicable use condition would be A as a minimum.

I have also enclosed a copy of 21CFR 178.3740 which lists a number of plasticizers which have clearance. I have placed an X before those you may wish to consider. Please note limitations on use levels, etc. I have also enclosed a copy of 21CFR 181.27 Plasticizers (prior sanctioned). Any of these could be used. A copy of 21CFR 181.29 Stabilizers (prior sanctioned) is also enclosed. Any of these can be used.

If you have any questions about the use of any of these substances, please do not hesitate to call.

W. C. Bachtel

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