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Product Stewardship Environment Compliance and Regulatory Affairs

September 29, 2022

Re: FDA Food-Contact; Substances of Concern

Product Name: Corrugate

Corrugated Packaging

Company:

Packaging Corporation of America (PCA)

Facility Location:

New Oxford Container - PA

Intended Use:

Pack and ship pizza in direct contact with the inside liner

We are responding to your recent inquiry regarding the above-described product.

FDA FOOD-CONTACT

You inquired about the U.S. Food and Drug Administration (FDA) compliance status of corrugated containers manufactured by Packaging Corporation of America (PCA). PCA's corrugated containers are not intended for all food industry applications, but we are pleased to provide an FDA compliance guarantee for the intended use or uses described above.

This Guaranty is offered in keeping with United States Department of Agriculture (USDA) requirements as set forth at 9 CFR 317.24 (b) and at 9 CFR 381.144 (b).

Based upon information provided to us by our suppliers, and upon our own Good Manufacturing Practices with respect to sanitation, our company provides this Guaranty that its containerboard product shall be, at the time of shipment, in compliance with the Federal Food, Drug, and Cosmetic Act, as amended. The containerboard products comply with applicable food additive regulations promulgated by the U.S. Food and Drug Administration, including those set forth in 21 CFR 176.170 and 21 CFR 176.180, for components of paper and paperboard in contact with aqueous and fatty foods, and with dry foods, respectively. Our containerboard articles are not restricted from introduction into interstate commerce under the provisions of Sections 404 or 505 the Federal Food, Drug, and Cosmetic Act.

Our corrugated containerboard products are suitable for food contact packaging for aqueous, fatty foods and dry foods, when used:

(a) under temperature Conditions of Use E ("Room Temperature) and F ("Refrigerated Storage") as listed in 21 CFR 176.170(c). (Extractive testing on the linerboard material indicates that linerboard is

suitable for food contact at temperatures between -40° F. and +120° F., provided there is no subsequent thermal treatment (heating) of the food while it is packaged in the container.)

- (b) as authorized by and in accordance with the provisions of the Federal Food, Drug and Cosmetic Act;
- (c) according to good manufacturing practices for food packaging; and
- (d) so as to prevent any printing on the packaging from coming in contact with food.

This non-assignable certification applies only when the product is used in the manner and for the purpose intended, as described herein above.

SUBSTANCES OF CONCERN

To the best of our knowledge, the product described above does not contain any of the substances listed below.

• PFAS

This assertion is based upon information on raw material composition and process knowledge. Our company does not intentionally add any of these substances to our product.

This certification necessarily excludes any incidental, trace levels that may come into our product through paper made from recovered and recycled fiber.

Any trace, unintentional levels do not pose a health, safety, environmental or regulatory risk.

This certification letter shall be binding for three years from the date hereof, unless sooner terminated by written notice.

We appreciate your business.

Sincerely.

Len Kobal

Product Stewardship Manager

cc: Kelly Schneider, PCA

Vendor 9267

17136	68410	68428
29064	68412	68430
29065	68414	68431
60980	60415	68433
69688	68416	68435
70000	68418	68437
96130	68420	68438 68442
96131	68422	68447
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	68425	68450