To Whom it May Concern

November 2012

Dear Sirs,

**FLUON® PFA GRADES P63B and P63P**

**COMPLIANCE WITH FDA AND EU REGULATIONS FOR PLASTICS FOR FOOD CONTACT**

The compliance of the above Fluon® grades with the USA Food and Drug Administration (FDA) and European Union regulations for plastics intended for food contact is as follows:

**UNITED STATES OF AMERICA**

The above Fluon® grades comply with the compositional requirements of the United States of America FDA regulation 21CFR 177:1550 – ‘Perfluorocarbon Resins’ paragraph (a)(2) as coatings or components of coatings for articles intended for repeated food-contact use. FDA regulation 21CFR 177:1550 requires that extraction tests be carried out on coatings made using the resin.

Also the use of the above Fluon® grades as components of coatings is cleared under FDA 21CFR 175.300 – Resins and polymeric coatings.

**EUROPEAN UNION**

Fluon® grades are made according to a quality management system that meets the requirements of regulation (EC) No 2023/2006 (Good manufacturing practice).

Materials and articles manufactured from the above Fluon® grades, in accordance with good manufacturing practice, and in accordance with the appropriate recommendations, comply with the general requirements of the framework regulation (EC) 1935/2004.

Only monomers and starting substances that are listed in Annex I of Commission Regulation (EU) No 10/2011 are used in the manufacture of the above Fluon® grades. Aids to polymerisation (such as initiators, catalysts, chain transfer agents) are not regulated under Regulation (EU) No 10/2011.

The monomer tetrafluoroethylene, PM/Ref 25120, and the monomer perfluoropropyl perfluorvinyl ether PM/Ref 22937 used in the manufacture of the above Fluon® grades are both subject to a specific migration limit of 0.05 mg/kg in food or food simulants.

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1 References to Regulation (EU) No 10/2011 include subsequent amendments up to Regulation (EU) No 1282/2011
Compliance with the overall migration and specific migration limits of Commission Regulation (EU) No 10/2011 can only be demonstrated by tests carried out on the final article.

It is our view that in each particular case it must be the responsibility of the manufacturer of the finished material or article to ensure that it complies with the regulations and it is recommended that this party should conduct such tests as are necessary to ensure compliance. Some examples of processing that may affect compliance are the use of processing aids, additives or colourants mixed with Fluon®.

Yours faithfully

GP Andrews
Product Steward

Information contained in this publication (and otherwise supplied to users) is based on our general experience and is given in good faith, but we are unable to accept responsibility in respect of factors that are outside our knowledge or control. All conditions, warranties and liabilities of any kind relating to such information, expressed or implied, whether arising under statute, tort or otherwise are excluded to the fullest extent permissible in law. The user is reminded that his legal responsibility may extend beyond compliance with the information provided. Freedom under patents, copyright and registered designs cannot be assumed.

Fluon® grades are general industrial grades. It is the responsibility of the purchaser to check that the specification is appropriate for any individual application. Particular care is required for special applications such as pharmaceutical, medical devices or food. Not all grades are suitable for making finished materials and articles for use in contact with foodstuffs. It is advisable to contact the AGC Chemicals Europe, Ltd sales office for the latest position. Users of Fluon® are advised to consult the relevant Health and Safety literature which is available from the AGC Chemicals Europe, Ltd sales office.