



**REQUEST FOR INTERPRETATION OF 3-A
SANITARY STANDARDS OR 3-A ACCEPTED PRACTICE CRITERIA**

Requester Name and Address: Paul Bokelmann 723 W. Division St. Fond du Lac, WI 54935	Standard/Practice Name and Number: <i>3-A Sanitary Standards for Multiple-Use Plastic Materials, #20-25</i>
Requester's E-mail: pbokelmann@apt-inc.com	Criteria Paragraph Number: B5.2.1

Specific wording requested for interpretation:

B5.2.1 *Plastic Additive, n:* Any material that is added to a plastic or polymer to enhance or modify the original physical and/or chemical properties.

Supporting Comments:

Can stainless steel be considered a Plastic Additive? The term "Any material", in my mind, would allow its use. I'm not a plastic expert but I'm told that the stainless steel is in a fine powder-like condition when blended into a plastic or polymer and is one of the accepted stainless steel grades. And definitely not large enough to present a choking hazard. This could be beneficial in a couple of ways. Better wear characteristics and detectability in metal detectors.

I've learned that some stainless steel filled plastics have been tested per 20-25 and I believe that some have passed. In one case, I believe that a symbol authorization was granted.

I'm cognizant of the fact, however, that some groups within 3-A may be opposed to stainless steel as a plastic additive and may reject efforts to allow it; unless an interpretation allowing it is rendered.

Interpretation Committee's Response:

On June 25, 2009, at 11:00 a.m. EDT, the Interpretations Committee (IC) met via conference call to provide an interpretation of the definition of "plastic additive" as it appears in 3-A Standard 20-25. A quorum was present.

The IC noted that the following relevant clauses appear in Standard 20-25:

B5.2.1 *Plastic Additive, n*: Any material that is added to a plastic or polymer to enhance or modify the original physical and/or chemical properties.

B5.2.2 *Plastic, adj.*: The adjective "plastic" indicates that the noun is made of, consists of or pertains to plastic."

It was agreed that the definition B5.2.1 for "plastic additive" states that "any material" can be a plastic additive. It is not limited to a plastic material that is added to a plastic base substance. Then, B5.2.2 was reviewed. At first it appeared that B5.2.2 was a subset of B5.2.1 and indicated that the word "plastic" was an adjective to describe the nature of the "additive" defined in B5.2.1, meaning that the additive had to be a plastic. But on closer examination it became apparent that Clause B5.2.2 *was not* a sub-clause of B5.2.1 (it would have been numbered B5.2.1.1 if it was). Because of this, Clause B5.2.2 has no bearing on, and is independent of, the meaning of B5.2.1. B5.2.1 must be taken in context by itself. It was therefore concluded that a "plastic additive", as defined by standard 20-25, is any material added to plastic.

Official Interpretation: A plastic additive, as defined by, and used in the context of, 3-A Sanitary Standard Number 20-25, is any non-toxic substance or material used in accordance with Standard 20-25 and the additive must comply with all other clauses of Standard 20-25. Plastic additive(s) are not limited to plastic(s) themselves. Plastic additive(s), if used, shall be used at the minimum levels required for the desired functionality.

It was noted that Mr. Bokelmann also asked specifically if a particular stainless steel grade can be added to plastic and be in compliance with Standard 20-25. The IC briefly discussed this and concluded that they cannot introduce new technical requirements into the standard. The standard addresses plastic additives in Clause C (Materials) and requires compliance with Clause H (Standards for Acceptability). Clause H5 requires certification of each formulation for compliance with FDA regulations and/or FD&C Act requirements.

Date received by 3-A SSI: May 28, 2009	IC Chair
Date reviewed by IC: June 25, 2009	Randy Elsberry
Date of response: July 2, 2009	Date: July 2, 2009