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January 16, 2009

Jeff Van den Boom
Pacific Paper Tube

Via Email: jeff@pacificpapertube.com

Re: Newark Pacific NewKote Light Back Recycled Grade Paperboard

Dear Jeff:

In response to your recent inquiry regarding the appropriateness of using recycled paperboard in fatty, aqueous & dry food (21CFR 176.180) contact applications, we are pleased to advise you that our grade of board is covered by the Recycled Paperboard Technical Association's Chemical Testing Protocol for food contact paperboard made from recycled fibers (the RPTA Protocol). Newark Pacific Paperboard is a member of the RPTA.

The RPTA Protocol was initially developed by RPTA under the direction of Environ Corporation, a recognized expert in food safety assessment. The RPTA Protocol covers potential unintentional chemical constituents in recycled pulp, 21CFR 176.260. The methodology employed by the RPTA Protocol applies generally accepted human-health-risk characterization procedures for assessing potential chemical exposure through ingestion of foods in contact with paperboard made from recycled fiber. Existing data on the potential for chemical substances that could possibly be present in paperboard packaging, migrate to food, and cause adverse human health effects has been examined. Based on this safety assessment, it is our opinion that the ingestion of foods in contact with paperboard that has been produced using Good Manufacturing Practices (GMP) and containing no more than the amounts of chemical constituents as listed in Tables 3-2 through 3-5 of the RPTA Protocol, as applicable and appropriate, does not pose a human health risk.

In addition to the RPTA Protocol, RPTA recommends that microbiological and total extractive testing be performed to assure FDA compliance. Newark Pacific Paperboard has performed these additional analyses.

Newark Pacific Paperboard uses the industry's GMP in producing recycled paperboard consistent with the application of the RPTA Protocol and can represent that recycled paperboard contains no more than the amount of chemical constituents listed in the applicable appropriate tables. Therefore, consistent with the RPTA Protocol, appropriate surface swab microbiological testing, use of FDA permitted additives, compliance with the extraction analysis required by 21CFR176.170, and avoidance of the imparting of odor and/or taste to food products, 21CFR174.5(b), the use of recycled paperboard in fatty, aqueous & dry food contact does not pose a human health risk. The product that we supply complies with CONEG heavy metals, California Prop 65, and all pertinent FDA regulations for direct food contact.

Very truly yours,

Bill Doerr
Manager of Environmental Affairs

Copy: Larry Lacotti