VIA ELECTRONIC MAIL

RE: USDA ACCEPTANCE STATUS OF FIBERLOCK RECON SMOKE ODOR SEALANTS (#3090 WHITE AND #3091 CLEAR )

Dear Sir or Madam:

For many years, the U.S. Department of Agriculture’s Food Safety and Inspection Service (FSIS) administered a program to certify coatings for use in federally inspected meat and poultry plants. In August 1994, the FSIS issued a directive which ended that program and substituted a procedure under which coatings manufacturers would self-certify coatings for use in regulated facilities (FSIS Directive 11,400.4 dtd 8/12/94).

The National Paint & Coatings Association (NPCA) complained that their directive was flawed and got the FSIS to extend existing product certifications that were due to expire in August, 1995 until the Agency withdrew or revised the directive. As a result of NPCA’s effort’s the Agency finally decided to issue a new directive (FSIS Directive 11,400.4 (Rev. 1) dated 11/24/95) which effectively ends the requirement that coatings be certified in regulated facilities either by the USDA or by the coatings manufacturers.

Coatings manufacturers have been advised to inform their distributors and customers who, in the future, receive requests for “USDA-Certified or Approved Coatings”, particularly for uses which have not previously been regulated by USDA (eg., food preparation areas) , that they should be made aware that there are no longer procedures by which USDA will approve or certify such coatings.

Accordingly, we have reviewed the composition of the two Fiberlock RECON Smoke Odor Sealers #3090 White and #3091 Clear and found nothing that would prevent them from being used for incidental food contact in facilities such as bakeries, bottling plants and other food manufacturing facilities. This acceptance does not apply to direct or immersion contact with our coatings since coatings for those must be approved by the FDA.

Sincerely,

Ronald B. Child, VP

Compliance and Regulatory Affairs

California Products Corporation\*

Cc: Cole Stanton, Executive Vice President, Fiberlock Technologies, Inc

\*Fiberlock Technologies Inc. is a wholly owned subsidiary of California Products Corporation, Andover, MA 01810 REF #:\_\_\_\_\_\_\_