

# **Franklin International**

January 15, 2016

To Whom It May Concern:

Regarding our Titebond III Ultimate Wood Glue and FDA food contact compliance:

Titebond III Ultimate Wood Glue is compositionally compliant with US FDA regulations 21 CFR 175.105, INDIRECT FOOD ADDITIVES: ADHESIVES AND COMPONENTS OF COATINGS.

To be compliant you must have two things:

One, the ingredients of the adhesive must be on the list in the standard.

Second, there must be a functional barrier that acts to prevent the migration of adhesive ingredients into the food substance. Adhesive separated from food by a barrier that prevents their migration and are not considered to be food additives. A functional barrier can be something that represents very low exposure. Depending upon how much adhesive is used it is generally accepted that at seams and edges of wood articles (cutting boards, butcher block tables, etc.) there is very low exposure and a functional barrier is considered to be in place.

The FDA also has something called the "Housewares" exemption. This goes back to 1958 when the food additive standards first came out. Basically, Congress did not intend that housewares (or their components) would be subject to the requirement for FDA premarket clearance. Housewares are articles used by consumers or foodservice establishments to prepare, hold, or serve food. Examples include utensils, plates, food storage containers, clamshells, paper or plastic food wraps, etc. Cutting boards for use in the home would fall under this exemption.

I hope this information meets your needs. Please let me know if you have any additional questions or concerns.

Regards,

Ben Ward

Product Safety Assistant

Franklin International

**E** [BenWard@FranklinInternational.com](mailto:BenWard@FranklinInternational.com)

**P** 1.800.877.4583 ext. 1313