

## Grayson Wagner Co Ltd

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30 April 2025

Ecochem Australia Pty Ltd  
110 South Mountain Road  
Upper Plenty, Victoria 3758

Attn: Geoff Literski

Dear Geoff,

This letter is in reply to your request for information on the FDA status of your product Evolution Starch Off Ultra.

As you are aware, the FDA has developed guidelines for products which are considered to be either direct or indirect food additives. This product is a cleaner specialising as a residual starch remover which by design, is used for various types of equipment used in the food industry, e.g. corrugators & related lines of equipment, belts and other areas with starch build up. Thus the use of the product must be compliant with the requirements of the indirect food additive guidelines found at 21 CFR Sections 170-189 of the Federal Food Drug and Cosmetic Act.

If the instructions for use, as specified on the label, are followed, then the possibility of food contact for product residue is completely removed. This is because of initial product dilution resulting in very low-level indirect contact via food contact surfaces with residues and minimised, e.g. safe rinsed.

The MPI (Ministry of Primary Industries) of New Zealand define such products as Dairy Maintenance Compounds and have yet to assess an approval for the use of Evolution Starch Off Ultra (this process is pending), as defined on the label. Every ingredient present has been thoroughly assessed as safe for the product and ends-use, by their approved expert and authority.

In addition, every ingredient for Evolution Starch Off Ultra has been researched by MPI's approved expert as being present in 21 CFR, by direct reference, for acceptable and safe food use, subject to any use or use limitation for the appropriate section of 21 CFR.

I trust this information will satisfy your needs.

Kind regards



L Nicholls BSc MNZIC  
Consultant