

1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
tel. 202.434.4100
fax 202.434.4646

September 8, 2011

Writer's Direct Access
George G. Misko
(202) 434-4170
misko@khlaw.com

Electronic Mail and U.S. Mail

Mr. Markus Jörgensen
Add-X Biotech AB
Klangfärgsgatan 16
426 52 Västra Frölunda
Sweden

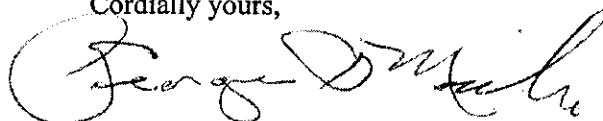
Re: FDA Status of Addiflex HES Additive for Use Food Packaging Films

Dear Mr. Jörgensen:

The purpose of this letter is to respond to your request for our opinion regarding the status, under the laws and regulations administered by the United States Food and Drug Administration (FDA) of the Add-X Biotech AB Addiflex HES product when intended for use as a component in primary and secondary packaging films for food products. Based on the information you have provided us, we have no hesitation in advising that Addiflex HES may be used as a component in packaging films directly in contact with aqueous, alcoholic, and other non-fatty foods (*i.e.*, FDA Food Types I, II, IV-B, VI, VII-B, and VIII)¹, as well as those that are used as secondary packaging, and that such use may properly be said to comply fully with the Federal Food, Drug, and Cosmetic Act, and all applicable food additive regulations. The basis for our conclusion is set forth below.

We trust that you will find this letter fully responsive to your request for our opinion. Should you have any further questions regarding this matter, or if we may be of assistance in any other way, please do not hesitate to contact us.

Cordially yours,



George G. Misko

¹ See "Table 1—Types of Raw and Processed Foods," 21 C.F.R. §176.170(c) ("Components of paper and paperboard in contact with aqueous and fatty food")