

MAY 22 1973

Industrial Chemicals

Syracuse Works

Mr. L. V. Haff

FOOD CHEMICAL CODEX  
JOINT FAO/WHO EXPERT COMMITTEE  
ON FOOD ADDITIVES

Industrial Chemicals

Manufacturing, MTO

May 17, 1973

In reference to your recent exchange of correspondence with the National Research Council regarding the sodium nitrite specification, it appears now from the attached correspondence from the MCA that sodium metabisulfite and sodium sulfite of ICD products should also have been considered. It is our opinion that the current FCC specifications are adequate for these products and I would not recommend any change at this time.

W. C. Koch  
Quality Assurance Manager

WCK/dl

Attachment

cc: W. A. Knapp ✓

ASI 00003294

# ROUTING SLIP

To:

W.C. Koch

For:

☐ Approval

☐ Comments

☐ Information

☐ Necessary Action

☐ Recommendation

☐ See me

☒ Return

☐ Retain

☐ Signature

From:

W. Knapp

Date:

5/10/73

Forward to:

Remarks:

*You may have some  
interest in the attached.  
We did not receive  
The April 16 Dodge  
communication mentioned  
Please return*

ASI 00003295

MAY 9 1973

MCA

MANUFACTURING CHEMISTS ASSOCIATION

1825 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20009 (202) 483-6126

May 7, 1973

To: FOOD ADDITIVES CONTACTS IN MCA MEMBER COMPANIES  
FOOD, DRUG, AND COSMETIC CHEMICALS COMMITTEE

Subject: Specifications for Substances to be Con-  
sidered at the June 26-July 4 Meeting of  
the Joint FAO/WHO Expert Committee on  
Food Additives

Gentlemen:

Please refer to the attached letter from the Director of the Food Chemicals Codex, note particularly the fourth paragraph, and advise Mr. Dodgen immediately if your company has not received a letter recently from him on the above subject, in the event you have an interest in the specifications for the substances categorized on page two of his letter and detailed by name on the list attached to this letter.

This project overlaps to some extent the 1971 effort which involved a review of specifications in FAO Nutrition Meetings Report Series Nos. 44B, 45A, and 46B. A number of you contributed substantially to this review, but I understand the input from other countries was meager. I'm sure Mr. Dodgen will be glad to indicate what may still be needed where there is an overlap with what went to Dr. Blumenthal in 1971.

I wish to thank all of you who have submitted toxicological information on substances to be considered at the June 26-July 4 JECFA meeting in response to my letter of February 12.

Sincerely yours,

  
M. M. Hoover, Secretary  
Food, Drug, and Cosmetic  
Chemicals Committee

MMH:gr  
Attachments

Distribution "B"  
cc: Mr. D. F. Dodgen  
Dr. H. Blumenthal

ASI 00003296

MAY 2 1973

# NATIONAL RESEARCH COUNCIL

NATIONAL ACADEMY OF SCIENCES NATIONAL ACADEMY OF ENGINEERING

2101 CONSTITUTION AVENUE WASHINGTON, D.C. 20418

FOOD CHEMICALS CODEX

(202) 961-1537

May 1, 1973

Mr. Morgan M. Hoover  
Secretary, Food, Drug, and  
Cosmetic Chemicals Committee  
Manufacturing Chemists Association  
1825 Connecticut Avenue, N.W.  
Washington, D.C. 20009

Dear Morgan:

You will recall that I called you several weeks ago in connection with the 17th JECFA meeting to be held in Geneva June 26-July 4. I mentioned that I would hope you could help me in getting comments on the specifications that have been prepared by the JECFA since its inception.

At the time I called you, I thought that it would be helpful if you could send out copies of some tabulations (comparing the JECFA specifications with those of the Food Chemicals Codex and the Japanese Standards of Food Additives) to the members of the MCA food additives committee. The tabulation, however, turned out to be 124 pages long. It would have been impractical (and expensive) to prepare copies of the whole set for you to send out, so I decided that we would first send out from this office copies of only the pertinent pages to individual firms. Thus, we mailed individual specifications to about 75 firms during the week of April 16.

A copy of the covering letter used for this mailing is enclosed for your information. Also enclosed, to give you an idea of what the tabulations look like, are copies of the first three pages from the group of antimicrobials/preservatives.

It is very possible, however, that we missed some manufacturers of some of the chemicals. For this reason, I hope that you will still be willing to help by informing the MCA member firms that if they did not receive a letter from me--and if they have comments to make on the specifications--I would be happy to send them copies of the tabulations in which they have an interest.

ASI 00003297

Mr. Morgan M. Hoover

-2-

May 1, 1973

As you probably already know, the substances to be discussed at the 17th JECFA are in the following categories (numbers below refer to the listings in the CX/FA Index, a copy of which is enclosed):

Antimicrobials/Preservatives: B.1 through B.32

Antioxidants/Synergists: C.1 through C.30

Anti-Caking Agents: D.1 through D.16

Emulsifiers: F.1 through F.26

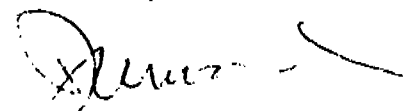
Thickening Agents: G.1 through G.19.8

Miscellaneous Substances: L.6, M.3, M.4, M.5, and P.3.

Your cooperation, as always, will be greatly appreciated. Please call me if you have any questions.

With best regards,

Sincerely,



Duward F. Dodgen  
Director, Food Chemicals Codex

DFD:vtc  
Enclosures

cc: Dr. R. K. Malik

ASI 00003298

**NATIONAL RESEARCH COUNCIL**  
**NATIONAL ACADEMY OF SCIENCES NATIONAL ACADEMY OF ENGINEERING**  
**2101 CONSTITUTION AVENUE WASHINGTON, D.C. 20418**

FOOD CHEMICALS CODEX

(202) 961-1537

Dear

Since the early 1960's, a committee of experts sponsored jointly by the Food and Agriculture Organization and the World Health Organization (both are agencies of the United Nations) has been developing standards and specifications for food additives. The specifications prepared by this Joint FAO/WHO Expert Committee on Food Additives are later adopted, after appropriate review and revision, as international standards by the Codex Alimentarius Commission, another joint activity of FAO and WHO (not connected with the U.S. Food Chemicals Codex).

The Joint Expert Committee will begin a general review of the specifications during its seventeenth meeting in Geneva, Switzerland in June. I have been asked by the FAO Secretariat to obtain comments from the U.S. industry on the particular substances under review; this is why I am writing to you, but I hope that you will also comment on the Food Chemicals Codex specifications, with particular emphasis on your views regarding adequacy of the FCC in defining "food grade."

At the meeting in Geneva, the FAO/WHO specifications will be reviewed in conjunction with those of the Food Chemicals Codex and the Japanese Standards of Food Additives. To facilitate this review, I have prepared a tabulation of the pertinent data from the FAO/WHO, FCC, and JSFA publications. Copies of the tabulations relating to substances believed to be of interest to your firm are enclosed, together with some additional explanatory material.

ASI 00003299

In your review of this material, please keep in mind the following questions:

- (1) Do you feel that the FAO/WHO specifications are suitable in defining the purity of the substances for their use on an international level? Are any of the limits too stringent or too lax? Are any important impurity limits lacking?
- (2) Do you feel that the FCC specifications are suitable in defining the purity of the substances for their intended use in the U.S.? Can the impurity limits (particularly those for arsenic, heavy metals, lead, etc.) be reduced further?
- (3) Most important: Do you know of any toxic or hazardous impurities that are not covered by the FCC (or FAO/WHO) specifications?
- (4) In those cases where FAO/WHO and FCC employ different analytical methods, which method do you prefer? Do you recommend that methods other than those indicated be used?

I am not asking that you review the Japanese specifications, but if you have any comments, I will be pleased to pass them on to the JSFA authorities.

So that your comments might be given full consideration by the Joint Expert Committee, please send them to me no later than June 1, but earlier if possible. If you have no international interests in these substances, we would still be pleased to receive your comments on the Food Chemicals Codex specifications at any time.

Your cooperation in this project will be greatly appreciated.

With best wishes,

Sincerely,

Durward F. Dodgen  
Director, Food Chemicals Codex  
(Member, 17th FAO/WHO Joint  
Expert Committee on Food Additives)

DFD:vtc  
Enclosures

P.S. I should also mention that in addition to food additive specifications, the Joint Expert Committee will also review the principles for evaluating the safety of food additives and the types of data needed in the toxicological reevaluation of the substances. If you wish further information about this aspect of the review, please write or call me.

SUBSTANCES TO BE CONSIDERED AT THE  
JUNE 26-JULY 4 MEETING OF THE JOINT  
FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES

**B. PRESERVATIVES**

B.1 Benzoic acid

B.13 Nitrate, potassium

B.23 Propionate, calcium

B.14 Nitrate, sodium

B.24 Propionate, potassium

B.2 Benzoate, potassium

B.25 Propionate, sodium

B.3 Benzoate, sodium

*B.15 Nitrite, potassium*  
B.15 Nitrite, potassium

B.26 Sodium diacetate

*1/14*  
✓ B.4 Calcium acetate

✓ B.16 Nitrite, sodium

B.27 Sorbic acid

B.5 Diethylpyrocarbonate  
(Syn.: Diethyl  
dicarbonate)

B.6 Formic acid

B.17 Parahydroxybenzoate,  
butyl

B.7 Hexamethylenetetramine

B.18 Parahydroxybenzoate,  
ethyl

B.28 Sorbate, calcium

B.19 Parahydroxybenzoate,  
methyl

B.29 Sorbate, potassium

B.8 Hydrogen peroxide

B.30 Sorbate, sodium

✓ B.9 Hydrogen sulphite,  
sodium (Syn.:  
Sodium bisulphite)

B.20 Parahydroxybenzoate,  
propyl

✓ B.31 Sulphur dioxide

B.10 Metabisulphite,  
potassium

✓ B.32 Sulphite, sodium

✓ B.11 Metabisulphite, sodium

B.21 Pimaricin

B.22 Propionic acid

B.12 Nisin

C. ANTIOXIDANTS AND ANTIOXIDANT SYNERGISTS

- |                                                                                                                                  |                                                                                           |                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| C.1 Ascorbic acid<br>(Syn.: Vitamin C)                                                                                           |                                                                                           |                                                                         |
| C.2 Ascorbate, sodium                                                                                                            | C.15 Gallate, octyl                                                                       | C.25 Tartaric acid (L(+))                                               |
| C.3 Ascorbyl palmitate                                                                                                           | C.16 Polyphosphate, sodium<br>(Syn.: Sodium hexameta-<br>phosphate)                       | C.26 Thiodipropionic acid                                               |
| C.4 Ascorbyl stearate                                                                                                            | C.17 Isoascorbic acid<br>(Syn.: Erythorbic acid)                                          | C.27 Thiodipropionate,<br>dilauryl                                      |
| C.5 Butylated hydroxyanisole<br>(BHA)                                                                                            |                                                                                           | C.28 Thiodipropionate,<br>distearyl                                     |
| C.6 Butylated hydroxytoluene<br>(BHT)                                                                                            | C.18 Isoascorbate, sodium<br>(Syn.: Sodium<br>erythorbate)                                | C.29 <u>alpha-Tocopherol</u><br>(Syn.: Vitamin E)                       |
| C.7 Citric acid                                                                                                                  | C.19 Isopropyl citrate<br>mixture (Syn.:<br>Monoisopropyl citrate)                        | C.30 Tocopherols, mixed<br>concentrate (Syn.:<br>Vitamin E concentrate) |
| C.8 Citrate, stearyl                                                                                                             | C.20 Guaiac gum<br>(Syn.: Guaiac resin)                                                   |                                                                         |
| C.9 Ethylenediamine -<br>tetraacetate, calcium<br>disodium (CaNa <sub>2</sub> EDTA)<br>(Syn.: Calcium disodium<br>edetate)       | C.21 Monoglyceride citrate<br>(Syn.: Citric acid and<br>fatty acid esters of<br>glycerol) |                                                                         |
| C.10 Ethylenediamine -<br>tetraacetate, disodium<br>dihydrogen (Na <sub>2</sub> H <sub>2</sub> EDTA)<br>(Syn.: Disodium edetate) | C.22 Nordihydroguaiaretic<br>acid (NDGA)                                                  |                                                                         |
| C.11 Ethyl protocatechuate                                                                                                       | C.23 Phosphoric acid<br>(Syn.: Orthophosphoric<br>acid)                                   |                                                                         |
| C.12 Gallate, dodecyl                                                                                                            | C.24 Stannous chloride                                                                    |                                                                         |
| C.13 Gallate, isoamyl                                                                                                            |                                                                                           |                                                                         |
| C.14 Gallate, propyl                                                                                                             |                                                                                           |                                                                         |

Malic Acid

D. ANTI-CAKING AGENTS

- D.1 Ferrocyanides, calcium, potassium and sodium
- D.2 Calcium carbonate (See para 108, ALINORM 71/12)
- D.3 Magnesium carbonate
- D.4 Magnesium oxide (See para 108, ALINORM 71/12)
- D.5 Myristates, aluminium, ammonium, calcium, magnesium, potassium, sodium
- D.6 Palmitates, aluminium, ammonium, calcium, magnesium, potassium, sodium
- ✓ D.7 Phosphate, calcium, tribasic (incl. "bone" phosphate)
- D.8 Phosphate, magnesium, tribasic
- D.9 Phosphate, Di-, tetrasodium (Syn.: tetrasodium pyrophosphate) (See para 108, ALINORM 71/12)
- D.10 Silicon dioxide, amorphous (incl. silica aerogel; hydrated silica; silicic acid; dehydrated silica gel)
- D.11 Silicate, aluminium (Syn.: Kaolin)
- D.12 Silicate, calcium
- D.13 Silicate, magnesium (incl. talc, magnesium trisilicate)
- D.14 Silicate, sodium alumino- (Syn.: sodium silico-aluminate)
- D.15 Silicate, sodium calcium alumino- (Syn.: sodium calcium silicoaluminate) (See CAC/RS 5-1969)
- D.16 Stearates, aluminium, ammonium, calcium, magnesium, potassium, sodium

F. EMULSIFIERS

- F.1 Ammonium salts of phosphatidic acid (Syn.: Emulsifier YN)
- F.2 Cholic acid
- F.3 Desoxycholic acid
- F.4 Glycerides, mono- and di-
- F.5 Glycerides, mono- and di-, acetic acid esters of (Syn.: acetic and fatty acid esters of glycerol)
- F.6 Glycerides, mono- and di-, tartaric and acetic acids esters of (Syn.: mixed tartaric, acetic and fatty acid esters of glycerol)
- F.7 Glycerides, mono- and di-, citric acid esters of (Syn.: Citric and fatty acid esters of glycerol)
- F.8 Glycerides, mono- and di, diacetyltartaric acid esters of (Syn.: diacetyl tartaric and fatty acid esters of glycerol)
- F.9 Glycerides, mono- and di-, lactic acid esters of (Syn.: lactic and fatty acid esters of glycerol)
- F.10 Lecithin
- F.11 Sorbitan monopalmitate
- F.12 Sorbitan monostearate
- F.13 Sorbitan tristearate
- F.14 Polyglycerol esters of interesterified ricinoleic acid
- F.15 Polyglycerol esters of fatty acids
- F.16 Polyoxyethylene (20) sorbitan monolaurate (Syn.: Polysorbate 20)
- F.17 Polyoxyethylene (20) sorbitan monooleate (Syn.: Polysorbate 80)
- F.18 Polyoxyethylene (20) sorbitan monostearate (Syn.: Polysorbate 60)
- F.19 Polyoxyethylene (20) sorbitan monopalmitate (Syn.: Polysorbate 40)
- F.20 Polyoxyethylene (20) sorbitan tristearate (Syn.: Polysorbate 65)
- F.21 Polyoxyethylene (8) stearate
- F.22 Polyoxyethylene (40) stearate
- F.23 Propylene glycol esters of fatty acids
- F.24 Stearoyl lactylate, calcium and sodium
- F.25 Sucrose esters of fatty acids
- F.26 Thermally oxidized soybean fatty acid esters of glycerol

**G. THICKENING AGENTS**

- |                                                                         |                                                             |                                                         |
|-------------------------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------|
| G.1 Agar (Syn.: agar agar)                                              | G.16 Dextrins, white and yellow                             | G.17.14 Monostarch phosphate                            |
| G.2 Alginic acid                                                        |                                                             |                                                         |
|                                                                         | G.17 Modified Starches:                                     | G.17.15 Starch acetate                                  |
| G.3 Alginate, ammonium                                                  | G.17.1 Acid-treated starch                                  | G.17.16 Starch, hydroxypropyl                           |
| G.4 Alginate, calcium                                                   | G.17.2 Alkali-treated starch                                |                                                         |
| G.5 Alginate, potassium                                                 | G.17.3 Bleached starch                                      | G.17.17 Starch s dium succinate                         |
| G.6 Alginate, sodium                                                    | G.17.4 Oxidised starch                                      |                                                         |
| G.7 Alginate, propylene glycol                                          |                                                             | G.17.18 Starch s dium octenylsuccinate                  |
| G.8 Cellulose, hydroxypropyl                                            | G.17.5 Distarch adipate, acetylated                         | G.17.19 Starch aluminium octenyl succinate              |
|                                                                         | G.17.6 Distarch glycerol                                    | G.17.20 Sodium carboxymethyl distarch glycerol          |
|                                                                         | G.17.7 Distarch glycerol, acetylated                        | G.18 Pectin                                             |
| G.9 Cellulose, hydroxypropylmethyl                                      | G.17.8 Distarch glycerol, hydroxypropyl                     | G.19 Vegetable Gums:                                    |
| G.10 Cellulose, methyl (Syn.: MC)                                       | G.17.9 Distarch phosphate (trimetaphosphate) (treated)      | G.19.1 Arabic gum (Syn.: Acacia gum)                    |
| G.11 Cellulose, methylethyl                                             | G.17.10 Distarch phosphate (phosphorus cxychloride treated) | G.19.2 Carob bean gum (Syn.: Lucust bean gum)           |
| G.12 Cellulose, micro-crystalline                                       | G.17.11 Distarch phosphate, phosphated                      | G.19.3 Carrageenan (Syn.: Carrageen, Irish moss gelose) |
| G.13 Cellulose, sodium carboxymethyl (Syn.: CMC; Na-CMC; cellulose gum) | G.17.12 Distarch phosphate, acetylated                      | G.19.4 Furcellaran (Syn.: Danish agar)                  |
| G.14 Amylose and amylopectin                                            | G.17.13 Distarch phosphate, hydroxypropyl                   | G.19.5 Guar gum (Syn.: guar flour)                      |
| G.15 Enzyme-treated starches                                            |                                                             | G.19.6 Karaya gum                                       |
|                                                                         |                                                             | G.19.7 Tragacanth gum (Syn.: Tragacanth)                |
|                                                                         |                                                             | G.19.8 Xanthan gum                                      |

Misc.

- L.6 L-Glutamate, monopotassium
- M.3 Saccharin
- M.4 Saccharin, calcium
- M.5 Saccharin, sodium
- P.3 Mannitol (Syn.: D-mannitol, mannite)

RECEIVED  
MAY 10 1973  
CHEMICAL