



October 17, 2014

Kelly Hislop  
Chief, Chemical Health Hazard Assessment Division  
Bureau of Chemical Safety  
Food Directorate  
251 Sir Frederick Banting Driveway  
Postal Locator: 2201C  
Ottawa, Ontario  
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Dear Dr. Hislop:

The International Association of Color Manufacturers (IACM) is the trade association that represents the global color industry, comprised of manufacturers and end-users of coloring substances that are used in foods, including natural and synthetic colors. IACM appreciates the opportunity to provide the following comments and recommendations in response to your letter of September 10, 2014 regarding the possibility of updating the specification requirements for certain permitted food colors.

In your letter, you asked the following questions:

- 1) Considering that requirements for coloring agents prescribed by Division 6 are minimum requirements, what food-grade specifications for coloring agents are typically used by your members when manufacturing coloring agents?

IACM member companies would prefer that country specifications move toward harmonization with the specifications listed by the Joint FAO/WHO Expert Committee on Food Additives (JECFA), where such specifications are available. Secondly, our members would recommend aligning with the specifications laid out in the US Federal Code of Regulations and utilized by the US Food and Drug Administration (FDA) if specifications do not exist under JECFA. Given the global nature of the color additive market, our members typically ensure that their products conform to these specifications.

- 2) There are no specifications in the FCC or established by JECFA for three of the permitted coloring agents that have specifications in Division 6, namely Ponceau SX, Citrus Red No. 2 and carbon black.

The Food Directorate would appreciate any information your members can provide on (i) current food uses of these three colors; (ii) the specifications to which these colors are manufactured and that are considered when selecting appropriate food-grade colors for food use; (iii) whether it would be appropriate to make any updates to the current specifications as set out in sections B.06.031, B.067.043 and B.06.053 for these three colors; and (iv) whether there are suitable alternatives that can be used in place of any of these three coloring agents, and if not, the reason why.

### Ponceau SX

Ponceau SX is permitted only in maraschino cherries only in Canada. The replacement for this use would be FD&C Red 40 (Allura Red). For trade reasons, IACM members have largely replaced Ponceau SX with FD&C Red 40, although we cannot be certain that this has been accomplished in all cases.

### Citrus Red No 2

We are aware that Citrus Red No 2 is still being certified in the US. For example, so far in fiscal year 2014, 3,703.72 pounds of the straight dye have been certified. While its only approved use is for coloring the skins of oranges, we would propose that Health Canada not delist the color. We would also propose that Health Canada adopt the FDA specification for this color, which can be found in 21 CFR 74.302.

### Carbon Black

We are aware that IACM members use carbon black that meets the JECFA and European Union specification for vegetable carbon (E153). IACM would be supportive of the JECFA specification for vegetable carbon to replace the existing specification for carbon black [B.06.031]. IACM members would like to retain their ability to use "vegetable carbon" in the future so would strongly request that the delisting of this color additive by Health Canada not be further considered.

IACM appreciates the opportunity to provide feedback to Health Canada's Food Directorate on its initiative to update the specification requirements for certain permitted food colors. Please do not hesitate to contact me directly with any further questions.

Sincerely,



Sarah Codrea  
Executive Director