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Bureau of Chemical Safety, Food Directorate
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Via Email: bcS-bipc@hc-sc.gc.ca

On behalf of the International Association of Color Manufacturers (IACM), I am pleased to submit the following comments in response to Health Canada's proposal to modify the currently permitted uses of amaranth in various foods [NOP/AVP-0023] published on January 4, 2017 in response to the recent reevaluation of the food additive uses of amaranth, which was conducted in support of a broader review of 52 azo dyes carried out as part of Canada's Chemicals Management Plan. 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.

Amaranth is currently permitted at a maximum level of use of 300 parts per million, singly or in combination with other specified synthetic colors, in a range of foods. The results of Health Canada's reevaluation of available data on the concentrations of amaranth used in foods sold in Canada reveal that exposure to amaranth is within acceptable levels. However, since the existing maximum levels of use for amaranth that appear in the List of Permitted Coloring Agents are generally higher than actual use levels, Health Canada is proposing to modify the List of Permitted Coloring Agents.

IACM largely supports the modifications as proposed, except that we would propose an additional category (9) in Column 2 of the proposed modifications to the List of Permitted Coloring Agents. IACM proposes that amaranth be permitted in or upon "Chips, pretzels, popcorn, extruded snacks, grain and pulse-based snacks, pita chips and fruit-based snacks, such as fruit chips" with a maximum level of use of 250 ppm singly or in combination.

IACM understands that Health Canada's modified proposal is based largely on actual usage as there is no safety concern associated with an exceedance of ADI. Therefore, we request that this additional category be added to reflect that amaranth is currently being used up in these types of products in the Canadian marketplace.

We are grateful for the opportunity to comment on this proposal and would be happy to provide any additional information that may be required to support this change.

Sincerely,

A handwritten signature in black ink that reads "Sarah A. Codrea". The signature is written in a cursive, flowing style.

Sarah Codrea
Executive Director