

SASSI Comments – Health Canada's Proposal to revise certain permitted uses of aluminum-containing food additives

22 May 2023

The <u>Synthetic Amorphous Silica and Silicate Industry Association</u> (SASSI), would like to share its comments concerning Health Canada's Proposal to Revise Certain Permitted Uses of Aluminum- containing Food Additives <u>Notice of Proposal - Lists of Permitted Food Additives Reference Number: NOP/ADP-0040 March 9, 2023 as it pertains to aluminum silicates.</u>

About SASSI

The Synthetic Amorphous Silica and Silicate Industry Association (SASSI) is a forum that addresses industry-wide questions arising during production-related activities as well as ecotoxicity, toxicology and regulatory matters concerning the use of synthetic amorphous silica and silicates. SASSI is a non-profit corporation (IRS 501(c)(6) corporation) with 7 members representing the major synthetic amorphous silica and silicate producers in the US and Europe.

SASSI came together as an association of manufacturers in 1993, commensurate with the 1992 formation of the Association of Synthetic Amorphous Silica Producers (ASASP), a Sector Group within Cefic one of the leading European trade associations with offices in Brussels.

Comments

SASSI thanks Bureau of Chemical Safety, Food Directorate for this opportunity to comment on the NOP/ADP-0400 for aluminum silicates.

To properly respond and provide additional information, SASSI is requesting additional details to further understand the drivers behind this proposal. Can you please provide specifics on why aluminum containing food additives uses are being updated? As stated in the proposal, "the results of this review did not present a concern from a food chemical safety perspective" and "Health Canada's assessment did not identify any concerns for human health". Sodium Aluminum Silicates, (CAS number 1344-00-9) produced by SASSI members, have been safely sold as direct food additives since 1954 without any detrimental effects to health in many countries, including Canada.

Sodium aluminum silicate is scientifically recognized as an inert substance and meets the Food and Chemical Codex specifications. Sodium aluminum silicate is considered GRAS (Generally recognized as safe) per 21 CFR 182.2727 in levels not to exceed 2% as a food additive with customers using it typically between 1-2% in their final food formulation. 21 CFR 160.105 "Dried Eggs" also allows the use of sodium aluminum silicate to be used as an anticaking agent in amounts less than 2% by weight of the finished food, which is one of the uses mentioned as being eliminated in the proposal.

Sodium aluminum silicate is an essential food additive for free-flowing and anti-caking properties in food, improving processability and reducing food waste in many applications including the ones listed for removal and/or modification in this Proposal. While being critical to the processing of food, it is also an important product contributing to the quality, appearance, and use of the final product.



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Sincerely,

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