

## TECHNICAL BULLETIN

### #2003-3

#### PROCESSING AIDS, INCIDENTAL ADDITIVES, AND PRODUCT LABELING

The following (*in Blue*) is excerpted directly from the United States Food and Drug Administration (FDA) Code of Federal Regulations

**"21 § 101.100 Food; exemptions from labeling**

(<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=101.100>)

- (a) The following foods are exempt from compliance with the requirements of section 403(i)(2) of the act (requiring a declaration on the label of the common or usual name of each ingredient when the food is fabricated from two or more ingredients).
- (3) **Incidental additives that are present in a food at insignificant levels and do not have any technical or functional effect in that food.**

For the purposes of this paragraph (a)(3), incidental additives are:

- (i) Substances that have no technical or functional effect but are present in a food by reason of having been incorporated into the food as an ingredient of another food, in which the substance did have a functional or technical effect
- (ii) **Processing aids**, which are as follows:
- (c) **Substances that are added to a food for their technical or functional effect in the processing but are present in the finished food at insignificant levels and do not have any technical or functional effect in that food**
- (iii) Substances migrating to food from equipment or packaging or otherwise affecting food that are not food additives as defined in section 201(s) of the act; or if they are food additives as so defined, they are used in conformity with regulations established pursuant to section 409 of the act."

**While IFC Solutions is not in a position to make specific recommendations to our customers with regard to the labeling of their products, it is our opinion that ingredients used in the production of the following categories of IFC products meet the FDA's standards as being "Incidental Additives" and/or "Processing Aids" and thus should be exempt from labeling on the customer's finished product (with the exception of ingredients that are "Known Allergens"\*)**

- ❖ Ingredients used in the production of our **Food Anti-Stick Products & Release Agents** (including our **SUGAR-EEZ™ Sugar Dissolving Lubricants**)
- ❖ Ingredients used as carriers or processing aids in our **COLOREZE™ Food Color Concentrates**
- ❖ Non-lecithin ingredients used in the production of our **Lecithin Powders** (*but only when the Lecithin Powder is used as an ingredient in the customer's product, and not sold as a finished product - such as a nutritional supplement*)

**\*"Known Allergens" and "The Food Allergen Labeling and Consumer Protection Act" (P.L. 108-282 1/1/2006):**

**The Food Allergen Labeling and Consumer Protection Act** requires the labeling of any individual ingredient present in an incidental additive or processing aid if that ingredient is considered a **"Known Allergen"** by the FDA.