

Commentary
Food Chemicals Codex (FCC), Twelfth Edition

March 2, 2020

In accordance with the *Rules and Procedures of the 2015–2020 Council of Experts (CoE Rules)*, and except as provided in Section 8.01(e) *Immediate Standards*, USP publishes proposed revisions to the *Food Chemicals Codex (FCC)* for public review and comment in the *FCC Forum (FCCF)*, USP's venue for providing public notice and receiving public comment on an *FCC* proposed standard. After comments are considered and incorporated as the Food Ingredients Expert Committee (FIEC) deems appropriate, the proposal may advance to effective status or be republished in *FCCF* for further notice and comment, in accordance with the *CoE Rules*. In cases when proposals advance to effective status without republication in the *FCCF*, a summary of comments received and the FIEC's responses are published in the *Commentary* section of the [FCC microsite](#) at the time the revision is published.

The *Commentary* is not part of the text of the monograph or general test or assay. Rather, it explains the basis of the FIEC's response to public comments. If there is a difference between the contents of the *Commentary* section and the monograph or general test or assay, the text of the monograph prevails. In case of a dispute or question of interpretation, the language of the monograph text, alone and independent of the *Commentary*, prevails.

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Comments were received for the following when they were proposed in the Food Chemicals Codex (FCC):

- [5'-Adenylic Acid](#)
- [Appendix XIII -- Adulterants and Contaminants in Food Ingredients](#)
- [Calcium Lignosulfonate \(40-65\)](#)
- [Cellulose Gel](#)
- [δ-Damascone](#)
- [Erythritol](#)
- [Gum Ghatti](#)

No Comments were received for the following when they were proposed in the Food Chemicals Codex (FCC):

- *Appendix V -- Enzyme Assays*
- *α-Damascone*
- *β-Damascone*
- *Ethyl Cellulose*
- *Petrolatum*
- *Potassium Hydroxide*
- *Potassium Hydroxide Solution*
- *Sodium Ferrocyanide*
- *Zein*

Monograph/Section(s): 5'-Adenylic Acid/Assay

Expert Committee: Food Ingredients

EC-initiated Change #1: The term “reversed phase” in *Column* under *Assay* was deleted because it presents duplicate information.

Monograph/Section(s): Appendix XIII Adulterants and Contaminants in Food Ingredients/Added Colorants in Spices

Expert Committee: Food Ingredients

EC-initiated Change #1: The *Title* of the general test was changed from “Non-Targeted Screening Method for Colorants Added to Spices by Thin-Layer Chromatography (TLC)” to “Non-Targeted Screening for Synthetic Colors in Spices using Thin-Layer Chromatography (TLC)” to provide clarity on the applicability of the method.

EC-initiated Change #2: The scope was modified to, “This method is applicable to synthetic colors in paprika, chili powder, turmeric, curry, and sumac.” The phrase “synthetic colors in” is intended to provide clarity on the scope.

EC-initiated Change #3: The term “colorant” throughout the text was replaced with “color” for consistency.

EC-initiated Change #4: The *Detection limit* was changed from “100 ppm” to “1000 ppm” based on the supporting data. Cautionary text that the detection limit can go lower with supporting information was added.

Monograph/Section(s): Calcium Lignosulfonate (40-65)/Identification

Expert Committee: Food Ingredients

EC-initiated Change #1: In the *Samples* subsection for the test for *Total sulfur determination* under *Degree of Sulfonation*, the description was changed to provide clarity for users from “Accurately weigh 1-2 mg of sample, previously dried, into each capsule” to “Add 1.0 – 2.0 mg of sample, previously dried, into each capsule. Record the exact weight of sample taken.”

Monograph/Section(s): Cellulose Gel/Identification

Expert Committee: Food Ingredients

Comment Summary #1: The commenter requested that the sample preparation “potassium bromide pellet” be added to the infrared spectrum in *Identification C* for clarification.

Response: Comment incorporated.

EC-initiated Change #1: The caption “Wavenumbers [cm⁻¹]” was added to the x-axis for clarification.

Monograph/Section(s): δ-Damascone

Expert Committee: Food Ingredients

EC-initiated Change #1: The *Acceptance criteria* in the *Assay* was changed from “NLT 96.5%” to “NLT 96.5% as the sum of all δ-damascone isomers” for clarification.

Monograph/Section(s): Erythritol/Assay

Expert Committee: Food Ingredients

EC-initiated Change #1: The *Acceptance criteria* for the *Assay* was widened from “98.0-102.0%” to “96.0-102.0%” to harmonize with the corresponding *USP–NF* monograph that has been official since June 1, 2018.

Monograph/Section(s): Gum Ghatti/Description

Expert Committee: Food Ingredients

EC-initiated Change #1: “Thickener, stabilizer, and carrier” were added to the *Function* subsection of the *Description* to harmonize with the corresponding monograph from the 84th Session (2017) of the Joint Food and Agriculture Organization of the United Nations/World Health Organization (FAO/WHO) Expert Committee on Food Additives (JECFA).