



## ***Commentary***

### ***FCC 15***

**February 27, 2026**

In accordance with the *Rules and Procedures of the 2025-2030 Council of Experts (CoE Rules)*, and except as provided in Section 10.02 *Accelerated Revision Processes*, 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 [www.FoodChemicalsCodex.org](http://www.FoodChemicalsCodex.org) 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.

For further information, contact:  
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**Comments were received for the following when they were proposed in Food Chemicals Codex Forum:**

**Monographs**

[BETA-CAROTENE](#)

[MANGANESE CITRATE](#)

**No comments were received for the following proposals:**

**Monographs**

AZORUBINE

BENZALDEHYDE PROPYLENE GLYCOL ACETAL

CAFFEINE

FERROUS LACTATE

ISOPROPYL ALCOHOL

KRILL OIL

MAGNESIUM PHOSPHATE, TRIBASIC

POTASSIUM LACTATE SOLUTION

SICHUAN PEPPER OIL

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**Monograph**

<b>Monograph/Section(s):</b>	BETA-CAROTENE
<b>Expert Committee:</b>	Food ingredients
<b>No. of Commenters:</b>	1

**Comment Summary #1:** The commenter requested that the molecular weight not be updated to maintain consistency across international standards.

**Response:** Comment not incorporated. The molecular weight is provided for information and is not used in any monograph calculations. The current molecular weight is reflective of the latest GRS information.

**SPECIFIC TESTS**

**Comment Summary #2:** The commenter recommended using five replicate injections rather than the proposed change to require six replicate injections to align with USP-NF <621> Chromatography.

**Response:** Comment incorporated. Text indicating six injections is not needed. Appendix II, High-Performance Liquid Chromatography, specifies five injections if the standard deviation is 2.0% or less.

**Total Carotenoids Calculation**

**Comment Summary #3:** The commenter requested to retain the multiplication factor of 100 in the "Calculation of Total Carotenoids as Beta-Carotene" because this factor is critical for scaling the result to a percentage format, which is consistent with the existing acceptance criteria of 96% to 101%.

**Response:** Comment not incorporated. The test method is harmonized with USP-NF and the real-world numbers indicate the "x 100" is no longer necessary.

<b>Monograph/Section(s):</b>	MANGANESE CITRATE
<b>Expert Committee:</b>	Food ingredients
<b>No. of Commenters:</b>	0

***Chemical Information***

**Expert Committee-Initiated Change #1:** The word "anhydrous" was placed before the CAS RN number to clarify that the number is specific to the anhydrous form.