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# Notice of Modification to the *List of Permitted pH Adjusting Agents, Acid-Reacting Materials and Water Correcting Agents* to Enable the Use of Hydrochloric Acid in Unstandardized Foods

Notice of Modification – Lists of Permitted Food Additives

Reference Number: NOM/ADM-0163

March 12, 2021



Canada

## Summary

Food additives are regulated in Canada under [Marketing Authorizations](#) (MAs) issued by the Minister of Health and the *Food and Drug Regulations* (Regulations). Approved food additives and their permitted conditions of use are set out in the [Lists of Permitted Food Additives](#) that are incorporated by reference in the MAs and published on the Canada.ca website. A petitioner can request that Health Canada approve a new additive or a new condition of use for an already approved food additive by filing a food additive submission with the Department's Food Directorate. Health Canada uses this premarket approval process to determine whether the scientific data support the safety of food additives when used under specified conditions in foods sold in Canada.

Health Canada's Food Directorate previously completed a premarket safety assessment of the use of hydrochloric acid as a pH adjusting agent in specific unstandardized foods<sup>1</sup> at a maximum level consistent with Good Manufacturing Practice (GMP). Some time ago, the Food Directorate had intended to enable the use of hydrochloric acid in unstandardized foods more generally at a maximum level of GMP. However, the decision had not been implemented.

Since the Food Directorate has not identified any food safety concerns with enabling the use of hydrochloric acid as a pH adjusting agent in unstandardized foods more generally at a maximum level consistent with GMP, Health Canada has modified the [List of Permitted pH Adjusting Agents, Acid-Reacting Materials and Water Correcting Agents](#) by replacing the entry for “Bakery fillings; Flavour emulsions; Icings”, all of which are unstandardized foods, in column (2) for sub-item (3) of item H.1 in the List with “Unstandardized foods” as shown in the table below.

### Modification to the *List of Permitted pH Adjusting Agents, Acid-Reacting Materials and Water Correcting Agents*

Item No.	Column 1 Additive	Column 2 Permitted in or Upon	Column 3 Maximum Level of Use and Other Conditions
H.1	Hydrochloric Acid	(3) Unstandardized foods	(3) Good Manufacturing Practice

## Rationale

Hydrochloric acid was already permitted for use as a pH adjusting agent in certain unstandardized foods at a maximum level consistent with GMP. The Food Directorate did not identify any food safety concerns with permitting this use of hydrochloric acid in unstandardized foods more generally.

Therefore, Health Canada has modified sub-item (3) to item H.1 of the [List of Permitted pH Adjusting Agents, Acid-Reacting Materials and Water Correcting Agents](#), as shown in the table above.

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<sup>1</sup> These foods were bakery fillings, flavour emulsions and icings.

## Other Relevant Information

The *Food and Drug Regulations* require that food additives, such as hydrochloric acid, that do not have food-grade specifications set out in Part B of the Regulations meet the food-grade specifications set out in the most recent edition of the *Food Chemicals Codex* or the *Combined Compendium of Food Additive Specifications*. The *Food Chemicals Codex* is a compendium of standards for purity and identity for food ingredients, including food additives, published by the United States Pharmacopeial Convention. The *Combined Compendium of Food Additive Specifications*, which contains specifications prepared by the Joint FAO/WHO Expert Committee on Food Additives (JECFA), is published by the Food and Agriculture Organization of the United Nations.

## Implementation and Enforcement

The above modification came into force **March 12, 2021**, the day it was published in the [\*List of Permitted pH Adjusting Agents, Acid-Reacting Materials and Water Correcting Agents\*](#).

The Canadian Food Inspection Agency is responsible for the enforcement of the *Food and Drugs Act* and its associated regulations with respect to foods.

## Contact Information

Health Canada's Food Directorate is committed to reviewing new scientific information on the safety in use of any permitted food additive, including hydrochloric acid. Anyone wishing to submit new scientific information on the use of this additive or to submit any inquiries may do so in writing, by regular mail or electronically. If you wish to contact the Food Directorate electronically, please use the words "**Hydrochloric acid (NOM-0163)**" in the subject line of your e-mail.

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