Health Canada Santé Canada ... August 11, 2011 E-mail

Dear Mr. Venchiarutti,

This is in response to your request for a reclassification of MirOil Fryliquid as a processing aid in Canada when added to frying oil by food manufacturers.

In 2005, the Bureau of Chemical Safety provided an opinion on the acceptability of MirOil Fryliquid (Fryliquid) to be added to frying oil by food manufacturers. Based on the information provided at that time, the Bureau classified Fryliquid as a food additive / ingredient preparation. In 2009, the Bureau received a request to re-evaluate Fryliquid as a processing aid. Based on the information provided in 2009, the Bureau reiterated its 2005 opinion that Fryliquid is considered a food additive / ingredient preparation.

In March of 2010, your firm provided additional information concerning Fryliquid, a water-based liquid consisting mainly of water and citric acid with other minor constituents including ascorbic acid, citric acid ester (triethyl citrate), lecithin from brown rice bran, curcumin and rosemarinic acid. Detailed information was submitted on the chemistry of the product, its mode of chemical interaction with frying oil, the intended purpose for adding the product to frying oil, and data on residue levels for components of Fryliquid found in frying oil that has been treated with the product.

For restaurant applications, typical levels of Fryliquid added to frying oil range from 500 ppm to 769 ppm. For food processor applications in a "conveyor" fryer, typical levels of Fryliquid added to frying oil is 200-250 ppm. Fryliquid is added directly to hot frying oil and as stated in the submitted documentation it is relatively quickly vapourized. This statement is supported by analytical data which indicate that insignificant amounts of Fryliquid components are present in frying oil and in finished foods fried in frying oil treated with Fryliquid.

As per the Food Directorate's Policy for Differentiating Food Additives and Processing Aids, a processing aid is a substance that is used for a technical effect in food processing or manufacture, the use of which does not affect the intrinsic characteristics of the food and results in no or negligible residues of the substance or its by-products in or on the finished food. Based on the most recent information provided, it is apparent that the Fryliquid product does have a technical effect on frying oil as it removes unwanted thermal degradation products produced during the food frying process. However, the Fryliquid product is not considered to affect the intrinsic properties or composition of the frying oil itself or the finished fried food product . In addition, the information provided indicates that the components of Fryliquid are mostly vapourized during the frying process resulting in residues remaining in the frying oil or on the finished food after frying is complete that can be considered "negligible" in accordance with the Policy mentioned above.

Upon consideration of the most recently submitted information, we would consider Fryliquid to meet the definition of a processing aid as outlined in *Health Canada's Policy for Differentiating Food Additives and Processing Aids* when added to frying oil by food manufacturers and restaurants at the levels noted above. We would note that the Fryliquid product should be added to frying oil at the minimum level required to achieve the intended technical effect . In addition, all components of Fryliquid should be of food-grade quality and meet the specifications set out in the most recent edition of the *Food Chemicals Codex*. Please note that this opinion does not apply to the use of Fryliquid in oil products offered directly for sale to the consumer.

We trust that this is satisfactory.

Sincerely,

Carl Strowbridge

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