

**GMA Response to Natural Status of pHase® Sodium
Acid Sulfate**

Question:

Regina,

I am interested your thoughts on bisulfate of soda (aka, sodium bisulfate or sodium acid sulfate).

I believe it fits the definition of natural. My reasoning is attached.

If you could review and contact me I would appreciate it.

Best regards,

Carl J Knueven

Corporate Manager - Product Development
Jones-Hamilton Co.
419-662-5277

Response:

From: Hildwine, Regina <RHildwine@gmaonline.org>
To: Carl Knueven
Sent: Tue Jul 22 18:34:30 2008
Subject: RE: Natural

TO: Carl Knueven, Jones-Hamilton Co.

Thank you for your email. GMA is not able to provide you with a legal opinion, and your company would be responsible for compliance with all relevant laws and regulations.

Your rationale regarding the "natural" status of bisulfate of soda is logical to me. Of course, with regard to any claim that might appear on the label of a food made using this ingredient, it would be the policy view of the regulatory agency that would govern. I don't see any issues that might impede FDA's view of the ingredient as "natural" in the formulation of an FDA-regulated food. For meat and poultry products regulated by USDA-FSIS, the issue would be one of making the point in the context of prior label approval for a food bearing a "natural" claim.

Please retain this reply for your records.

Please let me know if you have questions or need additional information.

Regina Hildwine

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