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Health Products
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Direction générale des produits
de santé et des aliments

Bureau of Chemical Safety
Food Directorate
251 Sir Frederick Banting Driveway
Tunney's Pasture, P.L. 2201C
Ottawa, ON K1A 0K9

July 19, 2013

File #: ADDPS12070501
CFIA File #: C795

Kevin Hunter
Sales Manager / New Product Development
Crystal Filtration Co.
2158 Avon Industrial Drive
Rochester Hills, Michigan
48309, U.S.A.

RE: FilSorb XP20

Dear Mr. Hunter:

This is in response to your submission of January 11, 2012, to the Canadian Food Inspection Agency (CFIA) for the use of FilSorb XP20 in Federally Registered Establishments. Please note that the CFIA has requested input from Health Canada on this file and we are replying directly to you.

FilSorb XP20, which according to your Non-Food Chemicals Application to the CFIA is made of 50% hydrated silicon dioxide and 50% hydrous sodium silicate, is represented as an oil purifying reagent and filter aid used to remove free fatty acids and other contaminants from hot cooking oil.

Cooking oil that has been treated with a mixture of 50% food-grade hydrated silicon dioxide and 50% food-grade hydrated sodium silicate and subsequently filtered to remove these chemicals, their by-products and other impurities, would not be expected to be chemically unsafe for manufacturing human food as a result of the silicon dioxide and sodium silicate themselves. Consequently, based on the information you have provided, we would have no objection to the use of FilSorb XP20 in cooking oil used in Canadian Federally Registered Establishments provided that:

- 1) The hydrated silicon dioxide meets its specifications set out in the most recent edition of the *Food Chemicals Codex*, and the hydrous sodium silicate is of food-grade quality;
- 2) There are no or negligible¹ residues of FilSorb XP20 and its by-products remaining in the cooking oil that has been treated with FilSorb XP20; and
- 3) There are no chemical residues in or on foods that are manufactured with cooking oil that has been treated with FilSorb XP20 that would not be present if the foods were cooked in fresh cooking oil that has not been treated with FilSorb XP20.

¹ According to the Food Directorate's *Policy for Differentiating Food Additives and Processing Aids*, the term "negligible" means "there are no residues of public health significance in or on the finished food, and any residues that are present are at levels that are too low to have a technical effect in or on the finished food", which differs from the definition of "negligible" in the *Food Chemicals Codex*. /..2

We note that information you provided suggests that use of FilSorb XP20 on a regular basis extends the service life of the oil from one to five days to several weeks to several months. However, we have not evaluated FilSorb XP20 with respect to this claim or with respect to the efficacy of FilSorb XP20 in removing free fatty acids and other contaminants from hot cooking oil, and we have not evaluated the suitability of used cooking oil that has been treated with FilSorb XP20 to be used to manufacture foods. There are various substances that could be present in used cooking oil that would not be present in fresh cooking oil and we have not received data demonstrating the effect that treatment of the used oil with FilSorb XP20 would have on such substances in the used oil.

Ultimately, the use of FilSorb XP20, like any substance used in manufacturing food that is to be sold in Canada, must not result in a violation of section 4 of the Canadian *Food and Drugs Act*².

Lastly, this letter is not an opinion regarding the acceptability of FilSorb XP20 and its use with respect to occupational health and safety which, in general, is subject to provincial and territorial oversight in Canada. We would recommend that you contact the Canadian Food Inspection Agency (CFIA) if you wish to obtain further guidance on occupational health and safety matters, as well as to verify that the labelling for FilSorb XP20 and any other representations that are made with respect to this product, including any claims associated with its use, are compliant with Canadian requirements. Contact information for the CFIA is available at: <http://www.inspection.gc.ca/about-the-cfia/contact-us/eng/1299860523723/1299860643049>

If you have questions about any of the above, please do not hesitate to contact me by email: michael.goodreid@hc-sc.gc.ca or by telephone: 613-946-9793.

Best regards,



Michael Goodreid
Regulatory Policy and Risk Management Advisor
Food Additives Section
Chemical Health Hazard Assessment Division

cc: Diane Allan, Executive Director, Food Safety Science Directorate, Canadian Food Inspection Agency

² Section 4 of the Part I of the Food and Drugs Act states, in part: “No person shall sell an article of food that (a) has in it or on it any poisonous or harmful substance; (b) Is unfit for human consumption; ...”