

**Conference for Food Protection
2020 Issue Form**

Issue: 2020 III-024

Council Recommendation: Accepted as Submitted _____ Accepted as Amended _____ No Action _____

Delegate Action: Accepted _____ Rejected _____

All information above the line is for conference use only.

Issue History:

This is a brand new Issue.

Title:

Amend Food Code by removing the flavor enhancers monosodium glutamate

Issue you would like the Conference to consider:

We would like the U.S. Food & Drug Administration (FDA) to amend the most current edition of the Food Code by removing the flavor enhancer monosodium glutamate (MSG) from the list on page 564 of 767 "*Annex 4, Table 2b- Added Chemical Hazard at Retail, Along with their Associated Foods and Control Measures.*"

By way of brief background, the *1999 Food Code* published examples of chemical hazards that included naturally occurring chemicals and added chemicals that was adopted from the textbook, "*HACCP Principles and Applications*" (Pierson and Corlett, Ed. 1992, Chapman & Hall, New York, NY). It is our understanding the *1999 Food Code* first mentioned monosodium glutamate as a chemical hazard. Subsequent Food Code publications have revised the table with a list of added chemical hazards and no longer references Pierson and Corlett, 1992; however, the Food Code retains monosodium glutamate as a chemical hazard even given the FDA's extensive review of MSG in the 1990s and its public position affirming the safety of MSG.

According to most current edition of the Food Code, it defines chemical hazards as, "... *naturally occurring or added to foods during processing. At high levels, toxic chemicals may cause acute cases of food borne illness while at low levels may cause chronic illnesses. Per 21 CFR Parts 109, chemical hazards may include poisonous or deleterious substances that are naturally occurring chemicals, and food allergens. In addition, food additives permitted for direct addition to food for human consumption (21 CFR Part 172) may have allowable limits for many of the chemicals added during processing.*"

It is important to note that MSG does not fit in the aforementioned definition of 'chemical hazards' categories. Per 21 CFR 182.1, MSG is a safe food ingredient regulated as a Generally Recognized as Safe (GRAS) substance, and the FDA has not set any limitation on its use other than Good Manufacturing Practices (GMPs). In fact, the FDA assigns MSG a GRAS status for its intended use alongside salt, pepper, vinegar, and baking powder.

It is also noteworthy that MSG is the sodium salt of glutamic acid, which is found in many foods that contain protein. In fact, the FDA's "*Questions and Answers on Monosodium Glutamate*" website states, "*MSG occurs naturally in ingredients such as hydrolyzed vegetable protein, autolyzed yeast, hydrolyzed yeast, yeast extract, soy extracts, and protein isolate, as well as in tomatoes and cheeses.*"² The human body utilizes and metabolizes MSG in the same way whether it comes from MSG or other dietary sources of protein. Furthermore, on average, an adult in the United States consumes approximately 0.55 grams per day added MSG, significantly lower quantity compared to 13 grams of glutamate consumed each day from protein in the diet.²

It is therefore inappropriate and contradictory to include MSG in the list of added chemical hazards in the Food Code because the FDA rightfully recognizes it to be a safe ingredient and has not been shown to elicit any reproducible adverse reactions in people². The inclusion of MSG as a chemical hazard in the Food Code is misleading and could potentially weaken the integrity of the Food Code as a science-based document. In addition, it sends an erroneous message that there is a safety concern with MSG and distracts food service establishments from focusing on real concerns that pose legitimate known chemical hazards to the public. To our knowledge, the FDA has not listed MSG as a chemical hazard in other relevant guidance documents. For example, there is no mention of MSG as a chemical hazard on the FDA's *Fish and Fishery Products Hazards and Control Guidance*³ or *A Regulator's Manual for Applying HACCP Principles to Risk-based Retail and Food Service Inspections and Evaluating Voluntary Food Safety Management Systems*.⁴

The FDA has investigated the safety of MSG on multiple occasions and concluded it to be a safe food ingredient. In the 1995 report by Life Sciences Research Office (LSRO) commissioned by the FDA, the review concluded, that MSG is safe for the general population⁵. The FDA website re-confirms the LSRO review that in studies with individuals who claim to be sensitive to MSG, when such individuals were given MSG or a placebo, scientists have not been able to consistently trigger adverse reactions. This conclusion is consistent to a double-blind, placebo-controlled with a crossover study design conducted at a multicenter, multiphase institutions at Harvard, Northwestern and the University of California Los Angeles where 130 individuals who claimed sensitivity to MSG following the administration of oral doses of up to 5 grams of MSG with and without food found "neither persistent nor serious effects from MSG ingestion are observed, and the responses were not consistent on retesting."⁶

There is no legitimate scientific evidence to include monosodium glutamate as a 'chemical hazard' in "*Table 2b- Added Chemical Hazard at Retail, Along with their Associated Foods and Control Measures*" in the most current edition of the *Food Code*. The overwhelming scientific evidence proves that monosodium glutamate is a safe food ingredient. We strongly urge the FDA to remove MSG as a chemical hazard from the Food Code because it is misleading and contradicts the agency's own internal documents and other global regulatory bodies' positions that affirm the safety of the ingredient.

Public Health Significance:

Monosodium glutamate is a GRAS affirmed safe ingredient that has been thoroughly evaluated by the FDA, Joint FAO/WHO Expert Committee on Food Additives (JECFA), European Food Safety Authority (EFSA) and other major regulatory bodies. Furthermore,

MSG plays a useful role in reducing dietary sodium intake while at the same time enhancing the flavor of food. MSG contains approximately 12% sodium by weight, which is approximately one-third contained in regular table salt (39%).

Publications by authoritative bodies such as the Institute of Medicine's (IOM) *Strategies to Reduce Sodium Intake in the United States* mention MSG as flavoring techniques to reduce the need for added salt by imparting a savory taste ("umami") as well as a salt taste to food.⁷ The *2019 Dietary Reference Intakes (DRI) for Sodium and Potassium* report, explores opportunities that can be applied to reduce sodium intake in the food supply using MSG. The report states that, "*a flavor enhancer to help reduce sodium is free glutamate, used mainly in the form of monosodium glutamate (MSG).*"⁸ The statements from these authoritative bodies concurs with studies that have shown monosodium glutamate utility in flavor enhancement and sodium reduction.⁹

Listing MSG as a chemical hazard in the most current edition of the Food Code results in misinformation and confusion among the public at large and those employed in the food service industry, which can prevent them from addressing legitimate chemical hazards that can impact the health of their patrons. MSG is a well-studied, safe ingredient that can play a useful role in dietary sodium intake. Dietary sodium reduction is recommended for reducing hypertension, a major public health concern in the United States. Listing MSG as a chemical hazard in the Food Code threatens the use of this ingredient as a safe, effective way to reduce dietary sodium. Its listing also creates confusion by reinforcing an urban legend based on scientifically unconfirmed safety concerns about MSG when the FDA's publicly available information confirms the ingredient is safe.

Supportive References 1-9 on content document is provided as attachments: 1) References web link on MSG Safety and sodium reduction benefits 2) References on MSG sodium reduction benefits.

Recommended Solution: The Conference recommends...:

The Conference recommends that a letter be send to the FDA requesting that the most recent edition of the Food Code be amended as follows:

"Annex 4, Table 2b- Added Chemical Hazard at Retail, Along with their Associated Foods and Control Measures." on page 564 of 767.

Added Chemical Hazard

Associated Foods

Control Measures

~~Flavor enhancers monosodium glutamate (MSG)~~

~~Asian or Latin American Food~~

~~Avoid using excessive amounts-~~

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Content Documents:

- "References web link on MSG safety and sodium reduction benefits"

Supporting Attachments:

- "Reference on MSG sodium reduction benefits"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.

Attachment: References on monosodium glutamate safety and sodium reduction benefits.

1. 21 C.F.R. 182.1(a) *Substances that are generally recognized as safe.*
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2. FDA, *Questions and Answers on Monosodium glutamate (MSG)* (accessed on March 30, 2019 at <https://www.fda.gov/food/food-additives-petitions/questions-and-answers-monosodium-glutamate-msg>)
3. *Fish and Fishery Products Hazards and Controls Guidance (Fourth Edition – August 2019)* (accessed on August 30, 2019) at <https://www.fda.gov/media/80637/download>
4. *Managing Food Safety: A Regulator’s Manual for Applying HACCP Principles to Risk-Based Retail and Food Service Inspections and Evaluating Voluntary Food Safety Management Systems (April 2006)* (accessed August 30, 2019 at <https://www.fda.gov/media/72067/download>)
5. Daniel J. Raiten John M. Talbot. *Executive Summary from the Report: Analysis of Adverse Reactions to Monosodium Glutamate (MSG).* *The Journal of Nutrition*, Volume 125, Issue 11, November 1995, Pages 2891S–2906S.
<https://academic.oup.com/jn/article-abstract/125/11/2891S/4730581?redirectedFrom=fulltext>
6. Geha R., Beiser A., Ren C., Patterson R., Greenberger P., Grammer L., Ditto A., Harris K., Shaughnessy M., Yarnold P., Corren J., Saxon A., "Multicenter, double-blind, placebo-controlled, multiple-challenge evaluation of reported reactions to monosodium glutamate," *J Allergy Clin Immunol* 2000;106:973-80.
<https://www.ncbi.nlm.nih.gov/pubmed/11080723>
7. *Institute of Medicine of the National Academies, National Academies Press Washington, DC. "Taste and Flavor Roles of Sodium in Foods: A Unique Challenge to Reducing Sodium Intake", pp.65-86, in Strategies to Reduce Sodium Intake in the United States, edited by Henney J.E. et al., 2010.* <https://www.nap.edu/catalog/12818/strategies-to-reduce-sodium-intake-in-the-united-states>
8. *National Academies of Sciences, Engineering, and Medicine. 2019. Dietary Reference Intakes for Sodium and Potassium.* Washington, DC: The National Academies Press. p. 410. <https://doi.org/10.17226/25353>
9. *International Glutamate Technical Committee. Glutamate contributes to the reduction of dietary sodium intake. Technical statement, 1, 2017. Attached.*

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Glutamate Contributes to the Reduction of Dietary Sodium Intake

The World Health Organization (WHO) recommendation on sodium consumption for adults is 2 g sodium/day (equivalent to 5 g salt/day). However, most people consume much more with the current mean global sodium consumption estimated to be at 3.95 g sodium/day (Mozaffarian et al. 2014). Since high sodium intake is reported to be associated with various non-communicable diseases (NCDs) such as hypertension, cardiovascular disease and stroke, the reduction of sodium intake is a very important public health concern around the world (WHO, 2003).

While sodium reduction in the diet is an important objective, when salt (NaCl) levels are reduced in foods, its palatability is also generally decreased. Monosodium glutamate (MSG) is a flavour enhancer that contains about 12% sodium, which is less than half of that contained in regular table salt at about 39%. Therefore, by the addition of an appropriate amount of MSG, the palatability of low salt foods can be recovered with the overall sodium content of the food being substantially reduced.

Further reduction in dietary sodium can also be achieved through the use of other forms of glutamate, such as calcium di-glutamate (CDG) and monomagnesium di-glutamate (MDG), which do not contain sodium. These other forms of glutamate have been shown to provide similar taste enhancing properties that are only marginally lower than those obtained by the use of MSG, therefore maintaining food palatability without contributing to any dietary sodium intake.

A considerable number of studies have demonstrated that glutamates can help to reduce the use of salt in the diet by enhancing the palatability of different types of foods including soups, prepared dishes, processed meat and dairy products.

The use of glutamate to replace salt in foods

In Japan, Yamaguchi investigated the palatability of Japanese clear soup containing varying amounts of NaCl with or without MSG (as shown in the Fig. 1). When the use of NaCl alone was reduced from its optimal level of about 0.92%, the palatability score of the soup decreased dramatically. However, by combining 0.38% MSG with 0.41% NaCl, the palatability rating of the soup recovered to the same level of pleasantness as was achieved by 0.92% NaCl alone. The sodium content of the soup with 0.92% NaCl was 0.36%, compared with 0.21% in the soup with 0.38% MSG and 0.41% NaCl, representing a 40% overall sodium reduction (Yamaguchi & Takahashi, 1984).

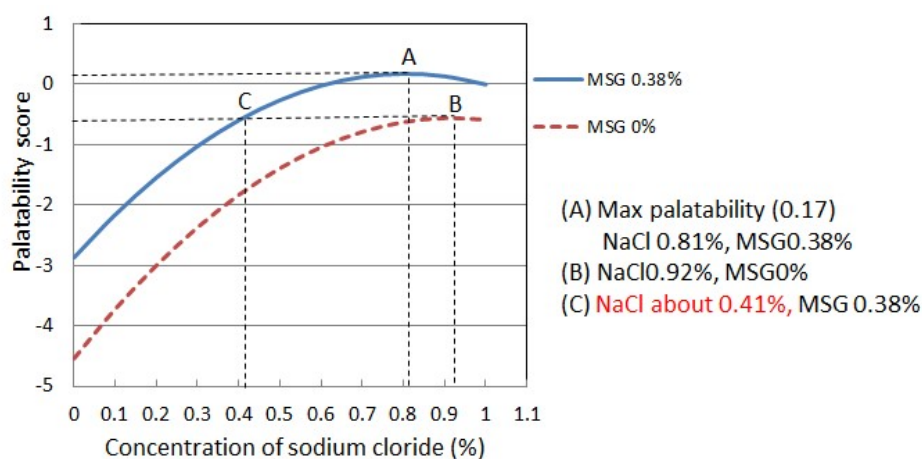


Fig 1. Palatability scores of clear soup at various concentrations of NaCl
 (Created using the data by Yamaguchi and Takahashi, J. Food Sci. 49(1):82-85, 1984)

Research in the USA found that chicken broth containing 0.70% NaCl and 0.30% MSG had an equal palatability score when compared with a broth containing 0.84% NaCl and 0.19% MSG, representing a total sodium reduction of about 11% (Chi and Chen, 1992).

The effects of umami substances on the preferences on low-salt soups with 0.3% and 0.5% salt were assessed in Finland. The subjects consumed soup with or without MSG during six sessions in five weeks. Ratings were higher in soup containing MSG in both 0.3%- and 0.5%-salt groups. The authors concluded that the pleasantness ratings of reduced-salt foods could be increased by addition of umami substances such as MSG (Roininen *et al.*, 1996).

A group in Australia managed to reduce sodium content of a reference commercial pumpkin soup containing 150mM NaCl by substituting it with 50mM NaCl and 43mM MSG or CDG, while maintaining similarly acceptable taste characteristics. The level of sodium contained in a typical serving of the reference soup was estimated to contain 57 mmol of sodium. The soup prepared with the NaCl and CDG combination however contained only 33 mmol of sodium, representing a 40% reduction (Ball *et al.*, 2002).

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Another study in the USA by Carter *et al.* reported that CDG could partly replace NaCl at constant levels of liking and pleasantness (Carter *et al.*, 2011). They showed that pleasant and liking ratings of 0.85% NaCl chicken broths were not significantly different from that of 0.53% NaCl broths with 0.33% CDG. These data showed that sodium concentration of chicken broths could be reduced by 38% with CDG supplementation.

A Brazilian group evaluated the use of MSG together with KCl to replace 25% and 50% NaCl in varying proportions, which helped to maintain the sensory acceptability of a garlic seasoning salt formulation when applied to cooked rice (Rodrigues *et al.*, 2014).

In Malaysia, subjects were presented with local spicy soup dishes, such as curry chicken and chili chicken, containing varying amounts of NaCl and MSG. It was found that the optimal acceptance level of these dishes was 0.8% NaCl when used by itself. However, the partial replacement of NaCl with MSG in the ratio of 0.3% NaCl and 0.7% MSG achieved the same level of palatability. (Jinap *et al.*, 2016).

Similarly, the effects of sodium reduction and flavor enhancers such as MSG on the sensory profile of two types of hawker foods commonly consumed in Singapore, namely chicken rice and *mee soto* broth, were examined. Addition of 0.40% MSG into the 40% salt-reduced recipes resulted in a 22% sodium reduction, and the perception of saltiness of these recipes was maintained when compared with the control (Leong *et al.*, 2016).

Several groups also investigated the potential of glutamates to reduce salt in processed meat and dairy products. In France, Bellisle found that addition of MSG to meat *pâté* maintained its palatability even though NaCl content was reduced (Bellisle, 1998).

Elsewhere, CDG was used to improve palatability of salt-reduced sausage in a study conducted in Australia by using 0.12% NaCl and 0.10% CDG, which would be equivalent to a formulation with 0.69% NaCl (Woodward *et al.*, 2003).

In Brazil, the use of MSG in combination with other umami substances (disodium inosinate, disodium guanylate) and amino acids (lysine, taurine) helped to reduce the negative sensory properties, such as bitter, astringent and metallic tastes, of using KCl to replace 50% and 75% of NaCl in cooked sausages (dos Santos *et al.*, 2014). In a separate study, MSG in combination with KCl was used in reduced sodium formulations of Mozzarella cheese, which helped to maintain acceptable sensory properties for formulations with up to 54% sodium reduction (Rodriguez, 2014). Quadros *et al.* also examined the acceptability of fish burgers containing various concentrations of NaCl and MSG, with the formulation containing 0.75% NaCl and 0.3% MSG scoring equally if not better than the formulation containing 1.5% NaCl only, therefore providing a 50% reduction (Quadros *et al.*, 2015).

Apart from sensory studies involving reduced-salt product formulations, a clinical study investigating the use of glutamate in the form of MDG as part of a low sodium diet and

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its effect on food intake and dietary sodium intake was undertaken by Kawano et al. Over several weeks, a group of psychiatric patients in Japan were alternately provided with standard meals containing 3.28g sodium/day and low sodium meals with MDG containing 2.43g sodium/day. Their food intake was measured and was found not to be significantly different when provided with standard meals or low sodium meals containing MDG, indicating that palatability was not adversely affected for the latter. As a result, average daily sodium intake was found to have decreased by 0.85g sodium/day when consuming the low sodium meal with MDG (Kawano *et al.*, 2015).

Recognition of the role of glutamate in dietary salt reduction by authoritative public health bodies

In 2010, the Institute of Medicine (IOM) in the United States indicated that compounds imparting umami taste and flavour can be used to reduce the need for added salt. The IOM Report on Strategies to Reduce Sodium Intake in the United States stated that "It is possible to replace some of the salt in foods with other taste or flavor compounds. --- A prominent example of an added compound involves glutamic acid (an amino acid). Combining glutamic acid with sodium creates the well-known flavoring compound monosodium glutamate, or MSG. MSG imparts a savory taste (called "umami") as well as a salt taste to food. Some studies have shown that it is possible to maintain food palatability with a lowered overall sodium level in a food when MSG is substituted for some of the salt." (IOM, 2010)

In 2013, the Academy of Nutrition and Dietetics in the United States performed a systematic review to evaluate the effect of umami compounds (such as MSG) or foods rich in umami (such as soy sauce, fish sauce, etc.) on the sodium content in foods and/or sodium intake. Based on the evidence reviewed, it was concluded that "*the addition of umami compounds or foods rich in umami allows for reductions in sodium content of foods (reported as sodium chloride) without sacrificing taste, liking and pleasantness. However, the resulting reduction in sodium may vary depending on the type of food consumed as well as the amount and type of umami compounds present.*" (Academy of Nutrition and Dietetics, 2013)

Conclusion

The reduction of sodium intake is a major health concern worldwide. However, it is very difficult to develop sodium-reduced diets with an acceptable palatability, since salt taste is an important basic taste that significantly contributes to the palatability of food. Based on the wide body of evidence from studies conducted in various geographical regions, the addition of glutamate to different types of foods belonging to different cultural traditions, can allow for substantial reductions in sodium consumption without a significant deterioration in palatability. The proper use of glutamate should therefore be considered in the discussion on how to reduce population sodium intake.

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References

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