



January 9, 2024

Primient Malic and Fumaric Acid Natural Statement

This letter is addressing our view as to whether a food incorporating Primient Malic and Fumaric Acid can be designated as "natural."

The [Food and Drug Administration \(FDA\)](#) has not engaged in rulemaking to establish a formal definition of the word "natural". However, FDA has a long-standing policy considering the use of the word "natural" in food labeling.

The FDA has considered the term "natural" to mean that nothing artificial or synthetic (including all color additives regardless of source) has been included in, or has been added to, a food that would not normally be expected to be in that food.

Our Malic Acid and Fumaric Acid are produced by chemical synthesis. The conventional process is carried out by using maleic anhydride as the starting material. Maleic Anhydride is a by-product of the petrochemical industry. The Malic Acid is a racemic mixture of D&L Malic Acids.

We do not consider our Malic Acid or Fumaric Acid to be "Natural".

Our Malic Acid and Fumaric Acid are not derived from products or ingredients that have genetically modified organisms nor have been produced with genetically modified organisms.

The quality of our finished products is of utmost importance and priority at Primient. We understand our customers' need for high quality and reliable ingredients. Your business is important to Primient. If you have any questions or require further information, please contact us.

Sincerely,

Victoria Alao

Victoria Alao
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Product Regulatory Manager

Primient is providing the data contained in this letter in good faith for your information only. The data is based on available information in our possession as at the date of this letter. Prospective purchasers are advised to conduct their own tests, studies, and regulatory review to determine the fitness of Primient products for their particular purposes, product claims, or specific applications.