

### GMO STATUS: GELLAN GUM

Dear Customer,

Thank you for your inquiry regarding the GMO status of CP Kelco's **gellan gum** line of products. CP Kelco's **gellan gum line of products** do not contain genetically modified organisms (GMO's). <sup>1</sup>

CP Kelco's **gellan gum** does not meet the definition of a genetically modified organism as defined in:

- US FDA: General regulations governing food ingredients and Labeling of "bioengineered foods" as defined by the U.S. Food and Drug Administration as prescribed.<sup>2</sup>
- EU: European Council Directive 2001/18/EC as amended.

CP Kelco's **gellan gum** is produced by fermentation of the non-GM strain *Sphingomonas elodea* in a nutrient media of carbohydrates and/or starch<sup>3</sup>. We cannot guarantee that the nutrient media are produced from non-GMO crops, but the EC Commission Standing Committee on Food Chain and Animal Health<sup>4</sup> has indicated that: "*substances produced by fermentation of micro-organisms do not fall in the scope of the legislation (authorization and labeling) if produced from a conventional micro-organism, irrespective whether the substrate used for this fermentation is genetically modified or not*"(2)(d)".

Thus, CP Kelco's **gellan gum** and nutrient media are out of scope of EU Regulation (EC) No. 1829/2003<sup>5</sup> as amended on genetically modified food and feed. None of the other ingredients such as the sugar used for standardization or blends are produced from GMOs or meet the definition of "bioengineered foods" and does not require labeling as such. No GMO labeling is required per Regulation (EC) No.1830/2003 as amended concerning the traceability and labeling of genetically modified organism.

Furthermore, CP Kelco's manufacturing facilities employ strict manufacturing standards that comply with all relevant requirements in the United States and the European Union for food products.

We trust that this satisfies your inquiry. If you have any further safety or regulatory questions, please feel free to contact us.

Sincerely,

*Chinyere Ubani-Baker*

**Chinyere Ubani-Baker**

Senior Regulatory Affairs Specialist

<sup>1</sup> Unless otherwise declared in the specific product data sheet and labeled.

<sup>2</sup> 66 Fed. Reg. 4706, 4730 (January 18, 2001). USDA National Bioengineered Food Disclosure Standard (December 20, 2018).

<sup>3</sup> CP Kelco's nutrient media composition is company confidential and cannot be disclosed other than as stated herein.

<sup>4</sup> Résumé of Meeting of 30th April 2004.

<sup>5</sup> Recital 16 of Regulation (EC) N°1829/2003 as amended draws a distinction between products made with a GMO and products made from a GMO, the former being generally exempt from labeling while the latter are not.