



BALDWIN RICHARDSON FOODS CO.

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June 30, 2003

Dockets Management Branch,
Food and Drugs Administration,
Department of Health and Human Services,
Room 1 – 23,
12420 Parklawn Drive,
Rockville, MD 20857

Citizen Petition

The undersigned submits this petition under 21 CFR, Part 1, Subpart B, § 1.23, section 502(b) of the Federal Food Drug and Cosmetic Act to request from the Commissioner of Food and Drugs, a reasonable variation and exemption for the labeling of a food product, **Nance®**, **Pretzel Dip** (**Product # 00037**).

Baldwin Richardson Foods has recently reformulated its **Nance®**, **Pretzel Dip** by adding Xanthan Gum to the formula at approximately 0.05% (w/w), to provide more stability and reduce incidences of emulsion separation/breakage. This is a minor component of the formulation.

On Monday June 23rd 2003, 530 cases of this reformulated **Pretzel Dip** were produced in 10 oz glass jars with a **Lot # of 62303**. Unfortunately, the jar labels do not reflect the Xanthan Gum change.

Xanthan Gum is widely known and extensively utilized in the food industry for its water holding capacity, as a stabilizer, and its binding properties for numerous food formulations. To date and to my best knowledge, Xanthan Gum's use in food formulations is not a Food Safety risk, and it is not a Food Allergen or hazard to the general public.

This Petition assures you that we at Baldwin Richardson Foods are in the process of upgrading our labels to include Xanthan Gum and that this oversight will not reoccur.

The undersigned certifies that to my best knowledge and belief, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to me which are unfavorable to the petition.


Esmond W. Joseph, Ph.D
Director of Technical Services

2003P-0310

CP 1