

23 August 2011

Reference: ADB 22/155

To Interested Parties

EU restrictions on use of aluminium-containing food additives: request for information on associated costs.

Following the opinion of the European Food Safety Authority on the safety of aluminium from dietary intake (<http://www.efsa.europa.eu/en/efsajournal/pub/754.htm>), the European Commission has discussed possible risk management measures with Member States which involve restrictions on the use of aluminium-containing food additives. The Commission has not yet tabled a formal proposal but I attach a copy of the informal proposal currently under discussion (Annex 1).

The main proposals are:

- i. tighter restrictions on the use of aluminium silicates, commonly used as anti-caking agents;
- ii. tighter restrictions on the use of aluminium lakes of colours;
- iii. removal of approval to use sodium aluminium phosphate (SALP) as a raising agent.

We expect the Commission to propose a transition period of 30 months between coming into force of legislation specifying agreed changes and the need for products placed on the market to comply with the restricted levels.

In line with Government policy we need to estimate the possible impact of these proposals and this letter invites those affected to submit information about the costs associated with the changes if they proceed unchanged. **It would be helpful to have this information by Wednesday 14 September.** The Commission has not

informed us of a date for a vote on a formal proposal: where possible we will take account of any information submitted after our requested date but prior to a vote on these proposals.

A suggested structure for the information sought is shown in Annex 2 but, where possible, we will take account of any appropriate information submitted.

Please send replies to **nasreen.shah@foodstandards.gsi.gov.uk**.

Yours sincerely

Nasreen Shah
Regulatory Coordination Branch
Chemical Safety Division

Annex 1

Part A of Annex II to Regulation (EC) No 1333/2008 is amended as follows:

Point 2.4 is replaced as follows:

Aluminium lakes prepared from the listed colours are authorised only where explicitly stated in Part E of the Annex II.

Part E of Annex II to Regulation (EC) No 1333/2008 is amended as follows:

In category 0.Food additives permitted in all categories of foods, the following entries related to E 551-559 are replaced as follows:

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000	(1) (57)	only foods in dried powdered form (i.e. foods dried during the production process, and mixtures thereof), excluding foods listed in table 1 of Part A of this Annex
	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	quantum satis	(1)	only foods in tablet and coated tablet form, excluding the foods listed in table 1 of Part A of this Annex

In category 01.4 Flavoured fermented milk products including heat treated products, the following entries related to Group

II and III colours are replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(61)	
	Group III	Food colours with combined maximum limit	150	(61)	

and the following footnote is added:

(61): Maximum limit for aluminium coming from all colour lakes 15 mg/kg

In category 01.7.2.Ripened cheese, the following entry related to E 551-559 is replaced as follows:

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000	(1)	only sliced or grated cheese hard and semihard cheese
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In category 01.7.2.Ripened cheese, the following entry is added:

	E 554	Sodium aluminium silicate	20 mg/kg in the cheese	(38)	carry over from salt for the surface treatment of cheese only
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In category 01.7.3 Edible cheese rind, the following entries related to Group III colours and to E 180 litholrubine BK are replaced as follows:

	Group III	Food colours with combined maximum limit	quantum satis	(67)	
	E 180	Litholrubine BK	quantum satis	(67)	

and the following footnote is added:

(67): Maximum limit for aluminium coming from colour lakes of E 120 cochineal, carminic acid, carmines and E 180 litholrubine BK 10 mg/kg.

In category 01.7.5 Processed cheese, the following entry related to E 120 cochineal, carminic acid, carmines is replaced as follows:

	E 120	Cochineal, Carminic acid, Carmines	100	(33), (66)	only flavoured processed cheese
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and the following footnote is added:

(66): Maximum limit for aluminium coming from colour lakes of E 120 cochineal, carminic acid, carmines 1,5 mg/kg.

In category 01.7.6 Cheese products (excluding products falling in category 16), the following entry related to E 551-559 is replaced as follows:

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000	(1)	only sliced or grated cheese and semi hard products
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In category 01.8 Dairy analogues, including beverages whiteners, the following entry related to E 551-559 is replaced as follows:

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000	(1)	Only sliced or grated cheese analogues and processed cheese analogue; beverage whiteners
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In category 02.2.2. Other fat and oil emulsions including spreads as defined by Council Regulation (EC) No 1234/2007

and liquid emulsions, the following entry related to E 551-559 is replaced as follows:

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	30000	(1)	only tin greasing products
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In category 03. Edible ices, the following entry related to Group II colours is replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(62)	
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and the following footnote is added:

(62): Maximum limit for aluminium coming from colour lakes of E 163 anthocyanines 30 mg/kg. No other colour lakes can be used.

In category 04.2.5.2 Jam, jellies and marmalades and sweetened chestnut puree as defined by Directive 2001/113/EEC, the following

entry related to E 120 cochineal, carminic acid, carmines is replaced as follows:

	E 120	Cochineal, Carminic acid, Carmines	100	(31), (66)	except chestnut puree
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and the following footnote is added:

(66): Maximum limit for aluminium coming from colour lakes of E 120 cochineal, carminic acid, carmines 1,5 mg/kg.

In category 05.2 Other confectionery including breath refreshing microsweets,

(a) the following entries are deleted:

	E 173	Aluminium	quantum satis		only external coating of sugar confectionery for the decoration of cakes and pastries
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	E 520 - 523	Aluminium sulphates	200	(1) (38)	only candied, crystallized or glacé fruit and vegetables
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(b) the following entry related to E 551-559 is replaced as follows:

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	quantum satis	(1)	surface treatment only
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(c) the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(56)	
	Group III	Food colours with combined maximum limit	300	(25), (56)	except candied fruit and vegetables
	Group III	Food colours with combined maximum limit	200	(56)	only candied fruit and vegetables

(d) the following footnote is added:

(56): Maximum limit for aluminium coming from all colour lakes 70 mg/kg. Only for microsweets 40 mg/kg.

In category 05.3 Chewing gum, the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(57)	
	Group III	Food colours with combined maximum limit	300	(25), (57)	

and the following footnote is added:

(57): Maximum limit for aluminium coming from all colour lakes 300 mg/kg

In category 05.4 Decorations, coatings and fillings, except fruit based fillings covered by category 4.2.4, the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(57)	
	Group III	Food colours with combined maximum limit	500	(57)	only decorations, coatings and sauces, except fillings
	Group III	Food colours with combined maximum limit	300	(25), (57)	only fillings

and the following footnote is added:

(57): Maximum limit for aluminium coming from all colour lakes 300 mg/kg

In category 05.4 Decorations, coatings and fillings, except fruit based fillings covered by category 4.2.4, the following entry related to E 551-559 is replaced as follows:

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	quantum satis		Surface treatment only
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In category 07.2 Fine bakery wares,

(a) the following entry is deleted:

	E 541	Sodium aluminium phosphate acidic	1000	(38)	only scones and sponge wares
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(b) the following entry related to Group III colours is replaced as follows:

	Group III	Food colours with combined maximum limit	200	(25), (63)	
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(c) the following footnote is added:

(63): Maximum limit for aluminium coming from colour lakes of E 120 cochineal, carminic acid, carmines 5 mg/kg. No other colour lakes can be used.

In category 8.2.1 Non heat treated processed meat, the following entries related to E 120 cochineal, carminic acid, carmines

are replaced as follows:

	E 120	Cochineal, Carminic acid, Carmines	100	(66)	only sausages
	E 120	Cochineal, Carminic acid, Carmines	quantum satis	(66)	only pasturmas

and the following footnote is added:

(66): Maximum limit for aluminium coming from colour lakes of E 120 cochineal, carminic acid, carmines 1,5 mg/kg.

In category 8.2.2 Heat treated processed meat, the following entry related to E 120 cochineal, carminic acid, carmines

is replaced as follows:

	E 120	Cochineal, Carminic acid, Carmines	100	(66)	only sausages, patés and terrines
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and the following footnote is added:

(66): Maximum limit for aluminium coming from colour lakes of E 120 cochineal, carminic acid, carmines 1,5 mg/kg.

In category 8.2.3 Casings and coatings and decorations for meat, the following entries related to Group III colours and to E 120

cochineal, carminic acid, carmines are replaced as follows:

	Group III	Food colours with combined maximum limit	500	(67)	only decorations and coatings except edible external coating of pasturmas
	E 120	Cochineal, Carminic acid, Carmines	quantum satis	(67)	only edible external coating of pasturmas

and the following footnote is added:

(67): Maximum limit for aluminium coming from colour lakes of E 120 cochineal, carminic acid, carmines 10 mg/kg. No other colour lakes can be used.

In category 9.3 Fish roe, the following entry related to E 123 amaranth is replaced as follows:

	E 123	Amaranth	30	(68)	except Sturgeons' eggs (Caviar)
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and the following footnote is added:

(68): Maximum limit for aluminium coming from colour lakes of E 123 amaranth 10 mg/kg.

In category 10.1 Unprocessed eggs, the following entry related to food colours used for the decorative colouring of egg shells is replaced as follows:

The Food colours listed in Annex II, part B 1 may be used for the decorative colouring of egg shells or for the stamping of egg shells as provided in Regulation (EC) No 589/2008. (64)

and the following footnote is added:

(64): Maximum limit for aluminium coming from all colour lakes “quantum satis”.

In category 10.2 Processed eggs and egg products,

(a) the following entry concerning E 520 – 523 is replaced as follows:

	E 520	Aluminium sulphate	25	(38)	Liquid egg white for egg foams only
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(b) the following entry related to food colours used for the decorative colouring of egg shells is replaced as follows:

The Food colours listed in Annex in part B 1 may be used for the decorative colouring of egg shells (64)

(c) the following footnote is added:

(64): Maximum limit for aluminium coming from all colour lakes “quantum satis”.

In category 11.1 Sugars and syrups as defined by Directive 2001/111/EC, the following entries related to E 551-559 are replaced as follows

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	quantum satis	(1)	only foods in tablet and coated tablet form
	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000	(1)	only dried powdered foods

In category 11.4.2 Table Top Sweeteners in powder form, the following entry related to E 551-559 is replaced as follows

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000	(1)	
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In category 11.4.3 Table Top Sweeteners in tablets, the following entry related to E 551-559 is replaced as follows

	E 551, E 552, E 553a,	Silicon dioxide,	quantum satis		
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	553b	calcium silicate, magnesium silicate, talc			
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In category 12.1.1 Salt, the following entry related to E 551-559 is replaced as follows

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000		
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In category 12.1.2 Salt substitutes, the following entry related to E 551-559 is replaced as follows

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	20000		
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In category 12.2.2 Seasonings and condiments, the following entry related to E 551-559 is replaced as follows

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	30000	(1)	only seasoning
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In category 12.2.2 Seasonings and condiments, the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(59)	only seasonings, for example curry powder, tandoori
	Group III	Food colours with combined maximum limit	500	(59)	only seasonings, for example curry powder, tandoori

and the following footnote is added:

(59): Maximum limit for aluminium coming from all colour lakes 120 mg/kg

In category 12.6 Sauces, the following entry related to Group III colours is replaced as follows:

	Group III	Food colours with combined maximum limit	500	(65)	including pickles, relishes, chutney and picalilli; excluding tomato-based sauces
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and the following footnote is added:

(65): Maximum limit for aluminium coming from colour lakes of E 120 cochineal, carminic acid, carmines 10 mg/kg. No other colour lakes can be used.

In category 14.1.4 Flavoured drinks, the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(68)	excluding chocolate milk; malt products
	Group III	Food colours with combined maximum limit	100	(25), (68)	excluding chocolate milk; malt products

and the following footnote is added:

(68): Maximum limit for aluminium coming from all colour lakes 15 mg/kg only for diary based drinks. No colour lakes can be used in the other categories of flavoured drinks.

In category 15.1 Potato-, cereal-, flour- or starch-based snacks, the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(60)	
	Group III	Food colours with combined maximum limit	100	(60)	excluding extruded or expanded savoury snack products
	Group III	Food colours with combined maximum limit	200	(60)	only extruded or expanded savoury snack products

and the following footnote is added:

(60): Maximum limit for aluminium coming from all colour lakes 30 mg/kg.

In category 16 Desserts excluding products covered in category 1, 3 and 4, the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at	quantum satis	(61)	
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		quantum satis			
	Group III	Food colours with combined maximum limit	150	(61)	

and the following footnote is added:

(61): Maximum limit for aluminium coming from all colour lakes 15 mg/kg

In category 17.1 Food supplements supplied in a solid form including capsules and tablets and similar forms excluding chewable forms,

(a) the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at quantum satis	quantum satis	(63)	
	Group III	Food colours with combined maximum limit	300	(63)	

and the following footnote is added:

(63): Maximum limit for aluminium coming from all colour lakes 150 mg/kg.

(b) the following entry related to E 551-559 is replaced as follows

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000		
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In category 17.2 Food supplements supplied in liquid form, the following entry related to E 551-559 is replaced as follows

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000		
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In category 17.3 Food supplements supplied in a syrup-type or chewable form,

(a) the following entries related to Group II and III colours are replaced as follows:

	Group II	Colours at quantum	quantum satis	(63)	
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		satis			
	Group III	Food colours with combined maximum limit	300	(63)	only solid food supplements
	Group III	Food colours with combined maximum limit	100		only liquid food supplements

and the following footnote is added:

(63): Maximum limit for aluminium coming from all colour lakes 150 mg/kg, only for food supplements in solid form.

(b) the following entry related to E 551-559 is replaced as follows

	E 551, E 552, E 553a, 553b	Silicon dioxide, calcium silicate, magnesium silicate, talc	10000		
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Annex 2

EU Restrictions on Use of Aluminium-Containing Food Additives: Request for Information on Associated Costs

Industry Questionnaire

Objective

Following the opinion of the European Food Safety Authority on the safety of aluminium from dietary intake (<http://www.efsa.europa.eu/en/efsajournal/pub/754.htm>), the European Commission has discussed possible risk management measures with Member States which involve restrictions on the use of aluminium-containing food additives.

The Agency is now seeking information on the actual costs and benefits of these restrictions in order to quantify its impact on industry. All information provided in response to this questionnaire will be held securely, treated anonymously, and not disclosed to third parties. If you have any queries on this or any other aspect of the questionnaire, please contact Nasreen Shah of the Food Standards Agency's Chemical Safety Division, telephone 020 7276 8553 or e-mail <nasreen.shah@foodstandards.gsi.gov.uk >.

Structure of Questionnaire

*The questionnaire is comprised of 2 sections which should take no longer than 15 minutes to complete. **Section A: Business Profile** - looks to gather information on the type and scale of business currently in operation. **Section B: Potential Costs to Business** – seeks to gather data that is as up to date as possible on the extent to which the legislative changes could impact on the cost to individual businesses and industry.*

Section A: Business Profile

1. What type of food business enterprise would you describe yourself as? [Choose as many that apply]

A) Food Manufacturer	<input type="checkbox"/>
B) Food Retailer	<input type="checkbox"/>
C) Food Additive Manufacturer	<input type="checkbox"/>
D) other (please specify)	<div style="border: 1px dashed gray; height: 20px; width: 100%;"></div>

2. What is your average annual turnover of the business? [Choose only one]

A) Less than £100,000	<input type="checkbox"/>
B) £100,000 - £200,000	<input type="checkbox"/>
C) £200,000 - £500,000	<input type="checkbox"/>
D) £500,000 - £1 million	<input type="checkbox"/>
E) £1 million - £2 million	<input type="checkbox"/>
F) £2 million - £ 5 million	<input type="checkbox"/>
G) + £5 million	<input type="checkbox"/>
H) Other (please give an approximation)	£ <input type="text"/>

3. How many Full Time Equivalent employees are there in your business? [Choose only one]

A) Micro (9 or fewer employees)	<input type="checkbox"/>
B) <20 (10- 20 employees)	<input type="checkbox"/>
C) Small (21-50 employees)	<input type="checkbox"/>
D) Medium (51-249 employees)	<input type="checkbox"/>
E) Large (250+ employees)	<input type="checkbox"/>

Section B: Potential Costs to Business

Familiarisation with restrictions

5 (a). Does your business need to familiarise itself with the changes in use of aluminium-containing food additives? [*Cross where applicable*]

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

If you have chosen NO to question 6(a) please go to question 6

5 (b). If yes, how much time did each member of staff need to invest in familiarising themselves with the Regulation? If possible would you be able give an indication of the number of staff involved including their grade? Please complete the table below (continued on page 5):

Familiarisation Time [Choose as many that apply]		Grade of Staff [Please complete as many boxes that apply]			
e.g.	15 minutes <input checked="" type="checkbox"/>	Senior Manager No. of Staff 1	n/a No. of Staff n/a	n/a No. of Staff n/a	n/a No. of Staff n/a
e.g.	30 minutes <input checked="" type="checkbox"/>	Quality Control No. of Staff 2	Production Manager No. of Staff 1	n/a No. of Staff n/a	n/a No. of Staff n/a
A	15 minutes <input type="checkbox"/>	 No. of Staff 	 No. of Staff 	 No. of Staff 	 No. of Staff
B	30 minutes <input type="checkbox"/>	 No. of Staff 	 No. of Staff 	 No. of Staff 	 No. of Staff

Familiarisation Time [Choose as many that apply]		Grade of Staff [Please complete as many boxes that apply]			
C	1 hour <input type="checkbox"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>
D	Other (approximation) <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>

6 (c). Did your business need to disseminate this information to key members of staff? [Cross where applicable]

Yes

No

If you have chosen NO to question 6(c) please go to question 7

6 (d). If yes, how much time did the business need to invest in disseminating this information to key members of staff? [Choose only one]

A) 15 minutes

B) 30 minutes

C) 1 hour

D) Other (approximation)

One-off Reformulation Costs

7 (a). Would your business need to reformulate any of its products as a result of these restrictions?
 [Cross where applicable]

Yes

No

If you have chosen NO to question 7(a) please go to question 9

7 (b). If yes, how many products will require re-formulation? Please explain and give approximate range below:

Insert Comments Here

7 (c). How much time will each member of staff need to invest in the reformulation process? If possible would you be able give an indication of the number of staff involved including their grade? Please complete the table below (continued on page 7):

Reformulation Time [Choose as many that apply]		Grade of Staff [Please complete as many boxes that apply]			
e.g.	1 - 3 hours <input checked="" type="checkbox"/>	Senior Manager No. of Staff <input type="text" value="1"/>	n/a No. of Staff <input type="text" value="n/a"/>	n/a No. of Staff <input type="text" value="n/a"/>	n/a No. of Staff <input type="text" value="n/a"/>
e.g.	3 - 5 hours <input checked="" type="checkbox"/>	Quality Control No. of Staff <input type="text" value="2"/>	Production Manager No. of Staff <input type="text" value="1"/>	n/a No. of Staff <input type="text" value="n/a"/>	n/a No. of Staff <input type="text" value="n/a"/>
A	1 - 3 hours <input type="checkbox"/>	<input type="text"/> No. of Staff <input type="text"/>	<input type="text"/> No. of Staff <input type="text"/>	<input type="text"/> No. of Staff <input type="text"/>	<input type="text"/> No. of Staff <input type="text"/>

Reformulation Time [Choose as many that apply]		Grade of Staff [Please complete as many boxes that apply]			
B	3 - 5 hours <input type="checkbox"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>
C	5 - 7 hours <input type="checkbox"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>
D	Other (approximation) <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>	<input type="text"/> <i>No. of Staff</i> <input type="text"/>

7 (d). Can you give us an indication of the cost associated with any reformulation where the level of aluminium additives exceeds the new restrictions? [Choose only one]

A) Less than £1, 000	<input type="checkbox"/>
B) £1, 000 - £5, 000	<input type="checkbox"/>
C) £5, 000 - £10, 000	<input type="checkbox"/>
D) £10, 000 - £15, 000	<input type="checkbox"/>
E) £20, 000 +	<input type="checkbox"/>
H) Other (please give an approximation)	£ <input type="text"/>

Ongoing Costs of Raw Materials

8 (a). If you responded yes to question 7 (a), will reformulation have an impact on the cost of sourcing raw materials? [*Cross where applicable*]

Yes

No

8 (b). If yes, can you give an estimate of the potential cost or savings associated with sourcing these raw materials? Please give approximate costs/savings below? [*Choose only one*]

	Costs	Savings
A) Less than £1, 000	<input type="checkbox"/>	<input type="checkbox"/>
B) £1, 000 - £5, 000	<input type="checkbox"/>	<input type="checkbox"/>
C) £5, 000 - £10, 000	<input type="checkbox"/>	<input type="checkbox"/>
D) £10, 000 - £15, 000	<input type="checkbox"/>	<input type="checkbox"/>
E) £20, 000 +	<input type="checkbox"/>	<input type="checkbox"/>
H) Other (please give an approximation)	£ <input type="text"/>	£ <input type="text"/>

Re-labelling Costs

9 (a). Will your business need to re-label any of its products as result of these restrictions? [*Cross where applicable*]

Yes

No

If you have chosen NO to question 9(a) please go to question 10

9 (b). If yes, can you give us an indication of the potential cost associated with any relabeling? [Choose only one]

A) Less than £1, 000

B) £1, 000 - £3, 000

C) £4, 000 - £6, 000

D) £7, 000 - £9, 000

E) £10, 000 +

F) Other (please give an approximation)

£

Market Share and Revenue

10. What impact is this restriction likely to have on the current market share of your business? Please explain and give approximate costs (potential loss of turnover/ sales revenue) below:

Insert Comments Here

Other Comments

11. Any other comments and/ or information you wish to provide that are relevant to the proposed possible EU Restrictions on aluminium food additives? Please explain and give approximate costs/benefits below:

Insert Comments Here