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October 31, 2015

Dear Dr. Marandi,

The International Association of Color Manufacturers (IACM) is the trade association that represents the manufacturers and end-users of coloring substances that are used in foods, including natural and artificial color additives. IACM thanks Iran chairing this electronic working group (eWG) and drafting the first discussion document to facilitate discussion for additions to the International Numbering System (INS).

**Comments on “Table 1: Modification of an existing INS name or new INS number purpose”**

IACM supports the addition of spirulina extract to the INS. Spirulina extract is an increasingly popular naturally derived alternative to synthetic blue colors, and is approved for use in many countries, including the US and many countries in the Asian region such as China, Korea and Japan.

IACM also supports the addition of red radish color and purple sweet potato color to the INS. These colors are both anthocyanins, and as such we would recommend that new INS numbers are allocated accordingly (i.e. 163 sub codes). As indicated in our submission nominating these colors as additions to the INS list, both are allowed for use and widely used in many countries, including China, Korea, and the EU.

IACM appreciates the opportunity to provide comments.

Best regards,

A handwritten signature in black ink that reads "Sarah A. Codrea". The signature is written in a cursive, flowing style.

Sarah Codrea  
Executive Director, IACM