

# INTERNATIONAL HYDROLYZED PROTEIN COUNCIL

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## STATEMENT ON NATIONAL BIOENGINEERED FOOD DISCLOSURE STANDARD

The International Hydrolyzed Protein Council (IHPC) was formed in 1977 by manufacturers and end users of hydrolyzed vegetable proteins (HVPs). IHPC's mission includes conducting scientific research regarding the various aspects of the composition, manufacture, distribution and use of HVPs, marketed for food uses, to assure their safety, functional value and purity; and disseminating to the general public information regarding the results of any such research and other pertinent information and to share them with legislative and regulatory bodies, in whatever national or international jurisdiction as may be desired or required from time to time.

For the reasons explained in more detail in this statement, data collected by IHPC member companies confirm there are no detectable levels of recombinant DNA (rDNA) in HVPs that meet the specifications found in the Food Chemicals Codex monograph for acid hydrolyzed proteins.

On December 21, 2018, USDA's Agricultural Marketing Service (AMS) issued a final rule implementing the National Bioengineered Food Disclosure Standard ("the BE Rule") and requiring disclosure of BE foods beginning January 1, 2022.<sup>1</sup> The term "bioengineered food" is defined, in relevant part, as a food that (1) **contains a detectable level of modified genetic material** (that has been modified through *in vitro* recombinant deoxyribonucleic acid (rDNA) techniques and for which the modification could not otherwise be obtained through conventional breeding or found in nature); and (2) **is not an incidental additive** present in a food at an insignificant level and that does not have any technical or functional effect in the food, as described in FDA regulations at 21 CFR 101.100(a)(3).<sup>2</sup>

Acid Hydrolyzed Vegetable Proteins are produced by breaking down proteins into amino acids and small peptides. The process involves heating the source vegetable protein, often corn or soy, in hydrochloric acid at a temperature of 90 to 120 degrees Celsius (200 to 250 degrees Fahrenheit) for multiple hours or up to several days. Exposing the proteins to hydrochloric acid for an extended period of time breaks down the source vegetable proteins into amino acids. The hydrolyzed solution is then neutralized with an alkali such as sodium hydroxide.

Our member companies have worked with accredited third-party laboratories to conduct rDNA testing on the different HVP products they produce. Members tested acid hydrolyzed soy and corn proteins that are representative of the products in their portfolios and reflect the varying degrees of processing that are used to make different HVPs. In total, IHPC member companies tested over 50

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<sup>1</sup> 83 Fed. Reg. 65814 (Dec. 21, 2018), available at <https://www.federalregister.gov/documents/2018/12/21/2018-27283/national-bioengineered-food-disclosure-standard>.

<sup>2</sup> 21 C.F.R. § 66.1 (definition of *Bioengineered food*).

HVP samples manufactured from GMO or non-IP handled crops and **no test found a detectable level of rDNA** in an acid hydrolyzed HVP. The testing also included a control finding detectable levels of rDNA in the raw material used to make the acid HVP and no detectable level of rDNA in the product after hydrolyzation.

In conclusion, from this activity IHPC has confirmed rDNA is detectable in the source protein prior to hydrolyzation and that the hydrolyzation process results in a final product that does not contain detectable rDNA. Years of testing conducted by IHPC member companies confirms there is no detectable level of rDNA in acid hydrolyzed HVPs meeting the FCC monograph that our members analyzed.

If you have any questions regarding this statement, please do not hesitate to contact me.

Respectfully,



Kam Patel  
President

International Hydrolyzed Protein Council