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I would like to comment on the proposed definition of intentionally added ingredient, "Intentionally added chemical means a chemical that serves an intended function in the final product, or in the manufacturing of the product or ingredients"

Most state laws and FDA consider ingredient as intentionally added if it serves an intended function in product only and not in raw material or ingredient. I would request you to update your definition of intentionally added ingredient to match with FDA's definition of incidental ingredients.

Thank you