



Clausen Ely
Covington and Burling LLP
1201 Pennsylvania Ave, NW
Washington, DC 20004

JAN 28 2010

Dear Mr. Ely,

This letter is in response to your inquiry dated December 15, 2009, requesting clarification from the Food and Drug Administration (FDA) on whether high fructose corn syrup (HFCS) may be declared as either "corn syrup" or "glucose syrup."

"Corn syrup" (also referred to as "glucose syrup") is described in Title 21 Code of Federal Regulations (21 CFR) 184.1865, a section that lists direct food substances affirmed as generally recognized as safe, as a substance obtained by partial hydrolysis of corn starch with safe and suitable acids or enzymes. "High fructose corn syrup" is also described in the same section (21 CFR 184.1866). The term "high fructose" refers to the amount of fructose found in the corn syrup. HFCS is a sub-category of corn syrup and, as such, may be simply labeled as "corn syrup."

"Glucose syrup" is a sweetener with a standard of identity found in 21 CFR 168.120. This section states that "when the food is derived from a specific type of starch, the name may alternatively be '_____ syrup', the blank to be filled in with the name of the starch" e.g., corn syrup. Therefore, HFCS could also be labeled as "glucose syrup." However, FDA believes the term "corn syrup" is more appropriate than "glucose syrup" as an alternate name for HFCS because "corn syrup" more accurately describes the basic nature of the sweetener.

Sincerely yours,

Felicia Billingslea
Director
Food Labeling and Standards Staff
Office of Nutrition, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition