

Note to: Mr M Norsworthy

Substitute Names - Central Additives Register

Problems of the security of the Central Additives Register have been addressed by assembling the Register in two parts, linkage being available to key personnel only.

With regard to Substitute Names, this concept has been discussed with Legal Dept. The following considerations would appear to seriously limit the usefulness of the scheme and we recommend against its adoption.

1. Governments require disclosure on the basis of normal chemical names
2. Negotiations with supplier's proceed on the basis of normal chemical names
3. The use of substitute names might form a basis for a claim by a consumer involving the fact that the company was deliberately concealing the name. If the additive is acceptable why conceal its name?

R E Thornton

RET/bta
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