

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5a, 5b and 5c

CRD12

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-Ninth Session

Macao SAR, China, 20-24 March 2017

AGENDA ITEM 5A GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): CCFA48 OUTSTANDING PROVISIONS; PROVISIONS FOR BENZOATES IN FC 14.1.4; PROVISIONS IN FC 5.0 AND 5.1; PROVISIONS ASSOCIATED WITH NOTE 22; PROVISIONS IN FC 01.1, 01.1.1, 01.1.3 AND 01.1.4 (REPORT OF THE EWG ON THE GSFA),

AGENDA ITEM 5B USE LEVELS FOR ADIPIC ACID (INS 355) IN VARIOUS FOOD CATEGORIES

AND

AGENDA ITEM 5C GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS

Comments of Cameroon, China, European Union, Ghana, India, Indonesia, Kenya, Malaysia, Nicaragua, Republic of Korea, Paraguay, Russian Federation, Thailand, United States of America, African Union, ICGMA and IDF

Part A:

AGENDA ITEM 5A

Cameroon

Annexe 2, Partie 1: Révisions des dispositions dans le tableau 2 de la NGAA (Catégorie d'aliments 05.0 et sous-catégories)

Observations générales des membres du GTE sur les propositions concernant l'annexe 2, partie 1: Le Cameroun soutient la proposition du GTE qui est de réviser les dispositions adoptées dans le tableau 1 et le tableau 2 de la NGAA.

Annexe 3: Demande d'informations sur les niveaux d'emploi et la justification technique pour l'emploi des benzoates dans la catégorie d'aliments 14.1.4 (Boissons aromatisées à base d'eau, y compris les boissons pour sportifs et les boissons « énergétiques » ou « électrolytes », et les boissons concentrées)

Parmi les sujets à traiter, le CCFA48 a demandé au GTE sur la NGAA pour le CCFA49 de demander des informations sur les niveaux d'emploi et la justification technologique pour l'emploi des benzoates dans la catégorie d'aliments 14.1.4.

BENZOATES	SIN	CATEGORIES FONCTIONNELLES	LIMITE MAXIMALE	NOTE
Acide benzoïque	SIN 210	Conservateur		
Benzoate de sodium	SIN 211	Conservateur		
Benzoate de potassium	SIN 212	Conservateur	250 mg/kg	13 et 301
Benzoate de calcium	SIN 213	Conservateur		

Observations :

Le niveau d'emploi des benzoates de 250 mg/kg est nécessaire dans les boissons relevant de la catégorie d'aliments 14.1.4 pour prévenir la dégradation microbiologique pendant la durée de conservation de la boisson.

Suivant les recommandations du JECFA, la DJA du benzoate de Sodium est fixée à **0-5mg/kg** de masse corporelle. Pour rester en phase avec cette DJA, l'option 3 est raisonnable (Pour une masse corporelle moyenne de 60kg, le benzoate (en tant qu'acide benzoïque) serait proche de 250mg/Kg.

Position : Nous soutenons l'**option 3** parce que la limite proposée de **250 mg/kg** pour les benzoates dans cette catégorie d'aliments est compatible avec la DJA (fixée à 0-5mg/Kg de masse corporelle) et permet également d'obtenir l'effet fonctionnel souhaité qui est de prévenir la dégradation microbiologique pendant la durée de conservation de la boisson.

European Union**General comments**

The European Union (EU) would like to thank the United States of America for chairing the electronic Working Group and preparing the paper CX/FA 17/49/7.

The EU comments are captured in the paper and the EU appreciates the possibility to discuss further the draft provisions on the General Standard for Food Additives.

Comments on Appendix 3: use of benzoates in category 14.1.4

The EU takes note of 3 Options recommended for consideration by the Committee. The EU supports **Option 1** (i.e. ML of 150 mg/kg).

The EU welcomes further discussion on the provision for the use of benzoates in food category 14.1.4. Lowering the maximum level (ML) to 250 mg/kg at the last CCFA meeting was a step in the right direction, however, a further reduction of the ML is needed to address the JECFA's recommendation related to the exceedance of the ADI.

The JECFA's exposure assessment was carried out using **the average typical reported use levels** from various countries **ranging between 83-209 mg/L** (maximum levels were reported between 173-627 mg/L) for beverages included in food category 14.1.4 for beverages included in food category 14.1.4¹.

Using the average typical reported use levels the exposure estimates indicated the exceedance of the ADI. Therefore, the EU cannot support Options 2 and 3 which recommend the ML of 200 mg/L (or 250 mg/L respectively) and 500 mg/L for beverages with a pH greater than 3.5.

The levels suggested in Option 2 and 3 are not in compliance with section 3.1 of the Preamble to the GSFA which states "*The inclusion of a food additive in this Standard shall have taken into account any ADI, or equivalent safety assessment established for the additive by JECFA and its probable daily intake from all food sources.*"

Within the context of probable daily intake from all food sources the importance of the reduction of the ML in category 14.1.4 is underlined by the fact that according to JECFA non-alcoholic beverages provide the primary source of dietary exposure to benzoates. This finding is in line with EFSA which published the re-evaluation of benzoates in March 2016².

According to EFSA the usage of benzoates has highly increased in the products available on the EU market especially since 2013. The main food categories to which benzoates are added are soft drinks, table sauces and fish products. As regards the exposure the EFSA opinion used information on the actual use levels from industry (typical mean ranged between 50-150 mg/L) and the analytical results from the EU Member States (6.835 analytical results for flavoured drinks were reported to EFSA). The use levels of 100 mg/L (mean) or 150 mg/L (P95) respectively were used in the refined exposure scenarios for category 14.1.4 to calculate the overall exposure to benzoates that still exceeded the ADI in particular for toddlers and children consuming flavoured drinks.

The EU would like to offer some further arguments why it believes that the ML of 150 mg/L is appropriate for all beverages falling under category 14.1.4:

¹ WHO FOOD ADDITIVES SERIES: 71; Safety evaluation of certain food additives and contaminants / prepared by the Eightieth meeting of the Joint FAO/WHO Expert Committee on Food Additives (JECFA), http://apps.who.int/iris/bitstream/10665/198360/1/9789240694897_eng.pdf?ua=1

² EFSA Journal 2016;14(4):4433 [110 pp.]; <http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2016.4433/epdf>

- A ML 150 mg/L is below the upper range of average typical use levels used by JECFA to calculate the exposure indicating an exceedance of the ADI
- A broad variety of products containing benzoates up to 150 mg/L is on the EU market. This level is sufficient and it allows achieving the intended technical effect. The EU is not aware of any issues related to microbiological stability and need for higher levels of benzoates.
- The need for higher levels cannot be explained by differences in climate – some EU Member States have regions having very hot summers (e.g. Spain, Greece and Italy). In addition, other Codex member from a tropical region replied to the first circular that similar level (160 mg/L) is satisfactory
- Considering the risks of exceedance of ADI for benzoates, it is appropriate to promote their use at the lowest level needed to achieve the intended technical effect. Best practices available among the Codex countries (e.g. use of the preservation methods based on physical processes – heat processing, carbonation, aseptic filling and an appropriate shelf-life) should thus be considered when assessing the appropriate use level of benzoates

Ghana

AGENDA ITEM No. 5a (ii)

General Standard for Food Additives (GSFA): CCFA 48 Outstanding Provisions; Provisions for Benzoates in FC 14.1.4

Specific Comments:

1. Ghana supports option 3, an ML of 250 mg/kg and Note 13:

*An ML of **250 mg/kg** for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note “Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed*

Rationale:JECFA performed exposure estimates for benzoates in non-alcoholic soft beverages (which JECFA indicated corresponds to GSFA food category 14.1). None of the population groups included in the estimate exceeded the ADI for consumers only exposure at the mean value. However, at the 95th percentile for consumers only, two population groups were reported to have exposure ranges that exceeded the ADI: 1) toddlers and young children (1-7 years) at 1.7-10.9 mg/kg body weight; and 2) other children, including adolescents (8-17 years) at 0.5-7.0 mg/kg body weight. A benzoate use level of 250 mg/kg is required in beverages falling under food category 14.1.4 to prevent microbiological spoilage during the shelf life of the beverage. The adoption of a use level below 250 mg/kg would result in significant market disruption and negative impact on the safety of the product. In the event of new data being available, JECFA should consider the evaluation of this level.

AGENDA ITEM No 5a(iv)

General Standard For Food Additives (GSFA): CCFA48 Outstanding Provisions; Provisions Associated with Note 22 in the Non-Standardized Food as Defined in Section 1 of the Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke Dried Fish (Codex Stan 311-2015)

Specific Comments

We recommend the retention of the new note 22, “*For use in non-standardized smoked fish products only.*”

Rationale:Section 1 of CODEX STAN 311-2015, as well as the descriptor of FC 09.2.5, provides indications as to the type of smoked-fish products that may qualify as non-standardized products as defined in Section 1 of CODEX STAN 311-2015.

AGENDA ITEM No 5a (v)

General Standard for Food Additives (GSFA): CCFA 48 Outstanding Provisions; Request to Consider the Appropriateness of the Food Additive Provisions (Adopted and in the Step Process) in the Renamed Food Categories 01.1, 01.1.1, 01.1.3 and 01.1.4

Specific Comments

Ghana supports the proposal of the EWG.

Rationale:The proposal of the EWG intends to do away with the inconsistencies in this FC.

India**Specific Comments**

Appendix 1, Part 1: Draft and Proposed Draft Provisions in Table 1 and 2 of the GSFA in food categories 01.2 through 08.4 held at the CCFA48

1. Food category No. 01.3.1 (Condensed milk (plain)):

Additive - Tocopherols:

India supports eWG proposal to adopt use of tocopherols in food category 01.3.1 with a note "For use in Khoya only". Use of antioxidants is technologically justified in condensed milk (plain, unsweetened) that are subjected to UHT or sterilization treatments.

2. Food category No. 01.4 (Cream (plain) and the like):

Additive - Nisin:

India doesn't support use of Nisin in food category 01.4. However the already adopted provision in sub-category 01.4.3 should be continued

Additive - Tocopherols:

India supports moving provision for Tocopherols to food category 01.4.4.

3. Food Category No. 01.4.1 (Pasteurized cream (plain)):

Additive - Nisin:

India supports discontinuation of provision for Nisin in food category 01.4.1 as use of nisin is not technologically justified in this category.

Additive - Tocopherols:

India doesn't support provision for tocopherols in food category 01.4.1 as use of antioxidants is not technologically justified in this category.

4. Food Category No. 01.4.2 (Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)):

Additive - Nisin:

India supports discontinuation of provision for Nisin in food category 01.4.2, as use of nisin is not technologically justified in this category.

Additive - Tocopherols:

India supports discontinuation of provision for Tocopherols in food category 01.4.1, as the use of antioxidants is not technologically justified in this category.

5. Food Category No. 01.4.3 (Clotted cream (plain)):

Additive - Tocopherols:

India supports discontinuation of provision for Tocopherols in food category 01.4.3, as use of antioxidants in creams is not technologically justified.

6. Food Category No. 01.4.4 (Cream analogues):

Additive - Nisin:

India doesn't support adoption of nisin in food category 01.4.4. as use of nisin is not technologically justified in this category.

Additive - Tocopherols:

India supports adoption of Tocopherols in food category 01.4.4 as listed, as use of antioxidants is technologically justified and necessary in this category.

7. Food Category No. 01.6.4 (Processed cheese):

Additive – Nisin:

India supports adoption of Nisin in food category 01.6.4 as listed, as use of Nisin is technologically justified in this category.

8. Food Category No. 04.1.2.7 (Candied fruit):

Additive - Tartrates:

India supports adoption of Tartrates in Food Category 04.1.2.7 (Candied fruit) as India allows Tartaric Acid at GMP level and Industry report actual use level at 20,000mg/kg.

9. **Food Category No. 04.2.1.1 (Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds):**

Additive - Propylene Glycol:

India doesn't support use of Propylene Glycol in category 04.2.1.1, as there is no technological justification for use of food additives in this category.

10. **and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds):**

Additive - Glycerol:

India supports discontinuation of Glycerol in food category 04.2.1.2, as there is no technological justification in this category.

Additives - Propylene Glycol:

India supports discontinuation of Propylene Glycol in food category 04.2.1.2, as there is no technological justification in this category.

Additives - Propylene Glycol Alginate:

India supports discontinuation of Propylene Glycol Alginate in food category 04.2.1.2, as there is no technological justification in this category.

Additive - Sucrose Esters of Fatty Acids:

India supports discontinuation of Sucrose Esters of Fatty Acids in food category 04.2.1.2, as there is no technological justification in this category.

11. **Food Category No. 04.2.1.3 (Peeled, cut or shredded fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds and nuts and seeds):**

Additive - Propylene Glycol:

India supports discontinuation of Propylene Glycol in food category 04.2.1.3, as there is no technological justification in this category.

12. **Food Category No. 04.2.2 (Fresh vegetables (Processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds):**

Additive - Propylene Glycol:

India doesn't support use of propylene glycol in food category 04.2.2, as there is no technological justification in this category.

13. **Food Category No. 04.2.2.1 (Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds):**

Additive - Propylene Glycol:

India doesn't support use of propylene glycol in food category 04.2.2.1, as there is no technological justification in this category.

14. **Food Category No. 04.2.2.3 (Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce):**

Additive - Propylene Glycol:

India doesn't support use of propylene glycol in food category 04.2.2.3, as there is no technological justification in this category.

15. **Food Category No. 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds):**

Additive - Nisin:

India supports discontinuation of nisin in food category 04.2.2.4, as there is no technological justification in this category.

Additive - Propylene Glycol:

India doesn't support use of propylene glycol in food category 04.2.2.4, as there is no technological justification in this category.

16. Food Category No. 04.2.2.7 (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3seeds):

Additives - Propylene Glycol:

India doesn't support use of propylene glycol in food category 04.2.2.7, as there is no technological justification in this category.

17. Food Category No. 04.2.2.8 (Cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds):

Additive - Propylene Glycol:

India doesn't support use of propylene glycol in food category, as there is no technological justification in this category.

18. Food Category No. 05.1.1 (Cocoa mixes (powders) and cocoa mass/cake):

Additive - Sucrose Esters of Fatty Acids:

India supports adoption of Sucrose esters of fatty acids in food category 05.1.1. India allows the use at 10,000 mg/kg in this food category.

19. Food Category No. 05.1.3 (Cocoa-based spreads, incl. fillings):

Additive - Propylene Glycol Alginate:

India supports adoption of Propylene Glycol Alginate in food category 05.1.3. India allows the use at 10,000 mg/kg in this food category.

20. Food Category No. 05.1.4 (Cocoa and chocolate products):

Additive - Poly Glycerol Esters of Fatty Acids:

India supports adoption of Poly Glycerol Esters of Fatty Acids in food category 05.1.4. India allows its use at 2000 mg/Kg in this food category.

21. Food Category No. 05.1.5 (Imitation chocolate, chocolate substitute products):

Additive - Sorbitan esters of fatty acids:

India supports adoption of Sorbitan esters of fatty acids at 10,000 mg/Kg in this food category.

22. Food Category No. 05.3 (Chewing gum):

Additive - Polyglycerol Esters of Interesterified Ricinoleic Acid:

India supports adoption of Polyglycerol Esters of Interesterified Ricinoleic Acid in this category at 10,000 mg/kg levels.

23. Food Category No. 07.1 (Bread and ordinary bakery wares and mixes):

Additive - Sucrose esters of fatty acids:

India doesn't support discontinuation of sucrose esters of fatty acids in food category 07.1. India allows at GMP levels and supports adoption at 10,000 mg/kg level.

24. Food Category No. 07.1.1 (Bread and rolls):

Additive - Sucrose esters of fatty acids:

India supports adoption of sucrose esters of fatty acids in food category 07.1. India allows at GMP levels in parent category (07.1) and support adoption at 10,000 mg/kg level in parent category (07.1).

25. Food Category No. 07.1.1.1 (Yeast-leavened breads and specialty breads):

Additive - Sodium Diacetate:

India supports adoption of Sodium Diacetate at 4000 mg/kg. India allows its use at 4000 mg/kg in parent category (07.1).

Additive - Tartrates:

India supports adoption of Tartrates in food category 07.1.1.1. India allows its use at GMP levels in parent category (07.1).

26. Food Category No. 07.1.1.2 (Soda breads):

Additive - Sodium Diacetate:

India supports adoption of Sodium Diacetate at 4000 mg/kg. India allows its use at 4000 mg/kg in parent category (07.1).

Additive - Tartrates:

India supports adoption of Tartrates in food category 07.1.1.2. India allows its use at GMP levels in parent category (07.1).

27. Food Category No. 07.1.2 (Crackers, excluding sweet crackers):

Additive - Sodium Diacetate:

India supports adoption of Sodium Diacetate at 4000 mg/kg. India allows its use at 4000 mg/kg in parent category (07.1).

Additive - Sucrose esters of fatty acids:

India supports adoption of sucrose esters of fatty acids in food category 07.1.2. India allows at GMP levels in parent category and support adoption at 10,000 mg/kg level.

Additive - Tartrates:

India supports adoption of Tartrates in food category 07.1.2. India allows its use at GMP levels in parent category (07.1).

28. Food Category No. 07.1.3 (Other ordinary bakery products (e.g. bagels, pita, English muffins)):

Additive - Sodium Diacetate:

India supports adoption of Sodium Diacetate at 4000 mg/kg. India allows its use at 4000 mg/kg in parent category (07.1).

Additive - Sucrose esters of fatty acids:

India supports adoption of sucrose esters of fatty acids in food category 07.1.3 India allows at GMP levels in parent category and support adoption at 10,000 mg/kg level.

Additive - Tartrates:

India supports adoption of Tartrates in food category 07.1.3. India allows its use at GMP levels in parent category (07.1).

29. Food Category No. 07.1.4 (Bread-type products, including bread stuffing and bread crumbs):

Additive - Sodium Diacetate:

India supports adoption of Sodium Diacetate at 4000 mg/kg. India allows its use at 4000 mg/kg in parent category (07.1).

Additive - Sucrose esters of fatty acids:

India supports adoption of sucrose esters of fatty acids in food category 07.1.4 India allows at GMP levels in parent category and support adoption at 10,000 mg/kg level.

Additive - Tartrates:

India supports adoption of Tartrates in food category 07.1.1.4. India allows its use at GMP levels in parent category (07.1).

30. Food Category No. 07.1.5 (Steamed breads and buns):

Additive - Sodium Diacetate:

India supports adoption of Sodium Diacetate at 4000 mg/kg. India allows its use at 4000 mg/kg in parent category (7.1).

Additive - Sucrose esters of fatty acids:

India supports adoption of sucrose esters of fatty acids in food category 07.1.5 India allows at GMP levels in parent category and support adoption at 10,000 mg/kg level

Additive - Tartrates:

India supports adoption of Tartrates in food category 07.1.5. India allows its use at GMP levels in parent category (07.1).

31. Food Category No. 07.1.6 (Mixes for bread and ordinary bakery wares)**Additive - Sodium Diacetate:**

India supports adoption of Sodium Diacetate at 4000 mg/kg. India allows its use at 4000 mg/kg in parent category (7.1).

Additive - Sucrose Esters of Fatty Acids:

India supports adoption of Sucrose Esters of Fatty Acids in food category 07.1.6. India allows its use at GMP levels in parent category (07.1).

Additive - Tartrates:

India supports adoption of Tartrates in food category 07.1.6. India allows its use at GMP levels in parent category (07.1).

32. Food Category No. 07.2.1 (Cakes, cookies and pies (e.g. fruit-filled or custard types)):**Additive - Tartrates:**

India supports adoption at 5000 mg/kg as India allows at GMP level.

33. Food Category No. 08.0 (Meat and meat products, including poultry and game):**Additive - Poly Glycerol Esters of Fatty Acids:**

India supports discontinuation of Poly Glycerol Esters of Fatty Acids in food category 08.0. India does not permit food additives in this food category.

Additive - Polyglycerol Esters of Interesterified Ricinoleic Acid:

India supports discontinuation of Polyglycerol Esters of Interesterified Ricinoleic Acid Acids in food category 08.0. India does not permit food additives in this food category.

Additive - Tartrates:

India supports discontinuation of Tartrates in food category 08.0. India does not permit food additives in this food category.

34. Food Category No. 08.1 (Fresh meat, poultry, and game):**Additive – Potassium Lactate:**

India supports discontinuation of Potassium Lactate in food category 08.1. India does not permit food additives in this food category.

Additive – Protease from *Aspergillus oryzae* Var.:

India supports discontinuation of Protease from *Aspergillus oryzae* var. in food category 08.1. India does not permit food additives in this food category.

Additive – Sodium Lactate:

India supports discontinuation of Sodium Lactate in food category 08.1. India does not permit food additives in this food category.

35. Food Category No. 08.1.1(Fresh meat, poultry, and game, whole pieces or cuts):**Additive - Tartrates:**

India supports discontinuation of Tartrates in food category 08.1.1. India does not permit food additives in this food category.

36. Food Category No. 08.1.2 (Fresh meat, poultry, and game, comminuted)**Additive - Tartrates:**

India supports discontinuation of Tartrates in food category 08.1.2. India does not permit food additives in this

food category.

Additive – Tocopherols:

India doesn't support adoption of Tocopherols in food category 08.1.2. India does not permit food additives in this food category.

Agenda 5a, Appendix 2, Part 2: Consequential revisions to Table 3

India appreciates the work done by eWG chaired by Australia and co-chaired by USA. We have the following specific comments to offer on the proposals regarding consequential revisions to Table 3.

India supports the interim approach, detailed in Proposal B. However we would like to mention that existing Table 3 has a column title "Acceptable, including foods conforming to the following commodity standards". This was agreed by CCFA in past, due to possible mis-interpretation on the title of column. Hence India propose to retain the same title as it is mentioned in current Table 3.

Specific Comments:

India supports interim approach listed in Proposal B. However the title of the column 6 should be changed from "Acceptable, in foods conforming to the following commodity standards" to "Acceptable, including foods conforming to the following commodity standards", so that it reflects accurately the current title of the column in Table 3.

Appendix 3: Request for information on use levels and technical justification for the use of benzoates in food category 14.1.4 (Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks)

India appreciates the work done by eWG, and would like to share the following comments:

Chair of eWG has recommended 3 options. India supports option 3 i.e. an ML of 250 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note "Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed."

Rationale:

- a) No direct substitute exists for Benzoates in beverages
- b) Certain spoilage micro-organisms of industrial significance (e.g., *Gluconobacter spp.* and certain *Aspergillus spp.*) are quite resistant to sorbate, thus limiting sorbates' value as a drop-in substitute preservative for benzoates.
- c) Antimicrobial activity of benzoates is associated with undissociated benzoic acid molecules, which decreases with increase in pH, Hence, higher concentration is required when pH is higher.
- d) Benzoates in beverages pose no safety concern.
- e) Reducing benzoates further, below 250 mg/kg (as benzoic acid) results in reduction in product shelf-life and increased spoilage/food waste.

Appendix 5, Part 2: Provisions in Tables 1 and 2 of the GSFA in food categories 01.1, 01.1.1, 01.1.3 and 01.1.4

1. Food Category No. 01.1.1 (Fluid milk (plain)):

Additive - Carob Bean Gum:

India doesn't agree with eWG proposal to adopt the use of **Carob Bean Gum** with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Carragenan:

India doesn't agree with eWG proposal to adopt the use of **Carragenan** with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Gellan Gum:

India doesn't agree with eWG proposal to adopt the use of **Gellan Gum** with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Mono and Di-glycerides of fatty acids:

India doesn't agree with eWG proposal to adopt the use of **Mono and Di-glycerides of fatty acids** with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Phosphates:

India supports adoption of Phosphates in this category with Note 227, as it is required to prevent curdling in **UHT and sterilized milks** in this category.

Additives - Pectin:

India doesn't agree with eWG proposal to adopt the use of **Pectin** with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Polydextrose:

India doesn't agree with eWG proposal to adopt the use of **Polydextrose** as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Sodium Carboxy Methyl Cellulose:

India doesn't agree with eWG proposal to adopt the use of **Sodium Carboxy Methyl Cellulose** with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Tocopherols:

India doesn't agree with eWG proposal to adopt the use of Tocopherols with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category

Additive - Trisodium citrate:

India doesn't agree with eWG proposal to adopt the use of Trisodium citrate with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Xanthan Gum:

India doesn't agree with eWG proposal to adopt the use of **Xanthan Gum** with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

2. Food Category No. 01.1.3 (Fluid buttermilk (plain)):

Additive - Phosphates:

India supports adoption of Phosphates in this category with Note 227, as it is required to prevent curdling in this category.

Additive –Mono and Diglycerides of Fatty Acids:

India doesn't agree with eWG proposal to adopt the use of **Mono and Di-glycerides of fatty acids** with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive - Phosphates:

India supports adoption of Phosphates in this category with Note 227, as it is required to prevent curdling in **UHT and sterilized milks** in this category.

Additive: Polydextrose:

India doesn't agree with eWG proposal to adopt the use of **Polydextrose** as India doesn't allow use of this additive due to lack of technological justification for its use in this category

Additive - Sodium Carboxy Methyl Cellulose:

India doesn't agree with eWG proposal to adopt the use of **Sodium Carboxy Methyl Cellulose**, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Additive- Tocopherols:

India doesn't agree with eWG proposal to adopt the use of Tocopherols with Note 227, as India doesn't allow use of this additive due to lack of technological justification for its use in this category

Additive- Trisodium citrate:

India doesn't agree with eWG proposal to adopt the use of Trisodium citrate as India doesn't allow use of this additive due to lack of technological justification for its use in this category

Additive- Xanthan Gum: India doesn't agree with eWG proposal to adopt the use of **Xanthan Gum**, as India doesn't allow use of this additive due to lack of technological justification for its use in this category.

Indonesia

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): CCFA48 OUTSTANDING PROVISIONS; PROVISIONS FOR BENZOATES IN FC 14.1.4; PROVISIONS IN FC 5.0 AND 5.1; PROVISIONS ASSOCIATED WITH NOTE 22; PROVISIONS IN FC 01.1, 01.1.1, 01.1.3 AND 01.1.4

- Request for information and justification on draft and proposed draft food additive provisions: A) in FC 01.2 through 08.4 held at the CCFA48; and B) in food categories 5.0 and 5.1 and related subcategories

APPENDIX 1: REQUEST FOR INFORMATION AND JUSTIFICATION ON DRAFT AND PROPOSED DRAFT FOOD ADDITIVE PROVISIONS: A) IN FC 01.2 THROUGH 08.4 HELD AT THE CCFA48; AND B) IN FOOD CATEGORIES 5.0 AND 5.1 AND RELATED SUBCATEGORIES

Food Category No. 01.3.1 (Condensed milk (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 281-1971, 282-1971: list specific firming agents, ES&T, and acidity regulators

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200			Antioxidant	<p>CX/FA 16/48/7: Do not move from FC 01.3 – not allowed in standards corresponding to FC 01.3.1 EU: does not support adoption; antioxidants not permitted in corresponding standards. It has to be clarified whether Khoya falls under this category and why antioxidants are needed</p> <p>India: Supports proposal. Use of antioxidant is technologically justified only in condensed milk (plain, unsweetened) that are subject to UHT or sterilization treatments and product like Khoya may be adopted with a suitable footnote to this effect.</p> <p>Indonesia: proposes ML of 300 mg/kg and does not agree with the note “For use in Khoya only” because tocopherols is used in sweetened condensed milk</p> <p>RF: Does not support adoption. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg.</p>	Adopt with note “For use in Khoya only” (khoya is a dairy product used in South Asian cuisine of India, Nepal, Bangladesh and Pakistan. It is made of either dried whole milk or milk thickened by heating. It is lower in moisture than typical fresh cheeses] FC is for condensed milk plain.	Indonesia proposes ML of 300 ppm and does not agree with the proposed note “For use in Khoya only” since there are some products in this sub category use this additive. Indonesia uses this additive for sweetened condensed milk.

Food Category No. 01.4 (Cream (plain) and the like)

Corresponding commodity standards: 288-1976 corresponds to subcategories 01.4.1 - 01.4.3

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal	Indonesia Comment
NISIN	234	12.5	233	3	Preservative	<p>CX/FA 16/48/7: Move to subcategory 01.4.4. Preservatives not allowed in CODEX STAN 288-1976</p> <p>EU: Supports move to 01.4.4. Need for additives in plain cream very limited; economically and technically feasible to produce products without preservatives</p> <p>IFAC: Does not support move to 01.4.4. Codex Stan 288- 1976 is out of date and should be updated. Request that CCFA solicit feedback on whether other CCFA members believe the standard needs to be updated.</p> <p>Disallowing a technically justified additive in this food category simply because of an outdated standard is not acceptable. We appreciate that some EWG members believe the need for additives in plain creams is limited, but following is the technical justification. See IFAC comments document for tech. justification FC 01.4.1 and 01.4.2.</p> <p>India: Supports move to subcat.</p> <p>Indonesia: supports moving to FC 01.4.4</p> <p>Iran: Agrees with move to subcat. 01.4.4 due to pasteurization</p> <p>RF: Discontinue in this FC and 01.4.4 due to antibiotic resistance</p>	Discuss further	Indonesia proposes to move to sub category 01.4.4

Food Category No. 01.4.2 (Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)) Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T are horizontally justified
Corresponding commodity standards: 288-1976: lists specific ES&T and acidity regulators, also packing gases and propellants in whipped cream and cream packed under pressure (which becomes whipped cream when removed from the container);

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200			Antioxidant	<p>CX/FA 16/48/7: Discontinue.</p> <p>Note Antioxidants not allowed in CS 288-1976 EU, India, RF: Suggest discontinue</p> <p>India: Use of antioxidant in creams is not technologically justified, as cream has natural antioxidants from milk and the fat is not in free form. Fat in cream is present as fat globules with a membrane.</p> <p>Indonesia: proposes to discontinue</p> <p>RF: Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg Suggests discontinuation</p> <p>ELC: This FC includes in its definition cream "<i>being whipped</i>" and includes products that are subject to harsh heat treatment (UHT, sterilization, ultra-pasteurization) and products packed under pressure. Fatty acids with unsaturated structure present in these products are prone to oxidation which is fostered by heat (sterilization, UHT) and by enlarging surface area (whipping process). For this reason antioxidative protection may be required. In addition, in the EU the use of tocopherols is permitted for FC 1.4. Permissions in the EU are based on a sound technical justification, among others. The required use level of 200 ppm is confirmed.</p>	Discuss further	Indonesia proposes to discontinue and proposes to set the ML in the parent category (01.4)

Food Category No. 01.4.3 (Clotted cream (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 288-1976: lists specific ES&T and acidity regulators, also packing gases and propellants in whipped cream and cream packed under pressure (which becomes whipped cream when removed from the container);**Note:** There is already an adopted provision for Nisin in the FC at 10 mg/kg with no Note.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200			Antioxidant	CX/FA 16/48/7: Discontinue. EU, India, Indonesia, RF: Support discontinuation India: Use of antioxidant in creams is not technologically justified, as cream has natural antioxidants from milk and the fat is not in free form. Fat in cream is present as fat globules with a membrane. RF: Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Do not move from FC 01.4	Indonesia supports the eWG proposal

Food Category No. 01.4.4 (Cream analogues)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200			Antioxidant	CX/FA 16/48/7: Adopt as listed India: Supports adoption as listed. Antioxidant function in cream analogues may be necessary, as the vegetable fat in water emulsion will often not have any natural antioxidant present. Indonesia: proposes to discontinue Japan: Supports proposal. Tocopherols are used in cream analogues containing vegetable oil to prevent oxidation. ELC: Support adoption. Vegetable fats can be high in poly-unsaturated fats, and emulsions and all the more powder forms are known for their large surface area which critically exposes fatty acids to air/oxygen and makes them prone to oxidation and rancidity which can result in unacceptable smell/taste of the product. For this reason antioxidative	Discuss further	Indonesia proposes to discontinue

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
						<p>protection is needed.</p> <p>Cream analogues include emulsions and powdered forms and whipped cream (toppings), structures of large surface area that foster fat oxidation and justify use of an antioxidant.</p> <p>In addition, in the EU the use of tocopherols is permitted for FC 1.4. Permissions in the EU are based on a sound technical justification, among others. The required use level of 200 ppm is confirmed.</p> <p>RF: Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg</p>		

Food Category No. 01.5 (Milk powder and cream powder and powder analogues (plain)) Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 207-1999, 290-1995 correspond to FC 01.5.1; 251-2006 corresponds to FC 01.5.2

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	5000			Antioxidant	<p>CCFA48: Requests information on technological justification in parent and subcategory</p> <p>ELC: Milk and cream naturally contain milk fat and milk fat contains sufficient quantities of fatty acids prone to oxidation. These products are per definition of this FC (milk powder and cream powder) in a powdered form. Powdered form means large surface area and much air exposure, conditions that favour strongly fat oxidation which results in rancidity and off flavor/taste of the product. Tocopherol is an effective, fat soluble antioxidant that can help prevent and delay fat oxidation. 1000 ppm maximum should be sufficient.</p> <p>EU: discontinue, not allowed in corresponding commodity standards of subcategories</p> <p>India: Use of antioxidants is technologically justified in this FC including all subcategories.</p>	Adopt at 1000	Indonesia proposes ML of 500 ppm

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
						<p>However to minimize use of FA in products and to align with commodity standards, these specific additives may not be allowed.</p> <p>Indonesia: use this additives in flavoured milk powder with ML of 500 mg/kg</p> <p>RF: Suggests discontinuation</p>		

Food Category No. 01.5.1 (Milk powder and cream powder (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 207-1999: lists specific firming agents, acidity regulators, anticaking agents, antioxidants, emulsifiers, and stabilizers; 290- 1995: lists specific bulking agents, acidity regulators, anticaking agents, and emulsifiers

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	5000		7	Antioxidant	<p>CX/FA 16/48/7: Discontinue, not allowed in corresponding commodity standards</p> <p>CCFA48: Requests information on technological justification</p> <p>Brazil, EU: supports discontinue</p> <p>India: Use of antioxidants technologically justified in this food category including all subcategories. However to minimize use of FA in products and to align with commodity standards, these specific additives may not be allowed.</p> <p>RF: Supports discontinuation. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg</p> <p>ELC: Milk and cream naturally contain milk fat and milk fat contain sufficient quantities of fatty acids prone to oxidation. These products are per definition of this FC (milk powder and cream powder) in a powdered form. Powdered form means large surface area and much air exposure, conditions that favour strongly fat oxidation which results in rancidity and off flavor/taste of the product. Tocopherol is an effective, fat soluble antioxidant that can help</p>	Adopt at 1000	Indonesia proposes to discontinue and set the ML in the parent category 01.5

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
						prevent and delay fat oxidation. 1000 ppm maximum should be sufficient. Indonesia: proposes to discontinue Allowed in the parent category		

Food Category No. 01.6 (Cheese and analogues)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Subcategories 01.6.3 and 01.6.6 are in the Annex to Table 3

Corresponding commodity standards: None; Multiple commodity standards correspond to subcategories

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200			Antioxidant	CX/FA 16/48/7: Indonesia: proposes moving provisions for these additives from subcategories to parent category 01.6 as used in all subcategories. CCFA48: Requests information on technological justification in parent and subcategories Note: adopted provision in 01.6.5 EU: Supports discussion in subcategories - Further info needed on technological justification ; Only CXS_275- 1973 Cream Cheese authorises use of antioxidants (INS 307 b/c) India, Japan, Malaysia: supports proposal RF: Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Do not move from subcategories, discuss use in each subcategory	Indonesia proposes that ML is set for this parent category

Food Category No. 01.6.2.1 (Ripened cheese, includes rind)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: **283-1987 (General standard for cheese): Refers to STAN 208-199 for cheeses in brine, lists specific additives that can be used in all other ripened cheeses; 208-1999 (Group standard for cheeses in brine): INS 270 & 575; Specific standards 263 through 272, 274, 276, 277: lists specific additives, most do not allow additives on the rind; 288: does not list food additives**

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200			Antioxidant	<p>CX/FA 16/48/7: Indonesia: proposes moving from FC 01.6.2 to parent FC 01.6.</p> <p>Note: adopted provision in 01.6.5</p> <p>EU: supports discontinue & move to 01.6.2.3. Not listed in corresponding commodity standards 283-1987 does not list antioxidants; 208-1999 only Acidity regulators (INS 270, 575)</p> <p>India: Supports proposal. Moving to parent category is not acceptable, as it may not be required in all subcategories. Consider use in specific subcategories.</p> <p>RF: Supports proposal. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg</p>	Do not move to this subcategory, only Move to subcategory 01.6.2.3. Antioxidants not listed in 283-1987.	Indonesia proposes to move to parent category 01.6

Food Category No. 01.6.2.2 (Rind of ripened cheese)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 283-1987 (General standard for cheese): Refers to STAN 208-199 for cheeses in brine, lists specific additives that can be used in all other ripened cheeses; 208-1999 (Group standard for cheeses in brine): INS 270 & 575; Specific standards 263 through 272, 274, 276, 277: lists specific additives; 288: does not list food additives.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200			Antioxidant	<p>CX/FA 16/48/7: Indonesia: proposes moving from FC 01.6.2 to parent FC 01.6.</p> <p>Note: adopted provision in 01.6.5</p> <p>EU: supports discontinue & move to 01.6.2.3. Not listed in corresponding commodity standards 283-1987 does not list antioxidants; 208-1999 only Acidity regulators (INS 270, 575)</p> <p>India: Supports proposal. Moving to parent category is not acceptable, as it</p>	Do not move to this subcategory, only Move to subcategory 01.6.2.3. Antioxidants not listed in 283-1987.	Indonesia proposes to move to parent category 01.6

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal	Indonesia Comment
						may not be required in all subcategories. Consider use in specific subcategories. RF: Supports proposal. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg		

Food Category No. 01.6.4 (Processed cheese) Corresponding commodity standards: None.

General Note: The CCFA48 did not discuss provisions in this Food Category due to ongoing work by the Codex Committee on Milk and Milk Products on a draft Standard for Processed Cheese.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal	Indonesia Comment
NISIN	234	12.5	233	6	Preservative	<p>CX/FA 16/48/7: Adopt EU: Accepts ELC, IFAC: Supports adoption. Currently used in FC 01.6.4 products in international trade. Studies show that nisin @ 2.5-6.25 mg/kg can help control <i>Clostridial</i> spore outgrowth and spoilage in various processed emmental and cheddar cheeses and @ 2.5-12.5 mg/kg can reduce <i>Bacillus spp.</i> spores counts in pasteurized processed cheese. Nisin (@12.5- 250 mg/kg) also used to control <i>Clostridia botulinum</i> growth in pasteurized processed cheese spreads.(Use at 250 mg/kg is country specific and for lower sodium and higher moisture processed cheese spreads.) IFAC notes that several member states have supported this provision, and the only opposition appears to be based on antimicrobial concerns, which are not relevant here per JECFA. India, Indonesia, Japan, Malaysia : support adoption Iran: supports adoption due to pasteurization Japan: used in processed cheese as preservative. Maximum use level is 6.25 mg/kg Malaysia: Supports adoption CX/FA 16/48/7 USA: allowed in the USA in pasteurized processed cheese spreads with and without fruits, etc at 250 mg/kg as a preservative RF: Does not support due to antibiotic resistance concerns</p>	Adopt	Indonesia supports the adoption of this additive

Food Category No. 04.1.2 (Processed fruit)

Corresponding commodity standards: None. Multiple standards apply to subcategories, several of which do not allow food additives;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class		Indonesia comment
						There are no provisions under discussion in this Food Category; CCFA48 requested information from the Codex Committee on Processed Fruits and Vegetables on the request by Indonesia to move the draft provision for tocopherols (INS 307a, b, c) from FC 04.1.2.2 to parent FC 04.1.2 (REP 16/FA para 65)	There are products in this category such as coconut based spread using this additive

- Request for information on use levels and technical justification for the use of benzoates in food category 14.1.4 (Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks)

Comment:

Indonesia supports option 1 “An ML of 150 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid)” considering that benzoates permitted in a wide range of food categories which can cause the use of this additives exceed ADI.

- Provisions in Tables 1 and 2 of the GSFA in food categories 01.1, 01.1.1, 01.1.3 and 01.1.4.

Comment:

Food Category No. 01.1 (Fluid milk and milk products)

Corresponding commodity standards: none; 243-2003 corresponds to subcategory 01.1.4.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200		7	Antioxidant	Move to subcategories	<p>EU: Accepts to move to subcategories</p> <p>India: There is no technical justification for use of antioxidants in this FC</p> <p>NZ: Used to enhance the keep qualities by inhibiting/reducing the potential for fat oxidation in UHT products; Add Note 227</p> <p>China: Use may be indicated to assure a shelf stable product of sufficient shelf life and which does not develop a rancid off taste and/or off-flavour; 200 ppm use level is generally indicated as technologically justified</p> <p>RF: Used for vitamin E and antioxidant in many foods; ML should consider exposure from all FA uses; Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of antioxidants in this FC</p>	Indonesia supports to move this additive to sub categories

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							<p>IDF: FC01.1 is a parent category, which includes raw milk where no food additives are allowed. All food additives provisions should be put in subcategories.</p> <p>ELC: Supports Proposal</p> <p>US: Used in the US with the limitation of 0.03% on fat basis. Not used in combination with other antioxidants; Foods in general</p> <p>Canada: Recommend considering provision in each subcategory case-by-case</p>	

Food Category No. 01.1.1 (Fluid milk (plain))

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
AGAR	406	4000		7	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	<p>India: There is no technical justification for use in this FC</p> <p>RF and EU: Supports Discontinuation</p>	Indonesia supports to discontinue
GELLAN GUM	418	GMP		7	Stabilizer, Thickener	Adopt; with Note 227	<p>EU: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer</p> <p>India: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC</p> <p>RF: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of this FA in this FC. Use of this FA in this FC could mislead consumers</p> <p>IFAC: Supports; Like carrageenan,</p>	Indonesia supports the adoption

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							<p>gellan can be used in in UHT plain milks due to its heat stability by formation of structures which reduce problems with age gelation. This renders the UHT product stable despite high heat treatment. We would not object to the inclusion of Note 227.</p> <p>NZ: Used to preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product; Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products.</p> <p>US: For use in foods in general</p> <p>Canada: If agreement is reached that the use of the additive is justified in certain products of this subcategory, recommend adding a note to restrict use to those products.</p>	
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	10000		7	Antifoaming agent, Emulsifier, Stabilizer	Adopt; with Note 227	<p>India: There is no technical justification for use in this FC</p> <p>EU: Does not support and seeks clarification – the phrase “to preserve the nutritional quality and enhance stability by stabilizing the cream, protein and added ingredient phases of the UHT product” is used by NZ to justify all additives in this category. To the EU knowledge milk is a complete stable emulsion of fat and water and apart from phosphates and sodium citrates no other additives are needed in this subcategory</p> <p>RF: Does not agree with 2nd circular proposal because in compliance with</p>	Indonesia supports the adoption

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							<p>Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers</p> <p>IFAC: Mono- and di- glycerides of fatty acids can be used as an emulsifier/anti-fouling agent by reducing surface tension of the milk, which prevents fouling layer build-up and then allows for longer run-times of equipment. (Note 227 should be added. ML=1000 mg/kg)</p> <p>NZ: To preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product. Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products</p> <p>Canada: If agreement is reached that the use of the additive is justified in certain products of this</p>	
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		4	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Adopt; with Note 227	<p>India: Proposal Not Supported; there is no technical justification for use in this FC</p> <p>EU: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer</p> <p>RF: Does not support because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC</p>	Indonesia supports the adoption

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							Use of this FA in this FC could mislead consumers IFAC : Supports Proposal. Like other gums, cellulose gum can be used in in UHT plain milks due to its heat stability. This renders the UHT product stable (prevents separation) despite high temperatures. We would not object to the inclusion of Note 227. NZ : Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products.	

Food Category No. 01.1.3 (Fluid buttermilk (plain))

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
MAGNESIUM HYDROXIDE	528	GMP	261	Adopted (2013)	Acidity regulator, Colour retention agent	Discontinue; no information on technological justification provided	India : Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. RF and EU : Supports Discontinuation	Indonesia supports to discontinue the proposed provision of this additive
OXIDIZED STARCH	1404	GMP		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	India : Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. RF and EU : Supports Discontinuation US : For use in foods in general	Indonesia supports to discontinue the proposed provision of this additive

Additive	INS	Max Level (mg/ka)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
TRISODIUM CITRATE	331 (iii)	GMP	261	Adopted (2013)	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	Adopt; Add Note 261	<p>India: Supports Proposal in 1st circular; Use of additive functions acidity regulator, stabilizer appear to be technologically justified in these food categories.</p> <p>NZ: Used as an aid in the manufacture of UHT products by buffering <i>pH</i> change as an acidity regulator; Add Note 261</p> <p>EU: Supports Proposal in 1st circular; Add Note 261</p>	Indonesia supports the adoption of this additive
XANTHAN GUM	415	3000		7	Emulsifier, Foaming agent, Stabilizer, Thickener	Adopt; Add Note 261	<p>EU: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC</p> <p>India: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories.</p> <p>RF: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers</p> <p>NZ: Used to preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product; Add Note 261. ML of GMP as this is an additive in Table 3</p> <p>US: For use in foods in general</p> <p>Canada: If the consensus of the EWG is to recommend adoption of the provision for the emulsifier/stabilizer/thickener xanthan gum because it is technologically</p>	Indonesia supports the adoption of this additive

Additive	INS	Max Level (mg/ka)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							justified, why is information on technological justification requested for other additives having the same functional classes? Would the "horizontal approach" for the use of E/S/T not be appropriate for FC 01.1.3?	

Food Category No. 01.1.4 (Flavoured fluid milk drinks)

Corresponding commodity standards: 243-2003: Pertains to drinks based on fermented milk. For Flavoured products allows specific Acidity Regulators, Carbonating agents, Colours, Emulsifiers, Flavour enhancers, Packaging Gases, Stabilizers, Sweeteners, and Thickeners. Also lists specific Preservatives for Flavoured products not heat treated after fermentation.

Additive	INS	Max Level (mg/ka)	Notes	Step/ Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
ACESULFAME POTASSIUM	950	350	161 & 188	Adopted (2007)	Flavour enhancer, Sweetener	Retain Adopt	<p>India and Iran: Supports Proposal in 1st circular</p> <p>EU: Supports Adoption</p> <p>NZ and CCC: Replace sweetness of sugar</p> <p>RF: For only energy-reduced products or with no added sugar</p> <p>US: For use in general except meat and poultry</p> <p>Japan: Used as a sweetener in milk-based drinks containing fruits or cocoa and yoghurt drinks containing fruit. The maximum use level is 150 mg/kg. CS243-2003 permits to use this additive at 350 mg/kg as a sweetener. Supports the 2nd Circular Proposal. Acesulfame potassium (INS950) is used not only for energy reduction or sugar replacement but for acidity masking. Acesulfame potassium is used in products less than 25% of energy reduction. The maximum use level is 150 mg/kg.</p> <p>Canada: Request information on whether it would be preferable, from</p>	Indonesia supports to retain the adoption of this additive

Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							the perspective of international trade, to maintain Note 161 or replace it with Note 145.	
ALLURA RED	129	300	52 &	Adopted	Colour	Retain Adopted	RF and Iran: Proposal Not Supported in	Indonesia
AZORUBINE (CARMOISINE)	122	150	52	7	Colour	Adopt	<p>Iran: Proposal Not Supported in 1st circular</p> <p>RF and India: Supports Proposal in 1st circular</p> <p>NZ: As a colour agent to suit customer requirements</p> <p>EU: Supports having further discussion on ML</p> <p>IACM: Supports maintaining at least at current level; use levels reported between 50-300 pm</p> <p>ELC: As a colour agent to suit customer requirements; Supports adoption at 150 mg/kg.</p>	Indonesia proposes ML of 70 ppm
BRILLIANT BLUE FCF	133	150	52	Adopted (2008)	Colour	Adopt	<p>Iran: Proposal Not Supported in 1st circular</p> <p>RF, India and China: Supports Proposal in 1st circular</p> <p>NZ: As a colour agent to suit customer requirements</p> <p>EU: Supports having further discussion on ML</p> <p>IACM: Use levels reported between 100-150 pm</p> <p>ELC: As a colour agent to suit customer requirements; Supports adoption at 150 mg/kg.</p> <p>US: For use in foods in general</p> <p>Canada: Canada allows use in non-standardized flavoured fluid milk beverages at 100 ppm singly or in combination with Fast Green FCF (INS 143).</p> <p>Recommend ML of 100 mg/kg and a new note "Singly or in combination with Fast</p>	Indonesia proposes ML of 70 ppm.

Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							Green FCF (INS 143) ⁷ However, Canada notes that the Codex Standard for fermented milks (CS243) allows 150 mg/kg, without a combination note.	
BROWN HT	155	150	52	7	Colour	Adopt	Iran: Proposal Not Supported in 1st circular RF and India: Supports Proposal in 1st circular NZ and ELC: As a colour agent to suit customer requirements EU: Supports having further discussion on ML IACM: Supports maintaining at least current level; Use levels reported between 50-300 pm	Indonesia proposes ML of 30 ppm.
CARAMEL III - AMMONIA CARAMEL	150c	2000	52	Adopted (2009)	Colour	Adopt	RF, India, IACM, Iran and China: Supports Proposal in 1st circular EU: Supports Adoption NZ: As a colour agent to suit customer requirements ELC: As a colour agent to suit customer requirements; Supports Proposal US: For use in foods in general	Indonesia proposes ML of 150 ppm.
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	2000	52	Adopted (2011)	Colour	Adopt	RF, India, IACM, Iran and China: Supports Proposal in 1st circular EU: Supports Adoption NZ: As a colour agent to suit customer requirements ELC: As a colour agent to suit customer requirements; Supports Proposal US: For use in foods in general	Indonesia proposes ML of 150 ppm.
CARMINES	120	150	52	Adopted (2008)	Colour	Adopt	Iran: Proposal Not Supported in 1st circular RF, India, IACM and China: Supports Proposal in 1st circular EU: Supports Adoption NZ: As a colour agent to suit customer	Indonesia proposes ML of 100 ppm.

Additive	INS	Max Level (mg/ka)	Notes	Step/ Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							requirements NATCOL: Supports Proposal ELC: As a colour agent to suit customer requirements; Supports Proposal US: For use in foods in general	
CAROTENOIDS	160a(i), a(iii),e,f	150	52	Adopted (2009)	Colour	Adopt; New note: For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 100 mg/kg	RF, India, IACM, EU and Iran: Supports Proposal in 1st circular NZ: As a colour agent to suit customer requirements IDF: This food additive is listed at a level of 100 mg/kg in Codex Stan 243. NATCOL: Supports Proposal ELC: As a colour agent to suit customer requirements; Supports Proposal Japan: Used in yoghurt drinks containing fruit juice to adjust colour of the products. The maximum use level is 120 mg/kg. Proposes new note be added to this food additive provision to align the food additive provision of the CS 243-2003 with the relevant provision of the GSFA. New note: For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 100 mg/kg	Indonesia proposes ML of 150 ppm
CHLOROPHYLL S AND CHLOROPHYLL INS, COPPER COMPLEXES	141(i),(ii)	50	52 & 190	Adopted (2009)	Colour	Adopt	RF, India, IACM, EU, Iran and China: Supports Proposal in 1st circular NZ: As a colour agent to suit customer requirements ELC: As a colour agent to suit customer requirements; Supports Proposal NATCOL: Supports Proposal	Indonesia proposes ML of 30 ppm
FAST GREEN FCF	143	100	52	Adopted (2008)	Colour	Adopt	RF and Iran: Proposal Not Supported in 1st circular India, IACM and EU: Supports Proposal in 1st circular NZ:	Indonesia proposes ML of 70 ppm

Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							As a colour agent to suit customer requirements ELC : As a colour agent to suit customer requirements ; Supports Proposal US : For use in foods in general Canada : Recommend adding a new note "Singly or in combination with Brilliant Blue FCF (INS 133)" However, Canada notes that the Codex Standard for fermented milks (CS243) allows 100 mg/kg, without a combination note.	
IRON OXIDES	172(i)-(iii)	20	52	Adopted (2008)	Colour	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 100 mg/kg	RF, India, IACM, EU and Iran : Supports Proposal in 1st circular NZ : As a colour agent to suit customer requirements IDF : This food additive is listed at a level of 100 mg/kg in Codex Stan 243. ELC : Supports Proposal; As a colour agent to suit customer requirements	Indonesia would like to request information regarding the use of this additive
NEOTAME	961	20	161	Adopted (2007)	Flavour enhancer, Sweetener	Adopt	RF : Not Used India, Iran : Supports Proposal NZ and CCC : Replace sweetness of sugar EU : Supports Adoption US : For use in foods in general Canada : Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.	Indonesia proposes ML of 15 ppm

Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
PONCEAU 4R (COCHINEAL RED A)	124	150	52 & 161	Adopted (2008)	Colour	Adopt at 300 ML	<p>India, IACM and China: Supports Proposal</p> <p>EU: Supports having further discussion on ML</p> <p>NZ and ELC: Used as a colour agent to suit customer requirements</p> <p>RF: Suggests ML of 1000 mg/l</p> <p>IACM, ELC: Supports maintaining at least current level; Maximum use level of 300 ppm reported</p>	Indonesia proposes ML of 70 ppm. The use level reported was 5-70 ppm
RIBOFLAVINS	101(i),(ii)	300	52	Adopted (2008)	Colour	Adopt	<p>RF, India, IACM, EU and Iran: Supports Proposal in 1st Circular</p> <p>NATCOL: Generally support the continued use of this category as well as the use level which is sufficient to cover current colour uses in drinks.</p> <p>NZ: Used as a colour agent to suit customer requirements</p> <p>ELC: Supports Proposal; Used as a colour agent to suit customer requirements</p> <p>US: For use in foods in general</p>	Indonesia proposes ML of 150 ppm
SACCHARINS	954(i)-(iv)	80	161	Adopted (2007)	Sweetener	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 100 mg/kg	<p>Iran: Proposal Not Supported in 1st circular</p> <p>India: Supports Proposal in 1st Circular</p> <p>RF: For only energy-reduced products or with no added sugar</p> <p>EU: Supports Adoption</p> <p>NZ and CCC: Replace sweetness of sugar</p> <p>IDF: This food additive is listed at a level of 100 mg/kg in Codex Stan 243. 100 mg/kg”</p> <p>Canada: Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with</p>	Indonesia supports to retain the adopted provision

Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
							Note 145.	
SUCRALOSE (TRICHLOROGA LACTOSUCROS E)	955	300	161	Adopted (2007)	Sweetener	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 400 mg/kg	<p>RF: For only energy-reduced products or with no added sugar EU: Supports Adoption India: Supports Proposal NZ and CCC: Replace sweetness of sugar IDF: This food additive is listed at a level of 400 mg/kg in Codex Stan 243. US: For use in foods in general Japan: Used as a sweetener in drinks based on fermented milk, yoghurt drinks and milk-based drinks with fruit juice. The max level is 200 mg/kg. CS 243-2003 permits to use this additive at 400 mg/kg as a sweetener; Proposes new note be added to align the food additive provision of the CS 243-2003 with the relevant food additive provision of the GSFA. New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 400 mg/kg. Sucralose (INS955) is used not only for energy reduction or sugar replacement but for acidity masking. Sucralose is used in products less than 25% of energy reduction. The maximum use level is 200 mg/kg. Canada: Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.</p>	Indonesia supports to retain the adopted provision

Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal	Indonesia Comment
SUNSET YELLOW FCF	110	300	52	Adopted (2008)	Colour	Adopt	<p>Iran: Proposal Not Supported India, IACM, and China: Supports Proposal EU: Supports having further discussion on ML NZ: Used as a colour agent to suit customer requirements RF: Suggests ML of 5 mg/l IACM: Use levels reported between 50-300 pm ELC: Used as a colour agent to suit customer requirements; Supports adoption at 300 mg/kg. US: For use in foods in general</p>	Indonesia proposes ML of 70 ppm
TARTRAZINE	102	300	52	7	Colour	Adopt	<p>Iran: Proposal Not Supported in 1st circular RF, India, IACM, Malaysia and China: Supports Proposal NZ and ELC: Used as a colour agent to suit customer requirements EU: Supports having further discussion on ML IACM: Use levels reported between 100-300 pm US: For use in foods in general</p>	Indonesia proposes ML of 70 ppm

Kenya

Issue: Appendix 1, Part 1: Draft and Proposed Draft Provisions in Tables 1 and 2 of the GSFA in food categories 01.2 through 08.4, with exceptions listed in paragraph 4

Comment: Kenya supports the eWG group recommendations of moving food additives provisions from the parent food category to the specific food sub category. Further, we support the discontinuation of the various food additives as recommended by the eWG in the appendix. In regard to the use of Tocopherol, Kenya supports exclusion of Tocopherol in food category where there is no technological justification despite its safety not being a major issue.

Issue: Appendix 2, Part 1: Revisions to provisions in Table 2 of the GSFA (Food Category 05.0 and subcategories)

Comments: Kenya agrees will all recommendations of appendix 2 of this agenda item including the added notes to the appendix.

Issue: Appendix 3: Request for information on use levels and technical justification for the use of benzoates in food category 14.1.4 (Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks)

Comment: Kenya support option 3, i.e. “An ML of 250 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and a new note reading except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed.”

Rationale: We appreciate the need to reduce on the use of benzoates in foods, however at use level of 250 mg/kg in lower pH foods and 500 mg/kg in higher pH food do not pose a major safety concern to the population. We note the benefits of the use of benzoates especially where temperature time combination is critical in reducing the risk of microbiological contamination. In addition in condition where GMP may be a challenge or where a product has to remain in market for an extended period of time, the use of benzoate is a viable option.

Issue: Appendix 4, Part 2: Recommendations on Provisions in FC 09.2.5 with Note 22

Comments: Kenya supports the recommendations of the eWG on the various food additive this category

Malaysia

AGENDA ITEM 5a

CX/FA 17/49/7 - General Standard for Food Additives (GSFA): CCFA48 Outstanding Provisions; Provisions for Benzoates in FC 14.1.4; Provisions in FC 5.0 And 5.1; Provisions Associated with Note 22; Provisions in FC 01.1, 01.1.1, 01.1.3 and 01.1.4 (Report of the eWG on the GSFA)

- i. Appendix 1, Part 1: Draft and Proposed Draft Provisions in Tables 1 and 2 of the GSFA in food categories 01.2 through 08.4, with exceptions listed in paragraph 4

Food category	Additive	INS	Max Level (mg/kg)	eWG proposal	Malaysia's Position
1.3.2 Beverage whitener	Tocopherols	307a,b,c	200	Adopted as listed with new Note excluding product conforming to CODEX STAN 250-2006 and CODEX STAN 252-2006	Malaysia supports the eWG proposal
1.4.1 Pasteurised cream (plain)	Nisin	234	12.5	Discuss further. Define what “fresh thickened cream”.	Malaysia supports the propose ML. Nisin is required to preserve the quality and freshness of the thickened cream products.
1.5.1 Milk powder and cream powder (plain)	Tocopherol	307a,b,c	5000	Adopt at 1000	Malaysia supports the eWG proposal
7.2.2 Other fine	Tocopherol	307a,b,c	200	Adopt	Malaysia supports the

bakery products					eWG proposal.
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- ii. Appendix 3: Request for information on use levels and technical justification for the use of benzoates in food category 14.1.4 (Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks)

Option	Malaysia’s Position
<p>Option 3 An ML of 250 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note “Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed.”</p>	<p>Malaysia may consider Option 3 based on estimation for benzoate exposure for Malaysian consumers were below the ADI. We are kindly note that referring to Agenda item (CX/FA 17/49/13), ICBA has also requested JECFA to refine the exposure assessment and review the toxicological studies for Benzoates.</p>

- iii. Appendix 5, Part 2: Provisions in Tables 1 and 2 of the GSFA in food category 01.1.4

Additive	INS	Max Level	EWG proposal	Malaysia’s Position
Nisin	234	12.5	Adopt	Malaysia supports the eWG proposal.

Nicaragua

Tema de Agenda 5 (a): Norma General para los Aditivos Alimentarios (NGAA): disposiciones pendientes de la CCFA48; disposiciones en las categorías de alimentos FC 01.1, 01.1.1, 01.1.3 y 01.1.4 (Informe del GTE sobre la NGAA)

(i) Comentarios generales

CODEX Nicaragua agradece a los participantes del Grupo de Trabajo Electrónico la elaboración del documento y por brindarnos la oportunidad de presentar observaciones. En éste documento, únicamente se abordarán observaciones correspondientes a las disposiciones en las categorías de alimentos FC **01.1, 01.1.1, 01.1.3 y 01.1.4. (apéndice V)**

(ii) Comentarios específicos

Observaciones para la CA 01.1, 01.1.1 y 01.1.3

Nicaragua no considera pertinente la aprobación de aditivos para estas categorías, de conformidad con las disposiciones en el CODEX STAN 192-1995. Se apoya la suspensión de aquellos aditivos que no presentan una justificación tecnológica para su uso.

Observaciones para la CA 01.1.4

Nicaragua apoya las recomendaciones del Grupo de Trabajo Electrónico para los siguientes aditivos:

- Acesulfame potásico
- Alitame
- Rojo allura
- Aspartamo
- Azul brillante FCF
- Cantaxantina
- Caramelo iii - caramelo al amoniacó
- Caramelo iv - caramelo al sulfito amónico
- Carmines
- Clorofilas y clorofilinas, complejos cúpricos
- Ciclamatos
- Dioctil sulfosuccinato de sodio
- Etilmaltol
- Verde sólido FCF
- Alginato de propilenglicol
- Ésteres de propilenglicol de ácidos grasos
- Riboflavinas
- Sucroglicéridos

Nicaragua considera que los siguientes aditivos deben seguir con su trámite de evaluación para determinar su pertinencia y NM, previo a acordar su aprobación o suspensión:

- Advantame
- Azorrubina(carmoisina)
- Amaranto
- Extractos de annato, base de bixina
- Extractos de annato, base de norbixina
- Negro brillante(negro pn)
- Marrón HT
- Caramelo ii - caramelo al sulfito
- Curcumina
- Ésteres diacetiltartá ricos y de los ácidos grasos del glicerol
- Ésteres de luteína de tagetes erecta:
- Maltol
- Nisina
- Ésteres poliglicéridos de ácidos grasos
- Amarillo de quinoleína
- Ésteres de sorbitán de ácidos grasos
- Lactilatos de sodio
- Ésteres de ácidos grasos y sacarosa
- Tartrazina
- Zeaxantina sintética

Nicaragua considera que los NM deben ser congruentes con los indicados en la NGAA, por lo tanto no apoya su modificación para los siguientes aditivos:

- Carotenos,beta,vegetales
- Carotenoides
- Extracto de piel de uva
- Indigotina (carmín de índigo)
- Óxidos de hierro
- Fosfatos
- Polisorbatos
- Ponceau 4r (rojo de cochinilla A)
- Sacarinas
- Sorbatos
- Sucralosa (triclorogalactosacarosa)
- Amarillo ocaso FCF

Silicato de aluminio y sodio: La NGAA incluye disposiciones para este aditivo, por lo tanto la recomendación del GTE no se considera pertinente.

Tocoferoles: En congruencia con los principios de la NGAA, este aditivo no debe ser aprobado dado que no se ha demostrado justificación tecnológica para su uso en esta categoría.

Paraguay

English

In relation to the information provided in Appendix 3 and the request for information on levels of use and technical justification for the use of benzoates in the food category 14.1.4 (Flavored water drinks including sports drinks, electrolytic beverages and beverages with added particles), the Technical Committee in Paraguay has studied the recommendations established by the eWG and the three options for the use of benzoates in foods of the category mentioned.

Paraguay supports the dose indicated in Option 3 ("An ML of 250 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note "Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed."), as the recommended one for the additive to fulfill its technological function, without affecting the health of consumers, and in accordance with JECFA report.

Spanish

Paraguay agradece al Grupo de Trabajo Electrónico por la preparación del documento y el esfuerzo conjunto para coordinar actividades y elaborar el informe.

Observaciones generales

En relación a la información proporcionada en el Apéndice 3 y la petición de información sobre los niveles de uso y la justificación técnica para el uso de benzoatos en la categoría de alimentos 14.1.4 (Bebidas a

base de agua aromatizadas, incluidas las bebidas para deportistas, bebidas electrolíticas y bebidas con partículas añadidas), el Comité Técnico en Paraguay ha estudiado las recomendaciones establecidas por el GTe y las 3 (tres) opciones para el uso de benzoatos en alimentos de la categoría mencionada.

Paraguay apoya la dosis indicada en la opción 3 ("Un NM de 250 mg/kg para los benzoatos (SIN 210-213) en la categoría de alimentos 14.1.4 con la Nota 13 (como ácido benzoico) y la nueva nota 'Excepto para uso en bebidas con un pH superior a 3,5 y concentrados, a 500 mg/kg como se consumen'"), como la recomendable para que el aditivo cumpla con su función tecnológica, sin afectar la salud de los consumidores, en concordancia con el reporte del JECFA.

Republic of Korea

Appendix 5 "Request to consider the appropriateness of the food additive provisions in the renamed food categories 01.1, 01.1.1, 01.1.3 and 01.1.4"

The Republic of Korea does not support to consider food additives provisions in food category 01.1.1 "fluid milk (plain)" and 01.1.3 "fluid butter milk (plain)". There is no technical justification for use in these food categories. The Republic of Korea does not permit food additives in fluid milk (plain) corresponding to FC 01.1.1 and fluid butter milk (plain) corresponding to FC 01.1.3.

Russian Federation

1. General Standard For Food Additives (GSFA): CCFA48 outstanding provisions

Appendix 1: Request for information and justification on draft and proposed draft food additive provisions: a) in FC 01.2 through 08.4 held at the CCFA48; and b) in food categories 5.0 and 5.1 and related subcategories

1.1) Principles nominating additives for "unprocessed food product" and "plain products"

According to the legislation of the Russian Federation and the Eurasian Economic Union (Belarus, Kazakhstan, Russia, Armenia, Kyrgyzstan), restrictions have been imposed on the use of food additives in the production of certain types of food products. Food additives (other than colours and sweeteners) may be used in all food categories except unprocessed food products, or in products with a simple matrix – plain products (honey, wine, animal fats, cow's milk butter, pasteurized and sterilized milk and cream, natural mineral water, coffee (other than soluble flavored) and coffee extracts, un-flavored leaf tea, sugars, dry pasta (except gluten-free and low-protein), natural, non-flavored buttermilk (except sterilized)).

An unprocessed food product is a product not subjected to any treatment that leads to significant changes in its initial state and composition; such product could be purified, portioned, packaged and/or frozen.

A limited number of food additives is used in the following food categories:

- Unprocessed fish, crustaceans and molluscs, including frozen and frozen buttered fish;
- Meat whole, chopped, ground, including frozen meat, blood and offal;
- Raw milk, raw skim milk, cream raw, powdered milk; mature and whey cheeses; non-flavored fermented products from milk and cream;
- Beekeeping products;
- Eggs;
- Products derived from cocoa and chocolate;
- Fruits and vegetables, unprocessed, including frozen, ready-to-eat, chilled packed, peeled;
- Fruit and vegetable juices, nectars;
- Non-emulsified vegetable and animal oils and fats;
- Bread;
- Pasta.

Similar requirements for the use of food additives are given in the EU Regulation No. 1333/2008 on the food additives.

The use of food additives should meet two basic requirements: not to increase the degree of risk of possible adverse effect of food products on human health, and not to mislead the consumers regarding properties of food products.

The Russian Federation believes that a number of proposals on the use of food additives in a) in FC 01.2 through 08.4 held at the CCFA48; and b) in food categories 5.0 and 5.1 and related subcategories are violated, as the main standard for food additives Codex Stan 192-1995 lacks definitions "unprocessed food" and "plain product."

For example, the use of Emulsifier, Stabilizer, Thickener in beverages as fruit and vegetable juices, milk (plain) is, in our point of view, a direct violation of this norm. In addition, the introduction of food additives in juices and milk (plain) adversely affected on their organoleptic properties and nutrition qualities. In our view, the GSFA Codex STAN 192-1995 lacks definitions "unprocessed food" and "plain product", and we propose that a new eWG is established to resolve the issue and work on the following tasks:

1. Developing definitions for unprocessed food and plain food;
2. Defining principles nominating additives for unprocessed and plain foods.

1.2) Position of the Russian Federation on proposals for the use of a preservative - nisin (INS 234).

Preservative nisin (INS 234) is an antibiotic. Therefore, an additional assessment of the risks of this food additive should be made with a view to its removal from the GSFA Codex STAN 192-1995 (see our comments on Agenda 7).

1.3) Position of the Russian Federation on establishing MLs for nitrates (INS 251, 252) and nitrites (INS 249, 250) in various food categories.

According to the risk assessment performed by the Russian Federation, an ML for nitrates (INS 251, INS 252) was established at 250 ppm in sausages, cured, cooked, smoked, canned meat products. An ML for nitrites added individually or in combination to sausages, smoked, cured, air-cured, cooked meat products was set at 50 ppm (expressed as NaNO₂). (see comments on Agenda 5e)

1.4) Propylene glycol (INS 1520)

The Russian Federation believes that proposals on the use of Propylene glycol (INS 1520) in different food categories at the ML 6,000 – 50,000 mg/kg are unacceptable. The proposals concerning using of INS 1520 in foods with the ML of 240,000 mg/kg seem unjustified.

The ADI for Propylene glycol (INS1520) is set in the range of 0 – 25 mg/kg bw.

If the ML of 240,000 mg/kg was accepted, a daily intake of this food additive (calculated for one food category and portion size of 200 g) would exceed the ADI by 32 times. According to the WHO monograph (SERIES NO. 5, 1974), such a dose consumed by different animals can lead to serious pathologies in health and, in most cases, to death within weeks. Also, it is not clear to which food category food products having ¼ part of food additives – propilenglycole could belong? Only nutrients can be presented in such quantities in finish foods.

If the ML is set at 50,000 mg/kg, the ADI will be exceeded by 6.6 times.

Therefore, in these amounts, propylene glycol (INS 1520) could only be used as a function carrier. Our proposal is to establish an ML for solid ready-to-eat food at 3,000 mg/kg and for beverages – at 1,000 mg/l. These values are established in the Russian Federation, the Eurasian Economic Union (Belarus, Kazakhstan, Russia, Armenia, Kyrgyzstan) and the European Union.

1.5) The position regarding the proposals for the use of tocopherols (INS 307a, b,c) in various food categories is set out in the comments on Agenda Item 5c

2. Information on use levels and technical justification for the use of benzoates in food category 14.1.4 (Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks)

In the Russian Federation and the Eurasian Economic Union, the following levels have been established for benzoates (INS 210-213) for the use in non-alcoholic flavored beverages (water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks):

INS 210 Benzoic acid	Non-alcoholic flavored beverages, ML =150 ppm
INS 211 Sodium benzoate	
INS 212 Potassium benzoate	
INS 213 Calcium benzoate	
Note 13 (As benzoic acid)	

This level has been technically justified, and it ensures the microbiological safety of beverages during their shelf life.

The Russian Federation considers appropriate to support the Option 1:

An ML of 150 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid).

United States of America

English

This comment responds to Agenda Item 5(a), and in particular, Appendix 3 (Benzoates) of CX/FA 17/49/7 (December 2016). The United States appreciates the opportunity to provide the following comments for consideration at the forthcoming 49th Session of the Codex Committee on Food Additives (CCFA).

Comments on Appendix 3: Request for information on use levels and technical justification for the use of benzoates in food category 14.1.4 (Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks)

The United States of America (USA) supports Option 3 as listed under para. 17 of Appendix 3 of CX/FA 17/49/7:

Option 3: An ML of 250 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note “Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed.”

The USA believes that the use of benzoates in beverages in Food Category (FC) 14.1.4 as described in Option 3 is safe and suitable. We note that the maximum level (ML) of 250 mg/kg for benzoates put forward in Option 3 represents a 60% reduction from the 600 mg/kg use level that had been adopted in FC 14.1.4 in the General Standard for Food Additives (GSFA) for many years.

Benzoates help to maintain the quality, stability, and integrity of beverages included in FC 14.1.4. They are the preferred preservative in soft drinks due to their low toxicity, good solubility, lack of color, mild flavor, and effectiveness against yeast, molds, and common soft drink spoilage bacteria, . Alternatives to benzoates, such as sorbates, are less effective as antimicrobials in beverages, and can present manufacturing and operational problems due to their lower solubility when compared to benzoates.

In support of our belief that the benzoate MLs put forward in Option 3 for FC 14.1.4 are safe, the USA has performed an exposure estimate for USA consumers of carbonated beverages incorporating the MLs indicated in Option 3. Carbonated beverages represent the largest market share of benzoate-containing beverages included in FC 14.1.4. We note that the USA as a country (and North America as a region) has been reported to have one of the highest (if not the highest) consumption of sugar containing and low calorie carbonated beverages in the world.³ Thus, benzoate exposure estimates based on dietary intake data for beverages from FC 14.1.4 in the USA would be expected to be higher than exposure estimates based on dietary intake data from most other countries.

Our estimate incorporated 10-14 day food consumption data for the USA population from NPD’s 2009-12 Nutrient Intake Database and National Eating Trends (NET-NID) survey coupled with portion sizes from the two day dietary intake portion of the 2009-2012 National Health and Nutrition Examination Survey (NHANES).

Our exposure estimate presumed the following:

1. All carbonated beverages included under FC 14.1.4 will contain benzoates. This is a conservative assumption because not all beverages covered under FC 14.1.4 will contain benzoates.
2. All carbonated beverages included under FC 14.1.4 will contain benzoates at a level of 250 mg/kg (except for root beers and cream sodas, which have a pH greater than 3.5, and were presumed to contain benzoates at a level of 500 mg/kg). These are conservative assumptions because the benzoate level needed in a benzoate-containing beverage included under FC 14.1.4 is specific to individual products, and not all beverages included under FC 14.1.4 will require a ML of 250 mg/kg (or 500 mg/kg for root beers and cream sodas).

Table 1. Benzoate exposure estimate for the population of the USA based on presumption of Option 3 MLs in FC 14.1.4 using 10-14 day NPD NET-NID data coupled with NHANES portion sizes. The JECFA ADI for benzoates is 0-5 mg/kg bw/d.

USA Population Group	Percentage of US Population Who Consume Carbonated Beverages	Average Benzoate Dietary Exposure (mg/kg bw/d)	90 th Percentile Benzoate Dietary Exposure (mg/kg bw/d)	95 th Percentile Benzoate Dietary Exposure (mg/kg bw/d)

³ Popkin, BM; Hawkes, C. “Sweetening of the global diet, particularly beverages: patterns, trends, and policy responses.” *Lancet Diabetes Endocrinol* 2016; 4: 174-186.

Children 1-7 Years of Age	56%	1.1	2.6	3.5
Children 8-17 Years of Age	79%	1.1	2.4	3.0
Adults 18 Years and Above	75%	1.0	2.4	3.1

Based on the conservative exposure estimate presented in Table 1, the USA concludes that there is no safety concern from the use of benzoates in FC 14.1.4 using the MLs outlined in Option 3 of (Appendix 3 of CX/FA 17/49/7). As noted above, the USA represents a country that has one of, if not the highest, consumption of carbonated beverages covered under FC 14.1.4. Therefore, it is reasonable that exposure to benzoates from consumption of carbonated beverages that is modeled on USA dietary intake represents an upper threshold for benzoate intake in FC 14.1.4.

French

Les observations ci-dessous concernent le point 5(a) de l'ordre du jour, et plus particulièrement l'Annexe 3 (Benzoates) du document CX/FA 17/49/7 (décembre 2016). Les États-Unis apprécient l'opportunité qui leur est offerte de fournir les observations suivantes pour examen lors de la quarante-neuvième session du Comité du Codex sur les additifs alimentaires (CCFA).

Observations sur l'Annexe 3 : Demande d'informations sur les niveaux d'emploi et la justification technique pour l'emploi des benzoates dans la catégorie d'aliments 14.1.4 (Boissons aromatisées à base d'eau, y compris les boissons pour sportifs et les boissons « énergétiques » ou « électrolytes », et les boissons concentrées)

Les États-Unis d'Amérique appuient l'option 3 telle qu'indiquée au paragraphe 17 de l'Annexe 3 du document CX/FA 17/49/7 :

Option 3 : Une LM de 250 mg/kg pour les benzoates (SIN 210-213) dans la catégorie d'aliments 14.1.4 avec la note 13 (En tant qu'acide benzoïque) et la nouvelle note « À l'exception de l'emploi dans les boissons ayant un pH supérieur à 3,5 et les concentrés à 500 mg/kg tel que consommé. »

Les États-Unis sont d'avis que l'emploi de benzoates dans les boissons figurant dans la catégorie d'aliments 14.1.4 tel que décrit dans l'option 3 est sans danger et propre à la consommation humaine. Nous remarquons que la limite maximale (LM) de 250 mg/kg pour les benzoates présentée dans l'option 3 représente une réduction de 60 % par rapport à la limite d'emploi de 600 mg/kg adoptée pour la catégorie d'aliments 14.1.4 dans la Norme générale pour les additifs alimentaires (NGAA) depuis de nombreuses années.

Les benzoates aident au maintien de la qualité, de la stabilité et de l'intégrité des boissons figurant dans la catégorie d'aliments 14.1.4. Ils constituent le conservateur le plus utilisé pour les boissons non alcoolisées en raison de leur faible toxicité, de leur bonne solubilité, de leur absence de couleur, de leur goût léger et de leur efficacité contre les levures, les moisissures et les bactéries courantes responsables de la détérioration dans ce type de boissons. Les solutions alternatives aux benzoates, comme les sorbates, sont moins efficaces en tant qu'antimicrobiens dans les boissons et peuvent présenter des problèmes de fabrication et de fonctionnement parce qu'elles sont moins solubles que les benzoates.

Pour étayer la revendication de sécurité sanitaire des LM pour les benzoates pour la catégorie d'aliments 14.1.4 présentée dans l'option 3, les États-Unis ont effectué une estimation de l'exposition pour les consommateurs de boissons gazeuses aux États-Unis avec les LM présentées dans l'option 3. Les boissons gazeuses représentent en effet la plus grande part de marché des boissons contenant des benzoates figurant dans la catégorie d'aliments 14.1.4. Remarquons que les États-Unis en tant que pays (et la région Amérique du Nord en général) sont censés présenter l'une des plus fortes consommations de boissons gazeuses sucrées et faiblement caloriques au monde (sinon *la* plus forte).⁴ Par conséquent, les estimations de l'exposition aux benzoates basées sur les données d'ingestion pour les boissons de la catégorie d'aliments 14.1.4 aux États-Unis devraient être plus élevées que celles basées sur les données d'autres pays.

Notre estimation comprenait des données de consommation d'aliments sur 10 à 14 jours pour la population des États-Unis issues de l'étude de la base de données sur la consommation de nutriments et des tendances alimentaires nationales (NET-NID) du NPD pour 2009-2012, associées aux tailles de portions de

⁴ Popkin, BM; Hawkes, C. «Sweetening of the global diet, particularly beverages: patterns, trends, and policy responses.» *Lancet Diabetes Endocrinol* 2016; 4: 174-186.

la consommation alimentaire sur deux jours de l'étude nationale 2009-2012 sur l'examen de la santé et de la nutrition (NHANES).

Notre estimation de l'exposition partait des hypothèses suivantes :

1. Toutes les boissons gazeuses figurant dans la catégorie d'aliments 14.1.4 contiennent des benzoates. Il s'agit là d'une hypothèse prudente, car toutes les boissons figurant dans cette catégorie d'aliments n'en contiennent pas.
2. Toutes les boissons gazeuses figurant dans la catégorie d'aliments 14.1.4 contiennent des benzoates à une limite de 250 mg/kg (sauf les boissons obtenues à partir de racines de plantes comestibles ou « racinettes », et les sodas crème ou mousse, qui ont un pH supérieur à 3,5 et dont on présume qu'ils ont une limite de benzoates de 500 mg/kg). Ce sont là des hypothèses prudentes car le niveau de benzoates nécessaire dans une boisson contenant des benzoates figurant dans la catégorie d'aliments 14.1.4 est spécifique aux produits individuels, et toutes les boissons dans cette catégorie n'exigent pas une LM de 250 mg/kg (ou de 500 mg/kg pour les boissons obtenues à partir de racines de plantes comestibles ou « racinettes », et les sodas crème ou mousse).

Tableau 1. Estimation de l'exposition aux benzoates pour la population des États-Unis basée sur l'hypothèse des LM de l'option 3 pour la catégorie d'aliments 14.1.4 avec les données NET-NID du NPD sur 10 à 14 jours, associées aux tailles de portions de l'étude NHANES. La DJA déterminée par le JECFA pour les benzoates est de 0-5 mg/kg p.c./jour.

Groupe de la population des États-Unis	Pourcentage de la population des États-Unis consommant des boissons gazeuses	Exposition alimentaire moyenne aux benzoates (mg/kg p.c./jour)	Exposition alimentaire aux benzoates du 90 ^e centile (mg/kg p.c./jour)	Exposition alimentaire aux benzoates du 95 ^e centile (mg/kg p.c./jour)
Enfant de 1 à 7 ans	56 %	1,1	2,6	3,5
Enfant de 8 à 17 ans	79 %	1,1	2,4	3,0
Adultes de 18 ans et plus	75 %	1,0	2,4	3,1

Sur la base de l'estimation prudente de l'exposition présentée au Tableau 1, les États-Unis concluent qu'il n'y a pas lieu d'avoir de préoccupations de sécurité sanitaire dues à l'emploi de benzoates dans la catégorie d'aliments 14.1.4 avec les LM présentées dans l'option 3 de l'Annexe 3 du document CF/FA 17/49/7. Comme indiqué ci-dessus, les États-Unis sont l'un des pays ayant l'une des consommations les plus élevées de boissons gazeuses figurant dans la catégorie d'aliments 14.1.4, sinon la plus élevée. Par conséquent, il est raisonnable de penser que l'exposition aux benzoates due à la consommation de boissons gazeuses selon la consommation alimentaire aux États-Unis représente un plafond pour l'ingestion de benzoates pour la catégorie d'aliments 14.1.4.

Spanish

Las presentes observaciones se refieren al tema 5a) del programa, concretamente al apéndice 3 (benzoatos) del documento CX/FA 17/49/7 (diciembre de 2016). Estados Unidos de América agradece la oportunidad de formular las siguientes observaciones para su examen durante la 49.^a reunión del Comité del Codex sobre Aditivos Alimentarios (CCFA), próxima a celebrarse.

Observaciones sobre el apéndice 3: Petición de información sobre los niveles de uso y la justificación técnica para el uso de benzoatos en la categoría de alimentos 14.1.4 (bebidas a base de agua aromatizadas, incluidas las bebidas para deportistas, bebidas electrolíticas y bebidas con partículas añadidas)

Estados Unidos de América (EE.UU.) respalda la opción 3 que figura en el párr. 17 del apéndice 3 de CX/FA 17/49/7:

Opción 3: Un NM de 250 mg/kg para los benzoatos (SIN 210-213) en la categoría de alimentos 14.1.4 con la nota 13 (como ácido benzoico) y la nueva nota "Excepto para uso en bebidas con un pH superior a 3,5 y concentrados, a 500 mg/kg como se consumen".

EE.UU. opina que el uso de benzoatos en las bebidas pertenecientes a la categoría de alimentos 14.1.4, tal como se describe en la opción 3, es inocuo e idóneo. Observamos que el nivel máximo (NM) de 250 mg/kg

para los benzoatos que se propone en la opción 3 supone una reducción del 60% con respecto al nivel de uso de 600 mg/kg, que se había adoptado durante muchos años para la categoría de alimentos 14.1.4 en la Norma General del Codex para los Aditivos Alimentarios (NGAA).

Los benzoatos contribuyen a mantener la calidad, la estabilidad y la integridad de las bebidas que pertenecen a la categoría de alimentos 14.1.4. Son el conservante preferido para los refrescos debido a su baja toxicidad, buena solubilidad, falta de color, sabor suave y eficacia contra las levaduras, los mohos y las bacterias comunes que producen deterioro en los refrescos. Las alternativas a los benzoatos, como los sorbatos, son menos eficaces como antimicrobianos en las bebidas y pueden plantear problemas de fabricación y operativos debido a su menor solubilidad en comparación con los benzoatos.

Para respaldar nuestra opinión sobre la inocuidad de los NM de benzoato para la categoría de alimentos 14.1.4 propuestos en la opción 3, EE.UU. llevó a cabo una estimación de la exposición de los consumidores estadounidenses de bebidas carbonatadas incorporando los NM que se indican en la opción 3. Las bebidas carbonatadas representan la mayor cuota de mercado de las bebidas que contienen benzoato de la categoría de alimentos 14.1.4. Queremos señalar que EE.UU. como país —y América del Norte como región— presenta uno de los consumos más elevados, si no el más elevado del mundo, de bebidas carbonatadas azucaradas y de bebidas carbonatadas bajas en calorías.⁵ Así, cabría esperar que las estimaciones de exposición a los benzoatos basadas en los datos de la ingesta alimentaria para las bebidas de la categoría de alimentos 14.1.4 en EE.UU. sean más elevadas que las estimaciones de exposición basadas en los datos de la ingesta alimentaria de la mayoría de los demás países.

Nuestras estimaciones han incorporado datos relativos al consumo de alimentos durante 10-14 días para la población estadounidense, tomados de la encuesta Nutrient Intake Database and National Eating Trends (NET-NID) de 2009-12 realizada por NPD, junto con los datos de los tamaños de las porciones de la porción de ingesta alimentaria de dos días de la National Health and Nutrition Examination Survey (NHANES) 2009-2012.

Nuestra estimación de exposición partió de los siguientes supuestos:

1. Todas las bebidas carbonatadas incluidas en la categoría de alimentos 14.1.4 contienen benzoatos. Se trata de un supuesto conservador, ya que no todas las bebidas de la categoría de alimentos 14.1.4 contienen benzoatos.
2. Todas las bebidas carbonatadas de la categoría de alimentos 14.1.4 contienen un nivel de benzoatos de 250 mg/kg (salvo las bebidas refrescantes a base de raíces y las gaseosas de vainilla o *cream sodas*, cuyo pH es superior a 3,5 y para las que se supuso un contenido de benzoatos es de 500 mg/kg). Se trata de supuestos conservadores, ya que el nivel de benzoato necesario en una bebida de la categoría de alimentos 14.1.4 que contiene benzoato es diferente para cada producto concreto, y no todas las bebidas de la categoría de alimentos 14.1.4 requieren un NM de 250 mg/kg (o de 500 mg/kg para las bebidas refrescantes a base de raíces y las gaseosas de vainilla).

Cuadro 1. Estimación de exposición al benzoato de la población estadounidense, basada en la presunción señalada en la opción 3 de NM en la categoría de alimentos 14.1.4, utilizando los datos NET-NID de NPD para 10-14 días junto con los tamaños de las porciones NHANES. La IDA del JECFA para los benzoatos es de 0-5 mg/kg pc/d.

Grupo de población EE.UU.	Porcentaje de población de EE.UU. que consume bebidas carbonatadas	Promedio de la exposición alimentaria al benzoato (mg/kg pc/d)	90.º percentil de exposición alimentaria al benzoato (mg/kg pc/d)	95.º percentil de exposición alimentaria al benzoato (mg/kg pc/d)
Niños entre 1 y 7 años	56%	1,1	2,6	3,5
Niños entre 8 y 17 años	79%	1,1	2,4	3,0
Adultos de 18 o más años	75%	1,0	2,4	3,1

⁵ Popkin, BM; Hawkes, C. "Sweetening of the global diet, particularly beverages: patterns, trends, and policy responses." *Lancet Diabetes Endocrinol* 2016; 4: 174-186.

A partir de la estimación conservadora de exposición presentada en el cuadro 1, EE.UU. concluye que el uso de benzoatos en la categoría de alimentos 14.1.4 utilizando los NM señalados en la opción 3 del apéndice 3 de CX/FA 17/49/7 no plantea ningún problema de inocuidad. Como ya se ha indicado, EE.UU. es un país que presenta, si no el más elevado, uno de los más elevados niveles de consumo de bebidas carbonatadas de la categoría de alimentos 14.1.4. Por tanto, es razonable afirmar que la exposición a los benzoatos por el consumo de bebidas carbonatadas según el modelo basado en la ingesta alimentaria de EE.UU. representa un umbral superior para la ingesta de benzoato en la categoría de alimentos 14.1.4.

African Union

A. CCFA48 Outstanding Provisions; Provisions For Benzoates In FC 14.1.4

Issue: CCFA48 lowered the maximum level (ML) for the food additive group Benzoates for use as a preservative in food category 14.1.4 (Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks) from 600 mg/kg (with Note 123 “Except for use in beverages with pH greater than 3.5 at 1000 mg/kg), to 250 mg/kg and removed Note 123.

The Chair of the EWG recommends that CCFA49 consider the following three options that cover the range of MLs considered by the EWG for the use of benzoates in food category 14.1.4.

- **Option 1:** An ML of **150 mg/kg** for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid).
- **Option 2** An ML of **200 mg/kg** for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note “Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed.
- **Option 3** An ML of **250 mg/kg** for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note “Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed.

Position: AU support option 3, and ML of 250 mg/kg.

Rationale: JECFA performed exposure estimates for benzoates in non-alcoholic soft beverages (which JECFA indicated corresponds to GSFA food category 14.1). None of the population groups included in the estimate exceeded the ADI for consumers-only exposure at the mean value. However, at the 95th percentile for consumers-only, two population groups were reported to have exposure ranges that exceeded the ADI: 1) toddlers and young children (1-7 years) at 1.7-10.9 mg/kg body weight; and 2) other children, including adolescents (8-17 years) at 0.5-7.0 mg/kg body weight.

A benzoate use level of 250 mg/kg is required in beverages falling under food category 14.1.4 to prevent microbiological spoilage during the shelf life of the beverage. The adoption of a use level below 250 mg/kg would result in significant market disruption and negative impact on the safety of the product. In the event of new data being available, JECFA should consider the evaluation of this level.

B. CCFA48 Outstanding Provisions; Provisions Associated With Note 22 In The Non-Standardized Food As Defined In Section 1 Of The Standard For Smoked Fish, Smoke-Flavoured Fish And Smoke Dried Fish (Codex Stan 311-2015)

Issue: At the time that CODEX STAN 311-2013 was adopted there were already multiple adopted provisions in the GSFA in FC 09.2.5. A number of those adopted provisions were associated with

Note 22, which read “*For use in smoked fish products only*”. When forwarding CODEX STAN

311-2013 to the CAC for adoption the 32nd Codex Committee on Fish and Fishery Products

(CCFFP) noted that there were adopted provisions in FC 09.2.5 of the GSFA for food additives that were not technologically justified in products covered by CODEX STAN 311-2013.4.

Therefore the CCFFP requested the CCFA to associate a note with the relevant provisions in FC 09.2.5 of the GSFA to specify that these additives were not allowed in the products covered by CODEX STAN 311-2013.5.

The EWG of CCF47 proposed that Note 22 be revised to read “*For use in non-standardized smoked fish products only*.” The EWG also proposed that adopted provisions in FC 09.2.5 with Note 22 be revised to also include a new note, Note XS 311 “*Excluding products conforming to the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013)*.” The EWG proposed that the combination of these two notes in a GSFA provision indicates that the additive may not be used in standardized smoked fish products (Note XS311) but may be used in non-standardized smoked fish products (Note 22).

Position: AU recommends the retention of the new note 22, “For use in non-standardized smoked fish products only.”

Rationale: Section 1 of CODEX STAN 311-2015, as well as the descriptor of FC 09.2.5 provides indications as to the type of smoked-fish products that may qualify as non-standardized products as defined in Section 1 of CODEX STAN 311-2015.

C. CCFA48 Outstanding Provisions; Request To Consider The Appropriateness Of The Food Additive Provisions (Adopted And In The Step Process) In The Renamed Food Categories 01.1, 01.1.1, 01.1.3 And 01.1.4

Issue: The PWG on the GSFA to CCFA45 noted inconsistencies between provisions for the technologically justified use of food additives in FC 01.1.1 and its subcategories, and the definitions of corresponding foods and the use of food additives in those foods as defined in CODEX STAN 206-1999. The CCFA48 noted that there are no provisions for the use of food additives in the new FC 01.1.2 as the scope of the new FC 01.1.2 did not correspond to the scope of a historical FC. CCFA48 requested that proposals for inclusion of food additive provisions in the new food category 01.1.2 “Other fluid milks (plain)” should be submitted for new and/or revision of adopted food additive provisions in this food category.

The EWG has presented the provisions explaining the movement of food additives from historical FC 01.1 and its sub-categories to the corresponding revised food categories.

Position: AU supports the proposal of the EWG.

Rationale: This proposal is necessary to remove the inconsistencies in this food category.

D. Other CCFA48 outstanding provisions;

Issue 1: The eWG proposed provisions in tables 1 and 2 of the GSFA in food categories 01.2 through 08.4. Nisin (FC 01.4.1, 01.4.2, 01.4.4) and Tocopherols (01.4, 01.4.1, 01.4.2, 01.4.4, 01.5.2, 01.6.6 and 05.1.1) are up for further discussion.

Position: AU does not support removal of nisin and tocopherols.

Rationale: Nisin is important in suppressing gram-positive spoilage and pathogenic bacteria in food. The warm climatic conditions in Africa promote rapid microbial growth and rancidity therefore these preservatives and anti-oxidants are needed for food preservation.

Issue 2: Appendix 2, Part 1: Revisions to provisions in Table 2 of the GSFA (Food Category 05.0 and subcategories)

Issue 3: Specific proposals in CX/FA 17/49/7: Food Category No. 05.1.4 (Cocoa and chocolate products) Corresponding commodity standard CS 87-1981 refers to acidity regulators, antioxidants, bulking agents, colours, emulsifiers, glazing agents, and sweeteners listed in GSFA FC 05.1.4. These additives are alitame, aspartame, butylated hydroxyanisole(BHA), butylated hydroxytoluene(BHT) and carnauba wax.

Position: AU supports the two proposals listed above.

Rationale: There are adopted provisions in GSFA food category 05.1.4 that were not aligned with CODEX STAN 87-1981, for which their use was not permitted in the standardized food category. These GSFA provisions were omitted from CX/FA 16/48/6 as an oversight. Therefore, to complete the alignment between CODEX STAN 87-1981 and the GSFA, the recommendations for the alignment of these adopted GSFA provisions are included.

International Council of Grocery Manufacturers Associations (ICGMA)

This proposal is made under **Agenda Item 5a General Standard for Food Additives (GSFA): CCFA48 outstanding provisions; provisions for benzoates in FC 14.1.4; provisions in FC 5.0 and 5.1; provisions associated with Note 22; provisions in FC 01.1, 01.1.1, 01.1.3 and 01.1.4 (Report of the EWG on the GSFA).** We would like to propose **Ethyl Maltol (INS 637)** in **Food Category 05.2 Confectionery** including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4 and **Food Category 05.3 Chewing gum** at **1000 mg/kg**.

FORM FOR THE SUBMISSION OF PROPOSALS FOR NEW AND/OR REVISION OF ADOPTED FOOD ADDITIVE PROVISIONS IN THE GSFA

In completing this form, only brief information is required. However, responsive information is required for each field. The form may be retyped if more space is needed under any one heading provided that the general format is maintained. A separate table should be completed for each food additive.

THE PROPOSAL IS SUBMITTED BY:		ICGMA	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Ethyl Maltol	
INS Number		637	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Flavor Enhancer	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input checked="" type="checkbox"/> revising an existing provision or <input type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4	1000 mg/kg	
05.3	Chewing gum	1000 mg/kg	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 2005 ADI: 0-2 mg/kg bw (1974) Meeting: 18 Specs Code: S Specifications monograph: FAO JECFA Monographs 4- JECFA 68/ . R (2007)	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		Ethyl maltol (INS 637) is used as a flavor enhancer to provide added appeal to fruit flavors. It improves the taste characteristics by mellowing harshness, enhancing sweetness and masking bitterness and any undesirable after-taste. The richness of the flavor is increased, while a smooth and mellow quality is produced. The use of ethyl maltol (INS 637) in fruit flavors, especially strawberry, provides a more creamy taste and a more natural fruit-type character. Ethyl maltol (INS 637) enhances also the sweetness, thereby reducing the need for sugar or other sweeteners. Ethyl maltol (INS 637) is needed at higher levels in chewing gum than in other confectionery products, since about 50% to 80% of the ethyl maltol (INS 637) remains in the gum after chewing. As such, sufficient amounts of ethyl maltol are required to provide continued enhancement to the flavors while chewing. When ethyl maltol (INS 637) and maltol (INS 636) are used together in strawberry or raspberry flavors, it takes more ethyl maltol (INS 637) than maltol (INS 636) to obtain the desired effect, while maltol (INS 636) functions as a booster. Overall, Ethyl maltol (INS 637) is technologically needed at 1000 mg/kg in 05.2 Confectionery including hard and soft candy, nougats,	

	etc. other than food categories 05.1, 05.3, and 05.4 and 05.3 Chewing gum.
Safe use of additive: Dietary intake assessment (<i>as appropriate</i>)	Table 3 additive: <input type="checkbox"/> Yes
	<input checked="" type="checkbox"/> No (Please provide information on dietary intake assessment below) JECFA allocated an ADI of 0-2 mg/kg b.w./day for ethyl maltol (INS 637). Consumption of 10 grams of candy and chewing gum containing 1000 mg/kg of ethyl maltol (INS 637) by a 60 kg adult would result in the possible ingestion of only 0.17 mg/kg bw/day ethyl maltol (INS 637), i.e. only 8 % of the ADI. It is also known that for chewing gum, a significant part of ethyl maltol (INS 637) will not be ingested because it remains in the gum cud after chewing. Therefore, exposure estimate of 8% of the ADI is a worst case scenario (i.e. very conservative and overestimating the real dietary exposure due to chewing gum).
Justification that the use does not mislead consumer	The use of ethyl maltol (INS 637) at a level 1000 mg/kg in 05.2 Confectionery including hard and soft candy, nougats, etc and 05.3 Chewing gum is technically justified and safe, based on the technical needs and related safety calculations mentioned above.

- (1) For proposed revisions of adopted provisions, the current adopted provision should be provided, with deletions noted in ~~strike through~~-text, and changes or additions noted in **bold** font.
- (2) Food category number and name, as listed in Annex B of the GSFA.
- (3) For consistency, the maximum use level should be reported on the same basis as the ADI. A numerical use level should be provided for a food additive assigned a numerical ADI. GMP or a numerical use level may be provided for a food additive assigned a non-numerical ADI (e.g. "not- specified").
- (4) Comments on specific restrictions on the use of the food additive to be included as Notes (e.g. limitation of use to specific products in a food category).

This proposal is made under **Agenda Item 5a General Standard for Food Additives (GSFA): CCFA48 outstanding provisions; provisions for benzoates in FC 14.1.4; provisions in FC 5.0 and 5.1; provisions associated with Note 22; provisions in FC 01.1, 01.1.1, 01.1.3 and 01.1.4 (Report of the EWG on the GSFA)**. We would like to propose **Maltol (INS 636)** in **Food Category 05.2** Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4 and **Food Category 05.3** Chewing gum at **200 mg/kg**.

FORM FOR THE SUBMISSION OF PROPOSALS FOR NEW AND/OR REVISION OF ADOPTED FOOD ADDITIVE PROVISIONS IN THE GSFA

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THE PROPOSAL IS SUBMITTED BY:	ICGMA
IDENTITY OF THE FOOD ADDITIVE:	
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>	Maltol

INS Number		636	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Flavor Enhancer	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input checked="" type="checkbox"/> revising an existing provision or <input type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4	200 mg/kg	
05.3	Chewing gum	200 mg/kg	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 2005 ADI: 0-1 mg/kg bw (1981) Meeting: 25 Specs Code: R Specifications monograph: FAO JECFA Monographs 4- JECFA 68/ . R (2007)	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		Maltol (INS 636) is used in fruit flavored candy and chewing gum products often, but not always, in conjunction with ethyl maltol (INS 637). Because maltol (INS 636) is less water soluble than ethyl maltol (INS 637), the use of both substances can help to impart a prolonged flavor release. In strawberry candies and chewing gums, maltol (INS 636) provides an early and sweet strawberry taste effect, where ethyl maltol (637) provides a somewhat ripe, cooked or jam flavor effect. Both maltol (INS 636) and ethyl maltol (INS 637) can have a flavor enhancing or a direct flavor impact, depending on the application. Overall, maltol (INS 636) is technologically needed at 200 mg/kg in 05.2 candy and 05.3 Chewing gum as a flavor enhancer.	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input type="checkbox"/> Yes	
		<input checked="" type="checkbox"/> No (Please provide information on dietary intake assessment below) JECFA allocated an ADI of 0-1 mg/kg b.w./day for maltol (INS 636). Consumption of 10 grams of candy and chewing gum containing 200 mg/kg of maltol (INS 636) by a 60 kg adult would result in the possible ingestion of only 0.03 mg/kg bw/day of maltol (INS 636), i.e. only 3% of the ADI. It is also known that for chewing gum, a significant part of maltol (INS 636) will not be ingested but will remain in the gum cud after chewing. Therefore, exposure estimate of 3% of the ADI is a worst case scenario (i.e. very conservative and overestimating the real dietary exposure due to chewing gum).	

Justification that the use does not mislead consumer	The use of maltol (INS 636) at a level 200 mg/kg in 05.2 Confectionery including hard and soft candy, nougats, etc and 05.3 Chewing gum is technically justified and safe, based on the technical needs and related safety calculations mentioned above.
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- (1) For proposed revisions of adopted provisions, the current adopted provision should be provided, with deletions noted in ~~strikethrough~~-text, and changes or additions noted in **bold** font.
- (2) Food category number and name, as listed in Annex B of the GSFA.
- (3) For consistency, the maximum use level should be reported on the same basis as the ADI. A numerical use level should be provided for a food additive assigned a numerical ADI. GMP or a numerical use level may be provided for a food additive assigned a non-numerical ADI (e.g. "not- specified").
- (4) Comments on specific restrictions on the use of the food additive to be included as Notes (e.g. limitation of use to specific products in a food category).

This proposal is made under **Agenda Item 5a General Standard for Food Additives (GSFA): CCFA48 outstanding provisions; provisions for benzoates in FC 14.1.4; provisions in FC 5.0 and 5.1; provisions associated with Note 22; provisions in FC 01.1, 01.1.1, 01.1.3 and 01.1.4 (Report of the EWG on the GSFA)**. We would like to propose **Propylene Glycol (INS 1520)** in **Food Category 05.2** Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4 and **Food Category 05.3** Chewing gum at **20,000 mg/kg**.

FORM FOR THE SUBMISSION OF PROPOSALS FOR NEW AND/OR REVISION OF ADOPTED FOOD ADDITIVE PROVISIONS IN THE GSFA

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THE PROPOSAL IS SUBMITTED BY:		ICGMA	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Propylene Glycol	
INS Number		1520	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier, Glazing Agent, Humectant	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input checked="" type="checkbox"/> revising an existing provision or <input type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4	240,000 mg/kg 20,000 mg/kg	
05.3	Chewing gum	240,000 mg/kg 20,000 mg/kg	

EVALUATION BY JECFA:	
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>	Evaluation year: 2002 ADI: 0-25 mg/kg bw (1973) Meeting: 49 Specs Code: R (1977) Specifications monograph: COMPENDIUM ADDENDUM 12/FNP 52 Add. 12/68 (METALS LIMITS) (2004). R; FAO JECFA Monographs 1 vol.3/187
JUSTIFICATION:	
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>	Propylene glycol (INS 1520) acts as a humectant, which retains moisture in products and keep them from drying out. Propylene glycol is used in many chewing gums, candies and cookies. Propylene glycol keeps products fresh and extends their shelf life. The appropriate use level in 05.2 Confectionery including hard and soft candy, nougats, etc and 05.3 Chewing gum is 20000 mg/kg. Indeed, Codex alimentarius has already adopted a level of 20000 mg/kg in chewing gum for propylene glycol of fatty acids (INS 477). Overall, Propylene glycol (INS 1520) is technologically needed at 20000 mg/kg in 05.2 candy and 05.3 Chewing gum.
Safe use of additive: Dietary intake assessment (as appropriate)	Table 3 additive: <input type="checkbox"/> Yes
	<input checked="" type="checkbox"/> No (Please provide information on dietary intake assessment below) JECFA allocated an ADI of 0-25 mg/kg b.w./day to propylene glycol (INS 1520). Consumption of 10 grams of candy and chewing gum containing 20000 mg/kg of propylene glycol by a 60 kg adult would result in the possible ingestion of only 3.3 mg/kg bw/day of propylene glycol, i.e. no more than 13% of the ADI.
Justification that the use does not mislead consumer	The use of Propylene glycol (INS 1520) at a level 20,000 mg/kg in 05.2 Confectionery including hard and soft candy, nougats, etc and 05.3 Chewing gum is technically justified and safe, based on the technical needs and related safety calculations mentioned above.

- (1) For proposed revisions of adopted provisions, the current adopted provision should be provided, with deletions noted in ~~strike through~~ text, and changes or additions noted in **bold** font.
- (2) Food category number and name, as listed in Annex B of the GSFA.
- (3) For consistency, the maximum use level should be reported on the same basis as the ADI. A numerical use level should be provided for a food additive assigned a numerical ADI. GMP or a numerical use level may be provided for a food additive assigned a non-numerical ADI (e.g. "not- specified").
- (4) Comments on specific restrictions on the use of the food additive to be included as Notes (e.g. limitation of use to specific products in a food category).

This proposal is made under **Agenda Item 5a General Standard for Food Additives (GSFA): CCFA48 outstanding provisions; provisions for benzoates in FC 14.1.4; provisions in FC 5.0 and 5.1; provisions associated with Note 22; provisions in FC 01.1, 01.1.1, 01.1.3 and 01.1.4 (Report of the EWG on the GSFA)**. We would like to propose **Tartrates (INS 334, 335(ii), 337)** in **Food Category 05.2** Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4 at **20000 mg/kg**.

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THE PROPOSAL IS SUBMITTED BY:		ICGMA	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		TARTRATES	
INS Number		334, 335(ii), 337	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Acidity regulator, Antioxidant, Flavour enhancer, Stabilizer, Emulsifying salt, Sequestrant	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input checked="" type="checkbox"/> revising an existing provision or <input type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, 05.4	2,000 mg/kg 20,000 mg/kg	Note 45, &XS309R
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1977 ADI: JECFA allocated a group ADI of 0-30 mg/kg b.w./day for tartrates (L(+)-tartaric acid and its sodium, potassium, potassium sodium salts) Meeting: 21 Specs Code: R Specifications monograph: - Tartaric acid (INS 334) , http://www.fao.org/ag/agn/jecfa-additives/specs/Monograph1/Additive-457.pdf ; - Sodium L(+)-tartrate (INS335(ii)), http://www.fao.org/ag/agn/jecfa-additives/specs/monograph7/additive-427-m7.pdf ; - Potassium sodium L(+)-tartrate (INS 337), http://www.fao.org/ag/agn/jecfa-additives/specs/Monograph1/Additive-348.pdf	
JUSTIFICATION			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an</i>		Tartrates are used as acidity (i.e. pH) control agents to provide the initial impact of sourness to confectionery. It contributes to a strong tart taste and has the ability to increase and enhance the flavors of fruits where they are naturally present. The sweetness of sucrose is also increased by acid such tartaric	

<p><i>advantage, does not present an appreciable health risk, serves a technological function).</i></p>	<p>acid, thus allowing some reduced use of sucrose. Tartrates are important ingredients for fruit flavored candy playing a role in the stability of the acidity of these candies, which in return play a synergist role in stabilizing the flavor profile of the added flavorings. Tartaric acid itself is the most water-soluble of the solids acidic substances, followed by, by decreasing order, malic acid, citric acid, adipic acid, fumaric acid and succinic acid. Tartaric acid provides the highest level of upfront tartness from the variety of commonly available food acids. In fruit flavored candies, the upfront tartness which enhances the natural flavor is of most important interest to the consumer. Thus, tartrates (INS 334, 335(ii), and 337) satisfy a consumer need that none of the other permitted acids can meet. Based on literature data, each individual consumer also differ radically in their physical and psychological ability to detect differences in acidic taste and in identifying acids. Hence, tartrates may also be found in combination with two or more acids (e.g. citric acid) to enhance the flavor of fruits. Overall, tartrates (INS 334, 335(ii), and 337) are technologically needed at 20.000 mg/kg specifically in 05.2 confectionery.</p>
<p>Safe use of additive: Dietary intake assessment (as appropriate)</p>	<p>Table 3 additive: <input type="checkbox"/> Yes</p>
	<p><input checked="" type="checkbox"/> No (Please provide information on dietary intake assessment below)</p> <p>JECFA allocated a group ADI of 0-30 mg/kg b.w./day for tartrates. Consumption of a 5 grams piece of candy containing the future maximum permitted use level of 20,000 mg/kg of tartrates by a 60 kg adult would result in the possible ingestion of only 100 mg of tartrates, i.e. 5.6% of the ADI.</p>
<p>Justification that the use does not mislead consumer</p>	<p>i) The use of Tartaric acid and its Tartrate salts (INS 334, 335(ii), and 337), i.e. tartrates, should be permitted in Codex GSFA at a level 20,000 mg/kg in confectionery, expressed as tartaric acid, for use singly or in combination and ii) this level is technically justified and safe, based on the technical needs and related safety calculations mentioned above.</p>

- (1) For proposed revisions of adopted provisions, the current adopted provision should be provided, with deletions noted in ~~strike through~~ text, and changes or additions noted in **bold** font.
- (2) Food category number and name, as listed in Annex B of the GSFA.
- (3) For consistency, the maximum use level should be reported on the same basis as the ADI. A numerical use level should be provided for a food additive assigned a numerical ADI. GMP or a numerical use level may be provided for a food additive assigned a non-numerical ADI (e.g. "not- specified").
- (4) Comments on specific restrictions on the use of the food additive to be included as Notes (e.g. limitation of use to specific products in a food category).

Part B:**AGENDA ITEM 5B****China**

THE PROPOSAL IS SUBMITTED BY:		China	
USE LEVELS FOR ADIPIC ACID (INS 355):			
Food Category No. (1)	Food Category Name (1)	Maximum Use Level (2)	Comments (3)
04.1.2.5	Jams, jellies, marmalades	100 mg/kg	
05.3	Chewing gum	4000 mg/kg	
14.1.4.3	Concentrates (liquid or solid) for water-based flavoured drinks	10 mg/kg	

Malaysia

FOOD CATEGORY NAME	MAXIMUM USE LEVEL	JUSTIFICATION
Chewing Gum	10,000ppm	It's used as acidulate to enhance fruit flavour. Adipates are used to provide prolonged sour taste and increased saliva flow while having low solubility. Very unique profile when mixed with other acids. It also helps with the duration of flavor for fruit gums and it will increase the sourness intensity when blended with other acids.
Confections (food category 05.2)	20,000ppm	

Republic of Korea

The Republic of Korea would like to submit the following information on use levels for adipic acid(INS 355).

Information on use levels for adipic acid(INS 355)

THE PROPOSAL IS SUBMITTED BY:			
USE LEVELS FOR ADIPIC ACID (INS 355): The rows below may be copied as many times as needed.			
Food Category No.	Food Category Name	Maximum Use Level	Comments
04.1.2.5	Jams, jellies, marmalades	3,500mg/kg	For use in jellies
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce	1,000mg/kg	For use in vinegar-pickled vegetable and soybean sauce-pickled vegetable
04.2.2.5	Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g. peanut butter)	2,900mg/kg	For use in garlic puree
06.4.3	Pre-cooked pastas and noodles and like products	40mg/kg	
06.8.4.2	Deep fried semi-dehydrated soybean curd	1,200mg/kg	
09.2.4.1	Cooked fish and fish products	1,660mg/kg	
09.2.4.2	Cooked molluscs, crustaceans, and echinoderms	2,426mg/kg	
09.3.3	Salmon substitutes, caviar and other fish roe products	360mg/kg	For use in soybean sauce-pickled salmon roe
12.2.2	Seasonings and condiments	282mg/kg	
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	18mg/kg	

International Council of Grocery Manufacturers Associations (ICGMA)

This proposal is made under **Agenda Item 5b General Standard for Food Additives (GSFA): Use levels for adipic acid (INS 355) in various food categories (replies to CL 2016/9-FA)**. We would like to provide the use level of adipic acid in **Food Category 05.2** Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4, i.e., **12000 mg/kg**.

FORM FOR THE SUBMISSION OF PROPOSALS FOR NEW AND/OR REVISION OF ADOPTED FOOD ADDITIVE PROVISIONS IN THE GSFA

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THE PROPOSAL IS SUBMITTED BY:		ICGMA	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Adipic acid	
INS Number		355	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Acidity regulator	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal is to provide use level of adipic acid (Agenda Item 5b)	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4	12000 mg/kg	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1999 ADI: 0-5 mg/kg bw Meeting: 21 Specs Code: S (1977) Specifications monograph: COMPENDIUM ADDENDUM 7/FNP 52 Add.7/5 (ACIDITY REGULATOR); 132 (FLAVOUR); FAO JECFA Monographs 1 vol.1/19	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		Adipic acid is used in confectionery products for its contribution to fruit and sour tastes. Adipic acid provides a prolonged sour taste and increased saliva flow while having low solubility. It is therefore an essential component used to promote continuous release of sour fruit flavors, thereby providing consumers that unique organoleptic experience and expected pleasure.	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input type="checkbox"/> Yes <input type="checkbox"/>	
		<input checked="" type="checkbox"/> No (Please provide information on dietary intake assessment below) At the use level of 12000 mg/kg in Food Category 05.2 confectionery, dietary intake in a person with a bodyweight of 60 kg consuming 5 g of candy	

	would be 1 mg/kg bw/day of adipic acid, i.e. 20% of the ADI
Justification that the use does not mislead consumer	The use of adipic acid (INS 355) at a level 12,000 mg/kg in confectionery is technically justified and safe, based on the technical needs and related safety calculations mentioned above.

- (1) For proposed revisions of adopted provisions, the current adopted provision should be provided, with deletions noted in ~~strike through~~-text, and changes or additions noted in **bold** font.
- (2) Food category number and name, as listed in Annex B of the GSFA.
- (3) For consistency, the maximum use level should be reported on the same basis as the ADI. A numerical use level should be provided for a food additive assigned a numerical ADI. GMP or a numerical use level may be provided for a food additive assigned a non-numerical ADI (e.g. "not- specified").
- (4) Comments on specific restrictions on the use of the food additive to be included as Notes (e.g. limitation of use to specific products in a food category).

PART C:

AGENDA ITEM 5C

Russian Federation

General Standard For Food Additives (GSFA): proposals for new and/or revision of food additive provisions

1.5) Tocopherols are added to foods to enrich in vitamin E or to perform a food additive function:

INS 307a d-alpha-Tocopherol. Functional Class: Antioxidant

INS 307b Tocopherol concentrate, mixed concentrate. Functional Class: Antioxidant

INS 307c dl-alpha-Tocopherol. Functional Class: Antioxidant

In the Russian Federation, an adequate daily intake for vitamin E is 15 mg, and the maximum levels are differentiated depending on the age group*:

Age	Children					Adults
	1-3 years	4-6 years	7-10 years	11-14 years	15-17 years	
E, mg TE	100	120	160	220	260	300

1.Uniform sanitary and epidemiological and hygienic requirements for goods subject to sanitary (control). Chapter II Section 1: Safety requirements and food value of food products (<http://www.eurasiancommission.org/>)

2.The norms of physiological requirements in energy and nutrients for different groups of the Russian population. Guidelines. MR 2.3.1.2432 -08

3 Tolerable upper intake levels for vitamins and minerals scientific// Committee on Food Scientific Panel on Dietetic Products, Nutrition and Allergies of European Food Safety Authority.- February 2006. <http://www.efsa.europa.eu/en/ndatopics/docs/ndatolerableuil.pdf>

CCFA 49 proposal includes the following MLs for INS307a, b, c in:

FC No. 01.2 – (Fermented and renneted milk products plain and its subcategories) with ML=200 mg/kg;

FC No. 01.3 (Condensed milk and analogues (plain) and its subcategories) with ML=200 mg/kg;

FC No. 01.4 (Cream (plain) and the like and its subcategories) with ML=200 mg/kg;

FC No. 01.5 (Milk powder and cream powder and powder analogues (plain) and its subcategories) with ML=200 mg/kg;

FC No. 01.6 (Cheese and analogues and its subcategories) with ML=200 mg/kg;

FC No. 04.1.2 (Processed fruit) with ML=200 mg/kg;

FC No. 04.2.1 (Fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds) with ML=200 mg/kg;

FC No. 04.2.2 (Fresh vegetables (Processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera and its subcategories), seaweeds, and nuts and seeds) with ML=200 mg/kg;

FC No. 05.1 (Cocoa products and chocolate products including imitations and chocolate substitutes and its subcategories) with ML=500 mg/kg;

FC No. 06.0 (Cereals and cereal products, derived from cereal grains, from roots and tubers, pulses, legumes and pith or soft core of palm tree, excluding bakery wares of food category 07.0 and its subcategories) with ML=600 mg/kg;

FC No. 07.0 (Bakery wares and its subcategories) with ML=200 mg/kg;

FC No. 08.0 (Meat and meat products, including poultry and game and its subcategories) with ML=300 mg/kg.

According to the national statistical data (<http://www.gks.ru/>), in 2014 consumption of foods in categories listed above in Russia was as follows:

Bread, fine bakery products -95,4 kg/per year per person;

Fruit and vegetables fresh and processed – 76,0 kg/per year per person;

Meat and meat products – 84,7 kg/per year per person;

Milk and milk products – 265,5 kg/per year per person;

Confectionery - 7,8 kg/per year per person;

Oils and fats – 10,5 kg/per year per person.

Calculation shows that if CCFA49 proposal was to go through, tocopherols intake (both naturally occurring and added as a food additive) would be about 350-360 mg per person per day.

Consequently, the maximum levels established in the Russian Federation and in the EAEU for tocopherols INS307a, b, c will be exceeded. Thus, our recommendation is to review the proposal taking into account existing adequate and maximum intake levels.

Thailand

Thailand would like to submit new proposals of food additive provisions in the new food category 01.1.2 “Other fluid milks (plain)” as follows:

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Ascorbic acid, L-	
INS Number		GMP	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Antioxidant	
PROPOSED USE(S) OF THE FOOD ADDITIVE <i>(¹): The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 “Other fluid milks (plain)”	
Food Category No. (²)	Food Category Name (²)	Maximum Use Level (³)	Comments (⁴)
01.1.2	Other fluid milks (plain)		
EVALUATION BY JECFA:			
Evaluation by JECFA		Evaluation year: 1981	

<i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or “not specified”); specifications monograph).</i>	ADI: Not specified Comments: Group ADI for ascorbic acid and its sodium, potassium and calcium salts Meeting: 25 Specs Code: R (1973) Specification: COMPENDIUM ADDENDUM 11/FNP 52 Add. 11/89 (METALS LIMITS) (2003); FAO JECFA Monographs 1 vol.1/115
JUSTIFICATION:	
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>	<i>Ascorbic acid is used as antioxidant in milk products such as recombined milk, reconstituted milk and vitamin and mineral fortified milk. It helps to prevent oxidation of fat and vitamins and maintain products quality throughout shelf life.</i>
Safe use of additive: Dietary intake assessment (as appropriate)	Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)
Justification that the use does not mislead consumer	<i>The use of ascorbic acid as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and enhance stability of milk products. Its use does not change the nature of products and disguise the effects of the use of faulty raw materials which could mislead consumer.</i>

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Carob bean gum	
INS Number		410	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier, Stabilizer, Thickener	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 “Other fluid milks (plain)”	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or “not specified”); specifications monograph).</i>		Evaluation year: 1981 ADI: Not specified Meeting: 25 Specs Code: R (1995) Specification: FAO JECFA MONOGRAPHS 5-JECFA	

		69/17
JUSTIFICATION:		
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Carob bean gum is used in fluid milk such as recombined milk, reconstituted milk, and vitamin and mineral fortified milk to stabilize colloidal suspension and prevent sedimentation of solid particles in milk (e.g. milk protein and fortified minerals) during storage period. Moreover, it also helps to improve the viscosity of product as per consumer preferences. Carob bean gum is usually used in combination with other EST at an optimized ratio.</i>
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)
Justification that the use does not mislead consumer		<i>The use of carob bean gum as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Carrageenan	
INS Number		407	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier, Stabilizer, Thickener	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	

EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 2014 ADI: Not specified Meeting: 79 Specs Code: R Specification: FAO JECFA Monographs 16/7	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an</i>		<i>Carrageenan is added to aid the suspension of solid particles in milk products, prevent water-fat separation and protein sedimentation, especially in recombined milk and vitamin and mineral fortified formula. In milk system, carrageenan has the property of reacting with proteins which can increase the stability of products. Moreover,</i>	

<i>advantage, does not present an appreciable health risk, serves a technological function).</i>	<i>it also helps to improve the viscosity of product as per consumer preferences. Carrageenan is used usually in combination with other EST at an optimized ratio.</i>
Safe use of additive: Dietary intake assessment (as appropriate)	Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)
Justification that the use does not mislead consumer	<i>The use of carrageenan as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Gellan gum	
INS Number		418	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Stabilizer, Thickener	
PROPOSED USE(S) OF THE FOOD ADDITIVE (¹): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (²)	Food Category Name (²)	Maximum Use Level (³)	Comments (⁴)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 2014 ADI: Not specified Meeting: 79 Specs Code: R Specification: FAO JECFA Monographs 16/19	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Gellan gum is used to enhance the stability of fluid milks, especially in recombined milk, reconstituted milk and vitamin and mineral fortified formula. It helps to stabilize colloidal suspension and prevent sedimentation of solid particles in milk (e.g. milk protein and fortified minerals) during storage period. It also helps to improve the viscosity of product as per consumer preferences and enhance the organoleptic properties. Gellan gum is usually used in combination with other EST at an optimized ratio.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake)	

		assessment below)	
Justification that the use does not mislead consumer		<i>The use of gellan gum as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>	
THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Guar gum	
INS Number		412	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier, Stabilizer, Thickener	
PROPOSED USE(S) OF THE FOOD ADDITIVE (¹): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (²)	Food Category Name (²)	Maximum Use Level (³)	Comments (⁴)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1975 ADI: Not specified Meeting: 19 Specs Code: R (1995) Specification: FAO JECFA Monographs 5-JECFA69/31.	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Guar gum is used in fluid milk such as recombined milk, reconstituted milk and vitamin and mineral fortified milk to stabilize colloidal suspension and prevent sedimentation of solid particles in milk (e.g. milk protein and fortified minerals) during storage period. Moreover, it helps to improve the viscosity of product as per consumer preferences. It also contributes to the organoleptic property by improving mouthfeel. Guar gum is usually used in combination with other EST at an optimized ratio.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)	
Justification that the use does not mislead consumer		<i>The use of guar gum as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences.</i>	

		<i>It is not used to disguise the effects of the use of faulty raw materials.</i>	
THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Hydroxypropyl starch	
INS Number		1440	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier, Stabilizer, Thickener	
PROPOSED USE(S) OF THE FOOD ADDITIVE (¹): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (²)	Food Category Name (²)	Maximum Use Level (³)	Comments (⁴)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1982 ADI: Not specified Meeting: 26 Specs Code: R (1989) Specification: FNP 49-JECFA 35/28 (1989); COMPENDIUM/965; FAO JECFA Monographs 1 vol.2/397	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Hydroxypropyl starch is used as stabilizer in recombined milk, reconstituted milk and vitamin and mineral fortified milk. It prevents sedimentation of solid particles in milk (e.g. milk protein and fortified minerals) during storage period. Moreover, it helps to enhance the viscosity of product as per consumer preferences. It also contributes to the organoleptic property by improving mouthfeel.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)	
Justification that the use does not mislead consumer		<i>The use of hydroxypropyl starch as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>	

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive		Lecithin	

<i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>			
INS Number		322i	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1973 ADI: Not specified Meeting: 17 Specs Code: R (1993) Specification: COMPENDIUM ADDENDUM 11/FNP 52 Add. 11/89 (METALS LIMITS) (2003). R; FAO JECFA Monographs 1 vol.2/259	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Lecithin is added to fluid milk in order to prevent separation of water and oil phase, especially in recombined milk and reconstituted milk. It also helps to stabilize the colloidal suspension of products and prevents sedimentation of solid particles in milk (e.g. milk protein and fortified minerals) during storage period. In addition, lecithin provide aids in homogenisation process.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)	
Justification that the use does not mislead consumer		<i>The use of lecithin as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and enhance stability of milk products. Its use does not change the nature of products and disguise the effects of the use of faulty raw materials which could mislead consumer.</i>	

THE PROPOSAL IS SUBMITTED BY:	Thailand
IDENTITY OF THE FOOD ADDITIVE:	
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>	Microcrystalline cellulose
INS Number	460i
Functional Class <i>As listed in Class Names and the International</i>	Emulsifier, Stabilizer, Thickener

<i>Numbering System (INS) - CAC/GL 36-1989</i>			
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1997 ADI: Not specified Meeting: 49 Specs Code: R Specification: COMPENDIUM ADDENDUM 8/FNP 52 Add.8/65 (2000). R; FAO JECFA Monographs 1 vol.2/355	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Microcrystalline cellulose is used as emulsifier and stabilizer in recombined and reconstituted milk as well as vitamin and mineral fortified milk. It provides good colloidal suspension and prevent sedimentation of solid particles in milk system (e.g. milk protein and fortified minerals) during storage period. It is used in recombined and reconstituted milk to prevent separation of water and oil phase. In addition, microcrystalline cellulose also helps to improve the viscosity of product and create satisfactory mouth feel as per consumer preferences. Microcrystalline cellulose is either used individually or in combination with other EST at an optimized ratio.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)	
Justification that the use does not mislead consumer		<i>The use of microcrystalline cellulose of fatty acids as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>	
THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Mono- and di- glyceride of fatty acids	
INS Number		471	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier, Stabilizer, Antifoaming agent	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many</i>		The proposal for <input type="checkbox"/> a new provision;	

<i>times as needed.</i>		<input type="checkbox"/> revising an existing provision <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1973 ADI: Not specified Meeting: 17 Specs Code: R Specification: COMPENDIUM ADDENDUM 8/FNP 52 Add.8/203 (METALS LIMITS) (2000). R; FAO JECFA Monographs 1 vol.2/417	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Mono- and di- glyceride of fatty acids are used as emulsifier and stabilizer in products subject to food category 01.1.2. It helps to enhance stability of recombined and reconstituted products, especially for high fat content formula (milk fat, vegetable oil and DHA are added) by keeping the fat and water from separation. It also prevents the sedimentation of fine particle and increases colloidal stability of vitamin and mineral fortified formula. Moreover, it is used to reduce foam formation during processing. The excessive foam has an effect on further process (e.g. packing) which could lead to the poor quality of final products. Mono- and di- glyceride of fatty acids are usually used in combination with other EST at an optimized ratio.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)	
Justification that the use does not mislead consumer		<i>The use of mono- and di- glyceride of fatty acids as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>	
THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Nitrogen	
INS Number		941	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Packing gas	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): The rows below may be copied as many		The proposal for <input type="checkbox"/> a new provision;	

<i>times as needed.</i>		<input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1980 ADI: No ADI Necessary Meeting: 24 Specs Code: R (1995) Specification: COMPENDIUM ADDENDUM 7/FNP 52 Add.7/65 (1999). R; FAO JECFA Monographs 1 vol.2/443	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Nitrogen is used as packing gas for fluid milk products subject to food category 01.1.2. It is flushed to final products during filling step.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)	
Justification that the use does not mislead consumer		<i>The use of nitrogen as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and enhance stability of milk products. Its use does not change the nature of products and disguise the effects of the use of faulty raw materials which could mislead consumer.</i>	
THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Pectin	
INS Number		440	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier, Stabilizer, Thickener	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)

01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1981 ADI: Not specified Comments: Group ADI for pectins and amidated pectins, singly or in combination Meeting: 25 Specs Code: R (1992) Specification: FAO JECFA Monographs 4- JECFA 68/. R (2007)	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Pectin is added to aid the suspension of solid particles (e.g. milk protein and fortified minerals) and to avoid the sedimentation during the shelf life. It is currently used in fluid milk products such as recombined milk, reconstituted milk (high protein formula) and fortified vitamins and minerals milks. Pectin also helps to improve the viscosity of products and create satisfactory mouth feel as per consumer preferences. Pectin is either used individually or in combination with other EST at an optimized ratio.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)	
Justification that the use does not mislead consumer		<i>The use of pectin as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>	

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Phosphates	
INS Number		338, 339i-iii, 340i-iii, 341i-iii, 342i-ii, 343i-iii, 450i-iii, v-vii, ix, 451i-ii, 452i-v, 542	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Acidity regulator, Sequestrant, Stabilizer	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	1,320 mg/kg	Note 33: as phosphorus Note 227: For use in sterilized and UHT treated

		milks only
EVALUATION BY JECFA:		
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or “not specified”); specifications monograph).</i>	Evaluation year: 1982 Tolerable Intake: MTDI 70 mg/kg bw (as P) Comments: A group MTDI of 70 mg/kg bw, as phosphorus from all food sources Meeting: 26	
JUSTIFICATION:		
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>	<i>Phosphates are used as acidity regulator to adjust the pH of milk thus enhance protein stability. It is also required as stabilizer to prevent protein sedimentation during UHT and sterilization process. Moreover, phosphates form chelate complexes with polyvalent metal ions (e.g. iron and zinc) which can prevent the oxidation of fat in milk. In vitamin and mineral fortified formula, phosphates are added to enhance stability by reducing the interfacial tension between liquid and solid.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)	Table 3 additive: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Please provide information on dietary intake assessment below) <i>Regarding the dietary intake assessment of phosphates by using national food consumption data, it is found that the daily intake is 1.05 mg/kg bw (1.5% ADI) in total population (average body weight is 57.57 kg) and the daily intake of young children (3-6 years old) is 13.78 mg/kg (19.7% ADI) (based on 17.25 kg bw). Additional use of phosphates at the proposed ML would not cause intakes to exceed the ADI.</i>	
Justification that the use does not mislead consumer	<i>The use of phosphate as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and enhance stability of milk products. Its use does not change the nature of products and disguise the effects of the use of faulty raw materials which could mislead consumer.</i>	

THE PROPOSAL IS SUBMITTED BY:	Thailand
IDENTITY OF THE FOOD ADDITIVE:	
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>	Polydextrose
INS Number	1200
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>	Stabilizer, Thickener
PROPOSED USE(S) OF THE FOOD ADDITIVE <i>(¹): The rows below may be copied as many times as needed.</i>	The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 “Other fluid milks (plain)”

Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1987 ADI: Not specified Meeting: 31 Specs Code: R (1995) Specification: COMPENDIUM ADDENDUM 6/FNP 52 Add.6/103 (1998). R; FAO JECFA Monographs 1 vol.3/51	
JUSTIFICATION:			
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>		<i>Polydextrose is used as thickener to improve organoleptic properties of milk products and increase viscosity of product as per consumer preferences. It also helps to enhance the stability of milk, especially vitamin and mineral fortified formula.</i>	
Safe use of additive: Dietary intake assessment (as appropriate)		Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)	
Justification that the use does not mislead consumer		<i>The use of polydextrose as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and improve organoleptic properties of milk products as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>	
THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Potassium hydroxide	
INS Number		525	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Acidity regulator	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	Note 227: For use in sterilized and UHT treated milks only
EVALUATION BY JECFA:			
Evaluation by JECFA		Evaluation year: 1965	

Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or “not specified”); specifications monograph).	ADI: Not limited Meeting: 09 Specs Code: R (1975) Specification: COMPENDIUM ADDENDUM 10/FNP 52 Add.10/34 (METALS LIMITS) (2002). R; FAO JECFA Monographs 1 vol.3/133
JUSTIFICATION:	
Justification for use and technological need Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).	<i>Potassium hydroxide is widely use as acidity regulator. It is used to adjust the pH of milk enhancing protein stability of sterilized and UHT treated milk. Potassium hydroxide is alkali agent that does not adversely affect the taste and smell of milk products. In addition, using of potassium salt is more suitable when compared to sodium salt because the sodium salt may cause excessive amount of sodium in milk products.</i> <i>Potassium hydroxide is allowed to use in FC 13.1.1 “Infant formulae”.</i>
Safe use of additive: Dietary intake assessment (as appropriate)	Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)
Justification that the use does not mislead consumer	<i>The use of potassium hydroxide as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and enhance stability of milk products. Its use does not change the nature of products and disguise the effects of the use of faulty raw materials which could mislead consumer.</i>

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989		Sodium ascorbate	
INS Number		301	
Functional Class As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989		Antioxidant	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): The rows below may be copied as many times as needed.		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 “Other fluid milks (plain)”	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI		Evaluation year: 1981 ADI: Not specified Comments: Group ADI for ascorbic acid and its sodium, potassium, and calcium salts	

<i>(numerical or "not specified"); specifications monograph).</i>	Meeting: 25 Specs Code: R (1973) Specification: COMPENDIUM ADDENDUM 11/FNP 52 Add. 11/89 (METALS LIMITS) (2003). FAO JECFA Monographs 1 vol.3/307
JUSTIFICATION:	
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>	<i>Sodium ascorbate is used as antioxidant in fluid milk such as recombined milk, reconstituted milk and non-flavoured vitamin and mineral fortified milk. It helps to prevent oxidation of fat and vitamins, and maintain products quality throughout shelf life. The use of sodium ascorbate together with tocopherols shows a synergistic effect.</i>
Safe use of additive: Dietary intake assessment (as appropriate)	Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)
Justification that the use does not mislead consumer	<i>The use of sodium ascorbate as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and enhance stability of milk products. Its use does not change the nature of products and disguise the effects of the use of faulty raw materials which could mislead consumer.</i>

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Sodium carboxymethyl cellulose	
INS Number		466	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Emulsifier, Stabilizer, Thickener	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1989 ADI: Not specified Comments: Group ADI for modified celluloses: ethyl cellulose, ethyl hydroxyethyl cellulose, hydroxypropyl cellulose, hydroxypropylmethyl cellulose, methyl cellulose, methyl ethyl cellulose, and sodium carboxymethyl cellulose Meeting: 35 Specs Code: S Specification: COMPENDIUM ADDENDUM 12/FNP 52	

	Add. 12/68 (METALS LIMITS) (2004). R; FAO JECFA Monographs 1 vol.3/315
JUSTIFICATION:	
Justification for use and technological need <i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i>	<i>Sodium carboxymethyl cellulose (CMC) is used as emulsifier, stabilizer in fluid milk such as recombined milk, reconstituted milk and vitamin and mineral fortified fluid milk. It provides good colloidal suspension and prevent sedimentation of solid particles in milk system (e.g. milk protein and fortified minerals) during storage period. It is used in recombined and reconstituted milk to prevent separation of water and oil phase. Moreover, CMC also helps to improve the viscosity of product as per consumer preferences. CMC is either used individually or in combination with other EST at an optimized ratio.</i>
Safe use of additive: Dietary intake assessment (as appropriate)	Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)
Justification that the use does not mislead consumer	<i>The use of CMC as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and stability of milk products and also improve organoleptic properties as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials.</i>

THE PROPOSAL IS SUBMITTED BY:		Thailand	
IDENTITY OF THE FOOD ADDITIVE:			
Name of the Additive <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Trisodium citrate	
INS Number		331iii	
Functional Class <i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i>		Sequestrant, Stabilizer	
PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i>		The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"	
Food Category No. (2)	Food Category Name (2)	Maximum Use Level (3)	Comments (4)
01.1.2	Other fluid milks (plain)	GMP	
EVALUATION BY JECFA:			
Evaluation by JECFA <i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i>		Evaluation year: 1973 ADI: Not specified Meeting: 17 Specs Code: R (1975) Specification: COMPENDIUM ADDENDUM 10/FNP 52 Add.10/34 (METALS LIMITS) (2002). R; FAO JECFA Monographs 1 vol.3/569	
JUSTIFICATION:			

<p>Justification for use and technological need</p> <p><i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i></p>	<p><i>Trisodium citrate is used to enhance stability of milk products by forming chelate complexes with polyvalent metal ions (e.g. iron and zinc) which can prevent the oxidation of fat in milk. It is also required as stabilizer to prevent sedimentation of protein.</i></p>
<p>Safe use of additive: Dietary intake assessment (as appropriate)</p>	<p>Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)</p>
<p>Justification that the use does not mislead consumer</p>	<p><i>The use of trisodium citrate as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and enhance stability of milk products. Its use does not change the nature of products and disguise the effects of the use of faulty raw materials which could mislead consumer.</i></p>

<p>THE PROPOSAL IS SUBMITTED BY:</p>		<p>Thailand</p>	
<p>IDENTITY OF THE FOOD ADDITIVE:</p>			
<p>Name of the Additive</p> <p><i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i></p>		<p>Xanthan gum</p>	
<p>INS Number</p>		<p>415</p>	
<p>Functional Class</p> <p><i>As listed in Class Names and the International Numbering System (INS) - CAC/GL 36-1989</i></p>		<p>Emulsifier, Stabilizer, Thickener</p>	
<p>PROPOSED USE(S) OF THE FOOD ADDITIVE (1): <i>The rows below may be copied as many times as needed.</i></p>		<p>The proposal for <input type="checkbox"/> a new provision; or <input type="checkbox"/> revising an existing provision or <input checked="" type="checkbox"/> a food additive provision in the new food category 01.1.2 "Other fluid milks (plain)"</p>	
<p>Food Category No. (2)</p>	<p>Food Category Name (2)</p>	<p>Maximum Use Level (3)</p>	<p>Comments (4)</p>
<p>01.1.2</p>	<p>Other fluid milks (plain)</p>	<p>GMP</p>	
<p>EVALUATION BY JECFA:</p>			
<p>Evaluation by JECFA</p> <p><i>Reference to the JECFA evaluation (including year and JECFA session of evaluation; full ADI (numerical or "not specified"); specifications monograph).</i></p>		<p>Evaluation year: 1986 ADI: Not specified Meeting: 30 Specs Code: R (1993) Specification: COMPENDIUM ADDENDUM 7/FNP 52 Add.7/105 (1999). R; FAO JECFA Monographs 1 vol.3/589</p>	
<p>JUSTIFICATION:</p>			
<p>Justification for use and technological need</p> <p><i>Supporting information based on the criteria in Section 3.2 of the Preamble of the General Standard for Food Additives (i.e. has an advantage, does not present an appreciable health risk, serves a technological function).</i></p>		<p><i>Xanthan gum is used as emulsifier, stabilizer in fluid milk such as recombined milk, reconstituted milk and vitamin and mineral fortified fluid milk. It provides good colloidal suspension and prevent sedimentation of solid particles in milk system (e.g. milk protein and fortified minerals) during storage period. It also helps to improve the viscosity of product and mouthfeel as per consumer preferences. Xanthan gum is either used individually or in combination with other EST at an optimized ratio.</i></p>	

Safe use of additive: Dietary intake assessment (as appropriate)	Table 3 additive: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Please provide information on dietary intake assessment below)
Justification that the use does not mislead consumer	<i>The use of xanthan gum as a food additive is technologically justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. It is used to keep quality and stability of milk products and also improve organoleptic properties as per consumer preferences. It is not used to disguise the effects of the use of faulty raw materials</i>

International Dairy Federation (IDF)

The International Dairy Federation (IDF) would like to support the joint proposals of the International Association of Color Manufacturers (IACM) and the Natural Food Colours Association (NATCOL) for the dairy related categories and at the proposed MLs for the use of Paprika Extract (INS 160c (ii)) contained in CX/FA 17/49/9, because they represent the maximum levels that are used, required and justified in these categories (reminded below).

FC No	Food Category	Proposed MLs expressed as mg/kg or mg/l as total carotenoids.
New FC 01.1.4	Flavoured fluid milk drinks	30
1.3.2	Beverage whiteners	5
1.4.4	Cream analogues	5
1.5.2	Milk and cream powder analogues	5
1.6.1	Unripened cheese	15
1.6.2	Ripened cheese	30
1.6.2.1	Ripened cheese, includes rind	30
1.6.2.2	Rind of ripened cheese	30
1.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	600
1.6.4.1	Plain processed cheese	50
1.6.4.2	Flavoured processed cheese, including containing fruit, vegetables, meat, etc.	70
1.6.5	Cheese analogues	50
1.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50
2.2.2	Fat spreads, dairy fat spreads and blended spreads	5