

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-First Session

PROPOSALS FOR ADDITIONS AND CHANGES TO THE PRIORITY LIST OF SUBSTANCES PROPOSED FOR EVALUATION BY JECFA

Comments of Ghana, Russian Federation and South Africa

Ghana

Position: Ghana supports the list submitted for priority and recommends that Fulvic acid be considered on higher priority.

Rationale: JECFA's evaluation is an essential step for food additive inclusion in the GSFA. Fulvic acid is an important alternative preservative for prevention of decomposition by microbiological growth and reduction the risk of foodborne.

Russian Federation

1. Fulvic acid (Chemical name: 7,8-dihydroxy-3-methyl-10-oxo-1H,10H-pyrano[4,3-b]chromene- 9-carboxylic acid), in organic polymers that extracted from humus found in soil, sediment, or aquatic environments. It's ADI not established. Only few data are available on fulvic acid influence on the bioavailability of heavy metals and gut microboita. Fulvic acid can have a pronounced effect on cell metabolism and DNA expression.

In connection with the expressed biological activity and associated with this activity possible risks to the health of consumers, consider it premature a proposal by South Africa on its inclusion in the list form for the submission of substances to be evaluated by JECFA.

2. Proposal ETA (Enzyme Technical Association) on the use of D-Allulose 3-epimerase from *Arthrobacter globiformis* expressed in *Escherichi coli*.

This proposal could be adopted only if an individual code of strain-producer is specified. We believe that the properties of these enzymes largely depend on the properties of the producing strain (DNA structure, its toxigenic properties, pathogenicity, the presence of plasmids, transposons, bacteriophages, its antibiotic resistance, the ability to produce metabolites that have a negative impact on the human body and animals, etc.). In addition, the individual code is required to ensure the control of DNA of the producing strain in products placed on the market.

3. Proposal EU Specialty Food Ingredients on the use of Riboflavin from *Ashbya gossypii*.

This proposal could be adopted only if an individual code of strain-producer is specified (see explanatory note in the previous paragraph).

South Africa

Substance: Fulvic acid

Proposal submitted by South Africa for safety evaluation and establishment of specifications. Data is available and it can be submitted to JECFA once requested.