



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-second Session

STATUS AND ANALYSIS OF THE GSFA ONLINE SYSTEM IN RELATION TO THE APPROACH OF NOT LISTING RELEVANT COMMODITY STANDARDS

Prepared by the Codex Secretariat

Background

1. The 50th Session of the Committee on Food Additives (CCFA50)² endorsed a revised approach to listing corresponding commodity standards in Table 3 of the GSFA as follows³:

- Only commodity standards that permit specific Table 3 additives should be listed in column 5 of Table 3 of the GSFA. Commodity standards that either permit all Table 3 additives or all Table 3 additives of a particular functional class should not be listed in the fifth column of Table 3;
- The heading for column 5 of Table 3 should be changed to “Specific allowance in the following commodity standards”;
- A footnote should be added to the heading of column 5 of Table 3 that reads: This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis or based on functional class, that information is contained in the “References to Commodity Standards for GSFA Table 3 Additives” section of Table 3;
- Column 5 of Table 3 of the GSFA should be revised to remove commodity standards that permit all Table 3 additives or all Table 3 additives of a particular functional class;
- When the suggestions in the proposal, above, are carried out, additional explanatory text for the new approach will be included directly below the revised Table 3.

2. CCFA50 agreed that the implementation of the revised approach be effected as soon as the technology issues associated with the GSFA online version were resolved.

3. CCFA51⁴ further agreed with the procedural change i.e. when technologically feasible, provided the additive has an INS name, number, and functional class, a proposed draft Table 3 provision at step 3 would be included in Agenda Item 3(a) MATTERS OF INTEREST ARISING FROM FAO/WHO AND FROM THE MEETING OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA) document when JECFA publishes an ADI of “not specified” and provides full specifications for the additive” will be included. This change will allow for the acceleration of endorsement for Table 3 food-additive provisions.

4. CCFA51 reconsidered this matter and agreed to postpone the implementation of CCFA50 decisions and a decision on the future of the GSFA online until CCFA52 in an attempt to find a solution allowing for both the PDF and the searchable online version of the GSFA to be maintained.

Analysis of the problems relating to the GSFA published before CCFA51

5. GSFA is presented in PDF and GSFA online (i.e. index) and both are produced from the GSFA database. CCFA has only proposed the changes to the GSFA in PDF version while how these changes can be reflected in GSFA online version also required examination.

6. Taking acetic acid glacial (INS 260) as an example, Table 3 of the GSFA PDF version and online version published before CCFA51 were presented respectively as follows:

¹ This document is an updated version of CX/FA 20/52/13

² REP18/FA paras 41, 42, 60 and 61.

³ CX/FA 18/50/6 Appendix V

⁴ REP19/FA paras 129-135

PDF version:

| INS No | Additive | Functional Class | Year Adopted | Acceptable, including foods conforming to the following commodity standards |
|--------|----------------------|---------------------------------|--------------|--|
| 260 | Acetic acid, glacial | Acidity regulator, Preservative | 1999 | CS 117-1981, CS 309R-2011, CS 70-1981, CS 94-1981, CS 119-1981, CS 291-2010, CS 302-2011, CS 319-2015, CS 249-2006 |

Online version:

GSFA Table 3 Provisions

Acetic acid glacial is a food additive that is included in Table 3, and as such may be used in the following foods under the conditions of good manufacturing practices (GMP) as outlined in the Preamble of the Codex GSFA. Although not listed below, Acetic acid glacial could also be used in heat-treated butter milk of food category 01.1.1 and spices of food category 12.2.1. Note that food categories listed in the Annex to Table 3 were excluded accordingly. Acetic acid is acceptable in foods conforming to the following commodity standards: CS 70-1981 CS 291-2010 CS 117-1981 CS 302-2011 CS 319-2015 CS 119-1981 CS 249-2006 CS 94-1981 CS 309R-2011

| Number | Food Category |
|--------|--------------------------------------|
| 01.1.4 | Flavoured fluid milk drinks |
| 01.3 | Condensed milk and analogues (plain) |
| 01.4.3 | Clotted cream (plain) |
| 01.4.4 | Cream analogues |

7. According to the new approach, CS 117-1981, CS 309R-2011, CS 291-2010 and CS 319-2015 would no longer be listed in the column 5 entitled “Acceptable including foods conforming to commodity standard column” as these commodity standards contain a reference to Table 3 of the GSFA on either a general basis or for specific functional classes. Table 3 of the GSFA PDF version for acetic acid glacial (INS 260) would be presented as follows:

| INS No | Additive | Functional Class | Year Adopted | Specific allowance in the following commodity standards ¹ |
|--------|----------------------|---------------------------------|--------------|--|
| 260 | Acetic acid, glacial | Acidity regulator, Preservative | 1999 | CS 70-1981, CS 94-1981, CS 119-1981, CS 302-2011, CS 249-2006 |

8. Considering the requirements of CCFA for the GSFA online database, a feasibility study were carried out by the Codex Secretariat in consultation with the FAO Information Technology Division (CIO) to try to amend the online version as follows:

| Number | Food Category |
|--------|--------------------------------------|
| 01.1.4 | Flavoured fluid milk drinks |
| 01.3 | Condensed milk and analogues (plain) |
| 01.4.3 | Clotted cream (plain) |
| 01.4.4 | Cream analogues |

Outcome of the Consultation with the FAO Information Technology Division (CIO)

9. Food Additives data is stored locally in a Microsoft Access Database. Reports from the database produce the tables published in the Report in PDF Format. Access also provides the data so the GSFA can be published online. The GSFA database is managed by CIO and the Codex Secretariat is specifically in charge of updating it.

10. The Codex Secretariat has been working with CIO to explore solutions in this regard. With the guidance of CIO, GSFA database has been modified in terms of format and presentation aspects in order to satisfy the requirements of CCFA50 and CCFA51. It should be noted that all these changes do not affect the contents of the database.

11. CIO has implemented the required changes to both the Report in PDF and the online Formats. An email informing Codex Members and Observers of these changes was sent out on 30 April 2020.

12. The Codex Secretariat will continuously work with CIO in order to upgrade the database solution on redesigning the web interface of the CCFA online to align with the visual identity of the overall website and to improve readability and the search function.

Explanatory notes

13. In applying the revised approach, the Codex Secretariat noted there were some discrepancies between the GSFA Table 3 and “References to Commodity Standards for GSFA Table 3 Additives”. Therefore, the Codex Secretariat only removed those commodity standards (or Notes) in column 5 of Table 3 which were totally compliant with the requirements established in the “References to Commodity Standards for GSFA Table 3 Additives”. In the case there were discrepancies, these Notes were temporarily retained. Below are explanations on these cases:

- (i) As elaborated in the “References to Commodity Standards for GSFA Table 3 Additives”, according to CODEX STAN 309R-2011, “**Acidity regulators** and **emulsifiers** listed in Table 3 are acceptable for use in foods”. Therefore, Note “CS 309R-2011” could be removed from all the Table 3 food additives with functional classes of either acidity regulators or emulsifiers. However, it was noted that gellan gum (INS 418) did not have these two functions, yet Note “CS 309R-2011” was listed in column 5. In that case, Note “CS 309R-2011” associated with gellan gum (INS 418) remained unchanged.
- (ii) There are two Notes for CS 319-2015 associated with antioxidants. The first is Note “CS 319-2015 (acidity regulator in general and as antioxidant in canned pineapple and canned mangoes)” which is applicable to “**certain antioxidants**” in Table 3. The second is Note “CS 319-2015 (canned mangoes only)” which is applicable to **all antioxidants** in Table 3. In order to avoid confusions, these two Notes were retained.
- (iii) As elaborated in the “References to Commodity Standards for GSFA Table 3 Additives”, according to CODEX STAN 319-2015, “Colours listed in Table 3 are acceptable for use in special holiday pack canned pears conforming to the standard”. Therefore, under such circumstances, Note “CS 319-2015 (for use in special holiday pack canned pears)” could be removed. However, since this Note did not associated with all the Table 3 food additives with colour function (e.g. Lutein esters from *Tagetes erecta* (INS 161b(iii))), this Note was retained. The same problem applied to Note “CS 66-1981” and Note “CS 66-1981 (as a thickener in table olives with stuffing only)” which had to be temporarily retained.

14. Based on the above mentioned considerations, the following seven Notes associated with relevant functional classes have been removed from column 5 of Table 3.

| Notes in column 5 of Table 3 | Functional classes for which corresponding Notes can be removed |
|---|---|
| CS 117-1981 | Acidity regulators, antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, humectants, packaging gases, preservatives, stabilizers, sweeteners and thickeners |
| CS 117-1981 (anticaking agents in dehydrated products only) | anticaking agents |
| CS 309R-2011 | Acidity regulators and emulsifiers |
| CS 13-1981 | Firming agents |
| CS 254-2007 | Acidity regulators and firming agents |

| | |
|-------------|--|
| CS 291-2010 | Acidity regulators, antioxidants and preservatives |
| CS 319-2015 | Acidity regulators |

Further consultations with the EWG Chairs on alignment and the GSFA on resolutions of these discrepancies

15. In May 2021, the Codex Secretariat consulted with the EWG Chairs on alignment and the GSFA on the possible ways to address the discrepancies as described in para. 13. After some investigations, the following solutions were identified:

- (i) The issue identified in para 13(i) is an error and should just be corrected. CXS 309R-2011 was considered by the GSFA working group for CCFA49 in 2017. Note CS 309R-2011 should not be entered for gellan gum (INS 418) as it does not have the functional class of acidity regulator or emulsifier.
- (ii) Regarding issues identified in para 13(ii), investigation indicated that both the current Notes in column 5 of additive entries in Table 3 due to alignment of CXS 319-2015 were not fully consistent in order to address differences in the use of additives in the multiple Annexes included in CXS 319-2015. To amend this situation, it is suggested removing the Note “CS 319-2015 (canned mangoes only)” associated with functional classes of antioxidants and firming agents. Consequentially, “CS 319-2015 (acidity regulator in general and as antioxidant in canned pineapple and canned mangoes” associated ascorbic acid (INS 300) should be simplified as “CS 319-2015 (as antioxidant in canned pineapples)”.
- (iii) Regarding the issue identified in para 13(iii), it is suggested removing Notes “CS 319-2015 (special holiday pack canned pears only)”, “CS 66-1981” and “CS 66-1981 (as a thickener in table olives with stuffing only)” from food additives associated with the corresponding functional classes.

16. To sum up, the following four Notes are proposed for removal:

| Notes in column 5 of Table 3 | Functional classes for which corresponding Notes can be removed |
|--|--|
| CS 319-2015 (special holiday pack canned pears only) | Colours |
| CS 319-2015 (canned mangoes only) | Antioxidants and firming agents |
| CS 66-1981 | Acidity regulators, antioxidants, colour retention agents (table olives darkened with oxidation only), firming agents, flavour enhancers and preservatives |
| CS 66-1981 (as a thickener in table olives with stuffing only) | thickeners |

17. In addition, it is further proposed:

- (i) Note CS 309R-2011 associated with gellan gum (INS 418) should be deleted; and
- (ii) Note “CS 319-2015 (acidity regulator in general and as antioxidant in canned pineapple and canned mangoes” associated with ascorbic acid (INS 300) should be revised as “CS 319-2015 (as antioxidant in canned pineapples)”.

Recommendations

18. CCFA52 is invited to:

- i. note the required changes in the pdf and online versions of the GSFA have been completed;
- ii. implement the decision taken at CCFA51 (i.e. to include a proposed draft Table 3 provision at step 3 in the Agenda Item 3(a) MATTERS OF INTEREST ARISING FROM FAO/WHO AND FROM THE MEETING OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA) document when JECFA publishes an ADI of “not specified” and provides full specifications for the additive” and the additive has an INS number); and
- iii. request the Codex Secretariat, when updating the GSFA database after CCFA52, make revisions to Table 3 as indicated in paras. 16 and 17.