

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 5b

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fourth Session

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA):

PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS (replies to CL 2023/46-FA)

(Comments of Canada, Kenya, Peru, Republic of Korea, Senegal)

Canada

Proposal by Peru – carotenoids

Canada does not support the introduction of to revise the GSFA provisions for beta-Carotenes, synthetic (INS 160a(i)), beta-Carotenes, *Blakeslea trispora* (INS 160a(iii)), carotenal, beta-apo-8'- (INS 160e), and carotenoic acid, ethyl ester, beta-apo-8'- (INS 160f) in FC 04.1.2.5 for the following reasons:

- JECFA withdrew the two group ADIs of 0–5 mg/kg bw for (1) the sum of the synthetic carotenoids β -carotene, β -apo-8'-carotenal and β -apo-8'-carotenoic acid methyl and ethyl esters and (2) synthetic β -carotene and β -carotene derived from *Blakeslea trisporae*. As a result, CCFA53 and preliminary working groups of the GSFA conducted a risk-management exercise to reorganize the groups of carotenoids and to reduce levels as much as possible.
- Peru has proposed to increase the use levels of INS 160a(i) and INS 160a(iii) in FC 04.1.2.5 from 15 mg/kg to 200 mg/kg, after the previously mentioned exercise was conducted. Canada would request justification, from a technological perspective, for this proposed increase in the level of use, especially considering that these carotenes lack JECFA ADIs and should, therefore, be used at levels that are as low as possible and within range of what is currently permitted for these carotenes. Peru has also made their proposal using the previous groupings of carotenoids, which are no longer applicable and so a new request should consider appropriate additive groupings.
- To the latter point, there are currently no provisions in the GSFA for INS 160e in FC 04.1.2.5, and its use in this FC should be considered separately from the use of the INS 160a group.
- Further, INS 160f no longer exists in the GSFA, and an agreed recommendation exists to have it removed from all commodity standards. Therefore, its use in any food category cannot be considered.

Proposal by Senegal – BMC

Canada does not support the proposal presented by Senegal for the use of BMC (INS 1205) to encapsulate micronutrients intended to be added to FCs 13.1, 13.2, and 13.3, for the following reasons:

- As part of JECFA's evaluation of BMC, the Committee estimated exposure to BMC, for adults and children, from its use as a glazing or coating agent in food supplements and foods for special medical purposes, as well as for micronutrient encapsulation for food fortification. The proposal includes FC 13.1 (infant formula) and FC 13.2 (complementary foods for infants and young children). However, infants do not appear to have been included as part of JECFA's exposure assessment of BMC, which means that there is no JECFA evaluation for BMC at this time that is relevant to infants. A review by JECFA would likely be necessary.
- The use of BMC to encapsulate nutrients for fortification purposes in foods subject to FCs 13.1, 13.2 or 13.3 has not been petitioned to the CCFSDU under the 'technological justification of food additives'

framework. As such, Canada would not support a proposal requesting such use of BMC until it is pushed forward to the CCNFSDU first.

Kenya

Position: Kenya thanks and agrees with the proposals from various member countries and observer organizations except for;

- a) Requests by Peru, where Kenya proposes that they be deferred and handled by the alignment committee, and
- b) Request by FIVS on Metatartaric acid where Kenya does not agree with the request of using it as a GMP since an ADI has been set for Metatartaric acid.

Peru

The Codex Secretariat through Circular Letter CL 2023/46-FA **requests proposals for revision and/or new provisions on food additives of the NGAA**, proposals that should be submitted using the form attached in the Annex of the aforementioned Circular Letter¹, in addition the request includes additional questions²; More precisely, the request for information and comments invites proposals concerning: **1.** New food additive provisions in the NGAA, and **2.** The revision of food additive provisions adopted in the NGAA.

In response, Peru **proposes the revision of the provisions for food additives** 1. Quinoline Yellow SIN 104, 2. Sulfur dioxide SIN 220, 3. Potassium Sulfite SIN 225, 4. Sodium thiosulfate SIN 539, 5. Curcumin SIN 100 i, 6. Sulfite Caramel (Caramel II) SIN 150b, 7. Ammonia Candy III (Candy III) SIN 150c, 8. Carotenos, 9. beta-, synthetic SIN 160 a(i) Carotene, 10. beta-, Blakeslea trispora SIN 160 a (iii) Carotenal, 11. beta-apo-8'-SIN 160e Ethyl ester of beta-apo-8'-carotenoic acid SIN 160 f, Dimethylpolysiloxane SIN 900a, provisions adopted in the NGAA for Food Category 04.1.2.5 Jams, jellies, jams, taking into account that the **Standard for jams, jellies and jams CXS 296-2009 has yet to be harmonized with the NGAA** It is listed in the Work Plan for the Future Harmonization of Food Additives Provisions in document FA/54 INF/02, respecting the provisions on Carotene Dimethylpolysiloxane SIN 900a adopted by this plenary.

La Secretaría el Codex mediante Carta Circular CL 2023/46-FA **solicita propuestas de revisión y/o nuevas disposiciones sobre aditivos alimentarios de la NGAA**, propuestas que deben ser remitidas utilizando el formulario adjunto en el Anexo de la citada Carta Circular³, además la solicitud incluye preguntas adicionales⁴; a mayor precisión la solicitud de información y observaciones invita a presentar propuesta relativas a: **1.** Nuevas disposiciones de aditivos alimentarios en la NGAA, y **2.** La revisión de disposiciones de aditivos alimentarios adoptadas en la NGAA.

En respuesta a ello Perú **propone la revisión de las disposiciones para aditivos alimentarios** 1. Amarillo de quinoleína SIN 104, 2. Dióxido de azufre SIN 220, 3. Sulfito de potasio SIN 225, 4. Tiosulfato de sodio SIN 539, 5. Curcumina SIN 100 i, 6. Caramelo al sulfito (caramelo II) SIN 150b, 7. Caramelo al amoniaco III (caramelo III) SIN 150c, 8. Carotenos, 9. beta-, sintético SIN 160 a(i) Carotenos, 10. beta-, Blakeslea trispora SIN 160 a (iii) Carotenal, 11. beta-apo-8'- SIN 160e Éster etílico del ácido beta-apo- 8'-carotenoico SIN 160 f, Dimetilpolisiloxano SIN 900a, disposiciones adoptadas en la NGAA para la Categoría de Alimentos 04.1.2.5 Confituras, jaleas, mermeladas, teniendo en cuenta que la **Norma para las confituras, jaleas y mermeladas CXS 296-2009 aún han de ser armonizadas con la NGAA** misma que se encuentra en lista del Plan de Trabajo para la Futura Armonización de las Disposiciones sobre Aditivos Alimentarios en el documento FA/54 INF/02 respetando las disposiciones sobre Carotenos Dimetilpolisiloxano SIN 900a que esta plenaria adopte.

¹ CAC46 agreed to consider the seven criteria for initiating work in accordance with the Procedure for Reviewing the Incorporation and Revision of Food Additive Provisions in the NGAA

² The request further indicates that (i) whether the proposal relates to a food category (FA) that encompasses product standards, and (ii) whether the proposal also aims to review the products covered by the product standards

³ La CAC46 acordó considerar los siete criterios para iniciar trabajos acordados a lo indicado en el Procedimiento para examinar la incorporación y revisión de disposiciones sobre aditivos alimentarios en la NGAA

⁴ La solicitud indica además que i) si la propuesta está relacionada con una categoría de alimentos (CA) que abarca normas para productos, y ii) si la propuesta tiene también como objetivo revisar los productos cubiertos por las normas para productos

Republic of Korea

1. The Republic of Korea proposes to remove Note XS294* from the acetic acid (glacial) (INS 260), calcium lactate (INS 327), citric acid (INS 330), disodium 5'-guanylate (INS 627), disodium 5'-inosinate (INS 631), disodium 5'-ribonucleotides (INS 635), lactic acid (L-, D-, DL-) (INS 270) provisions in FC 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 12.9.2.3).

* XS294: Excluding products conforming to the Standard for Gochujang (CXS 294-2009)

Senegal

Contexte : Se référant à la CL 2023/46-FA, les Membres et les observateurs ont été invités à soumettre leurs propositions concernant :

- a. les nouvelles propositions pour l'entrée de dispositions relatives aux additifs alimentaires dans la NGAA; et
- b. la révision des dispositions relatives aux additifs alimentaires adoptées dans la NGAA.

Les réponses à cette CL ont été rassemblées par le Secrétariat du CCFA (CX/FA 24/54/8) pour examen par le Groupe de travail physique sur la NGAA et établies par la CCFA52 qui a émis des recommandations sur leur inclusion dans la NGAA, à l'étape 2, à la cinquante-troisième quatrième session du CCFA.

Position : Le Sénégal appuie la proposition portant sur les nouvelles dispositions et révisions relatives au BMC que le pays a soumis.

Justification : Cette proposition permet d'élargir l'éventail d'aliments véhicules pour le BMC et d'assurer la cohérence entre les normes de produits et la NGAA.