TO: Codex Contact Points  
Contact Points of international organizations having observer status with Codex

FROM: Secretariat, Codex Alimentarius Commission,  
Joint FAO/WHO Food Standards Programme

SUBJECT: Request for Comments on the alignment of food additive provisions and alignment plan for regional standards developed by CCLAC

DEADLINE: 31 March 2021

COMMENTS: To:  
Secretariat  
Codex Alimentarius Commission  
Joint FAO/WHO Food Standards Programme  
E-mail: codex@fao.org

BACKGROUND

1. The 51st Session of the Codex Committee on Food Additives (CCFA51) endorsed an updated forward work plan for alignment of food-additive provisions in commodity standards, including three regional standards developed by the FAO/WHO Coordinating Committee for Latin America and the Caribbean (CCLAC).

2. CCLAC21 discussed alignment of food additive provisions in its standards in line with the request from CCFA. As Members needed to review this issue with their technical experts before they could take any decisions on alignment of the regional standards with the General Standard for Food Additives (GSFA) (CXS 192-1995). CCLAC21 agreed to request the Codex Secretariat to issue a Circular Letter (CL) with detailed information on the background and the potential options for alignment of the food additive provisions in order to facilitate decision-making at CCLAC22.

3. The regional standards that need to be aligned with GSFA (CXS 192-1995) are listed below together with the options to be considered for alignment. In order to proceed with the alignment task, clarifications on the food additives provisions in the current regional standards are required. Further details are included in Appendix I.

4. Following a decision on the revision of the food additive provisions in the regional standards, CCLAC should request CCFA for endorsement of food additive provisions in each regional standard.

5. Alignment of the food additive provisions in the regional standards and in the GSFA can only be started once the food additive provisions in the regional standards have been decided.

Regional Standard for Culantro Coyote (CXS 304R-2011)

6. The Regional Standard for Culantro Coyote (CXS 304R-2011) does not include any reference to food additive provisions. CCLAC may consider developing the appropriate food additive provision for inclusion in the standard. In light of GSFA (CXS 192-1995), Culantro coyote belongs to “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)” in which some food additives are permitted (see Appendix II). In light of this there is a need to revise the standard to ensure alignment with the GSFA (CXS 192-1995).

- **Option 1**: Confirm that no food additives are allowed in this commodity and insert text to this effect within the regional standard for Culantro coyote. This could be achieved by a revision of the standard to include a provision indicating that “No food additives are permitted in foods conforming to this standard.” to stipulate that no food additives are allowed for the commodity. In this case, CCLAC should request CCFA to exclude Culantro coyote from Food Category No. 04.2.1.1.
• **Option 2:** Confirm that food additives permitted in Food Category 04.2.1.1 of the GSFA are allowed for use in this commodity and revise the standard to include a food additive provision stating that “Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard” to stipulate that food additives are permitted for use in accordance with the GSFA (CXS 192-1995).

• **Option 3:** Develop a list of food additives which are permitted in this commodity and revise the standard accordingly. For those food additives which are not included in the Food Category 04.2.1.1 of the GSFA, technical justification for the use of food additives should be submitted to CCFA.

**Regional Standard for Lucuma (CXS 305R-2011)**

7. **Regional Standard for Lucuma (CXS 305R-2011)** does not include any reference to food additive provisions. CCLAC may consider developing the appropriate food additive provision for inclusion in the standard. In the GSFA (CXS 192-1995), lucuma belongs to “Food Category No. 04.1.1.1 Untreated fresh fruit” that does not have any food additive provisions as of now.

• **Option 1:** Confirm that no food additives are allowed in this commodity and insert text to this effect within the regional standard for lucuma. This could be achieved by a revision of the standard to include a provision indicating that “No food additives are permitted in foods conforming to this standard.” to stipulate that no food additives are allowed for the commodity.

• **Option 2:** Develop a list of food additives which are permitted in this commodity and revise the standard accordingly. In this case, technical justification for the use of food additives should be submitted to CCFA.

**Regional Standard for Yacon (CXS 324R-2017)**

8. The **Regional Standard for Yacon (CXS 324R-2017)** includes a food additive provision, which states that no food additives are allowed in accordance with CXS 192-1995. However, the latest version of CXS 192-1995 allows some food additives for “Food Category No. 04.2.1.1” which yacon belongs to. Therefore, this provision needs to be updated.

• **Option 1:** Confirm that no food additives are allowed in this commodity and revise the food additive provision within the regional standard for yacon as follows: “No food additives are permitted in foods conforming to this standard.” This would stipulate that no food additives are allowed in the commodity and in this case, CCLAC should request CCFA to exclude yacon from food category No. 04.2.1.1.

• **Option 2:** Confirm that food additives are permitted for use in this commodity in accordance with GSFA (CXS 192-1995) and revise the food additive provision such that “Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard”

• **Option 3:** Develop a list of food additives which are permitted in this commodity. For those food additives which are not included in the Food Category 04.2.1.1 of the GSFA, technical justification for the use of food additives should be submitted to CCFA.

**REQUEST FOR COMMENTS**

9. Codex Members and Observers are invited to review the options for each of the regional standards with regards to the alignment of food additive provisions therein with the GSFA (CXS 192-1995).

10. Comments should address which option should be taken for each standard, and if needed, a technical justification should be provided to clarify the need for the use of food additives.

**GUIDANCE ON THE PROVISION OF COMMENTS**

11. Comments should be submitted through the Codex Contact Points of Codex members and observers in writing, in conformity with the Procedure for the Elaboration of Codex Standards and Related Texts (Part 3 – Uniform Procedure for the Elaboration of Codex Standards and Related Texts, Procedural Manual of the Codex Alimentarius Commission) to the address and by the deadline indicated on the cover page. Comments must be submitted in word file to facilitate their compilation and translation.
### Relationship of Regional Standards Developed by CCLAC and the General Standard for Food Additives (CXS 192-1995; GSFA)

<table>
<thead>
<tr>
<th>Standard</th>
<th>Current food additive provisions</th>
<th>Food additives permitted in GSFA</th>
<th>Options</th>
</tr>
</thead>
</table>
| CXS304R-2011 Regional Standard for Culantro Coyote | No reference to Food Additive Provisions. | Culantro coyote belongs to “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”, in which some food additives are permitted (see Appendix II). | **Option 1**: No food additives are permitted in culantro coyote.  
- Revise the standard to indicate that “No food additives are permitted in foods conforming to this standard.”  
- Request CCFA to exclude *Culantro coyote* from food category No. 04.2.1.1..  
**Option 2**: Food additives are acceptable for use in accordance with GSFA in *Culantro coyote*.  
- Revise the standard to indicate that “Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard.”  
**Option 3**: Develop a list of food additives which are permitted in this commodity.  
- Revise the standard to include the food additives.  
- For those food additives which are not included in the Food Category 04.2.1.1 of the GSFA, technical justification for the use of food additives should be submitted to CCFA. |
| CXS305R-2011 Regional Standard for Lucuma | No reference to Food Additive Provisions. | Lucuma belongs to “Food category No. 04.1.1.1 Untreated fresh fruit”, in which no food additives are provided as of now. | **Option 1**: No food additives are permitted in lucuma.  
- Revise the standard to indicate that ”No food additives are permitted in foods conforming to this standard.”  
**Option 2**: Develop a list of food additives which are permitted in this commodity.  
- Revise the standard to include food additives.  
- Technical justification for the use of food additives should be submitted to CCFA. |
### 8. FOOD ADDITIVES.

This Standard applies to yacon as identified in Food Category 04.2.1.1 Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed and nuts and seeds, and therefore no food additives is allowed in accordance with the provisions of the General Standard for Food Additives (CXS 192-1995).

<table>
<thead>
<tr>
<th>Option 1: No food additives are permitted in yacon.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Revise the standard to indicate that “No food additives are permitted in foods conforming to this standard.”</td>
</tr>
<tr>
<td>• Request CCFA to exclude yacon from food category No. 04.2.1.1.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Option 2: Food additives are acceptable in accordance with GSFA for use in yacon.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Revise the standard to indicate that “Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard.”</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Option 3: Develop a list of food additives which are permitted in this commodity.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Revise the standard to include the food additives.</td>
</tr>
<tr>
<td>• For those food additives which are not included in the Food Category 04.2.1.1 of the GSFA, technical justification for the use of food additives should be submitted to CCFA.</td>
</tr>
</tbody>
</table>

Yacon belongs to “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”, in which some food additives are permitted (see Appendix II).
Food Additives Permitted for Food Category No. 04.2.1.1 in the General Standard for Food Additives (CXS 192-1995)

<table>
<thead>
<tr>
<th>Additive</th>
<th>INS</th>
<th>Year Adopted</th>
<th>Max Level</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACETIC ACID, GLACIAL</td>
<td>260</td>
<td>2013</td>
<td>GMP</td>
<td>262 &amp; 263</td>
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<tr>
<td>ASCORBIC ACID, L-</td>
<td>300</td>
<td>2013</td>
<td>500 mg/kg</td>
<td>262</td>
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<tr>
<td>CITRIC ACID</td>
<td>330</td>
<td>2013</td>
<td>GMP</td>
<td>262 &amp; 264</td>
</tr>
<tr>
<td>LACTIC ACID, L-, D- and DL-</td>
<td>270</td>
<td>2013</td>
<td>GMP</td>
<td>262 &amp; 264</td>
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<tr>
<td>SODIUM DIHYDROGEN CITRATE</td>
<td>331 (i)</td>
<td>2015</td>
<td>GMP</td>
<td>262</td>
</tr>
<tr>
<td>TRISODIUM CITRATE</td>
<td>331 (iii)</td>
<td>2015</td>
<td>GMP</td>
<td>262</td>
</tr>
</tbody>
</table>