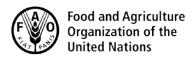
## CODEX ALIMENTARIUS COMMISSION





Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 7a

CRD 31

Original Language

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES

Forty-eighth Session Xi'an, China, 14-18 March 2016

## COMMENTS OF ASSOCIATION INTERNATIONALE POUR LE DÉVELOPPEMENT DES GOMMES NATURELLES (AIDGUM)

AIDGUM would recall that natural gum extracts coming from both *Acacia senegal* and *Acacia seyal* trees are physically a gum from Acacia and therefore they both completely meet the requirements of the JECFA specifications on acacia gum covered by INS 414 and called "gum Arabic (INS 414)".

This is the result of many JECFA meeting discussions and evaluations, all documented in JECFA meeting reports published in WHO Technical report series (TRS)<sup>1</sup>.

AIDGUM would like to draw the attention of this CCFA Committee that JECFA has already addressed this issue back in 1995. In its report, JECFA "recognized that the previous revision led to an inconsistency in that the limits for optical rotation and nitrogen content would have the effect of excluding gums from certain types of acacia senegal, and closely related species such as acacia seyal. The tests for optical rotation and nitrogen content were therefore deleted. In revising the specifications, the Committee nevertheless fully took into account concerns expressed about the potential adulteration of commercial gum Arabic with gums from non-Acacia species. It emphasized the importance of the Identification Test for Hydrolysis Products to ensure the absence of three sugars characteristics of common adulterants in gum Arabic. The Committee also considered that gum Arabic obtained from A.senegal or closely related species and meeting the revised specifications adequately reflects the materials that were toxicologically tested'.

Three years later, in 1998, JECFA stated the following: "In the light of these reports, the Committee reiterated that gum from other acacia species closely related to Acacia senegal and meeting the newly revised specifications would adequately reflect the material that had been toxicologically evaluated. The specifications were revised to make a clear distinction between gum Arabic obtained from A.seyal and from A.senegal'.

Moreover, a Technical Cooperation Programme project TCP/RAF/4557, "Quality Control of Gum Arabic", approved by FAO in 1995, was published in 2000. The report includes the following recommendation to the FAO: "The term gum Arabic in the current JECFA specifications should be revised to include A.senegal, A.seyal and "closely related" species, i.e., those species established in the study to be chemically closely related to A.senegal and A.seyal, respectively". This is on that basis as well that both JECFA and subsequently CCFA has decided to have one specification for all botanical sources.

As mentioned during last year CCFA meeting (47<sup>th</sup> session, 2015), AIDGUM recalled that no new data on toxicology, taxonomy or chemical properties were available in the public domain that would justify or lead the Committee to any revision of the specification of acacia gum. Therefore, there is no technical or scientific evidence that would justify challenging all the previous JECFA evaluations of gum Arabic (INS 414).

AIDGUM considers that the proposal to separate the current INS 414 into two subclasses based on the various botanical sources of the natural gum extracts which are used to prepare gum Arabic currently sold and labelled on finished food products as INS 414 is not acceptable for the reasons already expressed by Nigeria, Chad, Eritrea, Kenya, South Sudan and AIPG. Moreover, the proposal put forward by Sudan does not comply with the principles which are included in Annex I of the regular circular letter issued after each CCFA meetings to request comments for changes to the INS. <sup>2</sup>

Finally, AIDGUM strongly supports the delegations of Chad, Nigeria, Eritrea, South Sudan, Kenya, Ethiopia, Niger and Senegal.

<sup>&</sup>lt;sup>1</sup> http://www.who.int/foodsafety/publications/jecfa-reports/en/

<sup>&</sup>lt;sup>2</sup> See Annex I of CL 2015/10-FA May 2015

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In conclusion, AIDGUM opposes any separation of the current INS 414 and any revision of the current specifications and respectfully submits that the entry for new JECFA work on "gum Arabic" be totally removed from the JECFA Priority List.