

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 2, 6, and 8

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Original language only

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEx COMMITTEE ON FOOD ADDITIVES

#### Fiftieth Session

#### Comments of Kenya

#### Item 2

##### Matters for Action:

**Issue 1:** Standard for Mozzarella (CXS 262-2006)4: CAC40 requested CCFA to address only the technological justification of the use of preservatives and anticaking agents for surface treatment of mozzarella with high moisture content covered by the Standard for Mozzarella (CXS 262-2006) in the framework of the alignment work of food additive provisions of CCMMP standards and those of the GSFA

**Comment:** The use of preservative and anticaking agents may a justified use in mozzarella cheese. However, as it applies in all food additives the commodity committee in this case CCMMP should be requested to provide this justification.

**Justification:** Procedurally the CCFA should not develop technological justification for food additives.

**Issue 2:** The CCFFV20 agreed to recommend to CCFA 50 for their inclusion in the GSFA under FC04.1.1.2, "surface treated fresh fruits" FC04.2.1.2 "surface-treated fresh vegetables". These are mono- and diglycerides of fatty acids (INS 471) and salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium (INS 470 (i)) which extend the postharvest shelf-life as well as maintenance of nutrient levels and organoleptic qualities of fresh fruits and vegetables.

**Comment:** Kenya supports adoption of the recommendations of the CCFFV20.

**Justification:** The commodity committee has provided technical justification for the use of the additive.

**Issue 3:** JECFA requested CCFA50 to consider editorial amendments to the descriptors of FC 14.1.4.2 and FC 14.1.5 as in Appendix I of CX/FA 18/50/2.

**Comment:** Kenya supports the editorial changes as proposed by JECFA.

**Justification:** The editorial amendments' have added clarity in the food category especially in distinguishing the cold and hot ready to drink products.

**Issue 4:** Sorbitol syrup (INS 420(ii)) is currently included in the GSFA (Table 3) although it has not been assigned an Acceptable Daily Intake (ADI) or determined, on the basis or other criteria to be safe by JECFA. Sorbitol syrup is also included in the Standard for Instant Noodles (CXS 249-2006). In order to rectify this situation, JECFA will:

- i). Issue a Circular Letter requesting information on the commercial use of sorbitol syrup (INS 420(ii)), and
- ii). Based on the information provided, CCFA51 will recommend either its removal from the GSFA and the commodity standard or its inclusion in the priority list for JECFA.

**Comment:** Kenya supports the approach

**Justification:** This will ensure consistency of entering food additives in the GSFA.

**Issue 5:** The Codex Secretariat to undertake a review for carotenoids (INS 160a(i), INS 160a(iii), INS 160e, INS 160f); chlorophylls and chlorophyllins, copper complexes (INS 141(i), INS141(ii)); and polysorbates (INS 432, INS 433, INS 434, INS 435, INS 436) in the GSFA and prepare a more comprehensive document with proposals on how to deal with the issue for consideration at CCFA51.

**Comment:** Kenya supports the work to be undertaken by the secretariat.

**Justification:** It is important to ensure the ADI are applied to the specific additives where evaluation was done.

#### Item 6

**Issue:** Recommendations from eWG for CCFA to consider the changes and/or additions to the INS list as presented in Table 1.

**Comment:** Kenya supports the recommendations of the eWG and amendments in annex 1 on new or additional functional class or technological purpose.

**Justification:** The proposals procedurally originate from commodity committees who have the mandate to provide technological justification for consideration and adoption by the CCFA. There is sufficient technical justification for the proposed changes.

#### Item 8

**Issue:** Recommendation 1: That the Committee utilize a new process by which provisions entered into the Step Process at Step 2 will automatically be circulated for comment at Step 3 by the subsequent GSFA EWG.

**Comment:** Kenya supports the recommendation

**Justification:** This will expedite work on various food additives by avoiding unnecessary delay at the initial stages

**Issue:** Recommendation 2: That the Committee consider the following options to revise Section 3.2 of the GSFA Preamble to facilitate consensus on provisions for colours and sweeteners:

Option 1 - Define “advantage” and “does not mislead the consumer”;

Option 2 - Remove “advantage” and “does not mislead the consumer”;

Option 3 - Acknowledge, in a manner that removes the barrier to consensus, that “advantage” and “does not mislead the consumer” are often regionally dependent.

**Comment:** Kenya supports the recommendation to relook at the preamble. While it will ideal to provide definitions of the two terms, the resultant definition may not necessarily eliminate the challenges the two terms have on the application of GSFA. We therefore partly support option 3.

**Justification:** The option provides a viable compromise position and the committee may consider to develop further the option so as to specifically address the challenges arising from the use of both terminologies which has resulted to unnecessary delay in conclusion of a number of food additives. It is also linked to note 161 of the GSFA.

**Issue:** Recommendation 3: That the Committee consider the following options to accelerate the alignment of the GSFA and corresponding commodity standards. The options are not exclusive and some or all could be utilized if considered appropriate by the Committee.

Option 1 - Utilize preparatory work undertaken by industry associations;

Option 2 - Involve another country as an additional co-Chair of the WG on alignment;

Option 3 - Partnership approach between CCFA and Commodity Committees

**Comment:** Kenya supports Option 3

**Justification:** Commodity committees are in a better position to align additives within their committees.

**Issue:** Recommendation 4: That the Committee consider the addition of the following bolded text to the Background section of the INS in order to clarify the relationship between the INS and the GSFA:

The International Numbering System for Food Additives (INS) is intended as a harmonized naming system for food additives as an alternative to the use of the specific names, which may be lengthy. Inclusion in the INS does not imply approval by Codex for use as food additives. The list may include those additives that have not been evaluated by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) **or are not included in the General Standard for Food Additives (CODEX STAN 192-1995)**

**Comment:** Kenya supports this recommendation

**Justification:** The added text adds clarity to the relationship between INS and GSFA

**Issue:** Recommendation 5: That the Committee consider the addition of the following bolded text to the Annex 1 and Annex 2 of the circular letter “Request for proposals for change and/or addition to Section 3 of the Class Names and International Numbering System for Food Additives (CAC/GL 36-1989)”:

Annex 1, Point 5 “Deletion of an additive from the INS List”:

*Proposals for deletion of INS entries cannot be submitted to this circular letter if there are existing provisions (adopted or in the Step Process) for the additive in the General Standard for Food Additives (CODEX STAN 192-1995). The Codex Committee on Food Additives must first remove those provisions from the GSFA prior to the submission of proposals to delete a corresponding INS entry. Proposals for deletion of INS entries should be accompanied by a suitable justification.*

Annex 2, “Justification for the requested INS Change in Section 3: deletion of additive”

*(Please select only the appropriate option and provide details in the space below. Proposals for deletion of INS entries cannot be submitted to this circular letter if there are existing provisions (adopted or in the Step Process) for the additive in the General Standard for Food Additives (CODEX STAN 192-1995).)*

**Comment:** Kenya supports this recommendation

**Justification:** The added text provides clarity to the relationship between INS and GSFA

**Issue:** Recommendation 6: That the Committee consider the following ranking system to be used for requests for placement on the Priority List for those additives intended for inclusion in the GSFA, in order from highest (1) to lowest (3) priority:

- (1) Re-evaluation of an additive, based on an identified safety concern;
- (2) Evaluation of a new additive that is intended to be included in the GSFA;
- (3) Evaluation of a change to the specifications, including but not limited to the addition of a substance, a new source material, a new chemical form of a substance, a change to an analytical method, a change to a tolerance limit, and a revision of a physicochemical property such as melting point.

**Comment:** Kenya supports this recommendation

**Justification:** This provides clear criteria for prioritization of food additives.

**Issue:** Recommendation 7: That the Committee consider the following options for the management of requests for placement on the Priority List for food additives that are not intended for inclusion in the GSFA. Respondents are encouraged to provide practical suggestions to implement these options, or propose new options that are both practical and within the scope of the mandate of the Committee.

Option 1 – Food additives that are not intended for inclusion in the GSFA are not assigned a priority ranking;

Option 2 – Food additives that are not intended for inclusion in the GSFA should be assigned a priority ranking in tandem with other additives.

**Comment:** Kenya supports Option 1

**Justification:** There is no need of evaluating food additives that will not need to be included in GSFA. Their evaluation will only unnecessarily delay updating the GSFA.

**Issue:** Recommendation 8: That the Committee forms an electronic working group to explore revisions to Annex 2 of the Circular Letter Requests for information and comments on the priority list of substances proposed for evaluation by JECFA to address the following issues:

Option 1 - Provide guidance in Annex 2 of the Circular Letter on the level of detail necessary to adequately respond to the listed questions;

Option 2 - Revise the questions in Annex 2 of the Circular Letter to address all criteria listed in Annex 1 “Criteria for the Inclusion of Substances in the Priority List”

**Comment:** Kenya supports the formation of eWG

**Issue:** Recommendation 9: That the Committee, as a future priority not to be completed at this time, consider establishing an overall process for the re-evaluations and re-endorsements of additives currently in the GSFA.

**Comment:** Kenya supports this recommendation

**Issue:** Recommendation 10: That the Committee consider the following related options:

- Option 1 - Maintain the Processing Aids Database as an up-to-date reference on the use of processing aids;
- Option 2 - As a future priority not to be completed at this time, review/amend the Guidelines on Substances used as Processing Aids (CAC/GL 75-2010)

**Comment:** Kenya support these options

**Justification:** The current maintenance system of processing aids is sufficient at the moment; it may be revisited in future when the work load of CCFA reduces.

**Issue:** Recommendation 11: That the Committee consider the questions/criteria that could be used to facilitate a systematic approach to the prioritization of its work

**Comment:** Kenya supports this recommendation

**Justification:** This will facilitate systematic approach to prioritization of CCFA future work.