



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-first Session

PROPOSED DRAFT AMENDMENTS TO THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CXG 36-1989)

Comments at Step 3 (Replies to CL 2019/12-FA)

Comments of Malaysia, United States of America and EU Specialty Food Ingredients

Malaysia

Table 3: Substances to be deleted

General comment

Malaysia also has the same concern of reuse of similar number for another additive if the substance is deleted from the INS list. As such, the Committee may consider retaining the text in strikethrough form with a note of the year of deletion to avoid confusion.

Specific comment

INS	Food Additive	Functional Class	Technological purposes	Malaysia's Comment
128	Red 2G	Colour	Colour	Malaysia has no objection to the proposal to delete Red 2G due to safety concern. However, we would like to recall that CCFO50 had agreed with the Principles for Changes/Additions to Section 3 of the Class Names and International Numbering System (CAC/GL 36-1989). As there are still several draft provisions under discussion at step 7 on Red 2G, Malaysia proposes CCFA to keep the INS number for Red 2G.

United States of America

Comments on Annex 1 Proposed Changes and/or Additions to the INS (at Step 3) as found in CX/FA 19/51/12

Methacrylate copolymer, basic (INS 1205)

The United States supports the proposal made by Senegal to add the functional class of "Carrier" and the technological purposes of "Carrier" and "encapsulating agent" to Methacrylate copolymer, basic (INS 1205). We believe that the justification provided by Senegal regarding the use of INS 1205 for micronutrient encapsulation in conjunction with the successful JECFA review of INS 1205 (in part for use in the micronutrient encapsulation of food) establishes adequate justification for the addition of the requested functional class and technological purposes.

Proposal to delete additives from the INS list

An initial proposal was made to the INS eWG to remove four additives from the INS list (CXG 36-1989) in part on the basis that there were no provisions for their use in the General Standard for Food Additives (CXS 192-1995). Ultimately, only two additives were recommended for deletion from the INS as part of the report of the INS eWG (Red 2G (INS 128) and Distarch glycerol (INS 1411)).

The United States strongly maintains that it is not necessary to remove additives from the INS list on the basis that the additives are not included in the GSFA. The INS was meant to be an open list, and does not

imply approval by Codex for use as a food additive. As indicated in Section 1 of CXG 36-1989: “*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 name, 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 (CXS 192-1995).*”

Federation of European Specialty Food Ingredients Industries (EU Specialty Food Ingredients)

EU Specialty Food Ingredients would like to thank the Codex secretariat for the opportunity to comment on the proposed changes and/or addition to the International Numbering System for Food Additives (CXG 36-1989). Our comments deal with the assignment of an INS number to β - carotene- rich extract from *Dunaliella salina*, specifically.

We support the following changes to the INS list as presented the in tables 2 and 4 of the Annex 1 to the working document CX/FA 19/51/12¹:

Table 2: Change of name

INS No.	Name of Food Additive	Functional class	Technological Purpose
160a(iv)	Carotenes, <i>beta</i> -, algae <u>β- carotene- rich extract from <i>Dunaliella salina</i></u>	Colour	colour

Table 4: Consequential changes in the List of Codex Specifications for Food Additives (CXM 6-2018)

FOOD ADDITIVE	ADDITIF ALIMENTAIRE	ADITIVO ALIMENTARIO	INS No.	Year of adoption
Red 2G	Rouge 2G	Rojo 2G	128	1987; (2003)
β -Carotene-rich extract from <i>Dunaliella salina</i>	Extrait riche en β -Carotène de <i>Dunaliella salina</i>	Extracto de <i>Dunaliella salina</i> rico en betacarotenos	<u>160a(iv)</u>	2018

We confirm that the product described in the JECFA specifications for “beta-carotene-rich extract from *Dunaliella salina*” is marketed worldwide. On the other hand, we are not aware of the presence of products corresponding to the JECFA specifications for “carotenes (algae)” INS 160a(iv) on the market. We therefore support the use of the INS 160a(iv) “carotenes (algae)” for the product corresponding to the JECFA specifications for “beta-carotene-rich extract from *Dunaliella salina*”.

¹ See http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-51%252FWD%252Ffa51_12e.pdf