

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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

Agenda Item 5a and 5c

CRD11

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-second Session
Comments of INDIA

Agenda item 5a

CX/FA 21/52/7

I. Appendix 1- Replies of Codex Committee on Spices and Culinary Herbs (CCSCH) and Codex Committee on Fats and Oils (CCFO)

1. Food Category No. 12.2.1 Herbs and spices)

i. MAGNESIUM STEARATE (INS 470(iii)):

Comment: India supports final EWG Proposal to adopt at GMP with the new note "for herbs use is limited to herbs that have been ground – processed into powder only".

ii. SILICON DIOXIDE, AMORPHOUS (INS 551)

Comment: India supports final EWG Proposal to adopt at GMP with the new note "for herbs use is limited to herbs that have been ground – processed into powder only".

II. Appendix 2- Draft and Proposed draft provisions for Table 3

1. LECITHIN, PARTIALLY HYDROLYZED (INS322(ii)):

Comment: India supports adoption of the additive in table 3.

III. Appendix 3: Creation of a group header in the GSFA for INS 473, 473a, and 474

Comment: India supports adoption of combined provisions of the food additive as listed.

IV. Appendix 7: Provisions for colours in FCs 05.0 and its subcategories, 13.6, and 14.0 and its subcategories (except FC 14.1.2, 14.1.3, 14.2.3 and their subcategories): adopted provisions for colours with Note 161 associated with them, and draft and proposed draft provisions for colours

A. Annex 1 – Adopted Provisions in Food Categories 05.2 and 05.3 with Note 161 attached

1. Category No. 05.2 (Confectionary including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4)

i. PONCEAU 4R (COCHINEAL RED A) (INS 124)

Comment: India supports adoption at 100mg/kg in parent category but does not support revocation from parent category as India allows this food additive in parent category.

ii. SUNSET YELLOW FCF (INS 110)

Comment: India supports adoption at 100mg/kg in parent category.

2. Category No. 05.2.1 (Hard candy)

i. PONCEAU 4R (COCHINEAL RED A) (INS 124)

Comment: India supports adoption at 100mg/kg in parent category 5.2.

3. Category No. 05.2.2 (Soft candy)

i. PONCEAU 4R (COCHINEAL RED A) (INS 124)

Comment: India supports adoption at 100mg/kg in parent category 5.2.

4. Category No. 05.2.3 (Nougats and marzipans)**i. PONCEAU 4R (COCHINEAL RED A) (INS 124)**

Comment: India supports adoption at 100mg/kg in parent category 5.2.

B. Annex 2 – Adopted Provisions with Note 161 attached and Draft and Proposed Draft Provisions in FCs 05.1, 13.6, 14.0 and its subcategories (except 14.1.2, 14.1.3, 14.2.3 and their subcategories)**1. Category No. 05.1 (Confectionary including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4)****i. AZORUBINE (CARMOISINE) (INS 122)**

Comment: India supports discontinuation as India does not allow this food additive in the parent category.

ii. CAMEL II - SULFITE CAMEL (INS 150 b)

Comment: India does not support adoption of this food additive in the parent category.

iii. CURCUMIN (INS 100(i))

Comment: India does not support adoption of this food additive in the parent category.

iv. QUINOLINE YELLOW (INS 104)

Comment: India support discontinuation.

v. TARTRAZINE (INS 102)

Comment: India does not support adoption of this food additive in the parent category.

2. Category No. 05.1.1 (Cocoa mixes (powders) and cocoa mass/cake)**i. ANNATTO EXTRACTS, BIXIN BASED (INS 160b(i))**

Comment: India does not support adoption of this food additive as it is not allowed in India in this food category.

ii. ANNATTO EXTRACTS, NORBIXIN BASED (INS 160b(ii))

Comment: India does not support adoption of this food additive as it is not allowed in India in this food category.

3. Category No. 05.1.3 (Cocoa-based spreads, including fillings)**i. ALLURA RED AC (INS 129)**

Comment: India supports adoption at 100mg/kg in this food category.

ii. AMARANTH (INS 123)

Comment: India support discontinuation.

iii. ANNATTO EXTRACTS, BIXIN BASED (INS160b(i))

Comment: India supports adoption at 100mg/kg in this food category.

iv. ANNATTO EXTRACTS, NORBIXIN BASED (INS160b(ii))

Comment: India supports adoption at 100mg/kg in this food category.

v. BRILLIANT BLUE FCF (INS 133)

Comment: India supports final EWG proposal to maintain adopted provision in this food category and remove note 161.

4. Category No. 05.1.4 (Cocoa and chocolate products)**i. ANNATTO EXTRACTS, BIXIN BASED (INS160b(i))**

Comment: India supports adoption at 100mg/kg as India allows it at this level in this food category.

ii. LYCOPENE, TOMATO (160d(ii))

Comment: India supports discontinuation as it is already listed in Table 3 of the GSFA.

5. **Category No. 05.1.5 (Imitation chocolate, chocolate substitute product)**

i. **ANNATTO EXTRACTS, BIXIN BASED (INS160b(i))**

Comment: India supports adoption at 100mg/kg as India allows it at this level in this food category.

ii. **ANNATTO EXTRACTS, NORBIXIN BASED (INS160b(ii))**

Comment: India supports adoption at 100mg/kg as India allows it at this level in this food category.

iii. **LYCOPENE, TOMATO (160d(ii))**

Comment: India supports discontinuation as it is already listed in Table 3 of the GSFA.

Agenda Item 5a CX/FA 21/52/7 Add.1

I. **Appendix A: Recirculation of specific draft and proposed draft provisions from Appendix 4 of CX/FA 20/52/7: additives intended for use as a glaze or in a glaze/coating or wax for surface treatment in food categories 04.1.1.2 and 04.2.1.2**

A. **Draft and proposed draft provisions in the GSFA in FCs 04.1.1.2 “Surface-treated fresh fruit” and 04.2.1.2 “Surface-treated fresh vegetables, (including mushrooms, and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera, seaweeds and nuts and seeds)”**

1. **Food Category No. 04.1.1.2 (Surface treated fresh fruit)**

Food additive	India's Comments
ACETIC AND FATTY ACID ESTERS OF GLYCEROL (INS 472a)	India does not support adoption as this food additive is not allowed in this food category.
ACETYLATED DISTARCH PHOSPHATE (INS 1414)	India does not support adoption as this food additive is not allowed in this food category.
ALGINIC ACID (INS 400)	India does not support adoption as this food additive is not allowed in this food category
AMMONIUM ALGINATE (INS 403)	India does not support adoption as this food additive is not allowed in this food category
CALCIUM ALGINATE (INS 404)	India does not support adoption as this food additive is not allowed in this food category
CARRAGEENAN (INS 407)	India does not support adoption as this food additive is not allowed in this food category
GUM ARABIC (ACACIA GUM) (INS 414)	India does not support adoption as this food additive is not allowed in this food category
HYDROXYPROPYL CELLULOSE (INS 463)	India does not support adoption as this food additive is not allowed in this food category
HYDROXYPROPYL METHYL CELLULOSE (INS 464)	India does not support adoption as this food additive is not allowed in this food category
PECTINS (INS 440)	India does not support adoption as this food additive is not allowed in this food category

2. **Food Category No. 04.2.1.2 (Surface-treated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds**

Food additive	India's Comments
ALGINIC ACID (INS 400)	India does not support adoption as this food additive is not allowed in this food category
CALCIUM ALGINATE (INS 404)	India does not support adoption as this food additive is not allowed in this food category
PECTINS (INS 440)	India does not support adoption as this food additive is not allowed in this food category

II. Appendix B: Recirculation of draft and proposed draft provisions from Annex 2 of Appendix 6 of CX/FA 20/52/7 and Annex 2 of Appendix 7 of CX/FA 20/52/7: acesulfame potassium (INS 950) in food categories 14.1.4 and 14.1.5 and saccharins (INS 954(i)-(iv)) in subcategories of food categories 14.1.4, and additives with the functional class of colour in FCs 14.1.4 and its subcategories.

A. Annex 1: Provisions for Acesulfame potassium (INS 950) in FCs 14.1.4 and 14.1.5 and Saccharins (INS 954(i)-(iv)) in subcategories of FC 14.1.4

1. Category No. 14.1.4 (Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks)

i. ACESULFAME POTASSIUM (INS 950)

Comment: India supports final EWG proposal to maintain current use level of 600mg/kg with note 188 and 127 and replacement of note 161 with alternative note 478

ii. SACCHARINS (INS 954(i)-(iv))

Comment: India supports final EWG proposal of collapsing 3 provisions for saccharin in 14.1.4.1, 14.1.4.2 and 14.1.4.3 into parent category 14.1.4 and adopt with a reduced ML of 230 mg/kg in FC 14.1.4 and addition of Note 127, removal Note 161 and replacement with the compromise alternative Note 477.

2. Category No. 14.1.5 (Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa)

i. ACESULFAME POTASSIUM (INS 950)

Comment: India supports final EWG proposal to maintain current use level of 600mg/kg with note 188 and 127 and replacement of note 161 with alternative note 478.

B. Annex 2: Proposals for additives with the functional class of colour in FCs 14.1.4 and its subcategories.

1. Category No. 14.1.4 (Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks)

i. ALLURA RED AC (INS 129)

Comment: India support adoption at 100mg/kg as India allows it at this level in this food category.

ii. ANNATTO EXTRACTS, BIXIN BASED (INS 160b(i))

Comment: India support adoption at 100mg/kg as India allows it at this level in this food category.

iii. ANNATTO EXTRACTS, NORBIXIN BASED (INS 160b(ii))

Comment: India support adoption at 100mg/kg as India allows it at this level in this food category.

iv. AZORUBINE (CARMOISINE) (INS 122)

Comment: India support adoption at 100mg/kg as India allows it at this level in this food category.

v. CURCUMIN (INS 100(i))

Comment: India supports adoption at 100mg/kg as India allows it at this level in this food category.

ii. SUNSET YELLOW FCF (INS 110)

Comment: India supports final recirculation proposal to maintain adopted provision in parent category 14.1.4 and remove note 161.

vi. TARTRAZINE (INS 102)

Comment: India supports final recirculation proposal to adopt the provision in parent category 14.1.4 at 100mg/kg and add note 127.

III. Appendix C: Recirculation of adopted provisions from Annex 3 of Appendix 6 of CX/FA 20/52/7: provisions in the step process for Table 3 additives with sweetener function in food category 14.1.5

A. Annex 2: Draft and proposed draft provisions for Table 3 additives with sweetener function in food category 14.1.5

1. Category No. 14.1.5 (Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa)

Food additive	Comment
General Comment: India supports CX/FA 20/52/7 Final EWG Proposal as these food additives are evaluated by JECFA with non-numerical ADI (not specified) and hence adoption at GMP. The labeling w.r.t. 'laxative effect' is prominently displayed on the label.	
ERYTHRITOL (INS 968)	Adopt at GMP (TABLE 3 ADDITIVE) with Notes 160 and 478.
ISOMALT (HYDROGENATED ISOMALTULOSE) (INS953)	Adopt at GMP (TABLE 3 ADDITIVE); add Notes 160 and 477
LACTITOL (INS966)	Adopt at GMP (TABLE 3 ADDITIVE) with Notes 160 and 477
MALTITOL (INS965(i))	Adopt at GMP (TABLE 3 ADDITIVE); Add Notes 160 and 477
MALTITOL SYRUP (INS965(ii))	Adopt at GMP (TABLE 3 ADDITIVE); add Notes 160 and 477
SORBITOL (INS 42(ii))	Adopt at GMP (TABLE 3 ADDITIVE); Add Notes 160 and 477
SORBITOL SYRUP (INS 420(ii))	Adopt at GMP (TABLE 3 ADDITIVE); Add Notes 160 and 477
THAUMATIN (INS 957)	Adopt at GMP (TABLE 3 ADDITIVE) with Notes 160 and 478.
XYLITOL (INS 967)	Adopt at GMP (TABLE 3 ADDITIVE); Add Notes 160 and 477

IV. Appendix D: Provisions in FCs 01.0, 02.0, and 03.0 and their subcategories for additives with the functional class of colour: Draft and Proposed Draft Provisions and Adopted Provisions with Note 161

1. Category No. 01.1.4 (Flavoured fluid milk drinks)

i. ALLURA RED AC (INS129)

Comment: India supports adoption to a ML of 100 mg/kg with note 52 and removal of note 161.

ii. PONCEAU 4R (COCHINEAL RED A) (INS 124)

Comment: India supports adoption to a ML of 100 mg/kg with note 52 and removal of note 161.

2. Category No. 01.6.4.1 (Plain processed cheese)

i. ALLURA RED AC (INS129)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

ii. ANNATTO EXTRACTS, BIXIN BASED (INS 160b(i))

Comment: India support adoption at 50mg/kg as this food additive is allowed at this level in this food category

iii. ANNATTO EXTRACTS, NORBIXIN BASED (INS 160b(ii))

Comment: India support adoption at 50mg/kg as this food additive is allowed at this level in this food category.

iv. CURCUMIN (INS 100(i))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

3. Category No. 01.6.4.2 (Flavoured processed cheese, including containing fruit, vegetables, meat, etc.)

i. ALLURA RED AC (INS129)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

4. Category No. 01.6.5 (Cheese analogues)

i. INDIGOTINE (INDIGO CARMINE) (INS 132)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

5. Category No. 01.7 (Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt))

i. ALLURA RED AC (INS129)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category

ii. ANNATTO EXTRACTS, BIXIN BASED (INS 160b(i))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category

iii. ANNATTO EXTRACTS, NORBIXIN-BASED (INS 160b(ii))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category

iv. AZORUBINE (CARMOSINE) (INS 122)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

v. CURCUMIN (INS 100(i))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category

vi. PONCEAU 4R (COCHINEAL RED A)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

vii. SUNSET YELLOW FCF (INS 110)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category

viii. TARTRAZINE (INS 102)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

6. Category No. 02.2.2 (Fat spreads, dairy fat spreads and blended spreads)

i. ANNATTO EXTRACTS, BIXIN BASED (INS 160b(i))

Comment: India support adoption at 20mg/kg as this food additive is allowed at this level in this food category.

ii. CURCUMIN (INS 100(i))

Comment: India support adoption at 5mg/kg as this food additive is allowed at this level in this food category.

7. Category No. 02.3 (Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions)

i. INDIGOTINE (INDIGO CARMINE) (INS 132)

Comment: India support adoption at 20mg/kg as this food additive is allowed at this level in this food category.

8. Category No. 02.4 (Fat-based desserts excluding dairy-based dessert products of food category 01.7)

i. ALLURA RED AC (INS129)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

ii. ANNATTO EXTRACTS, BIXIN BASED (INS 160b(i))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

iii. ANNATTO EXTRACTS, NORBIXIN BASED (INS 160b(ii))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

iv. CURCUMIN (INS 100(i))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

9. Category No. 03.0 (Edible ices, including sherbet and sorbet)

i. ANNATTO EXTRACTS, BIXIN BASED (INS 160b(i))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

ii. ANNATTO EXTRACTS, NORBIXIN BASED (INS 160b(ii))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

iii. AZORUBINE (CARMOSINE)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category.

ix. CURCUMIN (INS 100(i))

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category

iv. TARTAZINE (INS 102)

Comment: India support adoption at 100mg/kg as this food additive is allowed at this level in this food category

Agenda Item 5c

CONTINUATION OF THE DISCUSSION ON THE RELEVANT PROVISIONS FOR SWEETENERS ASSOCIATED WITH NOTE 161 (REPORT OF THE EWG ON NOTE 161)

1. Food Category No. 04.2.2.8 (Cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds)

Food additive	India's Comments
ASPARTAME (INS951)	India does not support the proposal of revocation of these provisions as sweeteners are permitted for use in this food category in India. This category includes cooked/ fried vegetables, ready to eat curries, Frozen Curried vegetables /Ready to eat vegetables; vegetable gravies, etc. where sugar is added to taste and textural properties. Hence, sweeteners are required considering the possibility of replacing sugar.
NEOTAME (INS 961)	
SACCHARINS (INS954(i)-(iv))	
SUCRALOSE (TRICHLORO GALACTOSUCROSE) (INS955)	