As expressed in our comments on the three circular letters of the electronic working group on the GSFA and on the first and second recirculation of provisions from Annex 3 of Appendix 6 of CX/FA 20/52/7, EU Specialty Food Ingredients welcomes the use of polyols (INS 968 (erythritol), INS 953 (isomalt), INS 966 (lactitol), INS 965 (i) (maltitol), INS 965 (ii) (maltitol syrup), INS 420 (i) (sorbitol), INS 420 (ii) (sorbitol syrup), INS 967 (xylitol)) in food category FC 14.1.5 for use in Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages (excluding cocoa) in the draft provisions for Table 3 additives with sweetener function in FC 14.1.5.

EU Specialty Food Ingredients realized that indeed the use levels of the various polyols for this food category gives a heterogenous picture diverting sometimes by factor 10 or even 100. It therefore seems that further technical clarifications are needed prior to considering the maximum levels.

One reason for this appears to be that some of the use levels were calculated on the liquid food product as consumed, while others were calculated on the instant powder for this kind of beverages, which is the usual form for their marketing (emphasis added).

In addition, the reasons for using polyols in this food category in market practice is not only for “sweetening” as sugar replacer, but also for technological purposes like anticaking, thickener, stabilizer or emulsifier — that on one hand side prevent lumping of the instant powders of these FC, or on the other side provide a good mouthfeel of these products (the use for other technological purposes should be also reflected in the associated footnotes). Therefore, we propose to clarify that these Maximum Use Levels are applicable to the instant beverage products as marketed. We believe that the use levels of polyols in the final prepared beverages as consumed is in the lower single-digit-range that is unlikely to have laxative effect.