



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES**

**Thirty-eighth Session**

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**ALIGNMENT OF FOOD ADDITIVES PROVISIONS IN COMMONITY STANDARDS DEVELOPED BY THE  
COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES (CCNFSDU)**

*(Prepared by the Codex Secretariat)*

**Introduction**

1. CCNFSDU37 agreed to consider alignment of the food additives provisions in the different standards under its jurisdiction with the GSFA at its next session.
2. The decision of CCNFSDU37 reinforced the reminder from CCFA47 to all active commodity committees that it was their responsibility to consider the alignment of food additive provisions of standards with the GSFA for all commodity standards under their responsibility<sup>1</sup>.

**Scope of alignment**

3. Nine (9) standards related to commodities have been developed by CCNFSDU (See Appendix I). The work of alignment would be expected to address the following:
  - a) Ensure that the food additives in the commodity standards have a one-to-one relationship with the respective food categories in Table I and Table II of the GSFA. At the moment this is not the case and there are identified inconsistencies. For example, the following additives are authorised for use under CODEX STAN 72-1981 but are not currently listed in the GSFA, i.e. sodium dihydrogen phosphate and disodium hydrogen phosphate and trisodium phosphate (INS 339 i, ii, iii); potassium dihydrogen phosphate, dipotassium hydrogen phosphate and tripotassium phosphate (INS 340 i, ii, iii); and mixed tocopherol concentrate (INS 307b).
  - b) Address the inconsistencies between the general text used in the section for Food additives in some commodity standards (e.g. CODEX STAN 181-1991; and CODEX STAN 203-1995) and the recommended text of the Procedural Manual. However in the case of CODEX STAN 118-1979, the section on food additives was omitted.
  - c) Harmonise use of names (including synonyms) of food additives (including nomenclature) between commodity standards and the GSFA. For example, in CODEX STAN 73-1981 and CODEX STAN 156-1987, the food additive name “Locust bean gum” is used, on other hand, its synonym “carob bean gum” (INS 410) is used in the GSFA and JECFA monographs. In some standards, only food additives names are listed with no corresponding INS numbers.
  - d) Clarify the status of the footnote associated with the food additive “locust bean gum” (i.e. “temporarily endorsed”) in CODEX STAN 73-1981. As noted in 3 (c) above, “Carob bean gum” (INS 410) a synonym of “locust bean gum”, is already included in the GSFA for use in food categories 13.1.2 (Follow-up formulae); 13.1.3 Formulae for special medical purposes for infants; and 13.2 complementary foods for infants and young children.

**CCFA and Substances for JECFA evaluation**

4. CCNFSDU36 adopted a structured approach (based on the Procedural Manual and the Preamble of the GSFA) to be used in future for inclusion of additives into CODEX STAN 72-1981 or the GSFA:
  - Step 1: Proposal to be checked for: status at JECFA, specifications, intended technological use, and safety when used at proposed levels in infant formula. Any deficiency needs to be addressed by interested parties with CCFA and JECFA before further discussions at CCNFSDU.

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<sup>1</sup> REP15/FA, Para 54

- Step 2: Once all requirements are met, CCNFSDU will consider whether there is sufficient support based on technological needs that supports the use of the food additives in Sections A or B of the standard<sup>2</sup>.

5. At each session, CCFA establishes a priority list of substances for JECFA evaluation, at CCFA48 (2016), agreed that CCNFSDU needed to confirm the technological need of food additives intended for use in infant formula prior to the inclusion in the CCFA priority list; and that that it will be the sponsors' responsibility to obtain CCNFSDU confirmation of the technological need of food additives before submitting the request to CCFA<sup>3</sup>.

6. The process agreed by CCNFSDU36 is thus in conflict with the recent request from CCFA48.

7. This paper seeks to set out a framework on how to consider the question of alignment of additives as well as various questions around food additives as they apply to commodity standards developed by CCNFSDU.

### **Conclusion and Recommendations**

8. In light of the decision of CCNFSDU to start work on alignment of food additives provisions of the commodity standards under the mandate CCNFSDU as well as the recommendation of the CCFA on the need to provide technological justification of food additives prior to inclusion on the JECFA priority list for evaluation, it is recommended that the Committee considers the following options for addressing the issues around food additives:

Establishing an Electronic Working Group to:

- Review the food additive provisions in the adopted standards, with the objective of aligning them with the GSFA and if necessary propose changes to the GSFA; and
- Propose a mechanism or framework for considering the technological justification for substances intended for inclusion on the priority list of substances for JECFA evaluation.

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<sup>2</sup> REP15/NFSDU PARA 143

<sup>3</sup> REP16/FA, Para 120

**APPENDIX**

*Standard for Special Dietary Foods with Low-Sodium Content (including salt substitutes (CODEX STAN 53-1981)*

*Standard for Infant Formula and Formulas for Special Medical Purposes Intended For Infants (CODEX STAN 72-1981)*

*Standard for Canned Baby Foods (CODEX STAN 73-1981)*

*Standard for Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981)*

*Standard for "Gluten-Free Foods (CODEX STAN 118-1981)*

*Standard for Follow-Up Formula (CODEX STAN 156-1987)*

*Standard for Formula Foods for Use in Weight Control Diets (CODEX STAN 181-1991)*

*Standard for Formula Foods for Use in Very Low Energy Diets for Weight Reduction (CODEX STAN 203-1995)*