codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 5(a) **CX/FA 09/41/5 Add.1**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-first Session

Shanghai, China, 16-20 March 2009

COMMENTS AND INFORMATION SUBMITTED IN RESPONSE TO CL 2008/10-FA PART B(POINTS 9-12)

The following comments have been received from the following Codex members and observers:

Brazil, India and IDF

BRAZIL

Part B, points 10 and 11

Brazil has estimated the maximum level of aluminium containing food additives, taking into account their molecular weights and proportions of aluminium. Then, the values expressed as Al were compared to the levels proposed in the ALINORM 08/31/12, Appendix VI. The following comments are based on this data.

Proportion of aluminium in food additives on discussion in the CCFA

(Part 3 – Appendix VI – ALINORM 08/31/12)

INS	Molecular Formula	Molecular Weight	(%Al)
541i	$Na_3Al_2H_{15}(PO_4)_8$ $NaAl_3H_{14}(PO_4)_8 \cdot 4H_2O$	897,82 949,88	6% 5,7%
541ii	$Na_8Al_2(OH)_2(PO_4)_4$	652	8,3%
554	$AlNa_{12}SiO_5$	411	6,6 %
559	Al_2SiO_5	162	33 %
556	$CaAl_2Si_2O_8$ $Ca_2Al_2SiO_7$ Not less than 44% and not more than 50% of silicon dioxide (SiO_2) Not less than 3% and not more than 5% of aluminium oxide (Al_2O_3) Not less than 32% and not more than 38% of calcium oxide (CaO) Not less than 0.5% and not more than 4% of sodium oxide (Na_2O)	278 274	19-20% 2,65%
523	$AlNH_4(SO_4)_2 \cdot 12H_2O$	453,32	6%
523	$AlNH_4(SO_4)_2$	237	11%

Estimated maximum levels for aluminium containing food additives, based on the proportion of Al in each one

(Part 3 – Appendix VI – ALINORM 08/31/12)

The Committee should consider the possibility to express maximum levels for aluminium containing additives as Al, since concern has been raised by JECFA with regard to the contribution of food additives intake as a source of aluminium in the diet.

CALCIUM ALUMINIUM SILICATE

Calcium Aluminium Silicate INS: 556 **(2,65% Al)**

Function: Anticaking Agent

Food Cat. No.	Food Category	Max. Level (mg/kg)	Step/ Notes	Comments
01.8.2	Dried whey and whey products, excluding whey	10000	Adopted	It should be 265 mg/kg as Al
06.1	Whole, broken, or flaked grain, including rice	GMP	7	No information available in Brazil
11.1.2	Powdered sugar, powdered dextrose	15000	Adopted (Note 56)	400 mg/kg as Al
12.1.1	Salt	GMP	Adopted	It should be 265 mg/kg as Al
12.1.2	Salt substitutes	10000	7	It should be 265 mg/kg as Al
14.2.3	Grape wines	GMP	7	Technological need?

ALUMINIUM AMMONIUM SULPHATE

Aluminium Ammonium Sulphate INS: 523 **(6% Al)**

Function: Firming Agent, Raising Agent, Stabilizer

Food Cat. No.	Food Category	Max. Level (mg/kg)	Step	Comments
04.1.2.7	Candied fruit	200	Adopted (Note 6)	
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	4 (Note 6)	
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	35	Adopted (Note 6)	
04.2.2.6	Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	Adopted (Note 6)	
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	500	4 (Note 6)	
06.2	Flours and starches (including soybean powder)	500	4 (Note 6)	
06.2.2	Starches	GMP	7 (Notes 6 & 26)	It should be 500 mg/kg as Al (06.2)
07.1.2	Crackers, excluding sweet crackers	10000	4 (Note 29)	It should be 600 mg/kg as Al
07.1.3	Other ordinary bakery products (e.g., bagels, pita, English muffins)	10000	4 (Note 29)	It should be 600 mg/kg as Al
07.1.4	Bread-type products, including bread stuffing and bread crumbs	10000	4 (Note 29)	It should be 600 mg/kg as Al
07.1.5	Steamed breads and buns	10000	4 (Note 29)	It should be 600 mg/kg as Al
07.1.6	Mixes for bread and ordinary bakery wares	10000	4 (Note 6)	It should be 600 mg/kg as Al
07.2	Fine bakery wares (sweet, salty, savoury) and mixes	10000	4 (Note 29)	It should be 600 mg/kg as Al
09.2.4	Cooked and/or fried fish and fish products, including mollusks, crustaceans, and echinoderms	200	Adopted (Note 6)	

10.2	Egg products	30	Adopted (Note 6)	
10.4	Egg-based desserts (e.g., custard)	380	Adopted (Note 6)	
12.2	Herbs, spices, seasonings and condiments (e.g., seasoning for instant noodles)	500	4 (Note 6)	
15.1	Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	500	4 (Note 6)	

ALUMINIUM SILICATE

Aluminium Silicate INS: 559 **(33% Al)**

Function: Adjuvant, Anticaking Agent

Food Cat. No.	Food Category	Max. Level (mg/kg)	Step	Comments
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	Adopted	It should be 3000 mg/kg as Al
06.1	Whole, broken, or flaked grain, including rice	GMP	7	No information available in Brazil
12.1.2	Salt substitutes	10000	7	It should be 3000 mg/kg as Al
12.2.1	Herbs and spices	GMP	4 (Note 51)	For consistency, it should be 3000 mg/kg as Al

SODIUM ALUMINIUM PHOSPHATES

Sodium Aluminium Phosphate-Acidic INS: 541(i)

Sodium Aluminium Phosphate-Basic INS: 541(ii) **(6 - 8 % Al)**

Function: Acidity Regulator, Emulsifier, Raising Agent, Stabilizer, Thickener

Food Cat. No.	Food Category	Max. Level (mg/kg)	Step	Comments
01.6.1	Unripened cheese	670	4 (Note 6)	
01.6.4	Processed cheese	35000	7 (Note 29)	It should be 2100 mg/kg – 2800 mg/kg (as Al)
01.7	Dairy-based desserts (pudding, fruit or flavoured yoghurt)	2000	7 (Note 6)	
02.4	Fat-based desserts excluding dairy-based dessert products of food category 01.7	2000	7 (Note 6)	
04.1.2.9	Fruit-based desserts, including fruit-flavoured water-based desserts	2000	7 (Note 6)	
05.1.1	Cocoa mixes (powders) and cocoa mass/cake	2000	7 (Notes 6 & 72)	
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	350	4 (Note 29)	
06.2.1	Flours	45000	7 (Note 29)	It should be 2700 mg/kg – 3600 mg/kg (as Al)
06.5	Cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	2000	7 (Note 6)	
06.6	Batters (e.g., for breading or batters for fish or poultry)	1600	7 (Note 6)	
07.1	Bread and ordinary bakery wares	2000	7 (Note 6)	
07.2.1	Cakes, cookes and pies (e.g., fruit-filled or custard types)	2000	7 (Note 6)	
07.2.2	Other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	2000	7 (Note 6)	
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	15300	7 (Note 29)	It should be 900 mg/kg – 1200 mg/kg (as Al)
09.2.2	Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	190	7 (Notes 6 & 41)	

10.4	Egg-based desserts (e.g., custard)	2000	7 (Note 6)	
12.5.2	Mixes for soups and broths	2000	7 (Notes 6 & 127)	
12.6.3	Mixes for sauces and gravies	2000	7 (Notes 6 & 127)	
14.1.4.3	Concentrates (liquid or solid) for water-based flavoured drinks	2000	7 (Notes 6 & 127)	
16.0	Composite foods - foods that should not be placed in categories 01 - 15	190	7 (Note 6)	

SODIUM ALUMINOSILICATE

Sodium Aluminosilicate INS: 554 **(6,6% Al)**

Function: Anticaking Agent

Food Cat. No.	**Food Category**	**Max. Level (mg/kg)**	**Step**	**Comments**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	Adopted	It should be 600 mg/kg as Al
06.1	Whole, broken, or flaked grain, including rice	GMP	7	Is it substance used as food additive or processing aid? What is the technological need?
11.1.2	Powdered sugar, powdered dextrose	15000	Adopted (Note 56)	It should be 1000 mg/kg as Al
12.1.1	Salt	Not informed	Adopted	It should be 600 mg/kg as Al
12.1.2	Salt substitutes	10000	7	It should be 600 mg/kg as Al

INDIA

As per the 68th JECFA 2007, in which Magnesium Sulfate established an ADI ‘not specified’, we support the inclusion of Magnesium Sulfate in Table 3, GSFA.

IDF (The International Dairy Federation)

Part B - item 10 - Comments at Step 3 on new food additive provisions of the GSFA, including clarification on the basis of maximum levels for lycopenes and for aluminium containing food additives

The International Dairy Federation (IDF) wishes to inform that the typical level of use of lycopenes in Fermented Milks in the international dairy industry is 150 mg/kg or less.