



**Food and Agriculture
Organization of
the United Nations**



**World Health
Organization**

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REVISION OF THE NAME AND DESCRIPTORS OF FOOD CATEGORY 16.0

(Prepared by the Codex Secretariat)

Background

The 42nd session of the CCFA agreed to discuss the proposal for the revision of the name and descriptors of food category 16.0 “Composite foods – foods that could not be placed in categories 01-15” and examples of food products in this category at its next Session, as no agreement on the need for this category could be reached (Ref. ALINORM 10/33/12, para. 86).

The following document compiles written comments of Argentina, Australia, Brazil, European Union, India, Indonesia, United States of America, ICGMA and IFAC, submitted at the 42nd CCFA in response to CL 2009/7-FA Point 10 “Comments on the proposal for the revision of the name and descriptors of food category 16.0 “Composite foods - foods that could not be placed in categories 01-15” and examples of food products in this category” (Ref. CX/FA 10/42/8; CX/FA 10/42/8 Add.1; and FA42/CRD 11).

ARGENTINA

Argentina suggests, regarding the name, that the category be named “Industrial culinary preparations”, which excludes all those foods described in categories 1 to 15.

Argentina considers it appropriate to open a category to include the products that are similar.

Further, they may be classified into:

1- Lists for consumption (frozen or not)

Ready-to-eat industrial culinary preparations, frozen or not, based on ingredients of animal and/or plant origin, processed or not, not included in other categories.

2 - Dehydrated

Ready-to-eat industrial culinary preparations, frozen or not, based on ingredients of animal and/or plant origin, processed or not, not included in other categories.

AUSTRALIA

Australia has a similar category within the Australia New Zealand Food Standards Code, ‘Mixed Foods’ (Standard 1.3.1, Schedule 1, 20.0). This category (20.0) has sub-categories including beverages; custard mix, custard powder and blanc mange powder; dairy and fat based desserts, dips and snacks; sauces and toppings (including mayonnaises and salad dressings); and soup bases (made up as directed). While Australia is supportive of food category 16.0 being retained, we note that its intent and scope is somewhat different to the ‘Mixed Foods’ category in the Australia New Zealand Food Standards Code.

BRAZIL

16.0 Composite foods: ~~foods that could not be placed in categories 01-15~~

Composite foods are ~~includes~~ prepared ~~or composite dishes~~ **meals** in which additives are ~~directly~~ added to **achieve a technological effect in the final product** ~~composite food~~. Additives ~~may also be present as a~~

results of carry-over from the ~~ingredients~~ **components** are **covered by the appropriate food category**. ~~For example, an additive that is used as an ingredient in a meat pie, but not in any of its ingredients (e.g., in the crust) is reported in this category.~~

Examples of composite ~~dishes~~ **foods** include: **prepared meals that must be heated prior to consumption (e.g., frozen culinary products consisting of a mixture of components, such as lasagna, casseroles, pizza, risotto), ready-to-eat meals that are thermally-processed, frozen sandwich wraps, and meals to be reconstituted with water or milk (e.g., dehydrated culinary products which may contain processed vegetables or animal ingredients and spices, to be reconstituted with water before cooking), prepared dinners (e.g., frozen entrees), casseroles, mincemeat and snack dips (e.g., onion dip) excluding products under food categories 12.5.2 (mixes for soups and broths) and 12.6.3 (mixes for sauces and gravies), and mixes to prepare other foods (ice creams, beverages, desserts).**

EUROPEAN UNION

The EU takes note that the document CX/FA 10/42/5 has provided only one example of foodstuff – namely bean-paste – as a proposed candidate to be inserted into the category 16.0. The EU takes note that no technological justification was provided to justify this extra needs in term of food additives. In addition, the EU would very much appreciate receiving some clarification about the rationale to insert bean-paste into category 16.0 and not in 04.2.2.6 where the descriptor refers, *inter alia*, to red bean-paste.

The EU still considers that the discussion paper does not resolve the problem regarding the lack of clarity of products that are covered by this category which is far too broad.

Although the EU generally may support the revision of the section 5 (C) of the preamble to the GSFA, the last sentence should be completed with a specific statement requiring an amendment of the current FCS, e.g. a new category/sub category or specific footnote.

On the grounds that a specific compound food may need additional food additives, the food category 16.0 should not be seen as a way for authorising by default food additives in a wide range of non identified compound foods.

If it can be demonstrated, on a case by case basis, that an identified compound food requires an additive with a technological justification which is needed, or if the additive is used in the compound food at the different level than that in the component of the compound food, then such cases should be considered either under the appropriate category(ies) 1-15, e.g. via footnotes or as an alternative by amending the current FCS when it is necessary.

Finally, the EU reiterates that it may be questionable to group “unidentified” compound foods and be possibly confronted in a situation where none of these “composite food” fulfil the core criteria set for the identification of FCS i.e. (1) similarity of food consumption patterns, (2) similarity of food processing and (3) similarity of technological needs.

The EU therefore maintains its position regarding the lack of justification for maintaining the food category 16.0.

INDIA

We accept the proposed revision of the name and descriptors of food category 16.0 “Composite foods – foods that can not be placed in categories 01-15” made in the paragraph 33 of the CX/FA 09/41/13, as referred in the paragraph 147 of the ALINORM 09/32/12.

INDONESIA

Indonesia supports the proposal to revise the title and descriptor of food category 16 and supports the comment of USA, when discussing the GSFA provisions for a particular food additive, the Committee pay particular attention to the reported use of the additive in this category and evaluate whether the use is appropriate for a composite food in light of the revised descriptor, or if the use is already covered by an existing provision in another food category (e.g., due to carry-over).

UNITED STATES OF AMERICA

The USA supports the proposal to revise the title and descriptor of food category 16 and Section 5.0, paragraph (c) of the Preamble to the General Standard for Food Additives (GSFA) as presented in CX/FA

09/41/13 paragraphs 33 and 34. The USA believes that it is of particular importance to remove the text “foods that could not be placed in categories 01-15” from the title. The USA believes that this text is unnecessary and that it could be interpreted to mean that if the user of the GSFA could not identify an appropriate food category for the food in question, it would be placed in category 16.0, perhaps incorrectly, by default.

The USA does not have any additional examples of foods to be included in the descriptor.

If the Committee agrees to revise the scope of food category 16.0, the USA recommends that, when discussing the GSFA provisions for a particular food additive, the Committee pay particular attention to the reported use of the additive in this category and evaluate whether the use is appropriate for a composite food in light of the revised descriptor, or if the use is already covered by an existing provision in another food category (e.g., due to carry-over)

ICGMA (INTERNATIONAL COUNCIL OF GROCERY MANUFACTURERS ASSOCIATIONS)

ICGMA appreciates the opportunity to revise the descriptor of Food Category 16.0 “Composite Foods” and Section 5.0, paragraph (c) of the Preamble to the GSFA. The listing of food additive uses in this food category are intended to meet technological purposes that are required in the composite food and cannot be met as a result of carry-over.

ICGMA has tried to address some delegations’ concerns regarding, generally, the dissimilarities of composite foods (i.e., food consumption pattern; food processing; technological needs). ICGMA attempts to narrow the scope and focus of this category to specifically prepared meals (e.g., “microwavable” meals, ready-to-eat meals, frozen meals, pizza, sandwich wraps, dried culinary products, stew, etc.) Recommendations on revisions to food category (FC)16.0 “Composite Foods” and, as a consequence, to FC 12.6.1 “Emulsified sauces (e.g., mayonnaise, salad dressing)” are made. [Currently listed under FC 16 as an example are “Snack Dips”. Due to the consistency/texture of snack dips, and the fact that, in some country regulations Dips are grouped with Sauces, Gravies and Condiments, ICGMA suggests removing Snack Dips from FC 16.0, Composite Foods, and placing it under FC 12.6.1 “Emulsified Sauces”.] In addition, revision to Section 5(c) of the Preamble to the GSFA is necessary for consistency of the Codex Food Category System. In support of the retention of FC 16.0, examples of food additive provisions that would be grouped under this category are also provided.

Recommendation

1. Revise the Descriptor of Food Category 16.0 Composite foods to better define Composite Foods –

~~16.0 Composite foods – foods that could not be placed in categories 01-15:~~ **(e.g., prepared meals:**

Prepared meals are ~~Includes prepared or composite dishes~~ **foods** in which additives are directly added to **have a technical effect in** the composite food. Additives may also be present as a result of carry-over from the ingredients **components are captured under the appropriate food category**^(a). ~~For example, an additive that is used as an ingredient in a meat pie, but not in any of its ingredients (e.g., in the crust) is reported in this category.~~

Examples of ~~composite dishes~~ **prepared meals** include: **prepared dinners that must be heated prior to consumption (e.g., frozen culinary products consisting of a mixture of components, such as lasagna, casseroles, pizza, chicken with pasta in alfredo sauce, a single mixture of rice with fish and vegetables, beef and vegetable stew), ready-to-eat meals that are thermally-processed (e.g., canned beef hash), frozen sandwich wraps, and meals to be reconstituted with water or milk (e.g.,** dehydrated culinary products which may contain processed vegetables or animal ingredients and spices, to be reconstituted with water before cooking). ~~, prepared dinners (e.g., frozen entrees), casseroles, mincemeat and snack dips (e.g., onion dip).~~

(a) Principles regarding the carry-over of food additives into composite foods is described in Section 4 of the Preamble. Application of the carry-over principle to composite foods is described in Section 5(c) of the Preamble.

2. Revise Section 5(c) of the Preamble to the GSFA -

5c) The food category system takes into consideration the carry-over principle. By doing so, the food category system does not need to specifically mention ~~compound foodstuffs~~ **composite foods** (e.g., prepared

meals, such as pizza, because they may contain, *pro rata*, all the additives endorsed for use in their components), unless the ~~compound foodstuff~~ **composite food** needs an additive that is not endorsed for use in any of its components.

3. Revise Food Category 12.6.1 –

12.6.1 Emulsified sauces **and dips** (e.g., mayonnaise, salad dressing, **onion dip**):

Sauces, gravies, ~~and~~ dressings, **and dips** based, at least in part, on a fat- or oil-in water emulsion. Examples include: salad dressing (e.g., French, Italian, Greek, ranch style), fat-based sandwich spreads (e.g., mayonnaise with mustard), salad cream, ~~and~~ fatty sauces, **and snack dips (e.g., bacon and cheddar dip, onion dip)**.

4. Examples of Food Additive Provisions for Composite Foods

4(a) Food Additives with numerical ADIs

Additive	INS	Reason for addition/Type of Product	Maximum level for non-standardized foods	Notes/Justification
colour, annatto norbixin-based (NEW, include at Step 3 in the GSFA)	160b(ii)	Colour - microwavable meal (e.g., beef ravioli in tomato and meat sauce; chicken and noodle composite food; chicken flavored rice and vegetable products; spinach and cheese ravioli)	200 mg/kg	Norbixin-based annatto is used to restore the yellow color to the composite food. Color additives are typically used to standardize the color of the food product. Other purposes include to impart a yellow color to the food.
Sulfites (sodium metabisulfite) (NEW, include at Step 3 in the GSFA)	223	- antioxidant (antibrowning agent) - Beef and potato component with sauce	500 mg/kg as SO ₂	Sodium bisulfite in Beef Steak Tips would be used to help keep the potatoes from browning in the mixture of components.
L-Tartaric Acid	334	- flavor synergist	GMP	Tartaric acid in the microwavable meal “beef steak and peppers” has a flavor softening effect in products that might use salt/sodium substitutes which could impart harsh notes. As more of those components are used, there is a negative impact on acceptability.
Beta-carotene (step 3)	160a(ii)	Colour - Rice with chicken and vegetables	35 ppm	Beta-carotene is used to standardize the butter-like color of, for example, the entrée “Rice with chicken and vegetables” in a servable cup. beta-Carotene is used to restore color which was destroyed during heat processing.
Caramel III (step 3)	150c	Colour – dehydrated culinary product	50,000 ppm, Note 72	Caramel III is typically added in enough quantities to, for example, a dried culinary product, such that the color of the final food product as prepared by the consumer is of an appropriate brown tone.

Additive	INS	Reason for addition/Type of Product	Maximum level for non-standardized foods	Notes/Justification
Caramel IV (step 3)	150d	Colour – dehydrated culinary product	50,000 ppm, Note 72	Caramel IV is typically added in enough quantities to, for example, a dried culinary product, such that the color of the final food product as prepared by the consumer is of an appropriate brown tone.
disodium hydrogen phosphate (step 6)	339ii	Emulsifying, gelling, stabilizing or thickening agent - Product - Herb Chicken Flavored Vegetable Rice is a dried culinary product that contains dried vegetables, chicken fat, precooked rice, modified corn starch - frozen entrée (e.g., pasta with vegetables and cheese sauce)	5,000 mg/kg	Sodium phosphate acts as a stabilizer for after the frozen entrée is prepared. It has its technical effect in the heated finished product.
DATEM (=Diacetyltartaric and fatty acid esters of glycerol)	472e	<u>Emulsifying</u> (forms or maintains a uniform emulsion of two or more phases in a food), <u>gelling</u> (texture in food by creating a gel), <u>stabilizing</u> (maintain uniform dispersion between two or more components) or <u>thickening agent</u> (increase viscosity) DATEM is used, for example, in prepared meals such as chicken marsala.	1,000 mg/kg	DATEM is used in, for example, in chicken marsala and acts as a stabilizer.
potassium sorbate	202	Preservative	1000 mg/kg as sorbic acid	Sodium benzoate and potassium sorbate are used as yeast and mold inhibitors. They are often used concurrently since there is a synergistic effect.
sodium benzoate	211	Preservative-	1000 mg/kg	Sodium benzoate and potassium sorbate are used as yeast and mold inhibitors. They are often used concurrently since there is a synergistic effect.

*if used singly

Note 72: Ready-to-eat basis.

4(b) Food Additives with ADI “Not Specified” – Maximum Levels are GMP

Additive	INS	Reason for addition/Type of Product	Notes/Justification
Acid, ascorbic	300	Preservative - frozen breakfast entrée consisting of sausage, cheese, scrambled eggs, red and green peppers;	Ascorbic acid prolongs the shelf-life of this composite food by protecting against deterioration caused by mold formation.
Acid, citric*	330	preservative, pH adjusting agent - A ready-to-eat microwavable meal (e.g., chicken/beef meat component with some sauce, vegetables, and spaghetti)	The citric acid acts as a pH adjusting agent lowering the pH of the final product making the product more acidic. Citric acid allows the product to undergo a shorter

Additive	INS	Reason for addition/Type of Product	Notes/Justification
			cooking time. The shorter cooking time prevents the components (e.g., the pasta) from being destroyed. A higher pH would require longer cooking times to sterilize the product which would overcook some of the components.
Acid, lactic	270	pH adjusting agent - (ready-to-eat microwavable meal like “Rice with Chicken and Vegetables” that contains water, rice, vegetables)	Lactic acid controls the controls the acidity.
Colour, caustic caramel (plain)	150a	Colour - ready-to-eat microwavable meals (e.g., meat and gravy type of product; teriyaki chicken with rice;	Caramel coloring is added to the composite food in order to standardize the color.
Colour, paprika	160c	Colour	To standardize color in different types of “microwavable” meals.
Colour, turmeric	100ii	colour - Dried culinary product like “Chicken Flavor Broccoli with Fettuccini” which contains macaroni, corn syrup, dried chicken, broccoli, etc.	To standardize color in different types of “microwavable” meals or dried culinary product.
Disodium 5'-guanylate	627	Flavor Enhancer (enhances existing taste) - dried culinary products (e.g., herb chicken flavored vegetable rice; Chicken Flavor Broccoli with Fettuccini) - ready-to-eat “microwavable” meals such as “Rice with Chicken and Vegetables” - bacon and cheddar snack dip	Disodium guanylate is typically added in combination with disodium inosinate to enhance the organoleptic property of the composite food. It enhances the salty taste of the food. Like salt and MSG, disodium guanylate and disodium inosinate assist the taste buds to sense the product flavors better.
Disodium 5'-inosinate	631	Flavor Enhancer (enhances existing taste) - dried culinary products (e.g., herb chicken flavored vegetable rice; Chicken Flavor Broccoli with Fettuccini) - ready-to-eat “microwavable” meals such as “Rice with Chicken and Vegetables” - bacon and cheddar snack dip	Disodium inosinate is typically added in combination with disodium guanylate to enhance the organoleptic property of the composite food. It enhances the salty taste of the food. Like salt and MSG, disodium guanylate and disodium inosinate assist the taste buds to sense the product flavors better.
Gum, carrageenan	407	Emulsifying, gelling, stabilizing and <u>thickening agent</u> . (frozen lasagna, frozen sandwich wraps)	During the heating process, ingredients tend to release the moisture (water) contained in them (especially when they have been frozen) in products such as lasagna product, pizza, and frozen sandwich wrap. The addition of starches and/or cellulose help form a barrier between the bread/crust and the topping or filling by binding the water. The crust/bread can remain crisp and not become soggy.
Gum, gellan	418	<u>Emulsifying</u> , gelling, stabilizing or thickening agent	

Additive	INS	Reason for addition/Type of Product	Notes/Justification
gum, guar	412	Emulsifying, stabilizing, gelling or thickening agent	In fillings of composite foods (such as pot pies), it can prevent "weeping" (syneresis) of the water in the filling, keeping the crust crisp.
Gum, locust bean (= carob bean gum, carob gum, Saint John's bread, carubin)	410	Emulsifying, stabilizing, gelling or thickening agent	
Gum, xanthan	415	Emulsifying, stabilizing, gelling or thickening agent <ul style="list-style-type: none"> - dried culinary products (e.g., herb chicken flavored vegetable rice) - used in frozen entrée (e.g., butternut squash ravioli in a creamy sauce) - snack dip 	
Lecithin	322	Emulsifying, stabilizing, gelling or thickening agent	
Methyl cellulose	461	thickener(bind water in a lasagna product, pizza, and frozen sandwich wrap)	During the heating process, ingredients tend to release the moisture (water) contained in them (especially when they have been frozen) in products such as lasagna product, pizza, and frozen sandwich wrap. The addition of starches and/or cellulose help form a barrier between the bread/crust and the topping or filling by binding the water. The crust/bread can remain crisp and not become soggy.
Modified food starch	1400-1452	thickener(bind water in a lasagna product, pizza, and frozen sandwich wrap)	Generally, additives are added to meal-type "finished" products as moisture barriers to prevent syneresis (e.g., softening of crust or the "dough" component in frozen entrees, frozen lasagna, pizza, and frozen sandwich wraps.)
Mono- and diglycerides (= mono- and diglycerides of fat forming fatty acids)	471	Emulsifying, stabilizing, gelling or thickening agent <ul style="list-style-type: none"> - ready-to-eat microwavable meals (e.g., meat component with vegetable and grain component) 	
potassium chloride	508	Emulsifying, stabilizing, gelling or thickening agent or flavor enhancer	
Silicon Dioxide	551	Anticaking Agent	Anticaking agents such as silicon dioxide are added directly to CousCous and risotto products that contain processed vegetables or animal ingredients and spices. These anticaking agents are necessary to ensure the stability of the product, prevent clumping of the components, and improve flowability.

Additive	INS	Reason for addition/Type of Product	Notes/Justification
Sorbitol	420	Sweetener	
Titanium Dioxide	171	Color - Ready-to-eat microwavable meal such as "Chicken Alfredo with chicken with penne pasta in alfredo sauce" that contains water, penne pasta, chicken, alfredo sauce, cream, soybean oil, etc. spice, AND titanium dioxide (color).	A product going through a normal retort/thermal processing will succumb to browning effect. Titanium dioxide acts as a whitening agent and helps retain the whiteness of the alfredo sauce in this product.

*if used singly

IFAC (International Food Additives Council)

IFAC believes this category is necessary, as certain foods, such as frozen entrées, cannot be placed in categories 01-15, but require food additives to keep individual items within the entrée separated. Technological functions of food additives in this category include thickener, acidity regulatory, colors, antioxidants, and flavor enhancers. Therefore, we request that this category remain in the GFSA.