CODEX ALIMENTARIUS COMMISSION E

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World Health Organization

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Agenda Item 7 **CX/FA 12/44/14 Add. 1**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

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PROPOSALS FOR CHANGES AND/OR ADDITION TO THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES

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

Brazil, Colombia, Egypt, Japan, New Zealand, United States of America, IDF and IFAC

BRAZIL

Brazil supports the addition of the functional class bleaching agent to INS 928 - Benzoyl peroxide, which is included in the JECFA specification. This additive is used for treatment of whey at the level of 100 mg/kg with no safety concern (63rd JECFA, 2004).

Brazil requests clarification on the reason to align the technological purposes with FCC in Table 3: Proposal for additional technological purposes (Request for new technological purposes for 18 additives in order for the INS to be in line with the FCC).

For consistency and clarity, Brazil would like to suggest changing the name of INS 554 - sodium aluminosilicate - to sodium aluminium silicate. Despite the fact that the JECFA specification for this food additive is published with the name sodium aluminosilicate, the name sodium aluminium silicate would be aligned with other aluminium-containing salts and food additives, such as INS 556 – calcium aluminium silicate. We have noticed that the proposed name is also included in chemical databases.

COLOMBIA

Given the proposed changes and additions to the INS listed in Tables 1 - 4 of the Appendix, Colombia submits the following comments:

For Table 2. Changing a current name of the INS or a function of an INS number:

Table 2. Modification of an existing INS name INS number purpose:

Additive According to CAC/GL 36-1989	**Additive According to JECFA monograph**	**Technological Purpose**	**Comments**
Ponceau 4R (Cochineal Red A) **INS: 124**	Ponceau 4R **INS: 124**	Colour	Making the following revisions: Document CAC/GL 36-1989, in its explanatory note says that the name of the additive sometimes is followed by an additional name shown in parentheses, (Cochineal Red A) in this case, which is optional and can be used, where necessary, to indicate another name commonly associated with the additive or a synonym. In the JECFA monograph the term Red Cochineal is also considered a synonym for the additive and therefore it wouldn't be necessary to change the name.
Lithol rubine BK **INS: 180**	Lithol rubine BK **INS: 180**	Colour	We agree with the correction of the name to match that of the JECFA monograph.

Additive According to CAC/GL 36-1989	Additive According to JECFA monograph	Technological Purpose	Comments
Aluminium **INS: 173**	Aluminum powder **INS: 173**	Colour (for surface only)	We agree with the correction of the name to match that of the JECFA monograph. Additional in the technical function reported in CAC/GL 36-1989, it is necessary to clarify that its technical function is only for surface coloring.
Sodium potassium tripolyphosphate and **INS: 452 (vi)**	Sodium triphosphate **INS: 451 (iii)**		Not found in CAC/GL 36-1989, the additive sodium triphosphate, INS: 451 (iii)

For Table 4. Proposals for additional technological purposes (Request for new technological purposes for 9 additives in order to harmonize the INS with the functional uses of the JECFA specifications). The e-WG proposes changing the title of columns 3 and 4 from functional class to **technological function in order to avoid confusion between the functional classes of food additives among the various Codex standards and taking into account the JECFA specifications, thereby Colombia supports this proposal, for the following additives**:

Table 4. Proposals for additional technological purposes (Request for new technological purposes for 9 additives in order to harmonize the INS with the functional uses of the JECFA specifications).

Additive According to CAC/GL 36-1989	Technological Purpose (INS) According to CAC/GL 36-1989	Additional Technological Purposes (Reference: JECFA Monographs)
Calcium stearoyl lactylate **INS 482 (i)**	Emulsifier	Stabilizer
Potassium hydrogen carbonate **INS 501 (ii)**	Acidity regulator, stabilizer	Raising agent
Aluminium ammonium sulphate **INS 523**	Stabilizer, firming agent	Buffer, colour fixative (colour retention agent)
Ferrous gluconate **INS 579**	Colour retention agent	Colour stabilizer
Beeswax **INS 901**	Glazing agent, clouding agent	Stabilizer, texturizer, thickener, carrier.
Candelilla wax **INS 902**	Glazing agent, clouding agent	Texturing, surface-finishing agent, glazing agent), carrier.
Microcrystalline wax **INS 905 c (i)**	Glazing agent	Defoaming agent
Benzoyl peroxide **INS 928**	Flour treatment agent, preservative	Bleaching agent
Pullulan **INS 1204**	Glazing agent, film forming agent	Thickener

EGYPT

Referring to document CX/FA 12/44/14 concerning proposals for changes and/or addition to the international numbering system for food additives, Egypt's comments on these documents:

1. <u>Table 1: New additives</u>

Egypt proposed that :

Paprika extracts 160 c

Paprika extracts oleoresin 160 c(i)

Paprika extract 160 c(ii)

2. **Table 2: modification of an existing INS name or INS number purpose** :

Ponceau 4R:

Ponceau 4R is the same or equivalent name to the color Cochineal red A. So, Egypt propose to transfer Cochineal red A to the Annex of equivalent (section 3)

3. Table 3: Proposal for additional technological purposes (Request for new technological purposes for 18 additives in order for the INS to be in line with the FCC) :

*** Disodium ethylenediaminetetraacetate (EDETA) INS 386:**

This material cannot be used as a "Stabilizer" because this function does not comply with the definition of Stabilizers in the numerical number tables (INS).

*** Benzoyl peroxide) INS 928:**

Egypt agreed to the addition as the following:

"Bleaching agent" (for flour) as in the function (class flour treatment agent) INS

JAPAN

Japan is pleased to submit the following comments with regard to "Proposals for changes and/or addition to the international numbering system for food additives.

1. General comments

In order to discuss effectively in the electronic working group (eWG) and at the Committee, the reasons for proposed changes should be provided in the working document.

2. Specific comments

Comments on "Additional points which fall outside the focus of this eWG"

(i) Para.13 "the inclusion of functional classes in Section 3 and 4 of GL-36"

Japan supports the inclusion of functional classes in the list of Section 3 and 4 of GL-36 to facilitate cross-referencing between GSFA and GL-36.

Comments on Appendix1 "Proposed changes and/or additions to the INS

(ii) Bullet 8 addition of technological purposes

The following information is necessary for the Committee to make a decision:

- to which functional class(es) new technological purposes should be added;
- the reason why additional technological purposes are necessary;
- what is achieved by the addition of new technological purposes

(iii) Table 2: Technological purpose of Aluminium (INS 173)

Technological purpose of Aluminium"Colour (for surface only)"should be replaced by "surface colourant".

(Rationale)

We have already had the technological purpose "surface colourant". Therefore, it is not necessary to add new technological purpose which seems to have the same meaning.

(iv) Table 3: Aluminium ammonium sulfate (INS 523)

We would like to re-submit our comment for addition of the technological purpose "raising agent".

Justification for the requested INS change in Section 3: new or additional technological purpose (*only select the appropriate option and provide details in the space below)*

□ Evidence that the compound has been or is capable of being used effectively for the technological purpose proposed

□ A Codex Commodity standard has provisions for the use of the compound

□ The JECFA specification monograph lists the technological purpose under the heading "Functional Uses"

■ A national food authority has permitted such a use

■ The food industry is currently using a substance for the technological purpose proposed

□ Other justification, what?

Details:

As raising agent: Aluminium ammonium sulfate reacts with sodium hydrogen carbonate ($NaHCO_3$) and generates carbon dioxide to inflate dough.

Technological purpose: raising agent

(v) Table 3: Ferrous gluconate

The correct INS No. is "579".

NEW ZEALAND

New Zealand would like to thank Iran for the work undertaken by the eWG to prepare a proposal for changes and/or additions to the International Numbering System (INS) list and have the following comments to make:

Table 1: New Additives.

INS160c. The current entry in CAC/GL 36-1989 for INS 160c is Paprika oleoresin. This is not reflected in the proposal. Clarification is required as to whether paprika oleoresin and paprika extract are synonyms or are sub classes with different Codex specifications before any changes can be supported. (This appears to be a change to a current entry not a new additive and should therefore appear in Table 2).

Table 2: Modification of an existing INS name or INS number purpose.

New Zealand does not support the change 452(vi) Sodium potassium tripolyphosphate to 451 (iii) Sodium triphosphate as these are two different additives.

Table 3: Proposal for additional technological purposes (For INS to be in line with FCC)

New Zealand supports the column headers as proposed in the table.

Table 4 Proposal for additional technological purposes (For INS to be in line with "Functional Uses" in JECFA specifications)

New Zealand supports the column headers as proposed in the table.

Technological purposes proposed that are not currently included in Section 2 of CAC/CL 36-1989

New Zealand agrees that entries proposed in Tables 3 and 4 for technological purposes that are not currently recognised by the INS cannot be made until the committee gives approval to the terms. This relates to neutralizing agent, conditioning agent, antimicrobial agent and flavouring adjuvant.

Antimicrobial agent is being proposed as a technological purpose for chlorine. New Zealand does not support this TP being used for chlorine – unless examples of antimicrobial capacity by chlorine use a food additive use are provided. Chlorine antimicrobial activity is normally only temporary and is consistent with use as a processing aid. INS list related to TP for food additive use not processing aid use.

UNITED STATES OF AMERICA

The United States wishes to thank Iran for their hard work and leadership in chairing the electronic working group (eWG) for the INS. The United States appreciates the opportunity to provide the following comments for consideration at the forthcoming 44th Session of the Codex Committee on Food Additives (CCFA).

Comments on additional technological purposes suggested for inclusion in Section 2 of CAC/GL 36-1989

The following technological purposes have been proposed for inclusion in Section 2 of CAC/GL 36-1989:

- "neutralizing agent," as suggested for Aluminium ammonium sulfate (INS 523),
- "conditioning agent," as suggested for Silicon, dioxide, amorphous (INS 551),
- "antimicrobial agent," as suggested for Chlorine (INS 925), and
- "flavouring adjuvant", as suggested for Polyethylene glycol (INS 1521)

We have no concerns with the addition of "neutralizing agent" as a technological purpose under the functional class "Acidity regulator," nor the addition of "Antimicrobial agent" as a technological purpose under the functional class "Preservative."

We do not support the addition of the technological purpose "conditioning agent." The term "conditioning agent" is vague, and it is not clear which functional class would include this technological purpose. We seek clarification of the technological purpose of a "conditioning agent" and of the functional class with which it would be associated.

Likewise, we do not support the use of the term "adjuvant" in the suggested technological purpose "flavouring adjuvant." In the past, the Committee has not encouraged the use of the term "adjuvant" due to its lack of specificity. We seek clarification regarding the need for the technological purpose "flavouring adjuvant," and the appropriateness of its inclusion under the functional class "Flavour enhancer."

Comments on Table 1 "New Additives"

Table 1 indicates a new listing for "Paprika extract," as well as changing its INS number from 160c to 160c(ii). This is confusing, as INS 160c is currently associated with "Paprika oleoresin." The first draft of the report circulated to the eWG on 30 September 2011 indicated the INS number for "Paprika oleoresin" would be revised from INS 160c to INS 160c(ii), and a new INS number of INS 160c(i) would be assigned to "Paprika extract." Thus, it is possible that the INS number of 160c(ii) in Table 1 is a typographical error , and the intent was to assign an INS number of 160c(i) to "Paprika extract." It should also be noted that the Joint FAO/WHO Expert Committee on Food Additives (JECFA) has established a "tentative" specification monograph for "Paprika extract," but has not established an acceptable daily intake (ADI) for the additive. A full JECFA specification monograph is not required for inclusion in the INS list. However, in the past, the Committee has often chosen to include an additive in the INS list only after it has received a full JECFA specification monograph.

Comments on Tables 3 and 4 "Proposals for additional technological purposes"

In general, the United States supports the proposals to associate additional technological purposes with additives in Sections 3 and 4 of CAC/GL 36-1989 (INS List) based on the reference to specification monographs prepared by JECFA and the Food Chemicals Codex (FCC). We support the addition of technological purposes in Sections 3 and 4 only if they are listed in Section 2 (Table of Functional Classes, Definitions and Technological Purposes). In particular, the United States supports the addition of the technological purpose "thickener" to Pullulan (INS 1204), as this functional effect is recognized by JECFA, the FCC, and a successful Generally Recognized as Safe (GRAS) notification in the United States.

It is important to note that if a technological purpose is included in the INS List for an additive, and that technological purpose corresponds to a functional class that is not currently associated with the additive in the GSFA, then, for consistency, the GSFA should be updated to include the additional functional class. As an example, Table 3 proposes that the technological function "Flavour synergist" be added to INS 334 "L(+)- Tartaric acid." The technological purpose "Flavour synergist" is associated with the functional class "Flavour enhancer." Currently, the GSFA only associates the functional classes of "Acidity regulator," "Antioxidant," and "Sequestrant" with INS 334. Thus, if the technological purpose of "Flavour synergist" is added to INS 334 in the INS List, the functional class of "Flavour enhancer" should be associated with INS 334 in the GSFA.

IDF (INTERNATIONAL DAIRY FEDERATION)

IDF expresses its appreciation to and acknowledges the good work done by the leadership of Iran in chairing this electronic working group on INS.

General Comments:

At the outset we should like to repeat some comments of a general nature made within the electronic working group.

1. We note the terms of reference of the eWG includes *considering the replies to the CL requesting proposals for changes / additions to the INS list and prepare a proposal for circulation for comment at Step 3*.

   However, GL-36 states in Section 1 that the [technological] purposes listed therein **are indicative rather than exhaustive.** We also note that Annex 1 to Circular Letter CL 2011/7-FA repeats this point and goes on to state that proposals for the **inclusion of new technological purposes should be accompanied by a suitable reference and lists examples of four such references.** However other than the four references, there are no criteria established to indicate where additional inclusions would be required or justified, taking into account that the technological purposes listed are just indicative in any event. This tends to a situation where all such new requested proposals for new technological purposes being listed in Sections 3 and 4 of GL-36.

2. At this time there are 27 functional classes and 86 technological purposes listed in the table in Section 2 of GL-36 and with more and more technological purposes being added and the lists in Sections 3 and 4 thus becoming longer and longer; this would appear to go against the intent that these lists are indicative only and not exhaustive.

Finally, we thank the delegation of Iran for including our comments in the Appendix 1 of the document CX/FA 12/44/14, in Table 3 and 4 in italic. These comments are sometimes identified as "*Comment from IDF*", sometimes not.

IDF wished to clarify that for each of these comments, the last sentence starting with "*However*..." is a reply from the chair of the eWG to our comment, and not part of IDF's comment.

IFAC (INTERNATIONAL FOOD ADDITIVES COUNCIL)

The International Food Additives Council (IFAC) appreciates the opportunity to comment on Proposals and Changes and/or Additions to the International Numbering System for Food Additives. IFAC is an international association representing companies that produce high quality substances used worldwide as food additives and has NGO status before the Codex Alimentarius.

Regarding Table 1: Modification of an existing INS name or INS number purpose, IFAC would like to provide the following comment. Table 1 of CX/FA 12/44/14 states **"**Sodium potassium tripolyphosphate change to Sodium triphosphate Proposal was disagreed for rationale that the two are two different food additives." However, there is a typo (error) in this draft. For INS 452(vi) change to 451 (iii), IFAC previously requested that sodium potassium tripolyphosphate change to Sodium Potassium Triphosphate; the two are distinctly different compounds (see below). However, "potassium" was inadvertently left out of the sodium potassium triphosphate in Table 1 of CX/FA 12/44/14. We have attached our original submission for reference. Further, we would like to note that sodium potassium triphosphate (INS 451 category) is not a polyphosphate, as defined by the INS category 452. Thus, these are two distinct phosphates that should have different INS numbers, as previously requested by IFAC.

Table 1: modification of an existing INS name or INS number purpose

452(vi) change to 451(iii)	Sodium potassium tripolyphosphate change to Sodium **potassium** triphosphate *Please note, IFAC provided this name in its original submission to the eWG; perhaps it was copied and pasted incorrectly. See attached document (IFAC's previous submission) for additional information.		acidity regulator emulsifier moisture-retention agent raising agent sequestrant stabilizer

Additionally, IFAC agrees with the proposal to add a column to Tables 3 and 4 of the INS titled, "Functional Class" and recommends there be four columns in Table 3 and 4 of the INS, as follows: 1: INS number, 2: additive name, 3: INS Functional Class, 4: Technological Purpose (as examples). We recommend that the column "Technological Purpose" be labeled to say "Technological Purpose (as examples)," since many governments do not understand that the list of Technological Purposes is not all inclusive. This will help alleviate global trade issues.

In addition, we request that for INS 1521, Polyethylene glycol (PEG), the technological purpose of plasticizer be included in the technological purpose column. Although the functional class "emulsifier" listed includes a technological purpose of "plasticizer," some countries do not understand that the INS list is not all inclusive and thus it is very important that key technological purposes be listed next to the name of additives.