CODEX ALIMENTARIUS COMMISSION



Food and Agriculture Organization of the United Nations



#### Agenda Item 5(a)

CX/FA 13/45/7 January 2013

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

## CODEX COMMITTEE ON FOOD ADDITIVES

#### **Forty-fifth Session**

#### Beijing, China, 18-22 March 2013

#### RECOMMENDATIONS FOR PROVISIONS IN TABLES 1 AND 2 FOOD ADDITIVE LISTED IN TABLE 3 WITH "ACIDITY REGULATOR" FUNCTION AND HORIZONTAL APPROACH FOR PROVISIONS IN TABLES 1 AND 2 FOOD ADDITIVE LISTED IN TABLE 3 WITH "EMULSIFIER, STABILIZER AND THICKENER" FUNCTION

Prepared by an electronic Working Group lead by the United States of America, with the assistance of Australia, Brazil, Canada, Costa Rica, the European Union, Japan, Iran, Netherlands, New Zealand, Spain, Thailand, the United Kingdom, Biopolymer International, AIDGUM, CEFS, EFEMA, ELC, EuSalt, IAI, ICGA, ICGMA, IDF, IFAC, IFU, Marinalg International, OIV

#### Background

1. The 43<sup>rd</sup> Session of the Codex Committee on Food Additives (CCFA) agreed to consider at its next session the provisions in Table 1 and 2 of the General Standard for Food Additives (GSFA) for those food additives in Table 3 with the function "acidity regulators" or "emulsifiers, stabilizers, thickeners". A list of Table 3 additives with the technical function "acidity regulator" or "emulsifiers, stabilizers, thickeners" was provided in Appendix X of REP 11/FA, with the additives grouped by functional class.<sup>1</sup>

2. To facilitate the consideration of these groups of food additives, the 43<sup>rd</sup> Session of the CCFA also agreed to take a horizontal approach, i.e. to identify those food categories in the Annex to Table 3 in which the use of "acidity regulators" or "emulsifiers, stabilizers, thickeners" was technologically justified and those food categories in which it was not. The Committee agreed to establish an electronic Working Group (eWG), led by the United States of America, to develop this approach for use by the physical Working Group (pWG) on the GSFA when recommending final adoption, discontinuation, or revocation of the food additives provisions in Table 1 and 2 for the "acidity regulators" and "emulsifiers, stabilizers, thickeners" in Table 3.

The eWG on the GSFA for the 44<sup>th</sup> Session of the CCFA prepared proposals for the horizontal 3. approach for both "acidity regulators" and "emulsifiers, stabilizers, thickeners".<sup>2</sup> The pWG on the GSFA at the 44<sup>th</sup> Session of the CCFA considered the horizontal approach for "acidity regulators" proposed by the eWG and provided subsequent recommendations to the 44<sup>th</sup> Session of the CCFA.<sup>3</sup> These recommendations classified the food categories in the Annex to Table 3 where acidity regulators were: (i) acceptable and technologically justified; (ii) not justified; and (iii) should be considered on a case-by-case basis. The Committee agreed: (i) to discontinue work on the provisions in Tables 1 and 2 for food additives listed in Table 3 with "acidity regulators" function in those food categories were their uses were not justified; and (ii) that an eWG should consider the implementation of the recommendations of the pWG for food categories where acidity regulators are technologically justified or considered on a case-by-case basis. The Committee was not able to discuss the horizontal approach for food additives listed in Table 3 with "emulsifiers, stabilizers, thickeners" function due to time constraints, and agreed that the eWG should further refine the horizontal approach for consideration of food additives listed in Table 3 with "emulsifiers, stabilizers, thickeners" function.4

#### **Working Document**

#### General Comments

5. General comments from eWG members on Table 3 food additives with "acidity regulator" or "emulsifier, stabilizer, thickener" function are presented in Appendix 1 to this document.

<sup>&</sup>lt;sup>1</sup> REP 11/FA, paras. 71-72.

<sup>&</sup>lt;sup>2</sup> CX/FA 12/44/9 Add 1.

<sup>&</sup>lt;sup>3</sup> FA 44/CRD 2, Appendix 8.

<sup>&</sup>lt;sup>4</sup> REP 12/FA, paras. 94-98.

## Acidity Regulators:

- 6. Appendix 2 of the current document contains proposals on:
  - The existing adopted, draft, and proposed draft provisions in Tables 1 and 2 for food additives listed in Table 3 with "acidity regulator" function.
  - The horizontal approach for the justification of the use of acidity regulators in food categories that were not discussed by the pWG on the GSFA at the 44<sup>th</sup> Session of the CCFA.
  - The horizontal approach for the justification of the use of acidity regulators in specific food categories previously discussed by the pWG on the GSFA at the 44<sup>th</sup> Session of the CCFA. These include food categories where the pWG categorized the justification for the use of acidity regulators as "case-by-case" and where the current eWG provided information that acidity regulators are used in food category 04.2.1.3 *Peeled, cut or shredded fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds and nuts and seeds*
  - Note: Appendix 2 contains no proposals on the horizontal approach for the justification of the use of acidity regulators in food categories that were designated "Justified" or "Not Justified" by the pWG on the GSFA at the 44<sup>th</sup> Session of the CCFA (with the exception of food category 04.2.1.3 as discussed above). The decision of the pWG on the GSFA at the 44<sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in these food categories was taken as final and not discussed by the eWG.

7. These proposals are based upon a consensus approach taking into account the general recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2, comments from Codex Members and non-governmental organization (NGOs) recorded in CX/FA 12/44/9 Add. 2, and comments by members of the current eWG. These recommendations are based on a "weight of evidence" approach; that is, comments containing justifications were given more weight than comments with no supporting justification.

8. Several eWG members commented that the implementation of the horizontal approach may inadvertently affect specific provisions for food additives with multiple functions. For food additives with multiple functions, the use of the additive only as an acidity regulator was taken into account in developing the proposals for the horizontal classification of the justified use of acidity regulators in a particular food category. Therefore, the proposals in Appendix 2 for the horizontal classification of food categories are applicable to the use of food additives as acidity regulators only, and should not be applied for a technical purpose other than as an acidity regulator. Likewise, the use of a food additive with acidity regulator function for a technical purpose other than as an acidity regulator was not taken into account when proposing whether the use of the functional class of acidity regulator is technologically justified in a particular food category.

9. Appendix 2 is presented in the format of the food categories listed in the Annex to Table 3. Adopted, draft, and proposed draft provisions currently in the GSFA for food additives in Table 3 with the function "acidity regulators" are listed under the appropriate food category.<sup>5</sup> The hierarchical nature of the food category system is reflected by including subcategories affected by the listing of a parent food category and the food additives with "acidity regulator" function listed in those commodity standards is provided for each food category. Information on the decision of the pWG of the GSFA at the 44<sup>th</sup> CCFA in regard to the horizontal approach for acidity regulators for each food category is also presented. The following conventions were used to prepare Appendix 2:

- Subcategories not listed in the Annex to Table 3, but affected by the listing of the parent category in the Annex to Table 3 are indicated by <u>underlining</u> the food category number of the affected subcategory.
- In several instances Appendix 2 recommends moving a food additive provision from a parent food category to a subcategory. In such instances, the original provision in the parent food category is indicated with strikethrough font and the new provision in the subcategory is indicated in **bold** font with no step indicated in the "Step/Adopted" column

<sup>&</sup>lt;sup>5</sup> Only provisions for those additives listed in Appendix X of REP 11/FA are included in this working document.

## Emulsifiers, Stabilizers, Thickeners:

- 10. Appendix 3 of the current document contains proposals on:
  - The existing adopted, draft, and proposed draft provisions in Tables 1 and 2 for food additives listed in Table 3 with "emulsifier, stabilizer, thickener" function.
  - The horizontal approach for the justification of the use of emulsifiers, stabilizers, thickeners in specific food categories listed in the Annex to Table 3.

11. These proposals are based upon consensus, using a "weight of evidence" approach, and taking into account comments as described in paragraph 7 for acidity regulators.

12. For food additives with multiple functions, the use of the additive only as an emulsifier, stabilizer and thickener was taken into account in developing the proposals for the horizontal classification of the justified use of emulsifiers, stabilizers and thickeners in a particular food category. Therefore, the proposals in Appendix 3 are applicable to the use of food additives as emulsifiers, stabilizers and thickeners only, and should not be applied to the use of food additives with multiple functions for a technical purpose other than as an emulsifier, stabilizer and thickener. Likewise, the use of a food additive with emulsifier, stabilizer and thickener function for a technical purpose other than as an emulsifier, stabilizer and thickener was not taken into account when proposing whether the use of the functional classes of emulsifiers, stabilizers and thickeners is technologically justified in a particular food category.

13. Appendix 3 is presented in the format of the food categories listed in the Annex to Table 3. Adopted, draft, and proposed draft provisions currently in the GSFA for food additives in Table 3 with the function "emulsifiers, stabilizers, thickeners" are listed under the appropriate food category.<sup>6</sup> The hierarchical nature of the food category system is reflected by including subcategories affected by the listing of a parent food category and the food additives with "emulsifiers, stabilizers, thickeners" three stabilizers, thickeners, stabilizers, the commodity standards that correspond to each food category and the food additives with "emulsifiers, stabilizers, thickeners" function listed in those commodity standards is provided for each food category. The conventions used to prepare Appendix 3 are the same as those used to prepare Appendix 2 (see paragraph 9).

<sup>&</sup>lt;sup>6</sup> Only provisions for those additives listed in Appendix X of REP 11/FA are included in this working document.

## Appendix 1: General Comments by eWG members

## **European Union (EU):**

# General comments on the use of acidity regulators in Wine categories (i.e. 14.2.3, 14.2.3.1, 14.2.3.2 and 14.2.3.3)

44<sup>th</sup> CCFA's Physical working group on the GSFA decided to consider acidity regulators on "case-by-case basis" in the category 14.2.3. The EU strongly opposes to the proposal in the second circular to change the category 14.2.3 and its sub-categories to "justified". Wine is a very specific product, highly regulated, which quality factors are essential for its identity. Some additives (acidity regulators/ stabilisers and thickeners) affect the quality characteristic of wine, others may be used as processing aids and some have also other technological purposes. Therefore, acidity regulators as well as stabilisers and thickeners have to be considered on case-by-case basis in the category 14.2.3 and its subcategories. Emulsifiers are generally not justified in wine.

Furthermore, the food category "grape wine" (14.2.3) is identified in the GSFA as the wine defined by the International Code of Oenological Practices, established by the International Organisation for Vine and Wine (OIV) (footnote 87 of the Codex General Standard for Food Additives - CODEX STAN 192-1995). The International Code of Oenological Practice corresponds to a commodity standard. The EU strongly recommends that the list of additives in the GSFA should be coherent with the additives listed in the International Code of Oenological Practices in order to avoid having two divergent international standards. Finally, the EU supports the development of a Codex commodity standard for wine categories which would be based on the provisions listed in the International Code of Oenological Practices are commodity standard for wine categories which would be based on the provisions listed in the International Code of Oenological Practices are commodity standard for wine categories which would be based on the provisions listed in the International Code of Oenological Practices published by the OIV.

#### Technological justification

The EU strongly recommends that the technological justification is included in the final documents to be submitted to the Codex Secretariat. It would facilitate the discussion during the Physical Working Group.

#### Japan:

### Food category No. 01.1.1.1 Milk (plain)

Japan does not support to establish food additive provisions in this food category. In Japan, milk (no food additives are used) is distinguished from milk products which contains food additive. For ensuring consistency with Codex general standard for the use of dairy terms (CODEX STAN 206-1999), Japan proposes that the new sub category for milk products which may contain food additives be established.

#### (Rationale)

According to Codex general standard for the use of dairy terms (CODEX STAN 206-1999), definitions of the term "Milk" and "Milk product" are as follows:

*"Milk* is the normal mammary secretion of milking animals obtained from one or more milkings without either addition to it or extraction from it, intended for consumption as liquid milk or for further processing."

*"Milk product* is a product obtained by any processing of milk, which may contain food additives, and other ingredients functionally necessary for the processing."

Taken the above definition into consideration, milk which contains food additives does not conform to the definition of "Milk" but that of "Milk product". Therefore, food additive provisions should not be established in food category 01.1.1.1 and be established the new sub category for milk products.

#### Spain:

As a general comment, we consider that some additives that are included in several functional classes may have been incorporated to these documents with not appropriate functions (out of the scope of this eWG) by using new notes in order to restrict its use to a certain functional class. Although in a first stage we supported these notes now it seems more correct to include only those additives used as AR and ES&T respectively.

#### The United Kingdom (UK):

We understand this work to be considering whether a horizontal approach can be adopted for a particular functional class: if one or more substances of a particular functional class are already permitted in a food category, does it mean (subject to any safety considerations) that other substances of the same functional class can be accepted in that food category? Where we find some confusion is where a substance has more than one functional class. For example, if a substance is both an acidity regulator and an anti-oxidant then existing inclusion in the GSFA may be because of its anti-oxidant properties, in which case its inclusion in a

particular food category doesn't set any sort of precedent for the use of other acidity regulators in that food category.

#### The United States of America (USA):

The USA recognizes that one of the tasks of the GSFA eWG is to implement a horizontal approach to "acidity regulators" and "emulsifiers, stabilizers, and thickeners". However, the implementation of this horizontal approach may inadvertently affect specific provisions for food additives with multiple functions where those additives are not used as either acidity regulators or emulsifiers, stabilizers, or thickeners (for example, a provision for a food additive with both the technical function of "antioxidant" and "acidity regulator" may be discontinued or revoked in a food category where the use of acidity regulators is not justified, even though the additive is used as an antioxidant in that food category, and not as an acidity regulator). In such instances, the USA proposes that the specific provision be kept in the GSFA, but with an appropriate note indicating the intended use of the food additive. It is also the opinion of the USA that such provisions should not be taken into account when determining whether the broad use of acidity regulators or emulsifiers, stabilizers, or thickeners is technologically justified in a particular food category.

#### Appendix 2: Acidity Regulators

Food Category No. 01.1.1 (Milk and buttermilk (plain))

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

#### Corresponding commodity standards: None

**eWG Proposal for Horizontal Classification of Food Category:** Not Justified **Justification for proposal**: Appendix 8 of FA 44/CRD2 notes that acidity regulators are not justified in subcategory (01.1.1.1), therefore their use is not appropriate in the parent food category (01.1.1)

Comments by eWG on horizontal classification proposal: Japan, ELC: Supports proposal

Brazil: stabilizers necessary when adding micronutrients to milk to keep uniform product

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
TRISODIUM CITRATE	<u>331(iii)</u>	GMP		Ŧ	Discontinue in FC 01.1.1 and adopt in FC 01.1.1.2	Japan, UK: Support proposal Brazil: Agree with discontinuation

#### Food Category No. 01.1.1.1 (Milk (plain))

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Justified

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach on the use of acidity regulators in this food category as "Not Justified" was taken as
	final and comments on this approach were not requested by the eWG. There are no existing provisions in the GSFA for this food category.

## Food Category No. 01.1.1.2 (Buttermilk (plain))

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

eWG Proposal for Horizontal Cla	ssification	of Food Categ	ory:		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach on the use of acidity regulators in this food category as "Justified" was taken as final and comments on this approach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
MAGNESIUM CARBONATE	504(i)	GMP		7		UK, IDF: supports proposals	
MAGNESIUM HYDROXIDE	528	GMP		7		ELC: the definition as laid down in the FC includes processed	
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP		7	Adopt with note "For use in heat-treated buttermilk only"	buttermilk (e.g.UHT treated), therefore we consider the use of additives is in general justifiable, however, the additives as listed down here are not specific for the heat-treatment processes which are foreseen in this FC. Acidity regulators should be possible in order to adjust the pH-Value prior to the heat treatment and to	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7			
POTASSIUM LACTATE	326	GMP		7			
SODIUM DIHYDROGEN	331(i)	GMP		7		prevent thermal coagulation. The majority of potential acidity	

CITRATE				regulators have more functions that just AR, therefore the
SODIUM LACTATE	325	GMP	7	discussion should be restricted to the functional class as such. All
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	potential ARs (including those currently not listed in the GSFA in
				this category) should be later on discussed on a case-by case
				basis. For example, the use of citrates includes more functions
				than just AR, it includes in particular sequestering agent for the
				prevention of calcium precipitation as "milkstone" or to control the
TRISODIUM CITRATE	331(iii)	GMP	7	gelling

Food Category No. 01.2 (Fermented and renneted milk products (plain) excluding food category 01.1.2 (dairy based drinks))

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: None, 243-2003 corresponds to subcategories 01.2.1.1 & 01.2.1.2

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Acidity regulators are not generally justified in all	Brazil, Costa Rica, EU, UK: Supports proposal
subcategories (FC 01.2.1). As such acceptability of acidity regulators is specific to	
each subcatgory and cannot be specified in the parent category.	

Food Category No. 01.2.1 (Fermented milks (plain))

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Justified

approach on the use of acidity regulators in this food category as "Not Justified" was taken as final and comments on this approach were not requested by the eWG. There are no existing provisions for acidity regulators in the GSFA for this food category.	eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal
final and comments on this approach were not requested by the eWG. There are no existing provisions for acidity regulators in the GSFA for this food category.		approach on the use of acidity regulators in this food category as "Not Justified" was taken as
provisions for acidity regulators in the GSFA for this food category.		final and comments on this approach were not requested by the eWG. There are no existing
		provisions for acidity regulators in the GSFA for this food category.

Food Category No. 01.2.1.1 (Fermented milks (plain), not heat-treated after fermentation)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 243-2003: does not allow acidity regulators in non-heat treaded fermented milks

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Acidity regulators are not listed for use in plain	Brazil, EU, UK, IDF: Supports proposal
fermented milks in CODEX STAN 243-2003.	

# Food Category No. 01.2.1.2 (Fermented milks (plain), heat-treated after fermentation))

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

Corresponding commodity standards: 243-2003: allows acidity regulators in heat-treated fermented milks

eWG Proposal for Horizontal Cla	assification	of Food Categ	ory:		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal			
					approach on the use of a	cidity regulators in this food category as "Justified" was taken as final		
					and comments on this ap	proach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
AMMONIUM HYDROXIDE	527	GMP		4				
CALCIUM CARBONATE	170(i)	GMP		4	]			
CALCIUM HYDROXIDE	526	GMP		4	]			
CALCIUM LACTATE	327	GMP		4	]			
CALCIUM OXIDE	529	GMP		4	]			
CITRIC ACID	330	GMP		7				
GLUCONO DELTA-LACTONE	575	GMP		4				
MAGNESIUM CARBONATE	504(i)	GMP		7				
MAGNESIUM HYDROXIDE	528	GMP		7		Brazil Casta Bias Ell Spein LIK ICOMA IDE: support		
MAGNESIUM HYDROXIDE						Brazil, Costa Rica, EU, Spain, UK, ICGMA, IDF: Support		
CARBONATE	504(ii)	GMP		7		proposals.		
MALIC ACID, DL-	296	GMP		4	Adopt	the LIS as an acidity regulator at CMP and in cultured milk as a		
POTASSIUM CARBONATE	501(i)	GMP		4	Адорг	"flavour precursor" at 1500 mg/k		
POTASSIUM DIHYDROGEN						<b>IDF</b> . There is a one-to-one relationship between this category and		
CITRATE	332(i)	GMP		7		the Codex STAN 243-2003		
POTASSIUM LACTATE	326	GMP		7				
SODIUM CARBONATE	500(i)	GMP		4				
SODIUM DIHYDROGEN								
CITRATE	331(i)	GMP		7				
SODIUM HYDROGEN								
CARBONATE	500(ii)	GMP		4	]			
SODIUM HYDROXIDE	524	GMP		4	]			
SODIUM LACTATE	325	GMP		7	]			
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	]			

# Food Category No. 01.2.2 (Renneted milk (plain))

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

eWG Proposal for Horizontal Cla Justification for proposal: No tea eWG Members	assification chnological j	of Food Categ ustification prov	ory: Not J ided for pr	ustified ovisions by	Comments by eWG on horizontal classification proposal: Brazil, EU, UK: Support proposal		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
					Postpone until discussion of FC 01.2.2 in Appendix		
CALCIUM CARBONATE	170(i)	GMP		7	3 - used as ES&T		
MAGNESIUM CARBONATE	504(i)	GMP		7			
MAGNESIUM HYDROXIDE	528	GMP		7	Discontinuo		
MAGNESIUM HYDROXIDE					Discontinue		
CARBONATE	504(ii)	GMP		7			
POTASSIUM DIHYDROGEN							
CITRATE	332(i)	GMP		7	Postnone until discussion		
SODIUM DIHYDROGEN					of EC 01 2 2 in Appendix		
CITRATE	331(i)	GMP		7			
TRIPOTASSIUM CITRATE	332(ii)	GMP		7			
TRISODIUM CITRATE	331(iii)	GMP		7			

# Food Category No. 01.4.1 (Pasteurized cream (plain))

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

Corresponding commodity standards: 288-1976: allows acidity regulators, lists specific additives

eWG Proposal for Horizontal Cla	ssification	of Food Categ	ory:		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal			
					approach on the use of acidity regulators in this food category as "Justified" was taken as final,			
					and comments on this approach were not requested. However, some comments on this			
					classification were provide	d by eWG members:		
					Brazil: Not Justified. COD	DEX STAN 288-1976: "With regard to the durability, special		
					consideration should be giv	ven to the level of heat treatment applied since some minimally		
					IDE: Supports gonoral class	of require the use of certain additives.		
					the integrity of the emulsion	n and taking into consideration the fat content and the durability		
					expected of the product			
		Max Level		Step /				
Additive	INS	(mg/kg)	Notes	Adopted	ewG proposal	Comments by eWG members on proposal		
					Postpone until discussion			
					of FC 01.4.1 in Appendix			
CALCIUM CARBONATE	170(i)	GMP		7	3 - used as ES&T			
CALCIUM LACTATE	327	GMP		7	Adopt at GMP -			
CITRIC ACID	330	GMP		7	corresponds to CODEX			
LACTIC ACID, L-, D- and DL-	270	GMP		4	STAN 288-1976			
POTASSIUM CARBONATE	501(i)	GMP		7				
					Postpone until discussion			
POTASSIUM DIHYDROGEN	000(1)	0.45		-	of FC 01.4.1 in Appendix			
	332(1)	GMP		(	3 - used as ES&I			
	E01(ii)	2000		7	Adopt at GMP –	IDF: supports adoption at GMP		
	501(11)	2000		7	corresponds to CODEX			
	320 500(i)	GIVIP		7	STAN 288-1976			
SODIUM CARBONATE	500(1)	GIMP		1	Destrone until discussion			
					of EC 01.4.1 in Appendix			
	331(i)	GMP		7	3 - used as ES&T			
	331(1)	Givir		/				
CARBONATE	500(ii)	GMP		7				
SODIUM LACTATE	325	GMP		7	Adopt at GMP – corresponds to CODEX			
				•		USA: sodium sesquicarbonate is considered GRAS in the USA for		
SODIUM SESQUICARBONATE	500(iii)	GMP		7	STAN 288-1976	use as an acidity regulator for use in cream (FC 01.4) at GMP		
TRICALCIUM CITRATE	333(iii)	GMP		7	1			
					Postpone until discussion			
					of FC 01.4.1 in Appendix			
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	3 - used as ES&T			

				Adopt at GMP – corresponds to CODEX	
TRISODIUM CITRATE	331(iii)	1000	7	STAN 288-1976	

# Food Category No. 01.4.2 (Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain))

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

Corresponding commodity standards: 288-1976: allows acidity regulators, lists specific additives

eWG Proposal for Horizontal Clas	ssification	of Food Categ	ory:		Comments by eWG on horizontal classification proposal:			
					The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal			
					approach on the use of aci	dity regulators in this food category as "Justified" was taken as final,		
	1	1			and comments on this appl	roach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
					Postpone discussion until			
					Appendix 3 – listed as			
					stabilizer/thickener at			
	170(i)	5000		7	GMP IN CODEX STAN			
	227	GMP		1	200-1970			
	330	GMP		4	Adopt at GMP -	Brazil: Accepts proposals. Note that provisions overlap with those		
	270	GMP		1	corresponds to CODEX	in EST circular. <b>Costa Rica and Spain:</b> Those additives listed in CODEX STAN		
	501(i)	GMP		7	STAN 288-1976			
	001(1)				Postpone discussion until	288-1976 as stabilizer/thickener are already addressed in the EST		
					Appendix 3 – listed as	working document. Agree with the proposal to list all as GMP without notes.		
POTASSIUM DIHYDROGEN					GMP in CODEX STAN	EU: supports		
CITRATE	332(i)	GMP		7	288-1976	Iran: supports adoption of Citric acid (INS 330) at GMP		
POTASSIUM HYDROGEN						Japan: Do not support use of new note "for use of		
CARBONATE	501(ii)	GMP		7	Adopt at GMP -	stabilizer/thickener as additives with this note are not listed as		
POTASSIUM LACTATE	326	GMP		7	STAN 288-1976	UK: Accepts proposals IDE: Supports proposals for those acidity regulators listed in Codex		
SODIUM CARBONATE	500(i)	GMP		7	STAN 200-1970			
					Postpone discussion until	Stan 288-1976. Technological justification: to ensure product		
					Appendix 3 – listed as	stability and the integrity of the emulsion and taking into		
					stabilizer/thickener at	consideration the fat content and the durability expected of the		
	221(i)	CMD		7	GMP IN CODEX STAN	product.		
	331(1)	GIVIF		1	200-1970			
CARBONATE	500(ii)	GMP		7	Adopt at GMP -			
SODIUM LACTATE	325	GMP		7	corresponds to CODEX			
SODIUM SESQUICARBONATE	500(iii)	GMP		7	STAN 288-1976			
TRICALCIUM CITRATE	333(iii)	GMP		7				

TRIPOTASSIUM CITRATE	332(ii)	5000	7	Postpone discussion until	
				Appendix 3 – listed as	
				stabilizer/thickener at	
				GMP in CODEX STAN	
TRISODIUM CITRATE	331(iii)	5000	7	288-1976	

## Food Category No. 01.6.3 (Whey cheese)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 284-1971: refers to provisions in FCs 01.6.3 & 01.6.6 in Tables 1 & 2

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: There are no proposed provisions for Acidity Regulators	Spain, IDF: Supports proposal
in this FC.	<b>IFAC:</b> use of acidity regulators is justified to adjust pH of whey cheese and maintain stable
	emulsion in food

# Food Category No. 01.6.6 (Whey protein cheese)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 284-1971: refers to provisions in FCs 01.6.3 & 01.6.6 in Tables 1 & 2

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Justified <b>Justification for proposal</b> : For food additives CODEX STAN 284-1971 refers to provisions listed in Tables 1 and 2, FCs 01.6.3 and 01.6.6. Food Category 01.6.6 contains adopted provisions for acidity regulators					Comments by eWG on ho Costa Rica, Spain, UK, US EU: Case-by-Case but sup ICGMA: Acidification to cree producing ricotta cheese	prizontal classification proposal: S and IDF: Support proposal ports retaining adopted provisions pate proper pH balance needed for coagulation of milk to occur when
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP		Adopted		
CITRIC ACID	330	GMP		Adopted		
GLUCONO DELTA-LACTONE	575	GMP		Adopted	Retain Adopted	
LACTIC ACID, L-, D- and DL-	270	GMP		Adopted		
MALIC ACID, DL-	296	GMP		Adopted		

## Food Category No. 01.8.2 (Dried whey and whey products, excluding whey cheeses)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 289-1995: refers to provisions in FC 01.8.2 in Tables 1 & 2

eWG Proposal for Horizontal Classification of Food Category: Justified					Comments by eWG on horizontal classification proposal:			
Justification for proposal: For foc	od additives	CODEX STAN	289-1995	refers to	Costa Rica, UK: Support proposal.			
provisions in FC 01.8.2 in Tables 1	& 2. Food	category 01.8.2	contains a	adopted	Spain: questions whether	it is appropriate or in the tasks of this eWG to address additives that		
provisions for additives with the tec	hnological f	function of acidit	tv regulato	rs.	are used as anticaking age	ents, not acidity regulators.		
	5		,	-	IDF: does not support the	eWG recommendation and recommends that the use of acidity		
					regulators is not justified.	Some of the adopted provisions are for technological purposes other		
					than as acidity regulators.			
Additivo	INC	Max Level	Notos	Step /	oWC proposal	Comments by eWG members on proposal		
Additive	1113	(mg/kg)	Notes	Adopted	ewo proposal	comments by ewe members on proposal		
CALCIUM CARBONATE	170(i)	10000		Adopted		IDF: Not justified as ACR, but justified as anticaking agent		
CALCIUM HYDROXIDE	526	GMP		Adopted		IDF: Justified		
MAGNESIUM CARBONATE	504(i)	10000		Adopted	]	<b>IDF</b> : Not justified as ACR, but justified as anticaking agent		
POTASSIUM CARBONATE	501(i)	GMP		Adopted		<b>IDF</b> : Not justified as ACR but justified as stabilizer		
POTASSIUM DIHYDROGEN								
CITRATE	332(i)	GMP		Adopted		<b>IDF</b> : Not justified as ACR but justified as stabilizer		
POTASSIUM HYDROGEN								
CARBONATE	501(ii)	GMP		Adopted		<b>IDF</b> : Not justified as ACR but justified as stabilizer		
POTASSIUM HYDROXIDE	525	GMP		Adopted	Potain Adopted	IDF: Justified		
SODIUM CARBONATE	500(i)	GMP		Adopted	Retain Adopted	<b>IDF:</b> Not justified as ACR but justified as stabilizer		
SODIUM DIHYDROGEN								
CITRATE	331(i)	GMP		Adopted		<b>IDF:</b> Not justified as ACR but justified as stabilizer		
SODIUM HYDROGEN								
CARBONATE	500(ii)	GMP		Adopted		<b>IDF:</b> Not justified as ACR but justified as stabilizer		
SODIUM HYDROXIDE	524	GMP		Adopted		IDF: Justified		
SODIUM SESQUICARBONATE	500(iii)	GMP		Adopted	]	<b>IDF:</b> Not justified as ACR but justified as stabilizer		
TRIPOTASSIUM CITRATE	332(ii)	GMP		Adopted	]	<b>IDF:</b> Not justified as ACR but justified as stabilizer		
TRISODIUM CITRATE	331(iii)	GMP		Adopted		IDF: Not justified as ACR but justified as stabilizer		

## Food Category No. 02.1 (Fats and oils, essentially free from water)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

**Corresponding commodity standards:** 019-1981: does not allow acidity regulators; 280-19736 corresponds to subcategory 02.1.1; 033-1981 & 210-1999 correspond to subcategory 02.1.2; 211-1999 corresponds to subcategory 02.1.3

eWG Proposal for Horizontal Classification of Food Category: Not Justified<br/>Justification for proposal: Different commodity standards, some of which do not<br/>allow acidity regulators, apply to subcategories. Therefore not justified in thisComments by eWG on horizontal classification proposal:<br/>Brazil, EU, Spain: Support proposal<br/>USA: Acidity regulators are used in fats and oils in the USA.

#### Food Category No. 02.1.1 (Butter oil, anhydrous milkfat, ghee)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 280-1973: refers to provisions in FC 02.1.1 in Tables 1 & 2

<b>eWG Proposal for Horizontal Cla</b> <b>Justification for proposal</b> : Based currently adopted provisions in FC function of acidity regulators is for	assification d upon comn 02.1.1 for fo use as antio	of Food Categ nents from eWG ood additives wi xidants/ antioxid	ory: Not J 6 members th the tech dant syner	ustified , the nical gists.	<ul> <li><u>Comments by eWG on horizontal classification proposal:</u></li> <li><u>EU, Spain, IDF: support proposal</u></li> <li><u>UK: Codex standard does not specifically refer to acidity regulators.</u> Additives listed in 02.1.1</li> <li>likely act as antioxidants or emulsifiers. No sound technological justification for the generic use of acidity regulators in this category has been presented.</li> <li>IDF: Use of acidity regulators in this food category is not justified. The additives listed for this food category are used as anitioxidants, not acidity regulators.</li> <li>ICGMA: The listed additives serve primarily as antioxidants and antioxidant synergists.</li> </ul>		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CITRIC ACID	330	GMP	171 <sup>7</sup>	Adopted		<b>ICGMA:</b> used as antioxidant synergist - retain adopted <b>IDF:</b> Not justified as ACR but justified as antioxidant	
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	171	Adopted	Retain adopted	<b>IDF:</b> Not justified as ACR but justified as antioxidant	

<sup>&</sup>lt;sup>7</sup> **Note 171**: Excluding anhydrous milkfat.

# Food Category No. 02.1.2 (Vegetable oils and fats)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** 019-1981: does not allow acidity regulators; 033-1981: does not allow food additives (except tocopherols); 210-1999: does not allow acidity regulators

eWG Proposal for Horizontal C Justification for proposal: Cor acidity regulators. Comments fr provisions for food additives with their use as antioxidants/ antioxi	Classification responding cor om eWG memin the technical dant synergists	of Food Categ nmodity standa bers indicate the function of acidi s.	ory: Not J rds do not at propose ity regulato	ustified allow d ors is for	<ul> <li>Comments by eWG on horizontal classification proposal:</li> <li>Brazil: Supports use of acidity regulators.</li> <li>Costa Rica: Acidity regulators are technically justified, industry uses ascorbic acid, citric acid and lactic acid in vegetable oils and fats to prevent metal oxidative breakdown. In some instances, citric acid serves as an acidity regulator when it is added to oils and shortenings that contain the antioxidant TBHQ. Citric acid helps keep the TBHQ dissolved and dispersed in the vegetable oil.</li> <li>EU: Supports proposal – the proposed provisions do not relate to the use of these additives as acidity regulators.</li> <li>Japan: Is of the view that foodstuffs covered by FC 2.1.2 are categorized in one of corresponding CODEX STANs</li> <li>Spain: Questions whether it is appropriate or in the tasks of this eWG to address additives that are used as antioxidants synergists instead of AR given that they are different functional classes. In addition, a new note should be added to provisions to be adopted in order to be consistent with CODEX STAN 210-1999 to clarify AR are not permitted in olive oils as well as,</li> </ul>			
					virgin and cold pressed oils regardless of origin. UK: The standard does not specifically refer to acidity regulators. No sound technological justification for the use of acidity regulators in this category. ICGMA: These additives serve primarily as antioxidants and antioxidant synergists			
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
ACETIC ACID, GLACIAL	260	5000		7		Japan: seeks information about technological justification for the use of acidity regulator in vegetable fats and oils USA: Acetic acid, Glacial is allowed for use as an acidity regulator in the USA in fats and oils in general up to 5000 mg/kg		
					Discontinue	Costa Rica: Industry uses ascorbic acid in vegetable oils and fats		
ASCORBIC ACID, L-	300	200		7		Japan: supports proposal, not allowed in corresponding commodity standards.		
CALCIUM LACTATE	327	GMP		7		<b>Japan:</b> supports proposal, not allowed in corresponding commodity standards.		

					Adopt at GMP without	
					Note 15 & with new	
					notes "For use as	Costa Rica: Industry uses citric acid in vegetable oils and fats to
					antioxidant synergist" &	prevent metal oxidative breakdown.
					"not for use in olive or	Japan: supports proposal, allowed at GMP without Note 15 in
					olive-pomace oils or in	corresponding commodity standards.
	000	100	4 58	7	virgin or cold-pressed	
	330	100	15	7	olis regardless of origin	lenen oversete ereneel, est ellevisit is server ending serveredit.
LACTIC ACID. L D- and DL-	270	GMP		7		standards.
	-					Japan: Malic acid is not allowed in corresponding commodity
						standards
						USA: Malic acid is used in the USA as an antioxidant synergist in
MALIC ACID, DL-	296	100		7		Lard, poultry fat and shortening at a level of 100 mg/kg.
POTASSIUM ACETATES	261	GMP		7		
POTASSIUM DIHYDROGEN					1	Japan: supports proposal, not allowed in corresponding commodity
CITRATE	332(i)	GMP		7	Discontinue	standards.
POTASSIUM LACTATE	326	GMP		7		
						Japan: seeks information about technological justification for the
						use of acidity regulator in fats and oils, Sodium acetate is not
						allowed in corresponding commodity standards.
	(1)			_		<b>USA:</b> sodium acetate is used as an acidity regulator in fats and oils
SODIUM ACETATE	262(i)	5000		7	-	in general in the USA at a level of 5000 mg/kg.
000	500(1)			_		Japan: supports proposal, not allowed in corresponding commodity
SODIUM CARBONATE	500(1)	GMP	-	1		standards.
					Adopt with new notes	
					"For use as antioxidant	
						Japan: supports proposal
					use in onve of onve-	allowed at GMP in corresponding commodity standards.
					or cold-pressed oils	
CITRATE	331(i)	GMP		7	regardless of origin"	
SODIUM HYDROGEN	001(1)			,		
CARBONATE	500(ii)	GMP		7		
SODIUM LACTATE	325	GMP		7	1	Japan: supports proposals, not allowed in corresponding
SODIUM SESQUICARBONATE	500(iii)	GMP		7	Discontinue	commodity standards.
TRICALCIUM CITRATE	333(iii)	GMP		7	1	,
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	1	

<sup>&</sup>lt;sup>8</sup> Note 15: Fat or oil basis.

TRISODIUM CITRATE	331(iii)	GMP		7	adopt with new notes "For use as antioxidant synergist" "not for use in olive or olive-pomace oils or in virgin or cold- pressed oils regardless of origin"	<b>Japan:</b> supports proposal allowed at GMP in corresponding commodity standards.
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# Food Category No. 02.1.3 (Lard, tallow, fish oil, and other animal fats)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: 019-1981: does not allow acidity regulators; 211-1999: does not allow acidity regulators

eWG Proposal for Horizontal Clas	sification	of Food Categ	ory: Not J	ustified	Comments by eWG on horizontal classification proposal:			
Justification for proposal: Corres	onding cor	nmodity standa	rds do not	allow	Brazil: Supports use of acidity regulators.			
acidity regulators. Comments from	eWG meml	pers indicate the	at propose	ed	EU: Supports proposal - th	he proposed provisions do not relate to the use of these additives as		
provisions for food additives with the	e technical t	unction of acid	ity regulate	ors is for	acidity regulators.			
their use as antioxidants/ antioxidar	t synergists	6.			Japan: Is of the view that f	foodstuffs covered by FC 2.1.3 are categorized in one of		
					corresponding CODEX ST	ANs		
					Spain: Questions whether	it is appropriate or in the tasks of this eWG to address additives that		
					are used as antioxidants s	ynergists instead of AR given that they are different functional		
					classes. It could be approp	priate to change the wording of the new note in order to use the term		
					"antioxidant synergist" as stated in the commodity standard			
					UK: There is no acceptance	ce of a generic technological justification for use of acidity regulators		
					in this food category			
					ICGMA: These additives serve primarily as antioxidants and antioxidant synergists			
Additive	INS	Max Level	Notes	Step /	eWG proposal	Comments by eWG members on proposal		
		(mg/kg)		Adopted				
						<b>USA:</b> Acetic acid, Glacial is allowed for use as an acidity regulator		
						in the USA in fats and oils in general up to 5000 mg/kg		
						Japan: seeks information about technological justification for the		
ACETIC ACID, GLACIAL	260	5000		7		use of acidity regulator in vegetable fats and oils		
					Discontinue	<b>ICGMA:</b> Currently, industry uses ascorbic acid in FC 02.1.3.		
	1	1	1	1		O an use in the set of a later (to inner set in station at a solution of a station		
						Serves primarily as chelator (to prevent metal-catalyzed oxidative		
ASCORBIC ACID, L-	300	200		7	-	breakdown – antioxidant or antioxidant synergist)		
ASCORBIC ACID, L-	300	200		7		breakdown – antioxidant or antioxidant synergist) Japan: supports proposal, not allowed in corresponding commodity		

CITRIC ACID	330	100	15	7	Adopt at GMP without Note 15 & with new notes "For use as antioxidant synergist" & "not for use in olive or olive-pomace oils or in virgin or cold-pressed oils regardless of origin"	Japan: supports proposal, allowed at GMP without Note 15 in corresponding commodity standards. USA: citric acid is allowed for use in the USA in poultry fats as an antioxidant synergist up to 100 mg/kg ICGMA: Currently, industry uses citric acid in FC 02.1.3. Serves primarily as chelator (to prevent metal-catalyzed oxidative breakdown – antioxidant or antioxidant synergist)
GLUCONO DELTA-LACTONE	575	GMP		7		Japan: supports proposal, not allowed in corresponding commodity
LACTIC ACID, L-, D- and DL-	270	GMP		7		standards.
MALIC ACID, DL-	296	100		7		Japan: Malic acid is not allowed in corresponding commodity standards USA: Malic acid is used in the USA as an antioxidant synergist in Lard, poultry fat and shortening at a level of 100 mg/kg.
POTASSIUM ACETATES	261	GMP		7		
POTASSIUM DIHYDROGEN CITRATE POTASSIUM LACTATE	332(i)	GMP		7	Discontinue	<b>Japan:</b> supports proposal, not allowed in corresponding commodity standards.
SODIUM ACETATE	262(i)	5000		7		Japan: seeks information about technological justification for the use of acidity regulator in fats and oils, Sodium acetate is not allowed in corresponding commodity standards. USA: sodium acetate is used as an acidity regulator in fats and oils in general in the USA at a level of 5000 mg/kg.
SODIUM CARBONATE	500(i)	GMP		7		. Japan: supports proposal, not allowed in corresponding commodity standards.
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Adopt with new notes "For use as antioxidant synergist" and "not for use in olive or olive- pomace oils or in virgin or cold-pressed oils regardless of origin"	<b>Japan:</b> supports proposal allowed at GMP in corresponding commodity standards.
SODIUM HYDROGEN	500(ii)	GMP		7		Japan: seeks information about technological justification for the use of acidity regulator in rendered fats, Sodium hydrogen carbonate is not allowed in corresponding commodity standards. USA: Sodium hydrogen carbonate is allowed for use in the USA as an acidity regulator in rendered fats at GMP
	524	GMP		7	Discontinue	
	325	GMP		7	4	
	500(iii)	GMP		7	4	Japan: supports proposals, not allowed in corresponding
	333(iii)	GMP		7	4	commodity standards.
	0000000		1	1 1	1	

TRISODIUM CITRATE       331(iii)       GMP       7       of or origin"	allowed at GMP in corresponding commodity standards.
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# Food Category No. 02.2.1 (Butter)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 279-1971: refers to provisions in FC 02.2.1 in Tables 1 & 2

eWG Proposal for Horizontal Cl	assification	of Food Categ	ory: Justif	ied only with	Comments by eWG on h	Comments by eWG on horizontal classification proposal:			
note "for use in soured cream but	ter only"				Brazil: Case-by-Case bas	sis, but retain adopted provisions.			
Justification for proposal: Com	ments from e	WG members th	hat acidity	regulators	EU: Case-by-Case basis.	Acidity regulators are generally not justified in butter. To our			
are only allowed in certain types of	of butter.				knowledge only sodium ca	arbonates are used to stabilise pH of a very specific product - soured			
					cream butter				
					UK: Technological Justif	ication? Standard 279 doesn't specifically mention acidity regulators.			
					Without a convincing case	Without a convincing case we favour removal of these provisions from GSFA.			
					IDF comments: IDF reco	mmends that the limited number of Acidity Regulators listed below are			
					technologically justified in	technologically justified in this category, consistent with the Codex STAN 279-1971 for Butter			
					(one-to-one relationship). IDF notes that the specific food additive provisions for this FC, as				
					contained in the Codex Standard 279 1971 were already incorporated into the GSFA in 2008.				
					USA: Acidity regulators a	USA: Acidity regulators are used in fats and oils in the USA			
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal			
CALCIUM HYDROXIDE	526	GMP		Adopted		Brazil: retain adopted			
SODIUM CARBONATE	500(i)	GMP		Adopted		EU: revoke provisions for INS 526 & 524, restrict INS 500(i) & (ii) to			
SODIUM HYDROGEN					Retain adopted	"soured cream butter only"			
CARBONATE	500(ii)	GMP		Adopted		UK: Revoke provisions			
SODIUM HYDROXIDE	524	GMP		Adopted		<b>IDF:</b> Adopted provisions are technologically justified.			

## Food Category No. 04.1.1 (Fresh fruit)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Justified

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44 $^{ m th}$ Session of the CCFA on the horizontal
	approach for the justification of the use of acidity regulators in this food category was taken as
	final and comments on this approach were not requested by the eWG. There are no existing
	provisions for acidity regulators in the GSFA for this food category.

#### Food Category No. 04.1.1.1 (Untreated fresh fruit)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

**Corresponding commodity standards:** 143-1985; 182-1993; 183-1993; 184-1993; 187-1993; 196-1995; 204-1997; 205-1997; 213-1999; 214-1999; 216-1999; 216-1999; 217-1999; 219-1999; 220-1999; 226-2001; 237-2003; 245-2004; 246-2005; 255-2007; 299-2010; 305R-2011: no food additives are allowed in these standards

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Food additives are not allowed in the corresponding	EU, Brazil, Spain, UK: Support proposal
commodity standards. There are no existing provisions for acidity regulators in the	
GSFA for this food category.	

## Food Category No. 04.1.1.2 (Surface treated fresh fruit)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Justified

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal
	approach for the justification of the use of acidity regulators in this food category was taken as final. Comments on this approach were not requested by the eWG. There are no existing
	provisions for actually regulators in the GSFA for this food category.

## Food Category No. 04.1.1.3 (Peeled or cut fresh fruit)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: There are no existing provisions for acidity regulators in	Brazil, EU, UK: Support proposal; the uses in refrigerated and unprocessed agricultural
the GSFA for this food category. Comments to the eWG in support of use of acidity	products (ascorbic acid and citric acid) relate to antioxidant function - to prevent browning
regulators in refrigerated and unprocessed agricultural products appear to relate to	reaction
antioxidant function to prevent browning reaction, not as acidity regulator function.	Costa Rica: citric acid, ascorbic acid are generally used as AR
	Spain: "Case by case". In EU legislation justified only for refrigerated unprocessed fruit ready
	for consumption.
	ICGMA: Citric acid (330) (e.g., for apples and pineapples) - as AR. Ascorbic Acid (300) (e.g., for
	pineapples) Calcium Ascorbate (302) (e.g., for apples)

## CX/FA 13/45/7 Appendix 2

# Food Category No. 04.2.1 (Fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** None; subcategories have corresponding commodity standards.

eWG Proposal for Horizontal Cla	ssification	of Food Categ	ory: Not J	ustified –	Comments by eWG on horizontal classification proposal:			
Discontinue all provisions and mov	e to subcate	gories where a	ppropriate	-	EU, Brazil, Spain, UK: Support proposal			
Justification for proposal: Use of	facidity regu	lators are not ju	ustified in a	all	· · · ·			
subcategories (04.2.1.3), Commod	ity standards	s corresponding	g to subca	tegories				
require the use of notes specific to the subcategory.								
Additivo	INC	Max Level	Notos	Step /	oWG proposal	Commonts by oWG members on proposal		
Additive	INS	(mg/kg)	NOLES	Adopted	ewo proposal	comments by ewo members on proposal		
					Discontinue in FC 04.2.1			
					Adopt in FC 04.2.1.1			
					(with 2 new notes "for			
					use in edible fungi" & "20			
					g/kg in picked fungi").			
					Refer to discussion on			
					general approach in			
					subcategory 04.2.1.2 to			
					determine if provision			
					should be moved to that			
ACETIC ACID, GLACIAL	<del>260</del>	GMP		7	FC.			
					Discontinue in FC 04.2.1			
					and adopt in FC 04.2.1.1			
					(with new note "for use in			
					edible fungi"). Refer to			
					discussion on general			
					approach in subcategory			
					04.2.1.2 to determine if			
					provision should be			
ASCORBIC ACID, L-	300	<del>500</del>		7	moved to that FC.			
CITRIC ACID	330	GMP		7	Discontinue in FC 04.2.1			

LACTIC ACID, L-, D- and DL-	<del>270</del>	GMP	7		
MALIC ACID, DL-	<del>296</del>	GMP	7	Discontinue in FC 04.2.1.	
				Refer to discussion on	
				general approach in	
				subcategory 04.2.1.2 to	
				determine if provision	
				should be moved to that	
SODIUM ACETATE	<del>262(i)</del>	GMP	7	FC.	
				Discontinue in FC 04.2.1.	
				If used as acidity	
				regulator, refer to	
				discussion on general	
				approach in subcategory	
				04.2.1.2 to determine if	
				provision should be	
				moved to that FC. If	
				used as ES&T, postpone	
SODIUM DIHYDROGEN				discussion until Appendix	
CITRATE	<del>331(i)</del>	GMP	7	3.	
SODIUM LACTATE	<del>325</del>	GMP	7	Discontinue in FC 04.2.1.	
				Refer to discussion on	
				general approach in	
				subcategory 04.2.1.2 to	
				determine if provision	
				should be moved to that	
TRISODIUM CITRATE	<del>331(iii)</del>	<del>2000</del>	7	FC	

# Food Category No. 04.2.1.1 (Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds))

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

**Corresponding commodity standards**: 038-1981: allows specific acidity regulators in edible fungi and fungus product; 40R-1981, 131-1981, 171-1989, 185-1993, 186-1993, 188-1993, 197-1995, 200-1995, 218-1999, 224-2001, 225-2001, 238-2003, 293-2008, 300-2010, 303-2011, 304R-2011, 307-2011: do not allow food additives

eWG Proposal for Horizontal Cla notes limiting use to edible fungi an Justification for proposal: Acidity commodity standard ("Standard for	assification nd fungus pr y regulators r edible fung	of Food Categ oducts are only allowed i and fungus pro	<b>ory</b> : Justif d in one co oducts" 03	ied only with rresponding 8-1981)	Comments by eWG on horizontal classification proposal: Brazil: There is no technological justification for the use of acidity regulators in this food category. EU: Case-by-Case and limit to fungi Spain: supports proposal		
		Marchanal		01	UK: Case-by-Case		
Additive	INS	(mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC ACID, GLACIAL	260	GMP			Adopt with 2 new notes "for use in edible fungi" & "20 g/kg in picked fungi"		
ASCORBIC ACID, L-	300	500			Adopt with note "for use in edible fungi"		
CITRIC ACID	330	GMP			Adopt with 2 new notes		
					"tor use in edible fungi" & "Citric Acid (INS 220) and Lactic acid (INS 270) 5 g/kg singly or in combination in sterilized		
LACTIC ACID, L-, D- and DL-	270	GMP			fungi"		

## Food Category No. 04.2.1.2 (Surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

eWG Proposal for Horizontal Cla	ssification	of Food Categ	ory: Not J	ustified	Comments by eWG on horizontal classification proposal:			
Justification for proposal: Comm	ents to eW	G indicate that p	proposed p	rovisions in	Brazil, EU, UK: guestions technological need.			
this food category for food additive	s with acidit	y regulator fund	tion are for	r use of the	Costa Rica: These types of	of additives are technologically justified for use in surface-treated		
additives as film thickening/stabilizi	ing agents.				fresh vegetables. Modified	I food starches are typically used with components such as organic		
Ű	0 0				acids.			
					ICGMA: Modified food star	ches are typically used with components such as organic acids		
					(lemon juice, 330 citric, etc	) and coating agents in spray applications to thicken and stabilize the		
					film forming mixture in orde	er that it adhere to the surface of the fresh fruits and vegetables.		
					These types of additives ar	re technologically justified for use in surface-treated fresh vegetables.		
Additivo	INIS	Max Level	Notos	Step /	oWG proposal	Comments by oWG members on proposal		
Additive	INS	(mg/kg)	Notes	Adopted	ewe proposal	Comments by ewe members on proposal		
ACETIC ACID, GLACIAL	260	GMP			Do not move from FC			
ASCORBIC ACID, L-	300	500			04.2.1			
			4 <sup>°</sup> &		Postpone until discussion	<b>FII:</b> used as a firming agent - out of the scope of eWG		
CALCIUM CARBONATE	170(i)	GMP	16 <sup>10</sup>	7	of this FC in Appendix 3			
CALCIUM GLUCONATE	578	800	58 <sup>11</sup>	7	Adopt with Note 3			
					"Surface treatment", Note	<b>Brazil:</b> supports adoption for use as firming agents		
					58 "as calcium" and new	<b>FU:</b> used as a firming agent - out of the scope of eWG		
					note "for use as firming			
CALCIUM HYDROXIDE	526	800	58	7	agent"			
CITRIC ACID	330	GMP			Do not move from FC			
LACTIC ACID, L-, D- and DL-	270	GMP			04.2.1			
MAGNESIUM CARBONATE	504(i)	GMP	16	7	_			
MAGNESIUM HYDROXIDE	528	GMP	16	7	Discontinue			
MAGNESIUM HYDROXIDE					Discontinue			
CARBONATE	504(ii)	GMP	16	7				
					Do not move from FC			
MALIC ACID, DL-	296	GMP			04.2.1			
POTASSIUM DIHYDROGEN					Postpone until discussion			
CITRATE	332(i)	GMP	16	7	of this FC in Appendix 3			
SODIUM ACETATE	262(i)	GMP			Discontinue			
SODIUM DIHYDROGEN					Postpone until discussion			
CITRATE	331(i)	GMP			of this FC in Appendix 3			
SODIUM LACTATE	325	GMP			Discontinue			

 <sup>&</sup>lt;sup>9</sup> Note 4: For decoration, stamping, marking or branding the product.
 <sup>10</sup> Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.
 <sup>11</sup> Note 58: As calcium.

TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7	Postpone until discussion	
TRISODIUM CITRATE	331(iii)	2000			of this FC in Appendix 3	

# Food Category No. 04.2.1.3 (Peeled, cut or shredded fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds and nuts and seeds)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Justified

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Maintain "Not	Comments by eWG on horizontal classification proposal:
Justified"	EU: not justified; the uses in refrigerated and unprocessed agricultural products (ascorbic acid
Justification for proposal: There are no existing provisions for acidity regulators in	and citric acid) relate to antioxidant function - to prevent browning reaction
the GSFA for this food category. Comments to the eWG in support of use of acidity	Spain: supports proposal
regulators in refrigerated and unprocessed agricultural products appear to relate to	
antioxidant function to prevent browning reaction, not as acidity regulator function.	

# Food Category <u>No. 04.2.2.1 (Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds</u>)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** 038-1981: allows INS 260, 330, 270; 114-1981: allows INS 296, 330 as sequesterants, INS 330, 524, & 525 as processing aids; 140-1983: allows INS 330 & 524 as processing aids; 41-1981, 111-1981, 77-1981, 112-1981, 113-1981, 133-1981, 132-1981, & 104-1981: do not allow food additives

# **eWG Proposal for Horizontal Classification of Food Category:** Justified only with notes limiting use to edible fungi and fungus products

<u>Justification for proposal</u>: Acidity regulators are only allowed in one corresponding commodity standard ("Standard for edible fungi and fungus products" 038-1981). Proposed provisions for food additives with acidity regulator function in this food category is for technological function other than as an acidity regulator.

## Comments by eWG on horizontal classification proposal:

EU, Spain, UK: supports proposal

**Spain:** Questions whether it is appropriate or in the tasks of this eWG to address additives that are used as antioxidants instead of AR given that they are different functional classes.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP		7	Adopt with 2 new notes "for use in edible fungi only" & "20 g/kg in picked fungi"	Corresponds to CODEX STAN 038-1981
ASCORBIC ACID, L-	300	100		7	Discontinue – not	Brazil: ascorbic acid is necessary as an antioxidant, calcium
CALCIUM GLUCONATE	578	1000	58	7	allowed in corresponding	gluconate and calcium hydroxide are used as firming agents
CALCIUM HYDROXIDE	526	1000	58	7	commodity standards	EU: use is out of the scope of eWG discussion

CITRIC ACID	330	GMP	7	Adopt with new notes "for use as an antioxidant", "for use in edible fungi", "Citric Acid (INS 220) and Lactic acid (INS 270) 5 g/kg singly or in combination in sterilized fungi", & "for use in quick frozen french fried potatoes as a sequestrant"	Corresponds to CODEX STANs 038-1981 & 114-1981 Brazil: citric acid is necessary as an antioxidant EU: use is out of the scope of eWG discussion
LACTIC ACID, L-, D- and DL-	270	GMP	7	Adopt with new notes "for use in edible fungi" & "Citric Acid (INS 220) and Lactic acid (INS 270) 5 g/kg singly or in combination in sterilized fungi"	Corresponds to CODEX STAN 038-1981
MALIC ACID, DL-	296	GMP	7	Adopt with new note "for use in quick frozen french fried potatoes as a sequestrant"	Corresponds to CODEX STAN 114-1981 EU: use is out of the scope of eWG discussion
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	7	Postpone discussion until Appendix 3 – used as	
TRICALCIUM CITRATE	333(iii)	GMP	7	ES&T	
TRIPOTASSIUM CITRATE	332(ii)	GMP	7		
TRISODIUM CITRATE	331(iii)	GMP	7		

# Food Category <u>No. 04.2.2.7</u> (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

**Corresponding commodity standards:** 223-2001, 038-1981: list INS 269, 270, 330; 294R-2009: lists INS 296; 260-2007: lists INS 260, 262i, 270, 296, & 330; 151-1985: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category:					The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final. Comments on this approach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC ACID, GLACIAL	260	GMP		4	Adopt	Brazil, EU, UK: agree with proposals	

CALCIUM CARBONATE	170(i)	10000	58	4
CALCIUM LACTATE	327	10000	58	4
CITRIC ACID	330	GMP		4
FUMARIC ACID	297	GMP		4
LACTIC ACID, L-, D- and DL-	270	GMP		4
MAGNESIUM CARBONATE	504(i)	5000	36 <sup>12</sup>	4
MALIC ACID, DL-	296	GMP		4
POTASSIUM CARBONATE	501(i)	GMP		4
SODIUM ACETATE	262(i)	GMP		4
SODIUM CARBONATE	500(i)	GMP		4
SODIUM DL-MALATE	350(ii)	GMP		4
SODIUM FUMARATES	365	GMP		4
SODIUM LACTATE	325	GMP		4
TRISODIUM CITRATE	331(iii)	GMP		4

## Food Category No. 06.1 (Whole, broken, or flaked grain, including rice)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** 202-1995: does not allow food additives; 169-1989, 201-1995, 172-1989, 153-1985, 199-1995, 198-1995: do not discuss food additives

<b>eWG Proposal for Horizontal Cla</b> <b>Justification for proposal</b> : Comm this food category for food additives additives as anti-caking agents or p	ssification ents to eWC with acidity processing a	of Food Categ 6 indicate that p 7 regulator func ids.	ory: Not J proposed p tion are for	ustified provisions in r use of the	Comments by eWG on horizontal classification proposal: EU: supports proposal IFAC: higher processing pH improves starch gellation allowing for less harsh processing conditions		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CALCIUM CARBONATE	170(i)	2220	184 <sup>13</sup>	7	Adopt with Note 184 and new note "for use as an anticaking agent"	<b>Brazil:</b> supports the adoption of this provision, noting that calcium carbonate is used as anticaking agent. <b>UK:</b> Agree with this proposal.	
	262(i)	6000		7	Discontinue	<ul> <li>Brazil: supports the adoption of this provision.</li> <li>UK: Can agree if Note 184 is added. Otherwise wish to see a technological justification before proceeding.</li> <li>USA: sodium acetate allowed for use in Grains (FC 06.0) as an acidity regulator up to 6000 mg/kg</li> <li>IFAC: higher processing pH improves starch gellation allowing for lass bareh processing conditions.</li> </ul>	

<sup>&</sup>lt;sup>12</sup> Note 36: Residual level.

Note 36: Residual level.
 <sup>13</sup> Note 184: For use in nutrient coated rice grain premixes only.

## Food Category No. 06.2 (Flours and starches (including soybean powder))

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: None; subcategories have corresponding commodity standards

eWG Proposal for Horizontal Cla Justification for proposal: Comm regulators is limited in subcategorie regulators in the parent category is	ssification ents to eW( s to FC 06. not justified	of Food Categ G indicate that t 2. Therefore br	ory: Not J he use of a oad use o	ustified acidity f acidity	Comments by eWG on he Brazil: supports proposals EU, Spain: Supports Propo UK: These substances are that it is more appropriate f flour supplied for making fin carryover principle	prizontal classification proposal: to discontinue and move to subcategories osal probably being used as components of raising agent systems so for them to be included within FC 07.2 or its sub-categories. Then ne bakery wares, can include raising agents because of the
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	10000	58	4	Discontinue in FC 06.2.	
HYDROCHLORIC ACID	<del>507</del>	GMP		7	Refer to discussion on	
					general approach in	USA: sodium acetate is allowed in the USA for use in Grains (FC
SODIUM ACETATE	<del>262(i)</del>	<del>6000</del>		7	subcategories 06.2.1 &	06.0) as an acidity regulator up to 6000 mg/kg
SODIUM CARBONATE	<del>500(i)</del>	GMP		4	06.2.2 to determine if	
					provisions should be	
					moved to those	
TRISODIUM CITRATE	<del>331(iii)</del>	GMP		4	subcategories	

## Food Category No. 06.2.1 (Flours)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** 301R-2011: references FC 06.2.1 Tables 1 & 2; 176-1989, 154-1985, 173-1989, 170-1989, 178-1991, 155-1985: do not discuss food additives; 152-1985: lists INS 300

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Not Justified <b>Justification for proposal</b> : Comments to eWG indicate that the majority of the proposed provisions for food additives with acidity regulator function in this food category are for use of the additives as flour treatment agents, not as acidity regulators.					Comments by eWG on he UK: Supports proposal, no available from a commodit GSFA does not include any Spain: Questions whether are used as flour treatment	<b>prizontal classification proposal:</b> technological justification for acidity regulators is presented or y standard. (Whilst 301 R - 2011 references FC 6.2.1 that FC in the y acidity regulators.) it is appropriate or in the tasks of this eWG to address additives that agents instead of AR given that they are different functional classes
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ASCORBIC ACID, L-	300	300		7	Adopt with new note "For use in wheat flour as flour treatment agent"	<ul> <li>Brazil: suggests adoption with maximum use level of GMP, with Note 186.</li> <li>USA: ascorbic acid is allowed in flour as a flour treatment agent up to 200 mg/kg.</li> <li>ICGMA: supports proposal, corresponds to Codex Stan 152-1985 (INS 330) which allows L-ascorbic acid, and its sodium and potassium salts as Flour Treatment Agents at 300 mg/kg.</li> </ul>

CALCIUM CARBONATE	170(i)	GMP	57 <sup>14</sup>	7	Adopt with Notes 57, 186 <sup>15</sup> , & new note "for use as a flour treatment agent"	<b>Brazil:</b> suggests adoption with maximum use level of GMP, with Notes 57 & 186
HYDROCHLORIC ACID	507	GMP		7	Do not move from FC 06.2	
MAGNESIUM CARBONATE	504(i)	1500		4	Discontinue	Brazil:_suggests adoption Note 186 EU: use as flour treatment agent is not focus of eWG scope USA: magnesium carbonate is allowed in flour in the USA as a flour bleaching agent up to 1500 mg/kg
SODIUM ACETATE	262(i)	6000		7	Do not move from FC 06.2	<b>USA:</b> sodium acetate is allowed in the USA for use in Grains (FC 06.0) as an acidity regulator up to 6000 mg/kg
SODIUM CARBONATE	500(i)	GMP		4	Do not move from FC 06.2	
SODIUM HYDROGEN CARBONATE	500(ii)	45000		7	Adopt	Brazil: supports proposal USA: sodium hydrogen carbonate is allowed in self-rising flour and corn meal up to 45000 mg/kg
TRISODIUM CITRATE	331(iii)	GMP		4	Do not move from FC 06.2	

# Food Category No. 06.2.2 (Starches)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

eWG Proposal for Horizontal Class Justification for proposal: Commo sodium hydroxide in this food catego	ssification ents to eWC ory is for us	of Food Categ G indicate that p se as a process	ory: Not Jo proposed p ing aid.	ustified rovision for	<u>Comments by eWG on horizontal classification proposal</u> : IFAC: higher processing pH improves starch gellation allowing for less harsh processing conditions		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CALCIUM CARBONATE	170(i)	10000	58				
HYDROCHLORIC ACID	507	GMP			Do not move from FC		
SODIUM ACETATE	262(i)	6000			06.2		
SODIUM CARBONATE	500(i)	GMP					
SODIUM HYDROXIDE	524	GMP		7	Discontinue	UK: Adopt USA:_sodium hydroxide is allowed for use in the USA in modified starch up to 1% (10000 mg/kg) IFAC: higher processing pH improves starch gellation allowing for less harsh processing conditions	

 <sup>&</sup>lt;sup>14</sup> Note 57: GMP is 1 part benzoyl peroxide and not more than 6 parts of the subject additive by weight.
 <sup>15</sup> Note 186: For use in flours with additives only.

				Do not move from FC	
TRISODIUM CITRATE	331(iii)	GMP		06.2	

Food Category No. 06.4.1 (Fresh pastas and noodles and like products)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

eWG Proposal for Horizontal Cl	assification	of Food Categ	iory: Justif	ied	Comments by eWG on horizontal classification proposal:		
Justification for proposal: comm	nents by eW	G members that	t acidity re	gulators are	Brazil: supports adoption of all provisions		
used in fresh pastas and noodles	by at least s	ome Codex mei	mbers.		EU: case-by-case basis - different needs for pastas and noodles		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	200		4		Brazil, EU: supports adoption	
CALCIUM CARBONATE	170(i)	10000	58	4		Brazil: supports adoption EU: does not support in fresh pasta	
						Brazil, EU: supports adoption	
	220	CMD		4		Japan: used in noodles to prolong shelf life by adjusting pH. It is	
	330	GIVIF		4	-	Brazil: supports adoption	
						EU: does not support in fresh pastas	
						Japan proposes to change maximum use level to 700 mg/kg.	
FUMARIC ACID	297	600		4		Fumaric acid is used in noodle to prolong shelf life by adjusting pH.	
						Brazil: supports adoption	
GLUCONO DELTA-LACTONE	575	GMP		4		EU: does not support in fresh pasta	
						Brazil, EU: supports adoption	
						Japan: used in noodles to prolong shelf life by adjusting pH. It is	
LACTIC ACID, L-, D- and DL-	270	GMP		4	Adopt	used up to 10000 mg/kg	
						Brazil: supports adoption	
						EU: does not support in itest pastas	
	501(i)	2600		7		Japan: used to harden alkaline hoodle. It is used up to 11000	
	301(1)	2000		/	-	Brazil: supports adoption	
SODIUM ACETATE	262(i)	6000		7		EU: does not support in fresh pasta	
	202(!)	0000				Brazil: supports adoption	
						EU: does not support in fresh pastas	
						Japan: used to harden alkaline noodle. It is used up to 10000	
SODIUM CARBONATE	500(i)	2600		7		mg/kg.	
					]	Brazil: supports adoption	
						EU: does not support in fresh pastas	
						Japan: used in noodle to improve water retention by adjusting pH.	
SODIUM DL-MALATE	350(ii)	GMP		4		It is used up to 4000 mg/kg.	

				Brazil: supports adoption
				EU: does not support in fresh pastas
SODIUM HYDROGEN				Japan: used to harden alkaline noodle. It is used up to 10000
CARBONATE	500(ii)	GMP	4	mg/kg.
				Brazil: supports adoption
				EU: does not support in fresh pastas
				<b>Japan:</b> proposes to change maximum use level to 12000 mg/kg.
				Sodium acetate is used in noodle to improve water retention by
SODIUM LACTATE	325	2400	4	adjusting pH.

# Food Category No. 06.4.2 (Dried pastas and noodles and like products)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

eWG Proposal for Horizontal Clas Justification for proposal: comme	ents by eW0	of Food Categ	ory: Justif t acidity req	ied gulators are	Comments by eWG on horizontal classification proposal: Brazil: (CX/FA 12/44/9 Add. 2): - acidity regulators necessary to prevent undesired changes		
used in fresh pastas and noodles b	y at least so	ome Codex mer	nbers.		on the structure of dried pastas due to heat treatment; Brazil supports adoption EU: case-by-case basis - different needs for pastas and noodles		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	200		4			
CALCIUM CARBONATE	170(i)	10000	58	4			
CITRIC ACID	330	GMP		4			
FUMARIC ACID	297	600		4			
LACTIC ACID, L-, D- and DL-	270	GMP		4			
MALIC ACID, DL-	296	GMP		4	Adopt	EU: can accept these provisions in noodles and in gluten free	
POTASSIUM CARBONATE	501(i)	2600		7	Adopt	pasta and pasta intended for hypoproteic diets	
SODIUM ACETATE	262(i)	6000		7			
SODIUM CARBONATE	500(i)	2600		7			
SODIUM HYDROGEN							
CARBONATE	500(ii)	GMP		4			
SODIUM LACTATE	325	2400		4			

## Food Category <u>No. 08.1 (Fresh meat, poultry, and game)</u>

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

## Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category:Not JustifiedJustification for proposal:From comments by eWG members on specificEUprovisions and on subcategories, all justifications for use appear to be for atechnological function other than as acidity regulators.Content

Comments by eWG on horizontal classification proposal: EU, Spain: Supports proposal

technological function other that	an as acidity reg	ulators.				
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ASCORBIC ACID, L-	<del>300</del>	2000		7	Discontinue in FC 08.1 and adopt in subcategory 08.1.1 with Note 16 and new note "for use as a color retention agent"	<b>Spain and UK</b> : Agree with discontinuation <b>USA</b> : Ascorbic acid is allowed for use in the USA on fresh meat cuts (FC 08.1.1) as a color retention agent at a level up to 500 ppm (500 mg/kg)
POTASSIUM LACTATE	326	20000		7	Discontinue	Spain and UK: Agree with discontinuation
SODIUM LACTATE	325	20000		7	Discontinue	<b>Spain and UK</b> : Agree with discontinuation <b>USA</b> : sodium lactate is allowed for use in the USA on meat and poultry (FC 08.0) as a flavour at levels up to 20000 mg/kg of formulation, and in antimicrobial agents up to 4.5 % of formulation
SODIUM CARBONATE	500(i)	GMP		4	Discontinue (provision for sodium carbonate already present in FC 08.1.1)	Spain and UK: Agree with discontinuation
ASCORBIC ACID. L-	300	2000		7	Discontinue in FC 08.1 and adopt in subcategory 08.1.1 with Note 16 and new note "for use as a color retention agent"	<b>Spain and UK</b> : Agree with discontinuation <b>USA</b> : Ascorbic acid is allowed for use in the USA on fresh meat cuts (FC 08.1.1) as a color retention agent at a level up to 500 ppm (500 mg/kg)

# Food Category No. 08.1.1 (Fresh meat, poultry, and game, whole pieces or cuts)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

eWG Proposal for Horizontal Cla	ssification	of Food Categ	ory: Not J	ustified	Comments by eWG on horizontal classification proposal:			
Justification for proposal: From c	omments b	y eWG membe	rs on spec	ific	Brazil: Strongly oppose to	the adoption of these provisions. There is no technological need for		
provisions and on subcategories, a	l justificatio	ns for use appe	ear to be fo	ra	the use of acidity regulator	s in fresh meat, even with note 4 and 16. The justification of adding		
technological function other than us	e as acidity	regulators.			to the surface of fresh mea	it is not clear.		
5		0			EU: supports proposal; do	es not support the use of food additives in fresh meat except for		
					certain colours for health m	narking		
					Spain: supports proposal	Ũ		
					Costa Rica: Lactic acid is	used to adjust pH on the surface of carcasses for the purpose of		
					killing E. coli. Sodium aceta	ate as a pH control agent.		
					ICGMA: 270 Lactic acid do	bes serve to adjust pH on the surface of carcasses, primal/subs and		
					on trim- all for the purpose	of killing E. coli 262(i) Sodium acetate as a pH control agent at up		
					to 0.25% Bicarbonates (	sodium, potassium, etc)		
Additive	INS	Max Level	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
		(				USA: acetic acid is allowed in the USA at GMP in meat products		
ACETIC ACID GLACIAL	260	GMP		7	Discontinue	(FC 08 0) for general food additive use		
	200				Adopt at 500 mg/kg with			
					Note 16 and new note	USA: Ascorbic acid is allowed for use in the USA on fresh meat		
					"for use as a color	cuts (FC 08.1.1) as a color retention agent at a level up to 500		
ASCORBIC ACID, L-	300	2000		7	retention agent"	mg/kg		
,					Postpone discussion until			
					Appendix 3 – possibly			
CALCIUM CARBONATE	170(i)	GMP	4 & 16	7	used as ES&T			
CALCIUM HYDROXIDE	526	GMP		7				
CALCIUM OXIDE	529	GMP		7	Discontinue			
					Adopt at 500 mg/kg with			
					Note 16 and new note	USA: citric acid is allowed for use in the USA on fresh meat cuts as		
					"for use as a color	a color retention agent at levels up to 500 mg/kg and an		
CITRIC ACID	330	2000		7	retention agent"	anticoaguiant in fresh blood of livestock at up to 2000 mg/kg		
MAGNESIUM CARBONATE	504(i)	GMP	16	7				
MAGNESIUM HYDROXIDE	528	GMP	16	7	Discontinue			
MAGNESIUM HYDROXIDE					Discontinue			
CARBONATE	504(ii)	GMP	16	7				
					Postpone discussion until			
POTASSIUM DIHYDROGEN					Appendix 3 – possibly			
CITRATE	332(i)	GMP	16	7	used as ES&T			
POTASSIUM HYDROXIDE	525	GMP		7				
SODIUM ACETATE	262(i)	GMP		7	Discontinue			
SODIUM CARBONATE	500(i)	GMP		7				

					Adopt at 500 mg/kg with Note 16 and new note	<b>USA:</b> sodium dihydrogen citrate is allowed for use in the USA on
SODIUM DIHYDROGEN					"for use as a color	fresh meat cuts as a color retention agent up to 500 mg/kg
CITRATE	331(i)	GMP	16	7	retention agent"	
SODIUM HYDROGEN						
CARBONATE	500(ii)	GMP		7	Discontinuo	
SODIUM HYDROXIDE	524	GMP		7	Discontinue	
SODIUM SESQUICARBONATE	500(iii)	GMP		7		
					Postpone discussion until	
					Appendix 3 – possibly	
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7	used as ES&T	
					Adopt at 500 mg/kg with	
					Note 16 and new note	<b>USA:</b> sodium citrate is allowed for use in the USA on fresh meat
					"for use as a color	cuts as a color retention agent up to 500 mg/kg
TRISODIUM CITRATE	331(iii)	5000		7	retention agent"	

# Food Category No. 08.1.2 (Fresh meat, poultry, and game, comminuted)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: From comments by eWG members on specific	Brazil, Spain, UK: Supports proposal
provisions and on subcategories, all justifications for use appear to be for a	EU: supports proposal; does not support the use of food additives in fresh meat except for
technological function other than as acidity regulators.	certain colours for health marking
	ICGMA: 270 Lactic acid does serve to adjust pH on the surface of carcasses, primal/subs and
	on trim- all for the purpose of killing E. coli 262(i) Sodium acetate as a pH control agent at up
	to 0.25% Bicarbonates (sodium, potassium, etc)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
					Postpone discussion until Appendix 3 – possibly	
CALCIUM CARBONATE	170(i)	1500	4 & 16	7	used as ES&T	
					Adopt with new note "for	USA: calcium lactate is allowed for use in the USA as a binder in
CALCIUM LACTATE	327	6000		7	use as a binder"	ground and formed raw poultry pieces up to 6000 mg/kg.
CITRIC ACID	330	100	15	7		
						Costa Rica: Lactic acid is used to adjust pH on the surface of
						carcasses for the purpose of killing E. coli. Sodium acetate as a pH
LACTIC ACID, L-, D- and DL-	270	6000		7	Diagontinua	control agent
MAGNESIUM CARBONATE	504(i)	GMP		7	Discontinue	
MAGNESIUM HYDROXIDE	528	GMP		7		
MAGNESIUM HYDROXIDE						
CARBONATE	504(ii)	GMP		7		

POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	7		
SODIUM DIHYDROGEN				Postpone discussion until	
CITRATE	331(i)	GMP	7	Appendix 3 – possibly	
TRICALCIUM CITRATE	333(iii)	GMP	7	used as ES&T	
TRIPOTASSIUM CITRATE	332(ii)	GMP	7		
TRISODIUM CITRATE	331(iii)	GMP	7		

# Food Category No. 09.1 (Fresh fish and fish products, including mollusks, crustaceans, and echinoderms)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: None; 292-2008 corresponds to subcategory 09.1.2

eWG Proposal for Horizontal Clas	sification o	of Food Catego	ory: Not Ju	ustified	Comments by eWG on horizontal classification proposal:		
Justification for proposal: Use of a	acidity regul	ators not justifi	ed in subc	ategory	EU, Spain: supports proposal		
09.1.1 as per the decision of the pW	G on the G	SFA at the 44 <sup>th</sup>	Session c	of the	IFAC: acidity regulators are needed in this category to assist in the neutralization of pH to		
CCFA. Therefore, use in broader pa	arent catego	ory is not justifie	ed.		remove bitter taste in some	species, as well as to assist with flavor, firmness, and shelf-life	
, , , , , , , , , , , , , , , , , , ,	0	, ,			control.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	<del>300</del>	<del>200</del>		7			
CALCIUM LACTATE	<del>327</del>	<del>10000</del>	<del>58</del>	4			
CITRIC ACID	<del>330</del>	GMP		7	Discontinue		
GLUCONO DELTA-LACTONE	<del>575</del>	<del>100</del>		4			
MAGNESIUM CARBONATE	<del>504(i)</del>	GMP	<del>16</del>	7			
MAGNESIUM HYDROXIDE	<del>528</del>	GMP	<del>16</del>	7			
MAGNESIUM HYDROXIDE							
CARBONATE	<del>504(ii)</del>	GMP	<del>16</del>	7			
POTASSIUM DIHYDROGEN							
CITRATE	332(i)	GMP		7	Restance until discussion		
SODIUM DIHYDROGEN					in Appendix 2 passibly		
CITRATE	331(i)	GMP		7	In Appendix 3 – possibly		
TRICALCIUM CITRATE	333(iii)	GMP		7			
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	09.1.		
TRISODIUM CITRATE	331(iii)	GMP		7			

# Food Category No. 09.1.1 (Fresh fish)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Justified

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal
	approach for the justification of the use of acidity regulators in this food category was taken as
	final and comments on this approach were not requested by the eWG. There are no existing
	provisions for acidity regulators in the GSFA for this food category.

#### Food Category No. 09.1.2 (Fresh mollusks, crustaceans, and echinoderms)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** 292-2008: food additives not allowed in live bivalve molluscs, only antioxidants allowed in raw bivalve molluscs (chilled shucked molluscs) as per provisions in FC 09.1.2.

eWG Proposal for Horizontal Classification of Food Category: Not Justified Justification for proposal: No information provided to the eWG supporting use.					Comments by eWG on horizontal classification proposal: EU: asks for the clarification of the technological need; the function of acidity regulators in glaze, coatings or decorations should be clarified Spain: does not agree with the proposal. Questions whether it is appropriate or in the tasks of this eWG to address additives that are used as antioxidants or glazing agents instead of AR given that they are different functional classes. In addition Note 16 does not seem to fit FC 9.1.2 and we could not find where in CODEX STAN 292-2008 is specified that only ES&T could be used in live bivalve molluscs it seems that it prohibits the use of any additive and only allows the use of antioxidants on raw mollusks. IFAC: supports adoption of provisions with Note 16		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	200			Do not move from FC 09.1		
				_	Potpones decision until discussion of FC 09.1.2 in Appendix 3. – possibly used as ES&T.	<ul> <li>Brazil does not support the adoption of this provision. The justification provided may not apply to this subcategory since it refers to fresh "fish". Moreover, the justification for surface treatment is not clear.</li> <li>EU: it seems that INS 170(i) is a food colour use</li> <li>Spain: Bivalve molluscs should be excluded in order to be consistent with CODEX STAN 292-2008</li> </ul>	
CALCIUM CARBONATE	170(i)	GMP	4 & 16	7			
	327	10000	58		4		
	330	GMP			4		
GLUCONO DELTA-LACTONE	575	100	40		Do not move from FC		
	504(1)	GMP	16		09.1		
	528	GMP	16				
CARBONATE	504(ii)	GMP	16				
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		Postpone until discussion			
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SODIUM DIHYDROGEN CITRATE	331(i)	GMP		of Appendix 3 - possibly used as ES&T in FC 09.1. If so, adopt in FC			
TRICALCIUM CITRATE	333(iii)	GMP		09.1 as per discussion of			
TRIPOTASSIUM CITRATE	332(ii)	GMP		09.1 in Appendix 3			
TRISODIUM CITRATE	331(iii)	GMP					

## Food Category No. 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** None; subcategories have corresponding commodity standards

<b>eWG Proposal for Horizontal Clas</b> discontinue provisions and move to <b>Justification for proposal</b> : Several subcategories or are case-by-case.	ssification subcategor l subcatego	of Food Categ ries ries require not	<b>ory</b> : Not Ji tes specific	ustified – to those	Comments by eWG on horizontal classification proposal: Costa Rica: Ascorbic acid, Citric acid, sodium citrate and potassium citrate are used as antioxidants. Brazil: does not support the adoption of these provisions. The same food additives are proposed for adoption in the subcategories. They should be discussed on a case-by-case basis under each subcategory. Some fish products may contain high levels of urea, when stored		
					under inappropriate conditi Spain, UK: supports propo	ions, and the use of acetic acid may have a negative effect on GMP.	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC ACID, GLACIAL	<del>260</del>	GMP		4			
ASCORBIC ACID, L-	300	GMP		4			
CALCIUM CARBONATE	<del>170(i)</del>	<del>10000</del>	<del>58</del>	4			
CALCIUM LACTATE	<del>327</del>	<del>10000</del>	<del>58</del>	4			
CITRIC ACID	<del>330</del>	GMP		4			
FUMARIC ACID	<del>297</del>	GMP		4	Discontinuo, adapt in		
MAGNESIUM CARBONATE	<del>504(i)</del>	<del>5000</del>	<del>36</del>	4	Discontinue, adopt in		
MALIC ACID, DL-	<del>296</del>	GMP		4	appropriate		
POTASSIUM CARBONATE	<del>501(i)</del>	GMP		4	appropriate		
SODIUM ACETATE	<del>262(i)</del>	GMP		4			
SODIUM CARBONATE	<del>500(i)</del>	GMP		4			
SODIUM DL-MALATE	<del>350(ii)</del>	GMP		4			
SODIUM FUMARATES	<del>365</del>	GMP		4			
SODIUM LACTATE	<del>325</del>	GMP		4			

## Food Category No. 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** 092-1981: allows INS 330 as acidity regulator & INS 300 as antioxidant; 165-1989: allows INS 300 as antioxidant, INS 330, 331 & 332 as acidity regulators in minced fish only; 36-1981: allows INS 300 as antioxidant; 95-1981: allows INS 300 as antioxidant; 190-1995: does not list acidity regulators; 191-1995: does not allow food additives; 292-2008: food additives not allowed in live bivalve molluscs, only antioxidants allowed in raw bivalve molluscs (raw frozen molluscs) as per provisions in FC 09.2.1.

eWG Proposal for Horizontal Class by-Case"	ssification	of Food Categ	ory: Leave	e as "Case-	<u>Comments by eWG on horizontal classification proposal</u> : Costa Rica: Ascorbic acid, Citric acid, Sodium citrate, and Potassium citrate are used as		
of acidity regulators in correspondin	ig commodi	ty standards.			Brazil: does not support the technological need has been under the corresponding su with appropriate notes refe Spain: agree with the prop eWG to address additives given that they are differen UK: Accepts proposals.	e adoption of these provisions, since no information on the en provided. Specific provisions for minced fish products should be ubcategory (09.2.3). INS 300, 330, 331 and 332 could be included rring to specific products. bosal but we wonder whether it is appropriate or in the tasks of this that are used as antioxidants or texturizing agents instead of AR t functional classes.	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	400		7	Adopt at GMP with note "for use as an antioxidant" - corresponds to CODEX STANs 092-1981, 165- 1989, 63-1981, 95-1981, 292-2008		
CALCIUM CARBONATE	170(i)	GMP	95 <sup>16</sup>	7	Adopt, note 95 excludes use from products covered by commodity standards which do not allow ARs		
CITRIC ACID	330	GMP		7	Adopt with note 61 and new note "for use in shrimps or prawns" - corresponds to CODEX STANs 165-1989 and 092-1981		
MAGNESIUM CARBONATE MAGNESIUM HYDROXIDE	504(i) 528	GMP GMP		7 7	Discontinue		

<sup>&</sup>lt;sup>16</sup> **Note 95:** For use in surimi and fish roe products only.

MAGNESIUM HYDROXIDE	504(ii)	CMD		7		
CARDONATE	504(1)	GIVIF		1	Dostrono until disquesion	
					in Appondix 2 possibly	
POTASSIUM CARBONATE	501(i)	GMP			used as texturizing agent	
POTASSIUM DIHYDROGEN						
CITRATE	332(i)	GMP	61 <sup>17</sup>	7	Adopt with note 61 -	
SODIUM DIHYDROGEN						
CITRATE	331(i)	GMP		7	STAN 105-1969	
					Postpone until discussion	
					in Appendix 3 – possibly	
TRICALCIUM CITRATE	333(iii)	GMP		7	used as texturizing agent	
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	Adopt with note 61 -	
					corresponds to CODEX	
TRISODIUM CITRATE	331(iii)	GMP		7	STAN 165-1989	

#### Food Category No. 09.2.2 (Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

Corresponding commodity standards: 166-1989: in meat (allows INS 300 as antioxidant, INS 330, 331 & 332 as acidity regulators in minced fish only); in Coatings (allows INS 500, 501 and 503 as leavening agents)

eWG Proposal for Horizontal Cla	ssification	of Food Categ	<u>ory</u> :		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final and comments on this approach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC ACID, GLACIAL	260	GMP			Adopt with Note 41		
AMMONIUM CARBONATE	503(i)	GMP	41 <sup>18</sup>	7			
		0.15		_	Adopt	<b>Costa Rica, ICGMA:</b> used as an anti-oxidant <b>USA:</b> ascorbic acid is allowed in the USA for use as a preservative	
ASCORBIC ACID, L-	300	GMP		1		in frozen raw breaded shrimp at GMP levels	
CALCIUM CARBONATE	170(i)	GMP	16	7			
CALCIUM LACTATE	327	10000	58		Adopt at GMP with Note 41 only		
CITRIC ACID	330	GMP	61	4	Adopt	Costa Rica, ICGMA: used as an anti-oxidant	
FUMARIC ACID	297	GMP			Adopt with Note 41		
MAGNESIUM CARBONATE	504(i)	GMP	16	7	Adapt		
MAGNESIUM HYDROXIDE	528	GMP	16	7	Ацорі		

 <sup>&</sup>lt;sup>17</sup> Note 61: For use in minced fish only.
 <sup>18</sup> Note 41: Use in breading or batter coatings only.

MAGNESIUM HYDROXIDE						
CARBONATE	504(ii)	GMP	16	7		
MALIC ACID, DL-	296	GMP			Adopt with Note 41	
POTASSIUM CARBONATE	501(i)	GMP	41	7		
POTASSIUM DIHYDROGEN						Costa Rica ICGMA: used as an anti-ovidant
CITRATE	332(i)	GMP	61	7	Adopt	
POTASSIUM HYDROGEN						
CARBONATE	501(ii)	GMP	41	7		
SODIUM ACETATE	262(i)	GMP			Adopt with Note 41	
SODIUM CARBONATE	500(i)	GMP	41	7	Adopt	
SODIUM DL-MALATE	350(ii)	GMP			Adopt with Note 41	
SODIUM DIHYDROGEN					Adopt - complies with	Costa Rica ICGMA: used as an anti-ovidant
CITRATE	331(i)	GMP	61	7	CODEX STAN 166-1989	
SODIUM FUMARATES	365	GMP			Adopt with Note 41	
SODIUM HYDROGEN					Adopt	
CARBONATE	500(ii)	GMP	41	7	Адорг	
SODIUM LACTATE	325	GMP		4	Adopt with Note 41	
SODIUM SESQUICARBONATE	500(iii)	GMP	41	7		
TRIPOTASSIUM CITRATE	332(ii)	GMP	61	7	Adopt	
TRISODIUM CITRATE	331(iii)	GMP	61	7		

#### Food Category No. 09.2.3 (Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

eWG Proposal for Horizontal Cla	ssification	of Food Categ	ory:		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final and comments on this approach were not requested by the eWG		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC ACID, GLACIAL	260	GMP			Adapt with Note 16		
ASCORBIC ACID, L-	300	GMP			Adopt with Note 16		
CALCIUM CARBONATE	170(i)	GMP	16	7	Adopt		
CALCIUM LACTATE	327	10000	58		Adopt at GMP with Note 16		
CITRIC ACID	330	GMP			Adapt with Nata 16		
FUMARIC ACID	297	GMP			Adopt with Note 16		
MAGNESIUM CARBONATE	504(i)	GMP	16	7			
MAGNESIUM HYDROXIDE	528	GMP	16	7	Adapt		
MAGNESIUM HYDROXIDE					Ацорі		
CARBONATE	504(ii)	GMP	16	7			
MALIC ACID, DL-	296	GMP			Adopt with Note 16		

POTASSIUM CARBONATE	501(i)	GMP				
POTASSIUM DIHYDROGEN					Adapt	
CITRATE	332(i)	GMP	16	7	Αάορι	
SODIUM ACETATE	262(i)	GMP				
SODIUM CARBONATE	500(i)	GMP			Adopt with Note 16	
SODIUM DL-MALATE	350(ii)	GMP				
SODIUM DIHYDROGEN					Adapt	
CITRATE	331(i)	GMP	16	7	Αάορι	
SODIUM FUMARATES	365	GMP			Adapt with Nata 16	
SODIUM LACTATE	325	GMP				
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7	Adapt	
TRISODIUM CITRATE	331(iii)	GMP	16	7	Adopi	
ACETIC ACID, GLACIAL	260	GMP			Adapt with Nata 16	
ASCORBIC ACID, L-	300	GMP				
CALCIUM CARBONATE	170(i)	GMP	16	7	Adopt	

## Food Category No. 09.2.4 (Cooked and/or fried fish and fish products, including molluscs, crustaceans, and echinoderms)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

eWG Proposal for Horizontal Cla	ssification	of Food Categ	<u>ory</u> :		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final and comments on this approach were not requested by the eWG		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC ACID, GLACIAL	260	GMP				<b>Brazil:</b> Some fish products may contain high levels of urea, when stored under inappropriate conditions, and the use of acetic acid may have a negative effect on GMP.	
ASCORBIC ACID, L-	300	200		7			
CALCIUM CARBONATE	170(i)	10000	58			<b>Japan:</b> Calcium carbonate is used for some kind of surimi products. Justification: It is used to improve elasticity of surimi products.	
CALCIUM LACTATE	327	10000	58		Adapt		
CITRIC ACID	330	GMP			Adopt		
FUMARIC ACID	297	GMP					
MAGNESIUM CARBONATE	504(i)	GMP		7			
MAGNESIUM HYDROXIDE	528	GMP		7			
MAGNESIUM HYDROXIDE							
CARBONATE	504(ii)	GMP		7			
MALIC ACID, DL-	296	GMP		4	]		
POTASSIUM CARBONATE	501(i)	GMP		4	]		

POTASSIUM DIHYDROGEN			
CITRATE	332(i)	GMP	7
SODIUM ACETATE	262(i)	GMP	
SODIUM CARBONATE	500(i)	GMP	
SODIUM DL-MALATE	350(ii)	GMP	
SODIUM DIHYDROGEN			
CITRATE	331(i)	GMP	7
SODIUM FUMARATES	365	GMP	
SODIUM LACTATE	325	GMP	
TRICALCIUM CITRATE	333(iii)	GMP	7
TRIPOTASSIUM CITRATE	332(ii)	GMP	7
TRISODIUM CITRATE	331(iii)	GMP	7

# Food Category <u>No. 09.2.4.1 (Cooked fish and fish products)</u>

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

eWG Proposal for Horizontal Clas	sification	of Food Categ	ory:		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final and comments on this approach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CALCIUM CARBONATE	<del>170(i)</del>	GMP		7	Discontinue, adopt in parent FC 09.2.4 at GMP (same provision in all subcategories)		

## Food Category No. 09.2.4.2 (Cooked mollusks, crustaceans, and echinoderms)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

Corresponding commodity standards: None

eWG Proposal for Horizontal Clas	sification	of Food Categ	<u>ory</u> :		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final and comments on this approach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CALCIUM CARBONATE	<del>170(i)</del>	GMP		7	Discontinue, adopt in parent FC 09.2.4 at GMP (same provision in all subcategories)		

Food Category No. 09.2.4.3 (Fried fish and fish products, including mollusks, crustaceans, and echinoderms)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

eWG Proposal for Horizontal Classification of Food Category:					The decision of the pWG o approach for the justificatio final and comments on this	n the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal n of the use of acidity regulators in this food category was taken as approach were not requested by the eWG.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	<del>170(i)</del>	GMP		7	Discontinue, adopt in parent FC 09.2.4 at GMP (same provision in all subcategories)	

## Food Category No. 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** 244-2004: allows INS 300 & 330 as acidity regulators; 189-1993, 236-2003: food additives are not permitted; 167-1989, 222-2001: does not list acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Justified only with				ied only with	Comments by eWG on horizontal classification proposal:		
with new note "except for use in foods covered by the following standards: 189-					Spain, UK: Supports proposal		
1993, 236-2003, 167-1989, 222-20	01"						
Justification for proposal: This for	od category	/ covers both st	andardized	and non-			
standardized foods. Use of note w	ill exclude u	se in standardiz	zed foods \	where the			
corresponding commodity standard	l does not a	llow acidity regu	ulators.				
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
					Adopt with proposed new		
					note for FC and new note	Brazil: Some fish products may contain high levels of urea, when	
					"not for use in salted	stored under inappropriate conditions, and the use of acetic acid	
					Atlantic herring and	may have a negative effect on GMP.	
ACETIC ACID, GLACIAL	260	GMP			sprat"		
					Adopt with proposed new		
					note for FC only		
		0115			(corresponds to CODEX		
ASCORBIC ACID, L-	300	GMP			STAN 244-2004)		
CALCIUM CARBONATE	170(i)	GMP		1	Adopt at GMP with		
					proposed new note for		
					FC and new note "not for		
	227	10000	50		use in saited Atlantic		
	321	10000	30		Adapt with proposed pow		
					Adopt with proposed new		
					(corresponde to CODEX		
	330	GMP					
	207	GMP			31AN 244-2004)		
	504(i)	GMP		7	4		
	528	GMP		7	1		
	520			1	1		
CARBONATE	504(ii)	GMP		7	Adopt with proposed new		
MALIC ACID. DL-	296	GMP		-	note for FC and new note		
POTASSIUM CARBONATE	501(i)	GMP	1		"not for use in salted		
POTASSIUM DIHYDROGEN			1		Atlantic herring and		
CITRATE	332(i)	GMP		7	sprat		
SODIUM ACETATE	262(i)	GMP	1		]		
SODIUM CARBONATE	500(i)	GMP			]		
SODIUM DL-MALATE	350(ii)	GMP					

SODIUM DIHYDROGEN				
CITRATE	331(i)	GMP	7	
SODIUM FUMARATES	365	GMP		
SODIUM LACTATE	325	GMP		
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	
TRISODIUM CITRATE	331(iii)	GMP	7	

## Food Category <u>No. 10.1 (Fresh eggs)</u>

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Justified

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as
	final and comments on this approach were not requested by the eWG. There are no existing provisions for acidity regulators in the GSFA for this food category.

# Food Category No. 10.2.1 (Liquid egg products)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

eWG Proposal for Horizontal Classification of Food Category:					The decision of the pWG approach for the justificat final and comments on th	on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal ion of the use of acidity regulators in this food category was taken as is approach were not requested by the eWG.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP		7		UK: Accepts proposals
CITRIC ACID	330	GMP		7	]	Costa Rica: They are generally used to stabilize color
LACTIC ACID, L-, D- and DL-	270	GMP		7	]	ICGMA: AR are primarily used to stabilize color - 330 Citric acid,
SODIUM ACETATE	262(i)	GMP		7	]	monosodium phosphate, and monopotassium phosphate, 524
SODIUM DIHYDROGEN					]	sodium hydroxide, Calcium sulphate, Citric Acid, Phosphoric Acid,
CITRATE	331(i)	GMP		7		Sodium Bicarbonate, 500(i) Sodium Carbonate, 331(i) and 331(iii)
SODIUM LACTATE	325	GMP		7	Adopt	Sodium Citrate, Sodium Hexametaphosphate, 524 Sodium
						Hydroxide, Sodium Phosphate dibasic, Sodium Phosphate,
						monopasic
						<b>Spain:</b> agree with the proposal but questiosh whether it is
						appropriate or in the tasks of this evvG to address additives used
	004(:::)			7		as colour stabilizers instead of AR given that they are different
	33T(III)	GIVIP		1		Tunctional classes

## Food Category No. 10.2.2 (Frozen egg products)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

#### Corresponding commodity standards: None

eWG Proposal for Horizontal Clas	sification o	of Food Categ	ory:		The decision of the pWG c approach for the justification final and not discussed by	on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal on of the use of acidity regulators in this food category was taken as the eWG.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP		7		
CITRIC ACID	330	GMP		7		
LACTIC ACID, L-, D- and DL-	270	GMP		7		
SODIUM ACETATE	262(i)	GMP		7	Adopt	See comments to EC 10.2.1
SODIUM DIHYDROGEN					Adopt	
CITRATE	331(i)	GMP		7		
SODIUM LACTATE	325	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		

#### Food Category No. 11.1 (Refined and raw sugars)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 212-1999: does not permit acidity regulators; commodity standards for subcategories do not allow acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Corresponding commodity standards for this food	Brazil, EU, Spain, UK, CEFS: Supports proposal
category and subcategories do not allow acidity regulators. There are no provisions	
for acidity regulators in this food category in the GSFA.	

#### Food Category No. 11.1.1 (White sugar, dextrose anhydrous, dextrose monohydrate, fructose)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 212-1999: does not permit acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Corresponding commodity standard for this food	Brazil, EU, Spain, UK, CEFS: Supports proposal
category does not allow acidity regulators. There are no provisions for acidity	
regulators in this food category in the GSFA.	

#### Food Category No. 11.1.2 (Powdered sugar, powdered dextrose)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 212-1999: does not permit acidity regulators

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Not Justified <b>Justification for proposal</b> : Corresponding commodity standard for this food category does not allow acidity regulators. Comments to the eWG indicate that the provision for the food additive with acidity regulator function listed in this FC is for the use of the food additive as an anti-caking agent, not as an acidity regulator.					<u>Comments by eWG on h</u> Brazil, EU, Spain, UK, CE	<u>orizontal classification proposal</u> : E <b>FS:</b> Supports proposal
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
MAGNESIUM CARBONATE	504(i)	15000	56 <sup>19</sup>	Adopted	Retain Adopted	Brazil: The definition for this FC in the GSFA mentions "with or without added anticaking agents". If this FC includes sugar in cubes, anticaking agents are necessary. In this case, the use of INS 504(i) magnesium carbonate and INS 500(i) sodium carbonate may be justified as anticaking agents. UK, CEFS: used as an anti-caking agent not an acidity regulator. ICGMA: permitted in CODEX STAN 212-1999; anticaking

#### Food Category <u>No. 11.1.3 (Soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar)</u>

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

**Corresponding commodity standards:** 212-1999: does not permit acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Corresponding commodity standard for this food	Brazil, EU, Spain, UK, CEFS: Supports proposal.
category does not allow acidity regulators. There are no provisions for acidity	
regulators in this food category in the GSFA.	

#### Food Category No. 11.1.3.1 (Dried glucose syrup used to manufacture sugar confectionery)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 212-1999: does not permit acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Corresponding commodity standard for this food	Brazil, EU, Spain, UK, CEFS: Supports proposal
category does not allow acidity regulators. There are no provisions for acidity	
regulators in this food category in the GSFA.	

<sup>&</sup>lt;sup>19</sup> **Note 56:** Provided starch is not present.

#### Food Category No. 11.1.3.2 (Glucose syrup used to manufacture sugar confectionery)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 212-1999: does not permit acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Corresponding commodity standard for this food	Brazil, EU, Spain, UK, CEFS: Supports proposal
category does not allow acidity regulators. There are no provisions for acidity	
regulators in this food category in the GSFA.	

#### Food Category No. 11.1.4 (Lactose)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 212-1999: does not permit acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Corresponding commodity standard for this food	Brazil, EU, Spain, UK, CEFS: Supports proposal
category does not allow acidity regulators. There are no provisions for acidity	
regulators in this food category in the GSFA.	

#### Food Category No. 11.1.5 (Plantation or mill white sugar)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 212-1999: does not permit acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Corresponding commodity standard for this food	Brazil, EU, Spain, UK, CEFS: Supports proposal
category does not allow acidity regulators. There are no provisions for acidity	
regulators in this food category in the GSFA.	

# Food Category <u>No. 11.2 (Brown sugar, excluding products of food category 11.1.3 (soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar)</u>

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: There are no provisions for acidity regulators in this	Brazil, EU, Spain, UK, CEFS: Supports proposal
food category in the GSFA, nor was any support provided to the eWG for their use.	

# Food Category <u>No. 11.3 (Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3</u> (soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar))

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: There are no provisions for acidity regulators in this	Brazil, EU, Spain, UK, CEFS: Supports proposal
food category in the GSFA, nor was any support provided to the eWG for their use.	

#### Food Category No. 11.4 (Other sugars and syrups (e.g., xylose, maple syrup, sugar toppings))

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

#### Corresponding commodity standards: None

eWG Proposal for Horizontal Clas	ssification	of Food Categ	ory:		The decision of the pWG approach for the justificati final and comments on thi	on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal ion of the use of acidity regulators in this food category was taken as is approach were not requested by the eWG.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
						USA: calcium acetate is allowed in the USA for use in toppings and
CALCIUM ACETATE	263	1500		7		syrups as an acidity regulator at levels up to 0.15% (1500 mg/kg)
MAGNESIUM CARBONATE	504(i)	GMP		7		
MAGNESIUM HYDROXIDE	528	GMP		7		
MAGNESIUM HYDROXIDE						
CARBONATE	504(ii)	GMP		7	Adopt	
POTASSIUM DIHYDROGEN					Адорг	
CITRATE	332(i)	GMP		7		
SODIUM DIHYDROGEN						
CITRATE	331(i)	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	]	
TRISODIUM CITRATE	331(iii)	GMP		7		

#### Food Category No. 11.5 (Honey)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 012-1981: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: There are no provisions for acidity regulators in this
food category in the GSFA, nor was any support provided to the eWG for their use

Comments by eWG on horizontal classification proposal: EU, Spain, UK: Supports proposal.

## Food Category No. 12.1 (Salt and salt substitutes)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: None; subcategories have corresponding commodity standards which do not exclude acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments to the eWG indicate that acidity regulators	Brazil: Provisions for acidity regulators should be discussed under the subcategories.
are not used in subcategory 12.1.1, therefore not justified in the parent food	EU, Spain: supports proposal
category 12.1.	UK: There is no technological justification for the use of acidity regulators in salt itself, therefore
	there should be no listing in the parent FC.

# Food Category No. 12.1.1 (Salt)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 150-1985: allows food additives as per FC 12.1.1 Tables 1 & 2

eWG Proposal for Horizontal Clas	sification	of Food Catego	ory: Not J	ustified	Comments by eWG on ho	prizontal classification proposal:
Justification for proposal: Comme	ents to the e	WG indicate th	at the prov	isions for	Brazil: Could not find any p	provisions for acidity regulators in CODEX STAN 150-1985, which
the food additives with acidity regula	ator function	listed in this F	C are for the	ne use of	makes reference to tables	1 and 2 of the GSFA. INS 170(i) calcium carbonate and INS 504(i)
these food additives as anti-caking a	agents, not	as acidity regul	ators.		magnesium carbonate are	used as anticaking agents.
					EU, Spain: supports propo	sal
					UK: There is no technolog	ical justification for the use of acidity regulators in salt itself.
Additive	INS	Max Level	Notes	Step /	eWG proposal	Comments by eWG members on proposal
Additive		(mg/kg)	Hotes	Adopted		Comments by erro members on proposal
CALCIUM CARBONATE	170(i)	GMP		Adopted	Rotain Adopted	UK: Agree to retain these two adopted provisions on the basis the
MAGNESIUM CARBONATE	504(i)	GMP		Adopted	Retain Adopted	carbonates are used as anti-caking agents

#### Food Category No. 12.1.2 (Salt Substitutes)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

Corresponding commodity standards: 053-1981: does not discuss food additives

eWG Proposal for Horizontal Cla	assification	of Food Categ	ory:		The decision of the pWG or approach for the justification final and comments on this	on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal on of the use of acidity regulators in this food category was taken as approach were not requested by the eWG.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP		7		
ASCORBIC ACID, L-	300	GMP		4		
CALCIUM CARBONATE	170(i)	10000	58	4	Adopt	
CALCIUM LACTATE	327	10000	58	4		
CITRIC ACID	330	GMP		7		

FUMARIC ACID	297	GMP		4
ACTIC ACID, L-, D- and DL-	270	GMP		7
MAGNESIUM CARBONATE	504(i)	5000	36	4
MAGNESIUM HYDROXIDE	528	GMP		7
MAGNESIUM HYDROXIDE				
CARBONATE	504(ii)	GMP		7
MALIC ACID, DL-	296	GMP		4
POTASSIUM DIHYDROGEN				
CITRATE	332(i)	GMP		7
SODIUM ACETATE	262(i)	GMP		4
SODIUM CARBONATE	500(i)	GMP		4
SODIUM DIHYDROGEN				
CITRATE	331(i)	GMP		7
SODIUM DL-MALATE	350(ii)	GMP		4
SODIUM FUMARATES	365	GMP		4
TRIPOTASSIUM CITRATE	332(ii)	GMP		7
TRISODIUM CITRATE	331(iii)	GMP		7

## Food Category <u>No. 12.2.1 (Herbs and spices)</u>

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: None

eWG Proposal for Horizontal Cla Justification for proposal: Comm regulators are not used in this food	ents from el category.	<b>of Food Categ</b> WG members ir	ory: Not J ndicate tha	ustified t acidity	<u>Comments by eWG on ho</u> Brazil, EU, Spain, UK: Su ICGMA: Acidity Regulators further clarification, for stra used.	orizontal classification proposal: pport proposal s (AR) are not technologically justified for straight herbs. And, upon ight spices & herbs, neither anticaking agents nor antioxidants are
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP	51 <sup>20</sup>	7		
ASCORBIC ACID, L-	300	GMP	51	4		
CALCIUM CARBONATE	170(i)	10000	51& 58	4		
			51 &			
CALCIUM LACTATE	327	10000	58	4		
CITRIC ACID	330	GMP	51	7	Discontinue	
FUMARIC ACID	297	GMP	51	4		
LACTIC ACID, L-, D- and DL-	270	GMP	51	7		
			36 &			
MAGNESIUM CARBONATE	504(i)	5000	51	4		
MAGNESIUM HYDROXIDE	528	GMP	51	7		

<sup>20</sup> **Note 51:** For use in herbs only.

MAGNESIUM HYDROXIDE				
CARBONATE	504(ii)	GMP	51	7
MALIC ACID, DL-	296	GMP	51	4
POTASSIUM DIHYDROGEN				
CITRATE	332(i)	GMP	51	7
SODIUM ACETATE	262(i)	GMP	51	4
SODIUM CARBONATE	500(i)	GMP	51	4
SODIUM DIHYDROGEN				
CITRATE	331(i)	GMP	51	7
SODIUM DL-MALATE	350(ii)	GMP	51	4
SODIUM FUMARATES	365	GMP	51	4
TRICALCIUM CITRATE	333(iii)	GMP	51	7
TRIPOTASSIUM CITRATE	332(ii)	GMP	51	7
TRISODIUM CITRATE	331(iii)	GMP	51	7

#### Food Category No. 13.1 (Infant formulae, follow-up formulae, and formulae for special medical purposes for infants)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: None; 072-1981 applies to subcategories 13.1.1 & 13.1.3; 156-1987 applies to subcategory 13.1.2

eWG Proposal for Horizontal Classification of Food Category: Case-by-Case	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments by eWG members that the use of all	Brazil, EU, Spain, UK: Accepts proposal
additives in this food category and related subcategories should be specifically	ICGMA: 525 potassium hydroxide, 330 citric acid, 526 calcium hydroxide. These might be
evaluated for use in that food category.	used with products in all three categories under 13.1. These additives serve as aids in the
	manufacture of formulas to enhance the keeping quality or stability of the products and to
	preserve their nutritional quality

#### Food Category No. 13.1.1 (Infant formulae)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: 072-1981: allows INS 524, 500i-ii, 525, 501i-ii, 526, 270, 330, 331i, iii, & 332 as acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Case-by-Case					Comments by eWG on ho	prizontal classification proposal:
Justification for proposal: Comments by eWG members that the use of all					Brazil, EU, Japan, UK: Su	pports proposal and adoption of all proposed provisions.
additives in this food category and related subcategories should be specifically						
evaluated for use in that food category.						
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
			55 <sup>21</sup> &		Adopt as listed -	
CALCIUM HYDROXIDE	526	2000	72 <sup>22</sup>	7	Corresponds to CODEX	Japan: Citric acid is used to stabilize emulsion by adjusting pH.

 <sup>&</sup>lt;sup>21</sup> Note 55: Singly or in combination, within the limits for sodium, calcium, and potassium specified in the commodity standard.
 <sup>22</sup> Note 72: Ready-to-eat basis.

					STAN 72-1981	USA: lactic acid is not considered GRAS in the USA for use in
CITRIC ACID	330	GMP	72	7		infant formula (21 CFR 184.1063)
			72 &			Japan: Potassium carbonate is used to stabilize emulsion by
LACTIC ACID, L-, D- and DL-	270	GMP	83 <sup>23</sup>	7		adjusting pH.
			55 &			
POTASSIUM CARBONATE	501(i)	2000	72	7		
POTASSIUM DIHYDROGEN						
CITRATE	332(i)	GMP	72	7		
POTASSIUM HYDROGEN			55 &			
CARBONATE	501(ii)	2000	72	7		
			55 &			
POTASSIUM HYDROXIDE	525	2000	72	7		
			55 &			
SODIUM CARBONATE	500(i)	2000	72	7		
SODIUM DIHYDROGEN						
CITRATE	331(i)	GMP	72	4		
SODIUM HYDROGEN			55 &			
CARBONATE	500(ii)	2000	72	7		
			55 &			
SODIUM HYDROXIDE	524	2000	72	7		
						Japan: Trisodium citrate is used to stabilize emulsion by adjusting
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7		pH.
TRISODIUM CITRATE	331(iii)	GMP	72	7		Japan: Citric acid is used to stabilize emulsion by adjusting pH.

# Food Category No. 13.1.2 (Follow-up formulae)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: 156-1987: allows INS 500i-ii, 332i-ii, 501i-ii, 331iii, 524, 526, 270, 330, 525, & 331i as acidity regulators, and INS 330 for use as an antioxidant

eWG Proposal for Horizontal Classification of Food Category: Case-by-Case Justification for proposal: Comments by eWG members that the use of all					Comments by eWG on ho Brazil, EU, Japan, UK: Su	rizontal classification proposal: pports proposal and adoption of all proposed provisions
additives in this food category and re evaluated for use in that food catego	elated subca prv.	ategories shoul	d be spec	ifically		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
					Adopt with note 72 & New Note "for use as an antioxidant"- corresponds to CODEX	
ASCORBIC ACID, L-	300	50	72	7	STAN 156-1987	

<sup>23</sup> Note 83: L(+)-form only.

CALCIUM HYDROXIDE	526	GMP	72	7		
CITRIC ACID	330	GMP	72	7		Japan: Citric acid is used to stabilize emulsion by adjusting pH.
LACTIC ACID, L-, D- and DL-	270	GMP	72	7		<b>USA</b> : lactic acid is not considered GRAS in the USA for use in infant foods (21 CFR 184.1063)
						Japan: Potassium carbonate is used to stabilize emulsion by
POTASSIUM CARBONATE	501(i)	GMP	72	7		adjusting pH.
POTASSIUM DIHYDROGEN						
CITRATE	332(i)	GMP	72	4		
POTASSIUM HYDROGEN					Adapt on listed	
CARBONATE	501(ii)	GMP	72	7	Adopt as listed -	
POTASSIUM HYDROXIDE	525	GMP	72	7		
SODIUM CARBONATE	500(i)	GMP	72	7	STAN 150-1907	
SODIUM DIHYDROGEN						
CITRATE	331(i)	GMP	72	4		
SODIUM HYDROGEN						
CARBONATE	500(ii)	GMP	72	7		
SODIUM HYDROXIDE	524	GMP	72	7		
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7		
						Japan: Trisodium citrate is used to stabilize emulsion by adjusting
TRISODIUM CITRATE	331(iii)	GMP	72	7		pH.

## Food Category <u>No. 13.1.3 (Formulae for special medical purposes for infants)</u>

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: 072-1981: allows INS 524, 500i-ii, 525, 501i-ii, 526, 270, 330, 331i, iii, & 332 as acidity regulators

eWG Proposal for Horizontal Cla Justification for proposal: Comm additives in this food category and evaluated for use in that food category	ssification ents by eW related sube pory.	of Food Categ G members tha categories shou	ory: Case t the use o ld be spec	-by-Case f all ifically	<u>Comments by eWG on h</u> Brazil, EU, Japan, Spain	orizontal classification proposal: , UK: Supports proposal and adoption of all proposed provisions
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
			55 &			
CALCIUM HYDROXIDE	526	2000	72	4		
CITRIC ACID	330	GMP	72	4		Japan: Citric acid is used to stabilize emulsion by adjusting pH.
			72 &			USA: lactic acid is not considered GRAS in the USA for use in
LACTIC ACID, L-, D- and DL-	270	GMP	83	4	Adopt as listed -	infant foods (21 CFR 184.1063)
			55 &		corresponds to CODEX	Japan: Potassium carbonate is used to stabilize emulsion by
POTASSIUM CARBONATE	501(i)	2000	72	4	STAN 072-1981	adjusting pH.
POTASSIUM DIHYDROGEN					]	
CITRATE	332(i)	GMP	72	4		
POTASSIUM HYDROGEN			55 &		]	
CARBONATE	501(ii)	2000	72	4		

			55 &			
POTASSIUM HYDROXIDE	525	2000	72	4		
			55 &		- Γ	
SODIUM CARBONATE	500(i)	2000	72	4		
SODIUM DIHYDROGEN						
CITRATE	331(i)	GMP	72	4		
SODIUM HYDROGEN			55 &			
CARBONATE	500(ii)	2000	72	4		
			55 &		1	
SODIUM HYDROXIDE	524	2000	72	4		
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	4		
TRISODIUM CITRATE	331(iii)	GMP	72	4		

#### Food Category No. 13.2 (Complementary foods for infants and young children)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

**Corresponding commodity standards:** 073-1981: allows acidity regulators (INS 500i-ii, 501i-ii, 333iii, 270, 260, 330, 331i & 170i); 074-1981: allows acidity regulators (INS 500ii, 501i-ii, 170i, 330, 260, 261, 262i, 263, 296, 325, 326, 327, 331i-ii, 332i, iii, 333 (only 333iii in GSFA), 507, 524, 525, 526, & 575)and INS 503i-ii as raising agent; both STANs allow INS 300 as antioxidant

eWG Proposal for Horizontal Class	sification o	f Food Categ	ory: Case	by-Case	Comments by eWG on horizontal classification proposal:		
Justification for proposal: Commen	nts by eWG	members that	t the use o	fall	Brazil, EU, Japan, UK: Supports proposal and adoption of all proposed provisions		
additives in this food category and rel	lated subca	tegories shou	d be speci	fically	ELC: CODEX STAN 074 – 1981 includes several provisions for PHOSPHATES (@440mg/kg		
evaluated for use in that food categor	ry.	-			as P, for pH-adjustment only). These provisions should be taken up.		
		Max Loval		Stop /			

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
					Adopt at GMP with new	5000 mg/kg Corresponds to CODEX STAN 073-1981,GMP to 074-
ACETIC ACID, GLACIAL	260	5000		7	canned baby foods"	1981
AMMONIUM CARBONATE	503(i)	GMP		7	Adopt with new note "for use as a raising agent"	Corresponds to CODEX STAN 074-1981
AMMONIUM HYDROGEN CARBONATE	503(ii)	GMP		7	Adopt with new note "for use as a raising agent"	Corresponds to CODEX STAN 074-1981
	200	2000		7	Adopt at 500 mg/kg with new notes "as ascorbic acid" & "as an ontiovident"	Corresponds to CODEX STAN 073-1981 & 074-1981
CALCIUM ACETATE	263	GMP		7	antioxidant	GMP Corresponds to CODEX STAN 074-1981
CALCIUM CARBONATE	170(i)	GMP		7	1	GMP Corresponds to CODEX STAN 073-1981 & 074-1981
CALCIUM HYDROXIDE	526	GMP		7	Adopt	GMP Corresponds to CODEX STAN 074-1981
					Ацорі	GMP Corresponds to CODEX STAN 074-1981
						USA: calcium lactate is not GRAS in the USA for use in infant
CALCIUM LACTATE	327	GMP		7		formula and infant foods.

				Adopt at GMP with new note "5000 mg/kg in	5000 mg/kg Corresponds to CODEX STAN 073-1981,GMP to 074-
CITRIC ACID	330	25000	7	canned baby foods"	1901
GLUCONO DELTA-LACTONE	575	5000	4	Adopt at GMP	GMP Corresponds to CODEX STAN 074-1981
HYDROCHLORIC ACID	507	GMP	7	Adopt	GMP Corresponds to CODEX STAN 074-1981
	070	45000	7	Adopt at GMP with new note "2000 mg/kg in canned baby foods, L(+)- form only"	2000 mg/kg for L(+) Lactica Acid only Corresponds to CODEX STAN 073-1981, GMP for all coresponds to CODEX STAN 74- 1981 USA: lactic acid is not considered GRAS in the USA for use in infect faceds (24 CED 1944002)
	270	15000	7		Iniani 10005 (21 GFR 164.1003)
	504(1)	GIVIP	7		CMD Correspondence CODEX CTAN 074 4004
	296	GIVIP	/ 7		GMP Corresponds to CODEX STAN 074-1981
POTASSIUM ACETATES	261	GIVIP	1		GMP Corresponds to CODEX STAN 074-1981
	504(1)	0.45	-		potassium hydrogen carbonate and acidity regulators allowed in
	501(1)	GIVIP	1		both corresponding commodity standards
CITRATE	332(i)	GMP	7		GMP Corresponds to CODEX STAN 074-1981
POTASSIUM HYDROGEN				Adopt	CMD Corresponds to CODEX STAN 072 1091 8 074 1091
CARBONATE	501(ii)	GMP	7		GIMP COTTESPONDS TO CODEX STAIN 075-1961 & 074-1961
POTASSIUM HYDROXIDE	525	GMP	7		GMP Corresponds to CODEX STAN 074-1981
					GMP Corresponds to CODEX STAN 074-1981
					<b>USA:</b> potassium lactate is prohibited in the USA from use in infant
POTASSIUM LACTATE	326	GMP	7		formula and infant foods.
SODIUM ACETATE	262(i)	GMP	7		GMP Corresponds to CODEX STAN 074-1981
SODIUM CARBONATE	500(i)	GMP	7		GMP Corresponds to CODEX STAN 073-1981 & 074-1981
SODIUM DIHYDROGEN CITRATE	331(i)	5000	4	Adopt at GMP with new note "5000 mg/kg in canned baby foods"	5000 mg/kg Corresponds to CODEX STAN 073-1981, GMP to 74- 1981
SODIUM HYDROGEN CARBONATE	500(ii)	GMP	7	Adopt	GMP Corresponds to CODEX STAN 073-1981 & 074-1981
SODIUM HYDROXIDE	524	GMP	7		GMP Corresponds to CODEX STAN 074-1981
SODIUM LACTATE	324	GMP	7	Adopt with Note 83	sodium lactate (L+ form only) is GMP in 074-1981 USA: sodium lactate is prohibited from use in infant formula and is not affirmed as GRAS for use in infant foods in the USA.
TRICALCIUM CITRATE	333(iii)	GMP	7	Adopt	GMP Corresponds to CODEX STAN 074-1981 USA: calcium citrate is GRAS in the USA for use in foods in general, including infant formula, at levels up to GMP.
TRIPOTASSIUM CITRATE	332(ii)	GMP	7		GMP Corresponds to CODEX STAN 074-1981
	331(iii)	5000	7	Adopt at GMP with new note "5000 mg/kg in canned baby foods"	5000 mg/kg Corresponds to CODEX STAN 073-1981, GMP to 074- 1981

#### Food Category No. 14.1.1 (Waters)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

**Corresponding commodity standards:** None, 108-1981 corresponds to subcategory 14.1.1.1 & 227-2001 corresponds to 14.1.1.2. Neither commodity standard discusses food additives.

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: There are no provisions for acidity regulators in this	Brazil, EU, Spain, UK: Supports proposal
food category in the GSFA, nor was any support provided to the eWG for their use.	

#### Food Category No. 14.1.1.1 (Natural mineral waters and source waters)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 108-1981: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: There are no provisions for acidity regulators in this	Brazil, EU, Spain, UK: Supports proposal
food category in the GSFA, nor was any support provided to the eWG for their use.	

#### Food Category No. 14.1.1.2 (Table waters and soda waters)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 227-2001: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: There are no provisions for acidity regulators in this	Brazil, EU, Spain, UK: Supports proposal
food category in the GSFA, nor was any support provided to the eWG for their use.	

#### Food Category No. 14.1.2 (Fruit and vegetable juices)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity	standards: None, 247-2005 corresponds to subcategory 14.1.2.1 and allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1,
14.1.2.3, 14.1.3.1, & 14.1.3.3	

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments from eWG members indicate that adopted	Brazil: Provisions are presented under the subcategories, hence they are not necessary here.
provisions in subcategories for food additives with acidity regulator function are for	EU: does not support acidity regulators in this broad category - not appropriate for fruit juices
their use as anti-oxidants, not as acidity regulators.	<b>UK:</b> Standard 247 does not list acidity regulators. We consider a generic case for
	technological need of acidity regulators in fruit juices has not been made.

# Food Category No. 14.1.2.1 (Fruit juice)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

<b>eWG Proposal for Horizontal Classification of Food Category</b> : Not Justified <b>Justification for proposal</b> : Comments from eWG members indicate that the adopted provisions in this food category for food additives with acidity regulator function are for their use as anti-oxidants, not as acidity regulators.					Comments by eWG on horizontal classification proposal: comments from Brazil in CX/FA 12/44/9 Add. 2 that the use of acidity regulators are necessary in acidic fruit and vegetable juices to adjust sensorial characteristics Costa Rica: Heat treatment and high acid products may need citric acid; citrates, malic acid EU: questions technological need UK: Standard 247 does not list acidity regulators. We consider a generic case for technological need of acidity regulators has not been made. Use of substances already adopted may be as anti-oxidants rather than as acidity regulators. ICGMA: Hot fill, high acid products may need 330 Citric acid;Citrates; 296 Malic Acid – Codex Std 247-2005 Fruit luices and Nectars (fruit inices) is 1:1 with GSEA		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
						IFU, ICGMA: agrees to retain adopted;	
ASCORBIC ACID, L-	300	GMP		Adopted		Japan: ascorbic acid is used as antioxidant to prevent products from distaining.	
					Retain Adopted	IFU, ICGMA: agrees to retain adopted	
	220			Adopted		Japan: Citric acid is used as an acidity regulator to balance	
	206	3000 CMD	115 <sup>25</sup>	Adopted		Sourcess and Sweetness.	
MALIC ACID, DL-	296	GIMP	115-	Adopted		IFU, IUGMIA: agrees to retain adopted	

 <sup>&</sup>lt;sup>24</sup> Note 122: Subject to national legislation of the importing country.
 <sup>25</sup> Note 115: For use in pineapple juice only.

## Food Category No. 14.1.2.2 (Vegetable juice)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

## Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category:					The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final and comments on this approach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	GMP		4	Adopt	IFU: agrees to adopt	
CITRIC ACID	330	3000		4	Adopt at 5,000 mg/kg	<b>IFU:</b> agrees to adopt; <b>Japan:</b> proposes to change maximum level to 5,000 mg/kg, Citric acid is used to control microbial growth by lowering pH of carrot juice. It is also used to maintain consistent pH of the product throughout shelf life.	
MALIC ACID, DL-	296	3000		4	Adopt	IFU: agrees to adopt	

## Food Category No. 14.1.2.3 (Concentrates for fruit juice)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

<b><u>eWG Proposal for Horizontal Classification of Food Category</u>:</b> Not Justified <u>Justification for proposal</u> : Comments from eWG members indicate that the adopted provisions in this food category for food additives with acidity regulator function are for their use as anti-oxidants, not as acidity regulators.					Comments by eWG on horizontal classification proposal: comments from Brazil in CX/FA 12/44/9 Add. 2 that the use of acidity regulators are necessary in acidic fruit and vegetable juices to adjust sensorial characteristics Costa Rica: Heat treatment and high acid products may need citric acid; citrates, malic acid EU: questions technological need UK: Standard 247 does not list acidity regulators. We consider a generic case for technological need of acidity regulators has not been made. Use of substances already adopted may be as anti-oxidants rather than as acidity regulators. ICGMA: Frozen and aseptic products may need may need 330 Citric acid;Citrates; 296 Malic Acid – Codex Std 247-2005 Fruit Juices and Nectars (fruit juices) is 1:1 with GSFA 300		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	GMP	127 <sup>26</sup>	Adopted	Retain Adopted	Japan: Ascorbic acid is used as antioxidant to prevent products from distaining. UK: Retain adopted	

<sup>&</sup>lt;sup>26</sup> Note 127: As served to the consumer.

CITRIC ACID	330	3000	122 & 127	Adopted	Japan: Citric acid is used as an acidity regulator to balance sourness and sweetness. UK: Retain adopted
MALIC ACID, DL-	296	GMP	115 & 127	Adopted	UK: Retain adopted

#### Food Category No. 14.1.2.4 (Concentrates for vegetable juice)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

Corresponding commodity standards: None

eWG Proposal for Horizontal Clas	ssification	of Food Categ	ory:		The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final and comments on this approach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	GMP		4		Costa Rica: Heat treatment and high acid products may need citric	
CITRIC ACID	330	3000		4		acid; citrates, malic acid ;	
					Adopt	Brazil, EU, UK: Accepts proposals	
					Адорг	<b>ICGMA:</b> Frozen and aseptic products may need may need 330	
						Citric acid;Citrates; 296 Malic Acid – Codex Std 247-2005 Fruit	
MALIC ACID, DL-	296	3000		4		Juices and Nectars (fruit juices) is 1:1 with GSFA	

## Food Category No. 14.1.3 (Fruit and vegetable nectars)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

**Corresponding commodity standards:** None, 247-2005 corresponds to subcategory 14.1.3.1 and allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments from eWG members indicate that adopted	comments from Brazil in CX/FA 12/44/9 Add. 2 that the use of acidity regulators are
provisions in subcategories for food additives with acidity regulator function are for	necessary in acidic fruit and vegetable nectars to adjust sensorial characteristics
their use as anti-oxidants, not as acidity regulators	Costa Rica: Heat treatment and high acid products may need citric acid; malic acid
	EU: questions the technological need
	<b>UK:</b> Standard 247 does not list acidity regulators. We consider a generic case for
	technological need of acidity regulators in fruit nectars has not been made (Use of substances
	already adopted may be as anti-oxidants rather than as acidity regulators.)
	ICGMA: Hot fill, high acid products may need 330 Citric acid; 296 Malic Acid

## Food Category <u>No. 14.1.3.1 (Fruit nectar)</u>

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Not Justified <b>Justification for proposal</b> : Comments from eWG members indicate that adopted provisions in this food category for food additives with acidity regulator function are for their use as anti-oxidants, not as acidity regulators					Comments by eWG on horizontal classification proposal: Brazil: supports specific provisions listed in this food category Costa Rica: Heat treatment and high acid products may need citric acid; malic acid EU: questions the technological need UK: Standard 247 does not list acidity regulators. We consider a generic case for technological need of acidity regulators in fruit nectars has not been made (Use of substances already adopted may be as anti-oxidants rather than as acidity regulators.) ICGMA: Hot fill, high acid products may need 330 Citric acid; 296 Malic Acid		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	GMP		Adopted		<b>IFU:</b> agrees to retain adopted; <b>Japan</b> : Ascorbic acid is used as antioxidant to prevent products from distaining.	
CITRIC ACID	330	5000		Adopted	Retain Adopted	IFU: agrees to retain adopted; Japan: Citric acid is used as acidity regulator to balance sourness and sweetness.	
MALIC ACID, DL-	296	GMP		Adopted		IFU: agrees to retain adopted; Japan: Malic acid DL- is used as acidity regulator to balance sourness and sweetness.	

## Food Category No. 14.1.3.2 (Vegetable nectar)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

eWG Proposal for Horizontal Classification of Food Category:					The decision of the pWG on the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal approach for the justification of the use of acidity regulators in this food category was taken as final and comments on this approach were not requested by the eWG.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	300	GMP		4		Brazil, EU, UK, IFU: Accepts proposals	
CITRIC ACID	330	5000		4	Adopt	ICGMA: Hot fill, high acid products may need 330 Citric acid; 296	
MALIC ACID, DL-	296	3000		4		Malic Acid	

## Food Category <u>No. 14.1.3.3 (Concentrates for fruit juice)</u>

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Not Justified <b>Justification for proposal</b> : Comments from eWG members indicate that adopted provisions in this food category for food additives with acidity regulator function are for their use as anti-oxidants, not as acidity regulators				ustified t adopted nction are	Comments by eWG on horizontal classification proposal: Costa Rica: Heat treatment and high acid products may need citric acid; malic acid EU: questions the technological need UK: Standard 247 does not list acidity regulators. We consider a generic case for technological need of acidity regulators in fruit nectars has not been made (Use of substances already adopted may be as anti-oxidants rather than as acidity regulators.)		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ASCORBIC ACID, L-	CORBIC ACID, L- 300 GMP 127 Adopted						
CITRIC ACID	330	5000	127	Adopted	Retain Adopted	IFU :agrees to retain adopted	
MALIC ACID, DL-	296	GMP	127	Adopted			

#### Food Category No. 14.1.2.4 (Concentrates for vegetable juice)

## General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Justified

eWG Proposal for Horizontal C	lassification	of Food Categ	ory:		The decision of the pWG o approach for the justification final and comments on this	n the GSFA at the 44 <sup>th</sup> Session of the CCFA on the horizontal on of the use of acidity regulators in this food category was taken as approach were not requested by the eWG.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ASCORBIC ACID, L-	300	GMP		4		Brazil EII IIK IEII: Accorte proposale
CITRIC ACID	330	5000		4	Adopt	Costa Pica ICGMA: This products may need sitric acid: malic acid
MALIC ACID, DL-	296	3000		4		Costa Nica, ICOMA. This products may need cline acid, male acid

## Food Category No. 14.1.5 (Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa)

General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

Corresponding commodity standards: None

**eWG Proposal for Horizontal Classification of Food Category:** generally Justified with Note 142<sup>27</sup> "excluding coffee and tea" – however, in some cases include Note 160<sup>28</sup> "For use in ready-to-drink products and pre-mixes for ready-todrink products only."

Justification for proposal: Comments to the eWG indicate that acidity regulators are used in ready-to-drink (canned) coffee and teas.

Comments by eWG on horizontal classification proposal: Brazil: The technological need for acidity regulators in coffee is not clear. Costa Rica: We support the use of AR in these products EU questions the technological need in coffee and unflavoured leaf tea UK: Agree use of acidity regulators in some of the products within this FC. Recommend inclusion of footnote 142: "Excluding coffee and tea." in all entires for this FC. ICGMA: AR used for these products

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP		4		
ASCORBIC ACID, L-	300	500		4	Adapt on listed with Note	
CALCIUM CARBONATE	170(i)	10000	58 & 160	4	142	
CALCIUM LACTATE	327	10000	58	4		
CITRIC ACID	330	GMP		4	Adopt with Note 160	<b>Brazil</b> : supports adoption <b>Japan</b> : Citric acid is used as acidity regulator in canned tea and canned coffee. Reported from industry, these kind of drinks are produced in Japan and part of Asian countries. According to the Food Category Descriptors of GSFA, ready-to-drink products (including canned products) are included in this food category
FUMARIC ACID	297	1000	2 <sup>29</sup>	7		
MAGNESIUM CARBONATE	504(i)	GMP		7		
MAGNESIUM HYDROXIDE	528	GMP		7	Adopt as listed with Note	
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP		7	- 142	
MALIC ACID, DL-	296	GMP		4	Adopt with Note 160	<b>Brazil</b> : supports adoption <b>Japan:</b> Malic acid is used as acidity regulator in canned tea and canned coffee. Reported from industry, these kind of drinks are produced in Japan and part of Asian countries. According to the Food Category Descriptors of GSFA, ready-to-drink products (including canned products) are included in this food category
POTASSIUM CARBONATE	501(i)	GMP		4		
POTASSIUM DIHYDROGEN	(-)	-			Adopt as listed with Note	
CITRATE	332(i)	GMP		7	142	
SODIUM ACETATE	262(i)	GMP		4	1	

<sup>27</sup> Note 142: Excluding coffee and tea.
 <sup>28</sup> Note 160: For use in ready-to-drink products and pre-mixes for ready-to-drink products only.

<sup>29</sup> **Note 2:** On drv ingredient, dry weight, dry mix or concentrate basis.

SODIUM CARBONATE	500(i)	GMP	7		
SODIUM DIHYDROGEN					
CITRATE	331(i)	GMP	7		
SODIUM DL-MALATE	350(ii)	GMP	4		
SODIUM FUMARATES	365	GMP	4		
SODIUM HYDROGEN					
CARBONATE	500(ii)	GMP	7		
SODIUM LACTATE	325	GMP	4		
TRIPOTASSIUM CITRATE	332(ii)	GMP	7		
				Adopt with Note 160	Japan: Trisodium citrate is used as acidity regulator in canned tea with milk and canned coffee with milk. Reported from industry, these kind of drinks containing milk are produced in Japan and part of Asian countries. According to the Food Category Descriptors of GSFA, ready-to-drink products (including canned products) are
TRISODIUM CITRATE	331(iii)	GMP	7		included in this food category.

# Food Category No. 14.2.3 (Grape wines)

# General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Case-by-Case

eWG Proposal for Horizontal Classification of Food Category: Justified	Comments by eWG on horizontal classification proposal:			
Justification for proposal: No corresponding commodity standard, Comments to	EU: Case-by-Case. Some ARs affect quality of wine and must be carefully considered. A			
eWG on specific provisions demonstrate that acidity regulators are used in this	general limit for wine acidification should be established.			
category	Japan: supports all the 2nd circular provisions for specific additives			
	ICGMA: Acidulants used to modify taste/flavor/sensory attributes (citric acid)			

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
	300	250		1	Adopt at GMP	<ul> <li>EU: supports the adoption at the level proposed by OIV. In the EU Ascorbic acid, L is allowed as an antioxidant with a maximum limit in the wine of 250 mg/l</li> <li>Canada: Canada permits the use of ascorbic acid as a preservative in wine at a maximum level consistent with GMP and the Canadian wine industry has requested that ascorbic acid be listed in the GSFA as an acidity regulator / antioxidant at a maximum level of use of GMP.</li> <li>NZ: adopt at GMP. Ascorbic acid has also long been used in the wine industry as a nati-oxidant. Also used in the removal of disulphide</li> <li>USA: Ascorbic acid, L- is allowed in the USA for use in formula wine as an antioxidant up to GMP levels</li> <li>OIV: Ascorbic acid in the wine making process as acidity regulators but the maximal limit in wines is fixed at 300 mg/l. (300 mg/kg)</li> </ul>
ASCORDIC ACID, L-	300	200		4		but the maximal limit in wines is fixed at 300 mg/L (300 mg/kg).

				Brazil: Supports adoption
				EU: discontinue - Calcium carbonate is allowed in EU for
				deacidification of the must and the wine; it precipitates the fu
				tartaric acid, it is a processing aid (2) - out of the scope of the
				GSFA
				NZ: proposes adopt at GMP. Calcium and potassium carbo
				are used to deacidify wine
				USA: calcium carbonate is allowed in the USA for use in for
				wines as an acidity regulator at a level of 30 lbs/1000 gallons
CALCIUM CARBONATE	170(i)	3500	7	(approximately 3500 mg/kg)
				EU: does not support - not recognised by OIV: negative imp
				the quality - it increases the instability of the wine; other acid
				available to acidify
				<b>USA:</b> calcium malates are allowed in the USA for use in form
				wines as an acidity regulator at a level of 30 lbs/1000 gallon
				(approximately 3500 mg/kg)
				OIV: OIV has not recognized the use of Calcium Malate, D-
				acidification of wines. The OIV recommends to discuss furthe
CALCIUM MALATE, D,L-	352(ii)	GMP	7	provision providing technical justification.
				Brazil: Supports adoption
				EU: Citric acid is used in EU as an acidity regulator and also
				stabilizer (iron solubilisation) (2); the maximum level set up to
				is 1000 mg/l in the final product
				Canada: Canada permits the use of citric acid as a pH adjust
				agent in wine at a maximum level consistent with GMP and t
				Canadian wine industry has requested that citric acid be liste
				the GSFA as an acidity regulator at a maximum level of GMI
				Japan: Propose to change maximum level to 4500 mg/kg, c
				acid is used to balance sourness and sweetness.
				NZ: proposes GMP. Sometimes, citric acid is added to finish
				wines specifically to increase acidity and improve acid balan
				small quantities, it provides a fresh, citric characteristic, and
				citric quality is often appreciated in white table wines. Signifi
				additions of citric acid are seldom made to red wines.
				USA: citric acid is allowed in the USA for use in formula and
				standard wine as an acidity regulator at a level of 5.8 lbs/100
CITRIC ACID	330	4000	4	gallons (approximately 700 mg/kg):

					EU: does not support; not allowed by OIV. It may affect the flavour
					of wine.
					Canada: Canada supports New Zealand's proposal as Canada
					permits the use of fumaric acid as a pH adjusting agent in wine at a
					maximum level of GMP
					NZ proposes GMP Fumaric acid is approved. In addition, small
					quantities of fumaric acid are added to red wines to prevent
					malolactic fermentation from occurring after the wine was bottled.
					The customary dose levels range from one to three grams of acid
					per gallon of wine.
					<b>USA:</b> fumaric acid is allowed in the USA for use in wine as an
					acidity regulator at a level of 25 lbs/1000 gallons (approximately
FUMARIC ACID	297	3000	109 <sup>30</sup>	7	3000 mg/kg)
					Brazil, EU: supports adoption at 4000 mg/kg
					Canada. Proposes GMP. Canada permits the use of lactic acid as
					a pH adjusting agent in wine at a maximum level of GMP.
					NZ proposes GMP. Used to adjust pH
					<b>USA:</b> Lactic Acid (L-, D-, and DL-) is allowed in the USA for use in
LACTIC ACID, L-, D- and DL-	270	4000		4	formula wine as an acidity regulator up to GMP levels
					EU, Brazil: supports adoption at 4000 mg/kg
					<b>Canada</b> : Canada propses GMP, Canada permits the use of malic
					acid as a pH adjusting agent in wine at a maximum level of GMP.
					<b>USA:</b> Malic Acid (DL-) is allowed in the USA for use in formula
					wine as an acidity regulator up to GMP levels;
					Japan: Proposes to change maximum level to 8000 mg/kg; Malic
MALIC ACID, DL-	296	4000		4	acid DL- is used to balance sourness and sweetness.
					<b>EU:</b> does not support; not allowed by OIV, it increases the
					instability of the wine.
					NZ proposes GMP High acid/low pH must is best de-acidified with
					potassium carbonates. Best when used with high acid/low pH
					musts.• Works by combining with tartaric acid to form potassium
					bitartrate
					<b>USA</b> : potassium carbonate is allowed in the USA for use in formula
POTASSIUM CARBONATE	501(i)	5000		7	wine as an acidity regulator up to 5000 mg/kg

<sup>&</sup>lt;sup>30</sup> Note 109: Use level reported as 25 lbs/1 000 gal x (0.45 kg/lb) x (1 gal/3.75 L) x (1 L/kg) x (10E6 mg/kg) = 3 000 mg/kg.

				<b>Brazil:</b> Supports adoption at 5000 mg/kg <b>EU</b> : discontinue - potassium hydrogen carbonate is allowed in EU for deacidification; it precipitates the free tartaric acid, it is a
				processing aid (2) - out of the scope of the GSFA
				of wine by neutralization and precipitation. It neutralizes acid by
				converting one to the hydrogen ions of tartaric acid to water and
				insoluble potassium bitartrate (KHT.)
POTASSIUM HYDROGEN				<b>USA:</b> potassium hydrogen carbonate is allowed in the USA for use
CARBONATE	501(ii)	5000	7	in formula wine as an acidity regulator up to 5000 mg/kg

#### Food Category No. 14.2.3.1 (Still grape wine)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

#### Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Case-by-Case	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments by eWG members that some acidity	Brazil: provisions in these subcatgories of grape wines should be considered on a case-by-
regulators can affect the quality of the wine. No corresponding commodity standard,	case basis
acidity regulators are used in the parent category.	EU: case-by-case basis. Some AR affect quality of wine and must be carefully considered.

## Food Category No. 14.2.3.2 (Sparkling and semi-sparkling grape wines)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Case-by-Case	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments by eWG members that some acidity	Brazil: provisions in these subcatgories of grape wines should be considered on a case-by-
regulators can affect the quality of the wine. No corresponding commodity standard,	case basis
acidity regulators are used in the parent category.	EU: case-by-case basis. Some AR affect quality of wine and must be carefully considered.

#### Food Category No. 14.2.3.3 (Fortified grape wine, grape liquor wine, and sweet grape wine)

#### General recommendation for the food category as recorded in Appendix 8 of FA 44/CRD2: Not Discussed

eWG Proposal for Horizontal Classification of Food Category: Case-by-Case	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments by eWG members that some acidity	Brazil: provisions in these subcatgories of grape wines should be considered on a case-by-
regulators can affect the quality of the wine. No corresponding commodity standard,	case basis
acidity regulators are used in the parent category.	EU: case-by-case basis. Some AR affect quality of wine and must be carefully considered.

# Appendix 3: Emulsifiers, Stabilizers and Thickeners

# Food Category <u>No. 01.1.1 (Milk and buttermilk (plain))</u>

eWG Proposal for Horizontal Class	sification	of Food Categ	ory: Not J	ustified –	Comments by eWG on horizontal classification proposal:		
discontinue all provisions for ES&Ts	s in this foo	d category			Iran, Japan, Spain, ELC, IDF: Supports proposal, No provisions in this food category as per		
Justification for proposal: Codex	Stan 206-1	999 defines mil	k as "norm	nal	the Codex General standa	rd for the use of dairy terms (Codex Stan 206-1999) and descriptor in	
mammary secretion of milking anim	als witho	ut addition to	it", the de	scriptor for	GSFA.		
FC 0.1.1.1 in Annex B of the GSFA	states that	this category "in	ncludes re	constituted	Brazil: stabilizers necessa	ry when adding micronutrients to milk to keep uniform product	
plain milk that contains only dairy in	aredients".	0,			Costa Rica. ICGMA: ES&	T justified in buttermilk	
	0				UK: accept provision with r	note limiting to processed milks from certain species only	
					ICGMA: ES&T used in sma	all amount in low fat milk for increased mouthfeel	
					IFAC: all listed additives sh	nould be permitted at listed maximum level	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
AGAR	406	4000		7			
GELLAN GUM	418	GMP		7	1		
GUAR GUM	412	6000		7			
KARAYA GUM	<del>416</del>	<del>200</del>		7			
KONJAC FLOUR	425	GMP		7			
MICROCRYSTALLINE					Discontinue in EC 01 1 1		
CELLULOSE (CELLULOSE GEL)	<del>460(i)</del>	GMP		7	Discontinue in FC 01.1.1,		
MONO- AND DI-GLYCERIDES					note "For use in cortain		
OF FATTY ACIDS	471	10000		7	recombined		
PECTINS	440	GMP		7	reconstituted or LIHT		
POLYDEXTROSES	1200	GMP		7	heat-treated buttermilks		
PROCESSED EUCHEUMA					from certain species		
SEAWEED (PES)	<del>407a</del>	GMP		4	only e a buttermilk from		
TARA GUM	417	GMP		7	goat's milk"		
						Spain: move to FC 01.1.1.1 - is authorized in UE legislation in	
						UHT goat milk with a maximum level of 4000 pm, its effect is the	
						reduction of sedimentation	
						<b>IDF:</b> retain INS 331(iii) with note limiting to "recombined,	
						reconstituted or UHT heat-treated milks from certain species only,	
TRISODIUM CITRATE	<del>331(iii)</del>	GMP		7		e.g. goat's milk"	

# Food Category No. 01.1.1.1 (Milk (plain))

# Corresponding commodity standards: None

eWG Proposal for Horizontal Clas discontinue all provisions for ES&Ts Justification for proposal: Codex S mammary secretion of milking anima	sification of in this food Stan 206-19 als withou	of Food Categ I category 399 defines mill at addition to	<u>ory</u> : Not J k as "norm it"	ustified – al	Comments by eWG on horizontal classification proposal: Iran, Japan, Spain, IDF: supports proposal: No provisions in this food category. According to the Codex General Standard for the Use of Dairy Terms (Codex Stan 206-1999) additives can only be used in "milk products" – consider establishment of new subcategory for milk products. Brazil: Case-by-Case Spain: move provision for Ins 331(iii) from FC 01.1.1 to 01.1.1.1 UK: accept provision with note limiting to processed milks from certain species only ELC: definition for FC includes processed milk (e.g. UHT) therefore use of additives is generally justified but should be restircted (UHT, sterilized) to avoid overestimation of additive intake from plain products. ICGMA: ES&T used in small amount in low fat milk for increased mouthfeel UEAC: all listed additives should be permitted at listed maximum lovel		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CAROB BEAN GUM	410	GMP		7			
CARRAGEENAN	407	10000		7			
SODIUM ALGINATE	401	GMP		4	Discontinue all provisions		
SODIUM CARBOXYMETHYL					in this FC		
CELLULOSE (CELLULOSE GUM)	466	GMP		4			
XANTHAN GUM	415	GMP		7			

# Food Category No. 01.1.1.2 (Buttermilk (plain))

eWG Proposal for Horizontal Class	ssification	of Food Categ	ory: Justif	ied only with	Comments by eWG on he	prizontal classification proposal:		
note "For use in certain recombined	l, reconstitu	ted or UHT hea	t-treated b	outtermilks,	Iran, Spain, ELC, IDF: sup	oports proposal		
from certain species only, e.g. butte	rmilk from g	goaťs milk"			Costa Rica. ICGMA: ES&	T justified in buttermilk		
Justification for proposal: Buttern	nilk is not de	efined in Codex	Stan 206-	-1999,	Brazil: Case-by-case			
comments by eWG members.					UK: accept provisions with	<b>UK</b> : accept provisions with note limiting to processed milks from certain species only		
-					IDF: instead of proposed n	<b>IDF:</b> instead of proposed note recommends "For use in certain UHT heat-treated buttermilks,		
					for certain species only, e.g	for certain species only, e.g. goat milk" as this food category 01.1.1.2 does not include		
					reconstituted and recombined milk nor buttermilk"			
Additive INS Max Level Notes Step / (mg/kg) Adopted					eWG proposal	Comments by eWG members on proposal		
ACETIC AND FATTY ACID					adopt with new note:			
ESTERS OF GLYCEROL 472a GMP 7				7	"For use in certain	EFEMA, ELC, IFAC. accepts proposal		
ACETYLATED DISTARCH					recombined,			
PHOSPHATE	E 1414 GMP 7				reconstituted or UHT			
AGAR	406	4000			heat-treated buttermilks,			

ALGINIC ACID	400	6000	7	from certain species	
CALCIUM ALGINATE	404	6000	7	only, e.g. buttermilk from	
CAROB BEAN GUM	410	5000	7	goat's milk"	
CARRAGEENAN	407	6000	7		
CITRIC AND FATTY ACID					
ESTERS OF GLYCEROL	472c	GMP	7		EFEMA, ELC: accepts proposal
GELLAN GUM	418	GMP			
GUAR GUM	412	6000			
GUM ARABIC (ACACIA GUM)	414	GMP	7		AIDGUM: supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	7		
HYDROXYPROPYL METHYL		_			
CELLULOSE	464	GMP	7		
HYDROXYPROPYL STARCH	1440	GMP	7		
KARAYA GUM	416	200			
KONJAC FLOUR	425	GMP			
LACTIC AND FATTY ACID					
ESTERS OF GLYCEROL	472b	GMP	7		EFEMA, ELC: accepts proposal
LECITHIN	322(i)	GMP	7		
MAGNESIUM CHLORIDE	511	GMP	7		
METHYL CELLULOSE	461	GMP	7		
METHYL ETHYL CELLULOSE	465	GMP	7		
MICROCRYSTALLINE					
CELLULOSE (CELLULOSE GEL)	460(i)	GMP			
MONO- AND DI-GLYCERIDES					
OF FATTY ACIDS	471	10000			EFEMA, ELC: accepts proposal
OXIDIZED STARCH	1404	GMP	7		
PECTINS	440	GMP			
POLYDEXTROSES	1200	GMP			
POTASSIUM ALGINATE	402	6000	7		
				Refer to discussion on	
POTASSIUM DIHYDROGEN				Appendix 2, possibly	
CITRATE	332(i)	GMP	7	used as acidity regulator	
POWDERED CELLULOSE	460(ii)	GMP	7		
PROCESSED EUCHEUMA					
SEAWEED (PES)	407a	GMP		Adopt with new note:	
SALTS OF MYRISTIC, PALMITIC				"For use in certain	
AND STEARIC ACIDS WITH				recombined,	
AMMONIA, CALCIUM,				reconstituted or UHT	
POTASSIUM AND SODIUM	470(i)	GMP	7	heat-treated buttermilks,	
SALTS OF OLEIC ACID WITH				from certain species	
CALCIUM, POTASSIUM AND				only, e.g. buttermilk from	
SODIUM	470(ii)	GMP	7	goat's milk"	
SODIUM ALGINATE	401	6000	7		
SODIUM CARBOXYMETHYL	466	2000	7		

CELLULOSE (CELLULOSE GUM)					
				Refer to discussion on	
SODIUM DIHYDROGEN				Appendix 2, possibly	
CITRATE	331(i)	GMP	7	used as acidity regulator	
TARA GUM	417	GMP			
TRAGACANTH GUM	413	GMP	7		
TRIPOTASSIUM CITRATE	332(ii)	GMP	7		
TRISODIUM CITRATE	331(iii)	GMP			
XANTHAN GUM	415	3000	7		

#### Food Category No. 01.2 (Fermented and renneted milk products (plain) excluding food category 01.1.2 (dairy based drinks))

Corresponding commodity standards: None, 243-2003 corresponds to subcategories 01.2.1.1 & 01.2.1.2

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified – Recommend provisions currently in FC 01.2 be discontinued and moved to subcategories with appropriate notes Comments by eWG on horizontal classification proposal: Brazil, EU, Iran, Spain, UK, ELC, IDF: Support proposal IFAC: all listed additives should be permitted, add Pectins to this parent category as pectins are approved at GMP in all sub-categories

<u>Justification for proposal</u>: As per CODEX STAN 243-2003, Emulsifiers are not allowed in subcategories 01.2.1.1 & 01.2.1.2, and the allowances for stabilizers and thickeners differ for these two subcategories.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETYLATED DISTARCH				4		
ADIPATE	<del>1422</del>	GMP		4		
ACETYLATED DISTARCH				1		
PHOSPHATE	<del>1414</del>	GMP		-		
ACID TREATED STARCH	<del>1401</del>	GMP		4	discontinue; adopt in	
				z	subcategory 01.2.2	<b>JAPAN:</b> include in FC 01.2.1.2 - used for yoghurt heat-treated after
AGAR	4 <del>06</del>	<del>5000</del>		-	unchanged; adopt in	fermentation to prevent syneresis & separation during storage
ALKALINE TREATED STARCH	<u>1402</u>	GMP		4	subcategory 01.2.1.1 with new notes "for use as stabilizer or thickener	
BLEACHED STARCH	<del>1403</del>	GMP		4		
CAROB BEAN GUM	4 <del>10</del>	GMP		4		
				z	only" & "use restricted to	IFAC: adopt at GMP, corresponds to the Codex Standard 243-
CARRAGEENAN	407	<del>5000</del>		7	reconstitution and	2003
DEXTRINS, ROASTED STARCH	<del>1400</del>	GMP		4	recombination only"; adopt in subcategory	
DISTARCH PHOSPHATE	<u>1412</u>	GMP		4		
				1	01.2.1.2 with the new	<b>USA:</b> guar gum is allowed in the US for use in milk products as a
GUAR GUM	4 <u>12</u>	GMP			note "for use as stabilizer	stabilizer/thickener up to 6000 mg/kg
GUM ARABIC (ACACIA GUM)	414	GMP		4	or thickener only	
HYDROXYPROPYL DISTARCH				1		
PHOSPHATE	<del>1442</del>	GMP		-		
HYDROXYPROPYL STARCH	<del>1440</del>	GMP		4		
KONJAC FLOUR	<del>425</del>	GMP		4		

MONO- AND DI-GLYCERIDES			7
OF FATTY ACIDS	471	<del>5000</del>	+
MONOSTARCH PHOSPHATE	<del>1410</del>	GMP	4
OXIDIZED STARCH	<del>1404</del>	GMP	4
PHOSPHATED DISTARCH			4
PHOSPHATE	<del>1413</del>	GMP	4
POLYDEXTROSES	<del>1200</del>	GMP	7
PROCESSED EUCHEUMA			7
SEAWEED (PES)	<del>407a</del>	<del>5000</del>	+
SODIUM ALGINATE	401	GMP	4
SODIUM CARBOXYMETHYL			4
CELLULOSE (CELLULOSE GUM)	<del>466</del>	GMP	4
STARCH ACETATE	<del>1420</del>	GMP	4
STARCH SODIUM OCTENYL			4
SUCCINATE	<del>1450</del>	GMP	4
STARCHES, ENZYME TREATED	1405	GMP	4
XANTHAN GUM	4 <del>15</del>	GMP	4

## Food Category No. 01.2.1 (Fermented milks (plain))

Corresponding commodity standards: None, 243-2003 corresponds to subcategories 01.2.1.1 & 01.2.1.2

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: As per CODEX STAN 243-2003, Emulsifiers are not	Brazil, EU, Iran, Spain, IDF: Support proposal
allowed in subcategories 01.2.1.1 & 01.2.1.2, and the allowances for stabilizers and	<b>Costa Rica:</b> ES&T are used in yogurt and other types of fermented milks
thickeners differ for these two subcategories.	ICGMA: ES&T used in yogurt and other similar products (kefur, lepna, etc).

## Food Category <u>No. 01.2.1.1 (Fermented milks (plain), not heat-treated after fermentation)</u>

**Corresponding commodity standards:** 243-2003: does not allow emulsifiers in FC 01.2.1.1, allows specific stabilizer and thickeners if use is restricted to reconstitution and recombination

<b>eWG Proposal for Horizontal Classification of Food Category</b> Justified only with notes "for use as stabilizer or thickener only" & "use restricted to reconstitution and recombination only" <b>Justification for proposal</b> : Specific stabilizers and thickeners are allowed in CODEX STAN 243-2003 if use is restricted to reconstitution and recombination; comments from eWG members.					Comments by eWG on horizontal classification proposal: Brazil, Spain, UK, IDF: Support proposal Costa Rica: ES&T are used in yogurt and other types of fermented milks ICGMA: ES&T used in yogurt and other similar products (kefur, lepna, etc). Codex Standard 243-2003 Fermented Milks plain has permissions for S&T and lists many more GMP thickeners and stabilizers than are reflected in the below list.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETYLATED DISTARCH					adopt at GMP with new		
ADIPATE	1422	GMP			notes "for use as		
ACETYLATED DISTARCH					stabilizer or thickener		
PHOSPHATE	1414	GMP			only" & "use restricted to		
ACID TREATED STARCH	1401	GMP		reconstitution and			
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AGAR	406	<del>5000</del>		recombination only"			
ALKALINE TREATED STARCH	1402	GMP					
BLEACHED STARCH	1403	GMP					
CAROB BEAN GUM	410	GMP					
CARRAGEENAN	407	5000					
DEXTRINS, ROASTED STARCH	1400	GMP					
	1412	GMP					
BIOTAROTTTIOOTTIALE							
GELLAN GUM	418	GMP	4				
GUAR GUM	412	GMP	<del></del>				
	412	GMP					
	414						
	1112	GMP					
	1442	GMP					
HIDROATEROFIL STARCH	1440	GINIF					
	116	CMP	7				
	410	GIVIF	/				
	425	GIVIP					
	400(1)						
	460(I)	GMP	/				
MONO- AND DI-GLYCERIDES	474	5000					
	4/1	5000					
MONOSTARCH PHOSPHATE	1410	GMP					
OXIDIZED STARCH	1404	GMP					
PECTINS	440	GMP	7				
PHOSPHATED DISTARCH							
PHOSPHATE	1413	GMP					
POLYDEXTROSES	1200	GMP					
POWDERED CELLULOSE	460(ii)	GMP	4				
PROCESSED EUCHEUMA							
SEAWEED (PES)	407a	5000					
SODIUM ALGINATE	401	GMP					
SODIUM CARBOXYMETHYL							
CELLULOSE (CELLULOSE							
GUM)	466	GMP					
STARCH ACETATE	1420	GMP					
STARCH SODIUM OCTENYL							
SUCCINATE	1450	GMP					

<b>IFAC:</b> adopt at GMP, corresponds to the Codex Standard 243-2003
<b>IFAC:</b> adopt at GMP, corresponds to the Codex Standard 243-2003
<b>USA:</b> guar gum is allowed in the US for use in milk products as a stabilizer/thickener up to 6000 mg/kg
AIDGUM: supports adoption
IFAC: adopt at GMP, corresponds to the Codex Standard 243- 2003
IFAC: adopt at GMP, corresponds to the Codex Standard 243- 2003
<b>IFAC:</b> adopt at GMP, corresponds to the Codex Standard 243-2003
<b>IFAC:</b> adopt at GMP, corresponds to the Codex Standard 243-2003
IFAC: adopt at GMP, corresponds to the Codex Standard 243- 2003
<b>IFAC:</b> adopt at GMP, corresponds to the Codex Standard 243-2003
<b>IFAC:</b> adopt at GMP, corresponds to the Codex Standard 243-2003

STARCHES, ENZYME TREATED	1405	GMP		
TARA GUM	417	GMP	4	
				IFAC: adopt at GMP, corresponds to the Codex Standard 243-
XANTHAN GUM	415	GMP	7	2003

### Food Category No. 01.2.1.2 (Fermented milks (plain), heat-treated after fermentation)

Corresponding commodity standards: 243-2003: does not allow emulsifiers in FC 01.2.1.2, allows specific stabilizers and thickeners

eWG Proposal for Horizontal Classification of Food Category Justified only with notes "for use as stabilizer or thickener only"					Comments by eWG on horizontal classification proposal: Brazil, Spain, UK, IDF: Support proposal		
Justification for proposal: Specific stabilizers and thickeners are allowed in					Costa Rica: ES&T are use	ed in yogurt and other types of fermented milks	
CODEX STAN 243-2003.					ICGMA: ES&T used in yog	jurt and other similar products (kefur, lepna, etc). Codex Standard	
					243-2003 Fermented Milks	plain has permissions for S&T and lists many more GMP thickeners	
					and stabilizers than are ref	lected in the below list.	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC AND FATTY ACID							
ESTERS OF GLYCEROL	472a	GMP		7			
ACETYLATED DISTARCH							
ADIPATE	1422	GMP					
ACETYLATED DISTARCH							
PHOSPHATE	1414	GMP		7			
ACID TREATED STARCH	1401	GMP					
					adopt at GMP with new	Iran, Japan: supports proposal - used for yoghurt heat-treated	
AGAR	406	5000			note "for use as stabilizer	after fermentation to prevent syneresis & separation during storage	
				_	or thickener only	Iran, IDF, IFAC, Marlinga: support proposal, consistent with	
ALGINIC ACID	400	5000		7	4	Codex Stan 243-2003	
ALKALINE TREATED STARCH	1402	GMP			4		
				_		Iran, IDF, IFAC, Marlinga: support proposal, consistent with	
	403	5000		7	4	Codex Stan 243-2003	
BLEACHED STARCH	1403	GMP			4		
	40.4	5000		7		Iran, IDF, IFAC, Marlinga: support proposal, consistent with	
	404	5000		/		Codex Stan 243-2003	
					adopt as listed, can also		
					be used as acidity		
	170()	CMD		4	A D document)		
	170(1)	GIVIP		4	AR document)	Iran IDE: support proposal consistent with Codey Stap 242 2002	
	410	5000		/	4	Iran, IDF. support proposal, consistent with Codex Stan 243-2003	
	407	GIVIF			adopt at GMP with new	Iran, IDF. Support proposal, consistent with Codex Stan 243-2003	
	4720	CMD		7	note "for use as stabilizer		
DEVIDING BOASTED STADOU	4/20			/	or thickener only"		
DISTABCH DUOSDUATE	1400	GIVIP			4		
DISTARCH PHOSPHATE	1412	GMP					

GELLAN GUM	418	GMP	7		
					Iran, IDF, IFAC: support proposal, consistent with Codex Stan 243-
					2003
					USA: guar gum is allowed in the US for use in milk products as a
GUAR GUM	412	5000	7		stabilizer/thickener up to 6000 mg/kg
					Iran, AIDGUM, IDF: support proposal, consistent with Codex Stan
GUM ARABIC (ACACIA GUM)	414	5000	7		243-2003
HYDROXYPROPYL CELLULOSE	463	GMP	7		
HYDROXYPROPYL METHYL					
CELLULOSE	464	GMP	7		
HYDROXYPROPYL STARCH	1440	GMP	7		ICGMA: supports use
					Iran, IDF: support proposal, consistent with Codex Stan 243-2003
					USA: Karaya gum is allowed in the US for use in milk products as
KARAYA GUM	416	5000	7		a stabilizer/thickener up to 200 mg/kg
KONJAC FLOUR	425	GMP	7	]	
LACTIC AND FATTY ACID					
ESTERS OF GLYCEROL	472b	GMP	7		
				Discontinue – lecithin is	Japan, Iran: supports proposal
LECITHIN	322(i)	GMP	7	an emulsifier only	IDF: adopt with note "for use as emulsifier only
				Adopt with new note "for	lanan, doos not support note as not used as thiskoner. Socks
				use as stabilizer or	Japan. does not support note as not used as inickener. Seeks
MAGNESIUM CHLORIDE	811	GMP	7	thickener only"	tech justification for use as a thickener in termented milk
				discontinue - is used in	
				fermented milks as	Iran IDE: augusta proposal
				sweetener, which are not	Iran, IDF. Supports proposal
MANNITOL	421	GMP	4	allowed in plain products	
METHYL CELLULOSE	461	GMP	7		
METHYL ETHYL CELLULOSE	465	GMP	7	]	
MICROCRYSTALLINE				]	Iran, IDF, IFAC: supports proposal, corresponds to the Codex
CELLULOSE (CELLULOSE GEL)	460(i)	20000	7		Standard 243-2003
MONO- AND DI-GLYCERIDES				1	IFAC: supports proposal, corresponds to the Codex Standard 243-
OF FATTY ACIDS	471	5000			2003
MONOSTARCH PHOSPHATE	1410	GMP		adopt at GMP with new	
OXIDIZED STARCH	1404	GMP	7	note "for use as stabilizer	ICGMA: supports use
		-		or thickener only"	Japan, Iran, UK, IDF, IFAC: supports proposal, corresponds to the
PECTINS	440	10000	7		Codex Standard 243-2003
PHOSPHATED DISTARCH				1	
PHOSPHATE	1413	GMP			
POLYDEXTROSES	1200	GMP		1	
				1	Iran, IDF, IFAC, Marlinga: supports proposal, corresponds to the
POTASSIUM ALGINATE	402	5000	7		Codex Standard 243-2003
POTASSIUM CARBONATE	501(i)	GMP	4	Refer to discussion on	IDF: allowed in Codex Stan 243-2003 as Acidity Regulator
POTASSIUM DIHYDROGEN			-	Appendix 2 used as	
CITRATE	332(i)	GMP	7	acidity regulator	IDF: allowed in Codex Stan 243-2003 as Acidity Regulator

POWDERED CELLULOSE	460(ii)	GMP	7		
PROCESSED EUCHEUMA					IFAC: supports proposal, corresponds to the Codex Standard 243-
SEAWEED (PES)	407a	5000			2003
SALTS OF MYRISTIC, PALMITIC					lanan: according to CAC/GL 36-1989 the additive is not a
AND STEARIC ACIDS WITH					"thickener" Seeks technological justification for use as thickener in
AMMONIA, CALCIUM,				adopt at GMP with new	fermented milk
POTASSIUM AND SODIUM	470(i)	GMP	7	note "for use as stabilizer	
SALTS OF OLEIC ACID WITH				or thickener only"	Japan: according to CAC/GL 36-1989 the additive is not a
CALCIUM, POTASSIUM AND					"thickener". Seeks technological justification for use as thickener in
SODIUM	470(ii)	GMP	7		fermented milk
					Iran, IDF, IFAC, Marlinga: supports proposal, corresponds to the
SODIUM ALGINATE	401	5000	7		Codex Standard 243-2003
SODIUM CARBOXYMETHYL					Japan, IDF, IFAC: supports proposal, corresponds to the Codex
CELLULOSE (CELLULOSE GUM)	466	5000	7		Standard 243-2003
				Refer to discussion on	
SODIUM DIHYDROGEN			_	Appendix 2, possibly	Iran, IDF: not allowed in Codex Stan 243-2003 as ES&I
CITRATE	331(i)	GMP	7	used as acidity regulator	
STARCH ACETATE	1420	GMP		_	
STARCH SODIUM OCTENYL				Adopt with new note "for	
SUCCINATE	1450	GMP		use as stabilizer or	
STARCHES, ENZYME TREATED	1405	GMP		thickener only"	
TARA GUM	417	GMP	7		
TRAGACANTH GUM	413	GMP	7		
				Refer to discussion on	
				Appendix 2, used as	<b>IDF:</b> allowed in Codex Stan 243-2003 as AR
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	acidity regulator	
				Adopt at GMP with new	Iran, Biopolymer, IDF, IFAC: supports proposal, corresponds to
				note "for use as stabilizer	the Codex Standard 243-2003
I XANTHAN GUM	415	5000	7	l or thickener only"	

### Food Category No. 01.2.2 (Renneted milk (plain))

Corresponding commodity standards: None

**<u>eWG Proposal for Horizontal Classification of Food Category</u>:** Justified <u>Justification for proposal</u>: No corresponding commodity standards, comments from CX/FA 12/44/9 Add. 2: Brazil - parent category 01.2: stabilizers necessary to stabilize protein

Comments by eWG on horizontal classification proposal: UK: accept proposed provisions

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Adopt			
ACETYLATED DISTARCH ADIPATE	1422	GMP			Αάορι			

ACETYLATED DISTARCH			
PHOSPHATE	1414	GMP	7
ACID TREATED STARCH	1401	GMP	
AGAR	406	5000	
ALKALINE TREATED STARCH	1402	GMP	
BLEACHED STARCH	1403	GMP	
CALCIUM CARBONATE	170(i)	GMP	7
CAROB BEAN GUM	410	GMP	7
CARRAGEENAN	407	5000	
CITRIC AND FATTY ACID			
ESTERS OF GLYCEROL	472c	GMP	7
DEXTRINS, ROASTED STARCH	1400	GMP	
DISTARCH PHOSPHATE	1412	GMP	
GUAR GUM	412	GMP	7
GUM ARABIC (ACACIA GUM)	414	GMP	7
HYDROXYPROPYL CELLULOSE	463	GMP	7
HYDROXYPROPYL DISTARCH			
PHOSPHATE	1442	GMP	
HYDROXYPROPYL METHYL			
CELLULOSE	464	GMP	7
HYDROXYPROPYL STARCH	1440	GMP	7
	405	OMD	
KONJAC FLOUR	425	GMP	
LACTIC AND FATTY ACID	425	GMP	
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL	<b>425</b> 472b	GMP	7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN	425 472b 322(i)	GMP GMP GMP	7
KONJAC FLOUR         LACTIC AND FATTY ACID         ESTERS OF GLYCEROL         LECITHIN         MAGNESIUM CHLORIDE	425 472b 322(i) 511	GMP GMP GMP GMP	7 7 7 7
KONJAC FLOUR         LACTIC AND FATTY ACID         ESTERS OF GLYCEROL         LECITHIN         MAGNESIUM CHLORIDE         MANNITOL	425 472b 322(i) 511 421	GMP GMP GMP GMP GMP	7 7 7 7 4
KONJAC FLOUR         LACTIC AND FATTY ACID         ESTERS OF GLYCEROL         LECITHIN         MAGNESIUM CHLORIDE         MANNITOL         METHYL CELLULOSE	425 472b 322(i) 511 421 461	GMP GMP GMP GMP GMP GMP	7 7 7 7 4 7
KONJAC FLOUR         LACTIC AND FATTY ACID         ESTERS OF GLYCEROL         LECITHIN         MAGNESIUM CHLORIDE         MANNITOL         METHYL CELLULOSE         METHYL ETHYL CELLULOSE	425 472b 322(i) 511 421 461 465	GMP GMP GMP GMP GMP GMP GMP	7 7 7 4 7 7 7 7
KONJAC FLOUR         LACTIC AND FATTY ACID         ESTERS OF GLYCEROL         LECITHIN         MAGNESIUM CHLORIDE         MANNITOL         METHYL CELLULOSE         METHYL ETHYL CELLULOSE         MICROCRYSTALLINE	425 472b 322(i) 511 421 461 465	GMP GMP GMP GMP GMP GMP	7 7 7 4 7 7 7 7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	425 472b 322(i) 511 421 461 465 460(i)	GMP GMP GMP GMP GMP GMP GMP	7 7 7 4 7 7 7 7 7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES	425 472b 322(i) 511 421 461 465 460(i)	GMP GMP GMP GMP GMP GMP GMP	7 7 7 4 7 7 7 7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS	425 472b 322(i) 511 421 461 465 460(i) 471	GMP GMP GMP GMP GMP GMP GMP GMP 5000	7 7 7 4 7 7 7 7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE	425 472b 322(i) 511 421 461 465 460(i) 471 1410	GMP GMP GMP GMP GMP GMP GMP GMP 5000 GMP	7 7 7 4 7 7 7 7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE OXIDIZED STARCH	425         472b         322(i)         511         421         461         465         460(i)         471         1410         1404	GMP GMP GMP GMP GMP GMP GMP 5000 GMP GMP	7 7 7 4 7 7 7 7 7 7 7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE OXIDIZED STARCH PECTINS	425 472b 322(i) 511 421 461 465 460(i) 471 1410 1404 440	GMP GMP GMP GMP GMP GMP GMP 5000 GMP GMP GMP	7 7 7 4 7 7 7 7 7 7 7 7 7 7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE OXIDIZED STARCH PECTINS PHOSPHATED DISTARCH	425         472b         322(i)         511         421         461         465         460(i)         471         1410         1404         440	GMP GMP GMP GMP GMP GMP GMP 5000 GMP GMP GMP	7           7           7           4           7           7           7           7           7           7           7           7           7           7           7           7           7           7           7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE OXIDIZED STARCH PECTINS PHOSPHATED DISTARCH PHOSPHATE	425         472b         322(i)         511         421         461         465         460(i)         471         1410         1404         440         1413	GMP GMP GMP GMP GMP GMP GMP 5000 GMP GMP GMP GMP	7           7           7           4           7           7           7           7           7           7           7           7           7           7           7           7           7           7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE OXIDIZED STARCH PECTINS PHOSPHATED DISTARCH PHOSPHATE POLYDEXTROSES	425         472b         322(i)         511         421         461         465         460(i)         471         1410         1404         440         1413         1200	GMP GMP GMP GMP GMP GMP GMP 5000 GMP GMP GMP GMP GMP	7           7           7           4           7           7           7           7           7           7           7           7           7           7           7           7           7           7           7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE OXIDIZED STARCH PECTINS PHOSPHATED DISTARCH PHOSPHATE POLYDEXTROSES POTASSIUM DIHYDROGEN	425         472b         322(i)         511         421         461         465         460(i)         471         1410         1404         440         1413         1200	GMP GMP GMP GMP GMP GMP GMP 5000 GMP GMP GMP GMP GMP	7       7       7       4       7       7       7       7       7       7       7       7       7       7       7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE OXIDIZED STARCH PECTINS PHOSPHATED DISTARCH PHOSPHATE POLYDEXTROSES POTASSIUM DIHYDROGEN CITRATE	425 472b 322(i) 511 421 461 465 460(i) 471 1410 1404 440 1413 1200 332(i)	GMP GMP GMP GMP GMP GMP GMP 5000 GMP GMP GMP GMP GMP GMP	7       7       7       4       7
KONJAC FLOUR LACTIC AND FATTY ACID ESTERS OF GLYCEROL LECITHIN MAGNESIUM CHLORIDE MANNITOL METHYL CELLULOSE METHYL ETHYL CELLULOSE MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL) MONO- AND DI-GLYCERIDES OF FATTY ACIDS MONOSTARCH PHOSPHATE OXIDIZED STARCH PECTINS PHOSPHATED DISTARCH PHOSPHATE POLYDEXTROSES POTASSIUM DIHYDROGEN CITRATE POWDERED CELLULOSE	425         472b         322(i)         511         421         461         465         460(i)         471         1410         1404         440         1413         1200         332(i)         460(ii)	GMP GMP GMP GMP GMP GMP GMP 5000 GMP GMP GMP GMP GMP GMP GMP	7       7       7       4       7

USA: guar gum is allowed in the US for use in milk products as a stabilizer/thickener up to 6000 mg/kg
AIDGUM: supports adoption
ICGMA: supports use
ICGMA: supports use

SEAWEED (PES)					
SALTS OF MYRISTIC. PALMITIC	1			1 1	
AND STEARIC ACIDS WITH					
AMMONIA, CALCIUM,					
POTASSIUM AND SODIUM	470(i)	GMP	7		
SALTS OF OLEIC ACID WITH					
CALCIUM, POTASSIUM AND					
SODIUM	470(ii)	GMP	7		
SODIUM ALGINATE	401	GMP			
SODIUM CARBOXYMETHYL					
CELLULOSE (CELLULOSE GUM)	466	GMP	7		
SODIUM DIHYDROGEN					
CITRATE	331(i)	GMP	7		
STARCH ACETATE	1420	GMP			
STARCH SODIUM OCTENYL					
SUCCINATE	1450	GMP			
STARCHES, ENZYME TREATED	1405	GMP			
TARA GUM	417	GMP	7		
TRAGACANTH GUM	413	GMP	7		AIDGUM: supports adoption
TRIPOTASSIUM CITRATE	332(ii)	GMP	7		
TRISODIUM CITRATE	331(iii)	GMP	7		

# Food Category No. 01.4.1 (Pasteurized cream (plain))

Corresponding commodity standards: 288-1976: allows emulsifiers, stabilizers and thickeners, lists specific additives

eWG Proposal for Horizontal CI Justification for proposal: CODI stabilizers and thickeners	assification EX STAN 288	<u>of Food Categ</u> 3-1976 allows s	ory: Justif pecific em	ied ulsifiers,	Comments by eWG on he Spain, UK, ELC, ICGMA, Brazil: not justified. CODE ensure product stability s since some minimally past ELC: current provisions for stabilizer and thickener in t ICGMA: used in many pro- properties IDF: Technological justificat taking into consideration the to the durability, special co since some minimally past note suggested below for a	Drizontal classification proposal: IDF, IFAC: supports proposal EX STAN 288-1976 states additives may be used when needed to pecial consideration should be given to the level of heat applies eurized products do not require the use of certain additives. PHOSPHATES in CODEX STAN 288-1976 (@1100mg/kg as P) as he corresponding subcategories are not reflected in discussion. ducts, for example, thickeners give pasteurized cream its thickening tion to ensure product stability and the integrity of the emulsion and e fat content and the durability expected of the product. With regard nsideration should be given to the level of heat treatment applied eurized products do not require the use of certain additives. Add additives not listed in Codex Stan 288-1976.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	10000		7	Adopt at GMP - corresponds to CODEX	Iran, IDF, IFAC: accept proposal

				STAN 288-1076	
ADIPATE	1422	GMP	7	STAN 200-1970	
ACETYLATED DISTARCH				1	
PHOSPHATE	1414	GMP	7		
AGAR	406	GMP	7		
ALGINIC ACID	400	1000	7		Iran, IDF: accept proposal
AMMONIUM ALGINATE	403	100	7	1	Iran. IDF: accept proposal
CALCIUM ALGINATE	404	1000	7	1	Iran. IDF: accept proposal
	170(i)	GMP	7	1	
	509	GMP	7	1	
	516	GMP	4	-	
	010			-	Iran IDE: accent proposal
CAROB BEAN GUM	410	5000	7		Marlinga: 5000 mg/kg needed to prevent syneresis, propose GMP
CARRAGEENAN	407	500	7		Iran, IDF: accept proposal
CITRIC AND FATTY ACID					
ESTERS OF GLYCEROL	472c	5000	7		Iran, IDF: accept proposal
DISTARCH PHOSPHATE	1412	GMP	7		
GELLAN GUM	418	GMP	7	1	
GUAR GUM	412	GMP	7		
GUM ARABIC (ACACIA GUM)	414	5000	7	Discontinue	
GUM ARABIC (ACACIA GUM)	414	GMP	4		Iran, AIDGUM, IDF: accept proposal
HYDROXYPROPYL CELLULÓSE	463	GMP	7		
HYDROXYPROPYL DISTARCH				Adopt at GMP -	
PHOSPHATE	1442	GMP	7	corresponds to CODEX	
HYDROXYPROPYL METHYL				STAN 288-1976	
CELLULOSE	464	GMP	7		
HYDROXYPROPYL STARCH	1440	GMP	7		ICGMA: supports use
				Adopt - emulsifiers,	IDE: add note "for use only in products not covered by Codex Stan
				stabilizers and thickeners	
				are used in these	200
KONJAC FLOUR	425	GMP	7	products	
LACTIC AND FATTY ACID					
ESTERS OF GLYCEROL	472b	10000	7		Iran, IDF: accept proposal
					<b>IDF:</b> add note "for use only in products not covered by Codex Stan
LECITHIN	322(i)	5000	7		288" (lecithin is listed in codex stan 288 @ GMP)
METHYL CELLULOSE	461	GMP	7	Adopt at GMP -	
METHYL ETHYL CELLULOSE	465	GMP	7	corresponds to CODEX	
MICROCRYSTALLINE				STAN 288-1976	
CELLULOSE (CELLULOSE GEL)	460(i)	5000	7		Iran, IDF: accept proposal
MONO- AND DI-GLYCERIDES					
OF FATTY ACIDS	471	5000	7		Iran, EFEMA, ELC, IDF: accept proposal
MONOSTARCH PHOSPHATE	1410	GMP	7	]	EFEMA: adopt at GMP
				Adopt - emulsifiers,	ICGMA: supports use
OXIDIZED STARCH	1404	GMP	7	stabilizers and thickeners	IDF: add note "for use only in products not covered by Codex Stan

				are used in these	288"
				products	
PECTINS	440	GMP	7		
PHOSPHATED DISTARCH					
PHOSPHATE	1413	GMP	7		
					Iran, IDF: accept proposal
POTASSIUM ALGINATE	402	1000	7		Marlinga: 5000 mg/kg needed to prevent syneresis, propose GMP
POTASSIUM CARBONATE	501(i)	GMP	7		IDF: allowed in Codex Stan 288 as an acidity regulator
POTASSIUM CHLORIDE	508	GMP	7		
POTASSIUM DIHYDROGEN					
CITRATE	332(i)	GMP	7		Iran, IDF: accept proposal
POTASSIUM HYDROGEN					
CARBONATE	501(ii)	2000	7	Adopt at GMP -	Iran, IDF: accept proposal
POWDERED CELLULOSE	460(ii)	GMP	7	corresponds to CODEX	Iran, IDF: accept proposal
PROCESSED EUCHEUMA				STAN 288-1976	
SEAWEED (PES)	407a	GMP	7		
· · ·					Iran, IDF: accept proposal
SODIUM ALGINATE	401	1000	7		Marlinga: 5000 mg/kg needed to prevent syneresis, propose GMP
SODIUM CARBOXYMETHYL					
CELLULOSE (CELLULOSE GUM)	466	5000	7		Iran, IDF: accept proposal
SODIUM DIHYDROGEN					
CITRATE	331(i)	GMP	7		
STARCH ACETATE	1420	GMP	7		
STARCH SODIUM OCTENYL					
SUCCINATE	1450	GMP	7		
				Adapt omulaifiara	IDF: add note "for use only in products not covered by Codex Stan
TARA GUM	417	GMP	7	stabilizors and thickonors	288"
				are used in these	AIDGUM supports adoption
				products	IDF: add note "for use only in products not covered by Codex Stan
TRAGACANTH GUM	413	GMP	7	products	288"
TRICALCIUM CITRATE	333(iii)	GMP	7	adapt at CMP	<b>IDF:</b> allowed in Codex Stan 288 as an acidity regulator
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	accurace on the CODEV	
TRISODIUM CITRATE	331(iii)	1000	7		Iran, IDF: accept proposal
XANTHAN GUM	415	GMP	7	51AN 200-1970	

### Food Category No. 01.4.2 (Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain))

**Corresponding commodity standards:** 288-1976: allows emulsifiers, stabilizers and thickeners, lists specific additives

eWG Proposal for Horizontal Cla	ssification	of Food Categ	ory: Justif	ied	Comments by eWG on horizontal classification proposal:			
Justification for proposal: CODE	X STAN 28	8-1976 allows s	pecific em	ulsifiers,	Brazil, EU, Spain, UK, IFAC, ICGMA, IDF: Supports proposal No provisions in this food			
stabilizers and thickeners					category as per the Codex General standard for the use of dairy terms (Codex Stan 206-1999)			
					and descriptor in GSFA.			
					ELC: current provisions for	r PHOSPHATES in CODEX STAN 288-1976 (@1100mg/kg as P) as		
					stabilizer and thickener in t	he corresponding subcategories are not reflected in discussion.		
					ICGMA: used in many proc	ducts, for example, thickeners give pasteurized cream its thickening		
					properties			
					IDF: Technological justifica	ation to ensure product stability and the integrity of the emulsion and		
					taking into consideration th	le fat content and the durability expected of the product. With regard		
					to the durability, special co	nsideration should be given to the level of heat treatment applied		
					note suggested below for a	additives not listed in Codex Stan 288, 1076		
		Max Laval		Stop /				
Additive	INS	(mg/kg)	Notes	Adopted	eWG proposal	Comments by eWG members on proposal		
ACETIC AND FATTY ACID						EEEMA ELC: adopt at GMP		
ESTERS OF GLYCEROL	472a	10000		7	Adopt at GMP -			
ACETYLATED DISTARCH				_	corresponds to CODEX			
ADIPATE	1422	GMP		7	STAN 288-1976	JAPAN: agree, prevents syneresis		
ACETYLATED DISTARCH		0.45		_				
PHOSPHATE	1414	GMP		7				
					Adopt -emulsifiers,			
					stabilizers and thickeners	IDE: add note "fer use only in products not sovered by Codey Sten		
	1401	CMP		7	are used in these			
	406	5000		7	Adapt at CMP			
	400	5000		7	corresponds to CODEX	Marlinga: accept proposal		
	403	5000		7	STAN 288-1976	Marlinga: accept proposal		
	400	0000		1	Adopt -emulsifiers			
					stabilizers and thickeners			
					are used in these	<b>IDF</b> : add note "for use only in products not covered by Codex Stan		
BLEACHED STARCH	1403	GMP		7	products	288"		
CALCIUM ALGINATE	404	5000		7				
CALCIUM CARBONATE	170(i)	5000		7		Marlinga: accept proposal		
CALCIUM CHLORIDE	509	GMP		7				
CALCIUM SULFATE	516	GMP		4	Adopt at GMP -			
CAROB BEAN GUM	410	5000		7	corresponds to CODEX			
					STAN 288-1976	Japan: agree, prevents creaming during shelf-life		
CARRAGEENAN	407	5000		7		Marlinga: accept proposal		
CITRIC AND FATTY ACID						Japan: agree, prevents fat seperation		
ESTERS OF GLYCEROL	472c	5000		7		UK, EFEMA, ELC: adopt at GMP		

				Adopt -emulsifiers,	
				stabilizers and thickeners	Japan: agree, prevents creaming during shelf-life
	1 4 0 0		7	are used in these	IDF: add note for use only in products not covered by Codex Stan
	1400		 7	products	288
	1412	GIVIP	 7	Adopt at GMP -	lanany agree, provente greeming during shelf life
GELLAN GOW	410	GIMP	 1	corresponds to CODEX	Japan: agree, prevents creaming during shelf-life
GUAR GUM	412	5000	7	STAN 288-1976	AIDGUM, IFAC: adopt at GMP
GUM ARABIC (ACACIA GUM)	414	5000	7	Discontinue	
GUM ARABIC (ACACIA GUM)	414	GMP	4		Japan, AIDGUM: supports proposal
HYDROXYPROPYL CELLULÓSE	463	GMP	7		
HYDROXYPROPYL DISTARCH				Adopt at GMP -	
PHOSPHATE	1442	GMP	7	corresponds to CODEX	
HYDROXYPROPYL METHYL				STAN 288-1976	
CELLULOSE	464	GMP	7		
HYDROXYPROPYL STARCH	1440	GMP	7		
				Adopt -emulsifiers,	
				stabilizers and thickeners	
				are used in these	<b>IDF:</b> add note "for use only in products not covered by Codex Stan
KONJAC FLOUR	425	2000	7	products	288"
LACTIC AND FATTY ACID					EEEMA ELC: adopt at GMP
ESTERS OF GLYCEROL	472b	10000	7		
LECITHIN	322(i)	5000	7		Japan: agree, prevent fat seperation
METHYL CELLULOSE	461	GMP	7	Adapt at CMD	
METHYL ETHYL CELLULOSE	465	GMP	7	Adopt at GiviF -	
MICROCRYSTALLINE					Japan: agree, prevents creaming, increases viscosity for shape
CELLULOSE (CELLULOSE GEL)	460(i)	5000	7	STAN 200-1970	retention
MONO- AND DI-GLYCERIDES					Japan: agree, maintains emulsion
OF FATTY ACIDS	471	5000	7		EFEMA, ELC: adopt at GMP
MONOSTARCH PHOSPHATE	1410	GMP	7		
				Adopt -emulsifiers,	
				stabilizers and thickeners	
				are used in these	<b>IDF:</b> add note "for use only in products not covered by Codex Stan
OXIDIZED STARCH	1401	GMP	7	products	288"
PECTINS	110	5000	7	Adopt at GMP -	
PHOSPHATED DISTARCH				corresponds to CODEX	
PHOSPHATE	1413	GMP	7	STAN 288-1976	
				Adopt -emulsifiers,	
				stabilizers and thickeners	
	1000		_	are used in these	IDF: add note "for use only in products not covered by Codex Stan
POLYDEXTROSES	1200	GMP	7	products	288"
POTASSIUM ALGINATE	402	5000	7	Adopt at GMP -	Marlinga: accept proposal
POTASSIUM CARBONATE	501(i)	GMP	7	corresponds to CODEX	
POTASSIUM CHLORIDE	508	GMP	7	STAN 288-1976	

POTASSIUM DIHYDROGEN					
CITRATE	332(i)	GMP	7		
POTASSIUM HYDROGEN					
CARBONATE	501(ii)	GMP	7		
POWDERED CELLULOSE	460(ii)	GMP	7		
PROCESSED EUCHEUMA					
SEAWEED (PES)	407a	5000	7		
SODIUM ALGINATE	401	5000	7		Marlinga: accept proposal
SODIUM CARBOXYMETHYL					
CELLULOSE (CELLULOSE GUM)	466	5000	7		
SODIUM DIHYDROGEN					
CITRATE	331(i)	GMP	7		
STARCH ACETATE	1420	GMP	7		
STARCH SODIUM OCTENYL					
SUCCINATE	1450	GMP	7		
					IDF: add note "for use only in products not covered by Codex Stan
TARA GUM	417	GMP	7	stabilizers and thickeners	288"
				are used in these	AIDGUM: supports adoption
				products	<b>IDF:</b> add note "for use only in products not covered by Codex Stan
TRAGACANTH GUM	413	GMP	7	products	288"
TRICALCIUM CITRATE	333(iii)	GMP	7		
TRIPOTASSIUM CITRATE	332(ii)	5000	7	Adopt at GMP -	
			_	corresponds to CODEX	
TRISODIUM CITRATE	331(iii)	5000	7	STAN 288-1976	Japan: agree, prevents creaming during shelf-life
					Japan: agree, prevents creaming during shelf-life
XANTHAN GUM	415	5000	7		Biopolymer: adopt at GMP

Food Category No. 01.6.3 (Whey cheese)

Corresponding commodity standards: 284-1971: refers to provisions in FCs 01.6.3 & 01.6.6 in Tables 1 & 2

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: for food additives CODEX STAN 284-1971 refers to	EU, Iran, IDF: Supports proposal
provisions in Tables 1 and 2, FCs 01.6.3 and 01.6.6. FC 01.6.3 does not contain	
adopted provisions for emulsifiers, stabilizers or thickeners	

### Food Category No. 01.6.6 (Whey protein cheese)

### **Corresponding commodity standards:** 284-1971: refers to provisions in FCs 01.6.3 & 01.6.6 in Tables 1 & 2

**eWG Proposal for Horizontal Classification of Food Category:** Not Justified **Justification for proposal**: for food additives CODEX STAN 284-1971 refers to provisions in Tables 1 and 2, FCs 01.6.3 and 01.6.6. FC 01.6.6 does not contain adopted provisions for emulsifiers, stabilizers or thickeners

Comments by eWG on horizontal classification proposal:

EU, Iran, IDF: Supports proposal

### Food Category No. 01.8.2 (Dried whey and whey products, excluding whey cheeses)

Corresponding commodity standards: 289-1995: refers to provisions in FC 01.8.2 in Tables 1 & 2

<b>eWG Proposal for Horizontal Classification of Food Category</b> : Justified <b>Justification for proposal</b> : for food additives CODEX STAN 289-1995 refers to provisions in Tables 1 and 2, FC 01.8.2, which contains adopted provisions for additives with emulsifiers, stabilizers and thickeners function.					Comments by eWG on horizontal classification proposal: UK, ICGMA: Supports proposal ICGMA: emulsifiers used in this category, including modified food starch IDF: does not support the eWG recommendation.CODEX STAN 289-1995 as adopted (Alinorm 03/11 Appendix IV p 36) only allowed certain stabilizers. The specific food additive provisions contained in the Codex Standard 289-1995 were already incorporated into the GSFA in 2003.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
						IDF: only allowed as anticaking agent in original CODX STAN 289-	
CALCIUM CARBONATE	170(i)	10000		Adopted		1995	
CALCIUM CHLORIDE	509	GMP		Adopted			
HYDROXYPROPYL DISTARCH						<b>IDF:</b> only allowed as anticaking agent in original CODX STAN 289-	

CALCIUM CHLORIDE	509	GMP	Adopted		
HYDROXYPROPYL DISTARCH		10000			<b>IDF:</b> only allowed as anticaking agent in original CODX STAN 289-
PHOSPHATE	1442	10000	Adopted		1995
MICROCRYSTALLINE					IDF: only allowed as anticaking agent in original CODX STAN 289-
CELLULOSE (CELLULOSE GEL)	460(i)	10000	Adopted		1995
POTASSIUM CARBONATE	501(i)	GMP	Adopted		
POTASSIUM CHLORIDE	508	GMP	Adopted	Retain adopted -	
POTASSIUM DIHYDROGEN				corresponds to CODEX	
CITRATE	332(i)	GMP	Adopted	STAN 289-1995	
POTASSIUM HYDROGEN					
CARBONATE	501(ii)	GMP	Adopted		
					IDF: only allowed as anticaking agent in original CODX STAN 289-
POWDERED CELLULOSE	460(ii)	10000	Adopted		1995
SODIUM DIHYDROGEN					
CITRATE	331(i)	GMP	Adopted		
TRIPOTASSIUM CITRATE	332(ii)	GMP	Adopted		
TRISODIUM CITRATE	331(iii)	GMP	Adopted		

### Food Category No. 02.1 (Fats and oils, essentially free from water)

**Corresponding commodity standards:** 019-1981: does not allow ES&Ts; 280-1973 corresponds to subcategory 02.1.1; 033-1981 & 210-1999 correspond to subcategory 02.1.2; 211-1999 corresponds to subcategory 02.1.3

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: CODEX STAN 019-1981 does not allow Emulsifiers,	EU, Spain: Supports proposal
Stabilizers or Thickeners, several commodity standards apply to subcategories so it	Brazil: Case-By-Case
would not be appropriate to use horizontal approach here	

### Food Category No. 02.1.1 (Butter oil, anhydrous milkfat, ghee)

Corresponding commodity standards: 019-1981: does not allow ES&Ts; 280-1973: referes to provisions in FC 02.1.1 in Tables 1 & 2

<b>NG Proposal for Horizontal Classification of Food Category:</b> Not Justified <b>Jstification for proposal</b> : Although CODEX STAN 280-1973 refers to provisions Tables 1 and 2, the exisiting provisions for additives with ES&T function in FC 2.1.1 are for use as antioxidant synergists (see IDF comment)					Comments by eWG on he EU, Spain, IDF: Supports in original CODEX STAN 2	prizontal classification proposal: proposal; food additives below are allowed as antioxidant synergist 280-1973
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	171 <sup>31</sup>	Adopted	Datain a daata d	<b>IDF:</b> only allowed as antioxidant synergist in original CODX STAN 280-1973
TRISODIUM CITRATE	331(iii)	GMP	171	Adopted	Retain adopted	<b>IDF:</b> only allowed as antioxidant synergist in original CODX STAN 280-1973

### Food Category No. 02.1.2 (Vegetable oils and fats)

**Corresponding commodity standards**: 019-1981: does not allow ES&Ts; 033-1981: does not allow food additives (except tocopherols); 210-1999: does not allow emulsifiers, stabilizers and thickeners but lists INS 331i, iii, 472c with ES&T function as antioxidant synergists

<b>eWG Proposal for Horizontal Classification of Food Category</b> : Cas-By-Case Justification for proposal: Although CODEX STANs 019-1981, 033-1981, and 210-1999 do not allow ES&Ts, comments on specific food additive provisions from the eWG indicate that ES&Ts are used in this FC by several Codex Members.					Comments by eWG on he Brazil: Supports proposal ICGMA: Emulsifiers and st Japan, UK: there is no acc thickeners in this food cate Spain: no justification give notes "not for use in olive of STAN 33-1981 & CODEX	prizontal classification proposal: abilizers are used in this category ceptance of generic justification for emulsifiers, stabilizers or gory n for ES&T, justified use in certain oils should be restricted with new bils" & "not for use in virgin or cold pressed oils" (as stated in CODEX STAN 210-1999. discussion on antioxidants not the subject of WG.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID	472a	GMP		7	Adopt - comment by	Costa Rica: used as emulsifier/stabilizer in this category

<sup>31</sup> **Note 171:** Excluding anhydrous milkfat.

ESTERS OF GLYCEROL				Costa Rica	Japan: requests information on tech justification for
					emulsifiers/stabilizers in vegetable fats & oils
ACETYLATED DISTARCH					
ADIPATE	1422	GMP	7		Japan. Supports proposal
ACETYLATED DISTARCH				Discontinue - not allowed	lanan: supports proposal
PHOSPHATE	1414	GMP	7	in commodity standards,	Japan. Supports proposal
ACID TREATED STARCH	1401	GMP	7	no information provided	Japan: supports proposal
AGAR	406	GMP	7	supporting use	Japan: supports proposal
ALGINIC ACID	400	GMP	7		Japan: supports proposal
ALKALINE TREATED STARCH	1402	GMP	7		Japan: supports proposal
					Japan: requests information on tech justification for
					emulsifiers/stabilizers in vegetable fats & oils
					<b>USA:</b> ammonium alginate is allowed for use in fats and oils as a
AMMONIUM ALGINATE	403	5000	7	Adopt - comment by USA	stabilizer/thickener up to 5000 mg/kg
				Discontinue - not allowed	
				in commodity standards,	Japan: supports proposal
				no information provided	
BLEACHED STARCH	1403	GMP	7	supporting use	
					Japan: requests information on tech justification for
					emulsifiers/stabilizers in vegetable fats & oils
					<b>USA:</b> calcium alginate is allowed for use in fats and oils as a
CALCIUM ALGINATE	404	5000	7	Adopt - comment by USA	stabilizer/thickener up to 5000 mg/kg
CAROB BEAN GUM	410	GMP	7	Discontinue - not allowed	Japan: supports proposal
				in commodity standards,	
	407		_	no information provided	Japan: supports proposal
CARRAGEENAN	407	GMP	/	supporting use	-
				Adopt with note "for use	Operte Biege was dies ensulation/atabilizen in this actor was
				as antioxidant synergist"	Costa Rica: used as emulsifier/stabilizer in this category
	470-	OND	-	- for compliance with	Japan: supports proposal only
ESTERS OF GLYCEROL	472C	GMP	/ 7	210-1999	
DEXTRINS, ROASTED STARCH	1400	GMP	1	Discontinue - not allowed	Japan: supports proposal
DISTARCH PHOSPHATE	1412	GMP	1	In commodity standards,	Japan: supports proposal
GELLAN GUM	418	GMP	7	supporting use	Japan: supports proposal
					Japan: requests information on tech justification for
					emulsifiers/stabilizers in vegetable fats & oils
					<b>USA:</b> Guar gum is allowed for use in the US as a stabilizer and
				Adopt - comments by	thickener in fats and oils up to 20000 mg/kg
GUAR GUM	412	20000	7	USA & IFAC	IFAC: adopt at GMP
					Japan: requests information on tech justification for
					emulsifiers/stabilizers in vegetable fats & oils
					<b>USA:</b> Gum arabic is allowed for use in the US as a stabilizer and
GUM ARABIC (ACACIA GUM)	414	15000	7	Adopt - comment by USA	thickener in fats and oils up to 15000 mg/kg

HYDROXYPROPYL DISTARCH					Discontinue - not allowed	lanan: supports proposal
PHOSPHATE	1442	GMP		7	in commodity standards,	Japan. Supports proposal
HYDROXYPROPYL STARCH	1440	GMP		7	no information provided	Japan: supports proposal
KARAYA GUM	416	GMP		7	supporting use	Japan: supports proposal
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7	Adopt - comments by Costa Rica & USA	Costa Rica: used as emulsifier/stabilizer in this category Japan: requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils USA: lactic and fatty acid esters of glycerol is allowed for use in the US as an emulsifier in shortening at levels up to GMP
LECITHIN	322(i)	30000		7	Adopt - comments by Costa Rica, USA & ICGMA	Costa Rica: used as an emulsifier/stabilizer in this category Japan: requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils USA: Lecithin is allowed for use in the US as an emulsifier in shortening at levels up to GMP. ICGMA: used at 3,000 mg/kg
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	Japan: supports proposal
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	20000		7	adopt at GMP - comments by Costa Rica & ICGMA	<b>Costa Rica:</b> used as emulsifier/stabilizer in this category <b>Japan:</b> requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils <b>ICGMA:</b> used at GMP
MONOSTARCH PHOSPHATE	1410	GMP		7		Japan: supports proposal
OXIDIZED STARCH	1404	GMP		7		Japan: supports proposal
PECTINS	440	GMP		7		Japan: supports proposal
PHOSPHATED DISTARCH PHOSPHATE	1413	GMP		7	Discontinue - not allowed	Japan: supports proposal
POTASSIUM ALGINATE	402	GMP		7	in commodity standards,	Japan: supports proposal
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	supporting use	Japan: supports proposal
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		7		Japan: supports proposal
SODIUM ALGINATE	401	GMP		7		Japan: supports proposal
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Adopt with new notes "For use as antioxidant synergist" and "not for use in olive oils and olive-pomace oils"	Japan: supports proposal
STARCH ACETATE	1420	GMP	1 1	7		Japan: supports proposal
STARCH SODIUM OCTENYL SUCCINATE	1450	GMP		7	Discontinue - not allowed in commodity standards,	Japan: supports proposal
STARCHES, ENZYME TREATED	1405	GMP		7		Japan: supports proposal
TARA GUM	417	GMP		7		Japan: supports proposal

TRAGACANTH GUM	413	13000	7	adopt - comment from USA	Japan: requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils USA: tragacanth gum is allowed in the US for use in fats and oils as an emulsifier/stabilizer/thickener up to13000 mg/kg AIDGUM: supports adoption
TRICALCIUM CITRATE	333(iii)	GMP	7	Discontinue - not allowed	Japan: supports proposal
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	in commodity standards, no information provided supporting use	Japan: supports proposal
TRISODIUM CITRATE	331(iii)	GMP	7	Adopt with new notes "For use as antioxidant synergist" and "not for use in olive oils and olive-pomace oils"	Japan: supports proposal Permitted for use as antioxidant synergist in CODEX STANs 19- 1981, 210-1999, not permitted in 33-1981
XANTHAN GUM	415	10000	4	Discontinue - not allowed in commodity standards, no information provided supporting use	Japan: supports proposal

### Food Category No. 02.1.3 (Lard, tallow, fish oil, and other animal fats)

**Corresponding commodity standards**: 019-1981: does not allow ES&Ts; 211-1999: does not allow emulsifiers, stabilizers and thickeners but lists INS 331i, iii, 472c with ES&T function as antioxidant synergists

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Case-By-Case Justification for proposal: Although CODEX STANs 019-1981, 033-1981, and 210-1999 do not allow ES&Ts, comments on specific food additive provisions from the eWG indicate that ES&Ts are used in this FC by several Codex Members.					Comments by eWG on horizontal classification proposal: Brazil: Supports proposal ICGMA: Emulsifiers and stabilizers are used in this category Japan, UK: there is no acceptance of generic justification for emulsifiers, stabilizers or thickeners in this food category Spain: no justification given for ES&T, justified use in certain oils should be restricted with new notes "not for use in olive oils" & "not for use in virgin or cold pressed oils" (as stated in CODEX STAN 33-1981 & CODEX STAN 210-1999. discussion on antioxidants not the subject of WG.	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Adopt - comment from Costa Rica	<b>Costa Rica:</b> used as an emulsifer/stabilizer in this category <b>Japan:</b> requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils
ACETYLATED DISTARCH ADIPATE	1422	GMP		7		Japan: supports proposal
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7	Discontinue - not allowed in commodity standards,	Japan: supports proposal
ACID TREATED STARCH	1401	GMP		7	no information provided	Japan: supports proposal
AGAR	406	GMP		7	supporting use	Japan: supports proposal
ALGINIC ACID	400	GMP		7		Japan: supports proposal
ALKALINE TREATED STARCH	1402	GMP		7		Japan: supports proposal

				Adopt commont from	Japan: requests information on tech justification for
					LISA: ammonium alginate is allowed for use in fats and oils as a
	402	5000	7	USA	stabilizer/thickonor up to 5000 mg/kg
	403	5000	1	Discontinue - not allowed	
				in commodity standards	
				in commonly standards,	Japan: supports proposal
	1402	CMP	7		
BLEACHED STARCH	1403	Givir	1		lanan, requests information on tash justification for
				Adapt commont from	mulsifiers/stabilizors in vogetable fate & oils
					LISA: coloium algingto is allowed for use in foto and oils on a
	101	5000	7	USA	otabilizar/thickopar up to 5000 mg/kg
	404	5000 CMD	1 7	Discontinue, not allowed	Stabilizer/tillickener up to 5000 mg/kg
CAROB BEAN GUM	410	GIMP	1	Discontinue - not allowed	Japan: supports proposal
				In commodity standards,	
	407		-	no information provided	Japan: supports proposal
	407	GIMP	1	Supporting use	Casta Bias, used as an emulaifer/stabilizer in this asteromy
	470-		-	Adopt - comment from	Costa Rica: used as an emulsifer/stabilizer in this category
ESTERS OF GLYCEROL	472C	GMP	/ 7		Japan: supports proposal
DEXTRINS, ROASTED STARCH	1400	GMP	1	Discontinue - not allowed	Japan: supports proposal
DISTARCH PHOSPHATE	1412	GMP	7	in commodity standards,	Japan: supports proposal
	440		_	no information provided	Japan: supports proposal
GELLAN GUM	418	GMP	1	supporting use	
					Japan: requests information on tech justification for
				Adopt - comment from	emulsifiers/stabilizers in vegetable fats & oils
				USA & IFAC	USA: Guar gum is allowed for use in the US as a stabilizer and
					thickener in fats and oils up to 20000 mg/kg
GUAR GUM	412	20000	7		IFAC: adopt at GMP
GUM ARABIC (ACACIA GUM)	414	15000	7	Discontinue - not allowed	Japan: supports proposal
HYDROXYPROPYL DISTARCH				in commodity standards	Japan: supports proposal
PHOSPHATE	1442	GMP	7	no information provided	
HYDROXYPROPYL STARCH	1440	GMP	7	supporting use	Japan: supports proposal
KARAYA GUM	416	GMP	7		Japan: supports proposal
					Costa Rica: used as an emulsifer/stabilizer in this category
					Japan: requests information on tech justification for
				Adopt at GMP - comment	emulsifiers/stabilizers in vegetable fats & oils
				from Costa Rica & USA	<b>USA:</b> lactic and fatty acid esters of glycerol is allowed for use in the
LACTIC AND FATTY ACID					US as an emulsifier in shortening and rendered animal fats at
ESTERS OF GLYCEROL	472b	80000	7		levels up to GMP
				Adopt at CMP commant	Costa Rica: used as an emulsifer/stabilizer in this category
				from Costa Pica 8	Japan: requests information on tech justification for
					emulsifiers/stabilizers in vegetable fats & oils
LECITHIN	322(i)	30000	7		ICGMA: used at 3,000 mg/kg

				Discontinue - not allowed in commodity standards,	lanan: sunnorts proposal
MICROCRYSTALLINE				no information provided	Japan. Supports proposal
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	7	supporting use	
				Adopt at GMP - comment	Costa Rica: used as an emulsifer/stabilizer in this category
				from Costa Rica &	Japan: requests information on tech justification for
MONO- AND DI-GLYCERIDES				ICGMA	emulsifiers/stabilizers in vegetable fats & oils
OF FATTY ACIDS	471	100000	7	1001111	ICGMA: used at GMP
MONOSTARCH PHOSPHATE	1410	GMP	7		Japan, UK: supports proposal
OXIDIZED STARCH	1404	GMP	7		Japan: supports proposal
PECTINS	440	GMP	7	]	Japan: supports proposal
PHOSPHATED DISTARCH PHOSPHATE	1413	GMP	7	Discontinue - not allowed in commodity standards.	Japan: supports proposal
POTASSIUM ALGINATE	402	GMP	7	no information provided	Japan: supports proposal
POTASSIUM DIHYDROGEN				supporting use	
CITRATE	332(i)	GMP	7		Japan: supports proposal
PROCESSED EUCHEUMA				1	lanan: supports proposal
SEAWEED (PES)	407a	GMP	7		Japan. Supports proposal
SODIUM ALGINATE	401	GMP	7		Japan: supports proposal
				Adopt with note "for use	
				as antioxidant synergist"	Japan: supports proposal
SODIUM DIHYDROGEN				- for compliance with 19-	
CITRATE	331(i)	GMP	7	1981 & 211-1999	
STARCH ACETATE	1420	GMP	7	Discontinue - not allowed	Japan: supports proposal
STARCH SODIUM OCTENYL				in commodity standards	Japan: supports proposal
SUCCINATE	1450	GMP	7	no information provided	
STARCHES, ENZYME TREATED	1405	GMP	7	supporting use	Japan: supports proposal
TARA GUM	417	GMP	7		Japan: supports proposal
					Japan: requests information on tech justification for
				adopt - comment from	emulsifiers/stabilizers in vegetable fats & oils
		40000	_	USA	USA: tragacanth gum is allowed in the US for use in fats and oils
	413	13000	7		as an emulsifier/stabilizer/thickener up to13000 mg/kg
TRICALCIUM CITRATE	333(111)	GMP	7	Discontinue - not allowed	Japan: supports proposal
				in commodity standards,	
	222(::)		7	no information provided	Japan: supports proposal
	332(II)	GIVIP	1	Adapt with pate "for use	
				Adopt with note "for use	
				as antioxidant synergist	Japan: supports proposal
	331(iii)	GMP	7	1981 & 211-1999	
	001(11)				

				Discontinue - not allowed in commodity standards, no information provided	Japan: supports proposal
XANTHAN GUM	415	10000	4	supporting use	

### Food Category No. 02.2.1 (Butter)

**Corresponding commodity standards:** 279-1971: refers to provisions in FC 02.2.1 in Tables 1 & 2

<b>eWG Proposal for Horizontal Classification of Food Category</b> : Not Justified <b>Justification for proposal</b> : Comments by eWG					Comments by eWG on h EU, Spain, UK, IDF: Sup Brazil: case-by-case IDF: The specific food add 1971 were already incorp Emulsifiers, stabilizers an additives are justified as a ICGMA: E &S are used in	norizontal classification proposal: ports proposal; E &S are used in margarine, not butter. ditive provisions as contained in the original Codex Standard 279 orated into the GSFA in 2008. There were no provisions for d thickeners in the original standard as adopted. The relevant acidity regulators.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
GUM ARABIC (ACACIA GUM)	414	GMP		4	Discontinue	Brazil, UK, IDF: technological need questioned

### Food Category <u>No. 04.1.1 (Fresh fruit)</u>

**Corresponding commodity standards:** None; Multiple standards apply to subcategories, several of which do not allow food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Several commodity standards which apply to	Brazil, EU, Spain: Supports proposal
subcategories do not allow food additives.	

### Food Category No. 04.1.1.1 (Untreated fresh fruit)

**Corresponding commodity standards:** 143-1985; 182-1993; 183-1993; 184-1993; 187-1993; 196-1995; 204-1997; 205-1997; 213-1999; 214-1999; 216-1999; 216-1999; 217-1999; 219-1999; 220-1999; 226-2001; 237-2003; 245-2004; 246-2005; 255-2007; 299-2010; 305R-2011: no food additives allowed in these standards

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:		
Justification for proposal: Corresponding commodity standards do not allow food	Brazil, EU, Spain: Supports proposal		
additives.			

### Food Category No. 04.1.1.2 (Surface treated fresh fruit)

**Corresponding commodity standards:** 143-1985: allows only glycerol and sorbitol (INS 420) at GMP (Standard does not address coatings)

eWG Proposal for Horizontal Class Note 16 "For use in glaze, coatings	sification or decoratio	of Food Categ	<b>ory</b> : Justif getables, n	ied only with neat or fish."	Comments by eWG on horizontal classification proposal: Costa Rica, ICGMA: Emulsifiers are used in wax coatings for citrus and other fruit		
Justification for proposal: Comme	ents by evv	G members. C	orrespondi	ng	Brazil: Case-by-Case		
commodity standard does not addre	ess coatings	6.			EU - the use of additives s	should be limited in fresh fruit; the EU wonders whether the	
					Justification is relevant for a	all the provisions listed	
					Spain: glazing agents of c	amers are different functional classes from ES&T and not subject of	
						sifier on the surface of fresh fruit a Codex additive function? It may be	
					a carrier, or an additive in	an additive, but neither of these appear to set a precedent for	
					emulsifiers in this FC	an additive, but heither of these appear to set a precedent for	
		Max Level		Sten /			
Additive	INS	(mg/kg)	Notes	Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC AND FATTY ACID							
ESTERS OF GLYCEROL	472a	GMP	16 <sup>32</sup>	7			
ACETYLATED DISTARCH						ICCMA: adopt with note "for use as emulcifier"	
PHOSPHATE	1414	GMP	16	7			
AGAR	406	GMP		7			
ALGINIC ACID	400	GMP		7			
AMMONIUM ALGINATE	403	GMP		7			
CALCIUM ALGINATE	404	GMP		7			
CAROB BEAN GUM	410	GMP		7			
CARRAGEENAN	407	GMP		7			
CITRIC AND FATTY ACID							
ESTERS OF GLYCEROL	472c	GMP	16	7			
GELLAN GUM	417	GMP		7	adapt with Nata 16		
GUAR GUM	412	GMP		7			
GUM ARABIC (ACACIA GUM)	414	GMP	16	7		AIDGUM: supports proposal	
HYDROXYPROPYL CELLULOSE	463	GMP	16	7			
HYDROXYPROPYL METHYL							
CELLULOSE	464	GMP	16	7			
HYDROXYPROPYL STARCH	1440	GMP	16	7		ICGMA: adopt with note "for use as emulsifier"	
KARAYA GUM	416	GMP		7			
KONJAC FLOUR	425	GMP		7			
LACTIC AND FATTY ACID							
ESTERS OF GLYCEROL	472b	GMP	16	7			
LECITHIN	322(i)	GMP	16	7		Brazil: adopt with note "for use as emulsifier"	
MAGNESIUM CHLORIDE	511	GMP	16	7			
MANNITOL	421	GMP		4			

<sup>&</sup>lt;sup>32</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

METHYL CELLULOSE	461	GMP	16	7	
METHYL ETHYL CELLULOSE	465	GMP	16	7	
MICROCRYSTALLINE					
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	16	7	
MONO- AND DI-GLYCERIDES					
OF FATTY ACIDS	471	GMP	16	7	
OXIDIZED STARCH	1404	GMP	16	7	
PECTINS	440	GMP		7	
POTASSIUM ALGINATE	402	GMP		7	
POWDERED CELLULOSE	460(ii)	GMP	16	7	
PROCESSED EUCHEUMA					
SEAWEED (PES)	407a	GMP		7	
SALTS OF MYRISTIC, PALMITIC					
AND STEARIC ACIDS WITH					
AMMONIA, CALCIUM,			16 &		
POTASSIUM AND SODIUM	470(i)	GMP	7133	7	
SALTS OF OLEIC ACID WITH					
CALCIUM, POTASSIUM AND					
SODIUM	470(ii)	GMP	16	7	
SODIUM ALGINATE	401	GMP		7	
SODIUM CARBOXYMETHYL					ĺ
CELLULOSE (CELLULOSE GUM)	466	GMP	16	7	
TARA GUM	417	GMP		7	
TRAGACANTH GUM	413	GMP	16	7	
XANTHAN GUM	413	GMP		7	ĺ

ICGMA: adopt with note "for use as emulsifier"
Brazil: adopt with note "for use as emulsifier"
Brazii: adopt with note for use as emuisitier
AIDGUM: supports proposal

# Food Category No. 04.1.1.3 (Peeled or cut fresh fruit)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified					Comments by eWG on horizontal classification proposal:		
Justification for proposal: No support provided by eWG members					EU, Spain: support proposal		
					UK: questions technologica	al need	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
AGAR	406	GMP		7			
CAROB BEAN GUM	410	GMP		7			
CARRAGEENAN	407	GMP		7			
GELLAN GUM	418	GMP		7	Discontinue		
GUAR GUM	412	GMP		7			
KARAYA GUM	416	GMP		7			
KONJAC FLOUR	425	GMP		7			

<sup>33</sup> **Note 71:** Calcium, potassium and sodium salts only.

MICROCRYSTALLINE			
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	7
PECTINS	440	GMP	7
PROCESSED EUCHEUMA			
SEAWEED (PES)	407a	GMP	4
SODIUM ALGINATE	401	GMP	4
SODIUM CARBOXYMETHYL			
CELLULOSE (CELLULOSE GUM)	466	GMP	4
TARA GUM	417	GMP	7
TRAGACANTH GUM	413	GMP	7
XANTHAN GUM	415	GMP	7

# Food Category No. 04.2.1 (Fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

**Corresponding commodity standards:** None; subcategories have corresponding commodity standards

eWG Proposal for Horizontal Cla	ssification	of Food Categ	orv: Not J	ustified -	Comments by eWG on horizontal classification proposal:		
discontinue provisions and move to	subcatego	ries 04,2,1,2 & (	04.2.1.3		Brazil, EU, Spain, UK: support proposal		
Justification for proposal: Emulsi	fiers. Stabili	zers and Thick	eners are i	not allowed	,,,,,,	- F - · · F - • F - • • •	
in commodity standards correspond	ding to subc	ategory 04.2.1.	1				
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
					Discontinue, adopt in subcategories 04.2.1.2		
					(add Note 3) & 04.2.1.3		
GUM ARABIC (ACACIA GUM)	414	83000	<del>79<sup>34</sup></del>	7	(add note "as stabilizer")		
					Refer to discussion in		
					Appendix 2 for this FC. If		
					used as AR, follow		
					recommendation in		
					Appendix 2. If used as		
					ES&T, Discontinue,		
					adopt in subcategories		
					04.2.1.2 (add Note 3) &		
SODIUM DIHYDROGEN					04.2.1.3 (add note "as		
CITRATE	<del>331(i)</del>	GMP		7	stabilizer")		
					Discontinue, adopt in		
					subcategories 04.2.1.2		
					(add Note 3) & 04.2.1.3		
TRISODIUM CITRATE	<del>331(iii)</del>	2000		7	(add note "as stabilizer")		

<sup>&</sup>lt;sup>34</sup> **Note 79:** For use on nuts only.

# Food Category No. 04.2.1.1 (Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds)

**Corresponding commodity standards:** 038-1981: does not allow ES&Ts but allows specific acidity regulators in edible fungi and fungus product; 40R-1981, 131-1981, 171-1989, 185-1993, 186-1993, 188-1993, 197-1995, 200-1995, 218-1999, 224-2001, 225-2001, 238-2003, 293-2008, 300-2010, 303-2011, 304R-2011, 307-2011: do not allow food additives

**eWG Proposal for Horizontal Classification of Food Category:** Not Justified **Justification for proposal**: Emulsifiers, Stabilizers and Thickeners are not allowed in commodity standards corresponding to FC 04.2.1.1

Comments by eWG on horizontal classification proposal: Brazil, EU, Spain: Supports proposal

Brazil: supports proposal

# Food Category No. 04.2.1.2 (Surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

### Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with Comments by eWG on horizontal classification proposal: note 3 "surface treatment" Costa Rica. ICGMA: Stabilizers are technologically justified for use in surface-treated Justification for proposal: no corresponding commodity standards, Comments in vegetables. Modified food starches are typically used with components such as organic acids CX/FA12/44/9 Add. 2 from ICGMA: ES&T are technologically justified in FC 04.2.1.2 (lemon juice, citric, etc) and coating agents in spray applications to thicken and stabilize the film are used to thicken & stabilize the film forming mixture in order that it adheres to the forming mixture in order that it adhere to the surface of the fresh fruits and vegetables. surface of the fresh fruit/veg. Brazil: Case-by-Case EU: case-by-case; the category 04.2.1.2 limits the use of glazing agents to nuts only (note 79); it should be reflected when considering the provisions below; the provisions not related to nuts should be disregarded UK: agrees with proposal Max Level Step / Notes eWG proposal Comments by eWG members on proposal Additive INS (mg/kg) Adopted ACETIC AND FATTY ACID ESTERS OF GLYCEROL 472a GMP 16 7 Adopt with note 16 & 3 ACETYLATED DISTARCH GMP PHOSPHATE 1414 7 16 AGAR 406 GMP 7 ICGMA: accept proposal ALGINIC ACID 400 GMP 7 Adopt with note 3 GMP AMMONIUM ALGINATE 403 7 CALCIUM ALGINATE 404 GMP 7  $4^{35}$  & Adopt with note 4, 16 & 3 GMP 7 CALCIUM CARBONATE 170(i) 16 CALCIUM CHLORIDE 800  $58^{36}$ 7 Brazil: supports proposal 509 Adopt with note 3 & 58

Adopt with note 3

516

410

800

GMP

58

7

7

CALCIUM SULFATE

CAROB BEAN GUM

<sup>&</sup>lt;sup>35</sup>**Note 4:** For decoration, stamping, marking or branding the product.

<sup>&</sup>lt;sup>36</sup> Note 58: As calcium.

CARRAGEENAN	407	GMP		7		
CITRIC AND FATTY ACID					Adapt with pate 16.8.2	
ESTERS OF GLYCEROL	472c	GMP	16	7	Adopt with hole to & 3	
GELLAN GUM	418	GMP		7	Adapt with pate 2	
GUAR GUM	412	GMP		7	Adopt with hole 3	
GUM ARABIC (ACACIA GUM)	414	83000	79		Adopt with note 79 & 3	AIDGUM: supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	16	7		
HYDROXYPROPYL METHYL					Adapt with pate 16.8.2	
CELLULOSE	464	GMP	16	7	Adopt with hole to & 3	
HYDROXYPROPYL STARCH	1440	GMP	16	7		ICGMA: accept proposal
KARAYA GUM	416	GMP		7	Adapt with pate 2	
KONJAC FLOUR	425	GMP		7	Adopt with hole 5	
LACTIC AND FATTY ACID						
ESTERS OF GLYCEROL	472b	GMP	16	7	Adapt with pate 16.8.2	
LECITHIN	322(i)	GMP	16	7	Adopt with hole to & 3	
MAGNESIUM CHLORIDE	511	GMP	16	7		
MANNITOL	421	GMP		4	Adopt with note 3	
METHYL CELLULOSE	461	GMP	16	7		
METHYL ETHYL CELLULOSE	465	GMP	16	7		
MICROCRYSTALLINE						
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	16	7	Adopt with note 16 & 3	
MONO- AND DI-GLYCERIDES						
OF FATTY ACIDS	471	GMP	16	7		
OXIDIZED STARCH	1404	GMP	16	7		ICGMA: accept proposal
PECTINS	440	GMP		7	Adopt with poto 3	
POTASSIUM ALGINATE	402	GMP		7	Adopt with hote 5	
POTASSIUM DIHYDROGEN						
CITRATE	332(i)	GMP	16	7	Adopt with note 16 & 3	
POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA					Adopt with note 3	
SEAWEED (PES)	407a	GMP		7	Adopt with hote 5	
SALTS OF MYRISTIC, PALMITIC						
AND STEARIC ACIDS WITH					Adopt with note 16, 71 &	
AMMONIA, CALCIUM,			16 &		3	
POTASSIUM AND SODIUM	470(i)	GMP	71	7		
SALTS OF OLEIC ACID WITH						
CALCIUM, POTASSIUM AND				_	Adopt with note 16 & 3	
SODIUM	470(ii)	GMP	16	7		
SODIUM ALGINATE	401	GMP		7	Adopt with note 3	
SODIUM CARBOXYMETHYL				_	Adopt with note 16 & 3	
CELLULOSE (CELLULOSE GUM)	466	GMP	16	7		
	004/0				Adopt with note 3	
CIIRATE	331(i)	GMP				
IARA GUM	417	GMP		7	Adopt with note 3	

TRAGACANTH GUM	413	GMP	16	7	Adapt with pate 16 9 2	AIDGUM: supports adoption
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7		
XANTHAN GUM	415	GMP		7	Adopt with note 3	
CALCIUM GLUCONATE	578	800	58	7	Adapt with pate 2.8 E9	
CALCIUM HYDROXIDE	526	800	58	7		
MAGNESIUM CARBONATE	504(i)	GMP	16	7	-	
MAGNESIUM HYDROXIDE	528	GMP	16	7		
MAGNESIUM HYDROXIDE						
CARBONATE	504(ii)	GMP	16	7	Adopt with note 16 & 3	
POTASSIUM DIHYDROGEN						
CITRATE	332(i)	GMP	16	7		
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7		
TRISODIUM CITRATE	331(iii)	2000			Adopt with note 3	

# Food Category No. 04.2.1.3 (Peeled, cut or shredded fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds and nuts and seeds)

eWG Proposal for Horizontal Classification of Food Category: Justified only with					Comments by eWG on horizontal classification proposal:		
note "as stabilizer"					Brazil: Case-by-Case		
Justification for proposal: Recommendation in CX/FA 12/44/9 Add.1 Annex EU, UK: questions technological need.							
2;comments from Brazil on specific food additives							
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
AGAR	406	GMP		7			
	500	000	<b>F</b> 0	7		Drozil, supporte proposel	
CALCIUM CHLORIDE	509	800	58	1		Brazii: supports proposal	

	400	Givin		'		
CALCIUM CHLORIDE	509	800	58	7		Brazil: supports proposal
CALCIUM SULFATE	516	800	58	7		Brazil: supports proposal
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	407	GMP		7		
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	83000	79		Adapt as listed with pote	AIDGUM: supports adoption
KARAYA GUM	416	GMP		7	"as stabilizer"	
KONJAC FLOUR	425	GMP		7		
MICROCRYSTALLINE						
CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		
PECTINS	440	GMP		7		
PROCESSED EUCHEUMA						
SEAWEED (PES)	407a	GMP		4		
SODIUM CARBOXYMETHYL						
CELLULOSE (CELLULOSE GUM)	466	GMP		4		

				Refer to discussion in Appendix 2 for this FC. If used as AR, follow recommendation in Appendix 2. If used as	
SODIUM DIHYDROGEN				ES&T, Adopt with "as	
CITRATE	331(i)	GMP		stabilizer"	
TARA GUM	417	GMP	7		
TRAGACANTH GUM	413	GMP	7	Adopt as listed with note	AIDGUM: supports adoption
TRISODIUM CITRATE	331(iii)	2000		"as stabilizer"	
XANTHAN GUM	415	GMP	7	]	

# Food Category No. 04.2.2.1 (Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

**Corresponding commodity standards**: 038-198,140-1983, 114-1981: do not allow ES&T; 41-1981. 110-1981, 111-1981, 77-1981, 112-1981, 113-1981, 132-1981, 40-1981; do not allow food additives

eWG Proposal for Horizontal Clar Justification for proposal: Comm CX/FA12/44/9 Add. 2 from IFAC that maintain color (especially in potator vegetables. Emulsifiers, stabilizers,	ssification ents from so at stabilizati es) and to m and thicker	of Food Categ ome eWG mem on is needed in naintain the text ners provide this	ory: Justifi bers and these prod ure or firm s stabilizati	ed ducts to ness of the ion.	Comments by eWG on horizontal classification proposal: Brazil: Case-by-Case Costa Rica: Stabilizers necessary to maintain texture/firmness EU: Not justified; is maintaining the colour in potatoes a function of stabilisers; are products such as fresh frozen potatoes on the market; the other uses refer to firming agents (to maintain the texture or firmness of the vegetable) UK: restrict to potatoes only IFAC: supports adoption of all provisions		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETYLATED DISTARCH		40000		_			
PHOSPHATE	1414	10000					
AGAR	406	GMP		7			
						Brazil: supports proposal Costa Rica: added to frozen vegetables to maintain texture/firmness ICGMA: added to frozen potatoes, jalapeno peppers & dices	
CALCIUM CHLORIDE	509	4000		7	0 -1 t	tomatoes to maintain texture/firmness.	
CALCIUM SULFATE	516	3500		7	Adopt	Brazil: supports proposal	
CARRAGEENAN	407	GMP		7			
GELLAN GUM	418	GMP		7			
GUAR GUM	412	20000		7		IFAC: adopt at GMP	
GUM ARABIC (ACACIA GUM)	414	83000		7		AIDGUM: supports adoption	
KARAYA GUM	416	GMP		7	]		
KONJAC FLOUR	425	GMP		7			
LECITHIN	322(i)	GMP		7			

MICROCRYSTALLINE				
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	7	
PECTINS	440	20000	7	
POTASSIUM DIHYDROGEN				
CITRATE	332(i)	GMP	7	
POWDERED CELLULOSE	460(ii)	GMP	7	
PROCESSED EUCHEUMA				
SEAWEED (PES)	407a	GMP	4	
SALTS OF MYRISTIC, PALMITIC				
AND STEARIC ACIDS WITH				
AMMONIA, CALCIUM,				
POTASSIUM AND SODIUM	470(i)	GMP	7	
SODIUM ALGINATE	401	GMP	4	
SODIUM CARBOXYMETHYL				
CELLULOSE (CELLULOSE GUM)	466	GMP	4	
SODIUM DIHYDROGEN				
CITRATE	331(i)	GMP	7	
TARA GUM	417	GMP	7	
TRAGACANTH GUM	413	GMP	7	AIDGUM: supports adoption
TRICALCIUM CITRATE	333(iii)	GMP	7	
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	
TRISODIUM CITRATE	331(iii)	GMP	7	
XANTHAN GUM	415	GMP	7	

# Food Category <u>No. 04.2.2.7 (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed</u> products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3)

**Corresponding commodity standards:** 223-2001 list INS 407, 415 as thickening/stabilizing agents, INS 402 as Texturizer, 038-1981: does not list ES&T; 294R-2009: lists INS 412, 414 & 415 as stabilizers; 260-2007: lists INS 327 & 509 as firming agents; INS 200-203 as preservatives, INS 285, 286, 451(i) & 452(i) as sequesterants; 151-1985: does not discuss food additives

eWG Proposal for Horizontal CI Justification for proposal: Emul corresponding commodity standar standardized foods	assification sifiers, stabili rds, food cate	of Food Categ zers and thicker gory covers sta	ory: Justif ners allowe Indardized	ied ed in some and non-	Comments by eWG on ho Brazil, EU, Spain, UK: Su	prizontal classification proposal: pports Proposal
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ALGINIC ACID	400	GMP		4	Adapt	
CALCIUM CARBONATE	170(i)	10000	58	4	Adopt	
CALCIUM CHLORIDE	509	10000	58	4	Adopt: allowed in CODEX STAN 260-2007	
					Adopt: allowed in	Japan: supports proposal, improves viscosity which improves
CARRAGEENAN	407	GMP		4	CODEX STAN 223-2001	adhesion of seasoning
CITRIC AND FATTY ACID	472c	GMP		4	Adopt	

ESTERS OF GLYCEROL					
DEXTRINS, ROASTED STARCH	1400	GMP	4		
				Adopt: allowed in CODEX STAN 294R-	
GUAR GUM	412	GMP	4	2009	
LECITHIN	322(i)	GMP	4		
PECTINS	440	GMP	4		
POTASSIUM CARBONATE	501(i)	GMP	4	Í Í	
POTASSIUM CHLORIDE	508	GMP	4	Adopt	
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP	4	Ασορι	
SODIUM GLUCONATE	576	GMP	4		
TRISODIUM CITRATE	331(iii)	GMP	4		
XANTHAN GUM	415	GMP	4	Adopt: allowed in CODEX STAN 223-2001, 294R-2009	Japan: supports proposal, improves viscosity which improves adhesion of seasoning

### Food Category No. 06.1 (Whole, broken, or flaked grain, including rice)

**Corresponding commodity standards:** 202-1995: does not allow food additives; 169-1989, 201-1995, 172-1989, 153-1985, 199-1995, 198-1995: does not dicsuss food additives

eWG Proposal for Horizontal Cla Justification for proposal: Emuls corresponding commodity standard	<b>issification</b> ifiers, stabili ds	of Food Categ zers and thicke	<u>ory</u> : Not J ners not al	ustified llowed in	Comments by eWG on horizontal classification proposal: Brazil, EU, Spain, UK: Supports proposal		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Discontinue		
CALCIUM CARBONATE	170(i)	2220	184 <sup>37</sup>	7	Adopt with Note 184 & new note "for use as anticaking agent" (see Appendix 2)		
CAROB BEAN GUM	41	GMP		7			
GUAR GUM	412	GMP		7			
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7	Discontinue		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP		7			
TARA GUM	417	GMP		7			

<sup>&</sup>lt;sup>37</sup> **Note 184:** For use in nutrient coated rice grain premixes only.

### Food Category No. 06.2 (Flours and starches (including soybean powder))

### **Corresponding commodity standards:** None; subcategory 06.2.1 has corresponding commodity standards

eWG Proposal for Horizontal Class Move all provisions to FC 06.2.1 wit only" Justification for proposal: No prov	h Note 186 <sup>°</sup> hisions in FC	of Food Categ <sup>38</sup> "for use in flo C 06.2.2 for ES	<b>ory</b> : Not J urs with ac &T.	ustified - dditives	Comments by eWG on horizontal classification proposal: Brazil, Spain: Supports proposal, move to subcategory 06.2.1 with Note 186 Emulsifiers and stabilizers are needed for flours in general. EU, UK: not justified		
Additive	Additive INS Max Level (mg/kg) Notes Step / Adopted				eWG proposal	Comments by eWG members on proposal	
	170(i)	10000	58	Д	Discontinue, keep GMP provision in 06.2.1 add		
	<del>322(i)</del>	5000		7	Discontinue, adopt in 06.2.1 at 2000 mg/kg with note 186 - allowed in wheat flour at 2000 mg/kg in CODEX STAN 152-1985	ICGMA: soy flour requires lecithin as emulsifier	
TRISODIUM CITRATE	<del>331(iii)</del>	GMP		4	Discontinue, adopt in 06.2.1 with new note 186		

### Food Category No. 06.2.1 (Flours)

Corresponding commodity standards: 301R-2011: references FC 06.2.1 Tables 1 & 2; 176-1989, 154-1985, 173-1989, 170-1989, 178-1991, 155-1985: do not discuss food additives; 152-1985: only lists enzymes and flour treatment agents

eWG Proposal for Horizontal Clas	sification	of Food Categ	ory: Justifi	ed only with	Comments by eWG on horizontal classification proposal:			
Note 186 "for use in flours with addit	tives"				Brazil: Supports proposal,	Brazil: Supports proposal, Emulsifiers and stabilizers are needed for flours in general.		
Justification for proposal: Comme	ents from Br	azil			EU, UK: questions technological need			
					Spain: use of additives as flour treatment agents is not an ES&T function			
Additivo	INC	Max Level	Notos	Step /	aWG proposal	Comments by oWG members on proposal		
Additive	INS	(mg/kg)	NOLES	Adopted	ewo proposal	Comments by ewo members on proposal		
CALCIUM CARBONATE	170(i)	GMP	57 <sup>39</sup>	7				
					Adopt with notes 57 and	USA: calcium sulfate is allowed in flour as a bleaching agent up to		
					186	60000 mg/kg		
CALCIUM SULFATE	516	GMP	57	7		EU: bleaching agent is not a ES&T function		

 <sup>&</sup>lt;sup>38</sup> Note 186: For use in flours with additives only.
 <sup>39</sup> Note 57: GMP is 1 part benzoyl peroxide and not more than 6 parts of the subject additive by weight.

LECITHIN	322(i)	5000	Adopt at 2000 mg/kg with note 186 - allowed in wheat flour at 2000 mg/kg in CODEX STAN 152-1985	ICGMA: soy flour requires lecithin as emulsifier, add note "for use in soy flour"
TRISODIUM CITRATE	331(iii)	GMP	Adopt with note 186	

Food Category No. 06.2.2 (Starches)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: No provisions for ES&T listed in GSFA	Brazil, EU, Spain: Supports proposal

### Food Category No. 06.4.1 (Fresh pastas and noodles and like products)

<b>eWG Proposal for Horizontal Classification of Food Category</b> : Justified <b>Justification for proposal</b> : comments by eWG and in CX/FA 12/44/9 Add 2 Emulsifiers, thickeners, and stabilizers are commonly used in fresh pasta to improve binding and reduce cooking loss					Comments by eWG on horizontal classification proposal: Brazil, Costa Rica, IFAC, ICGMA: supports proposal, emulsifiers and stabilizers are used for binding EU: Case-by-Case; does not object to the use in noodles, however, for pastas the EU supports only INS 322(i) Lecithin and INS 471 'MONO- AND DI-GLYCERIDES OF FATTY ACIDS Spain: Case-by-Case: some EST are justified for fresh pastas, such as INS 322 or 471 but it should not be assumed that the use of all ESTs is justified. INS 415, 466, 472a, 472b, 472c were requested only in noodles and INS 1414, 1420 and 1422 are used only as T. Only a few uses for a few products have been requested. In EU legislation only INS 322 and 471 are allowed in "fresh pasta".		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
AGAR	406	GMP		4		EU: restrict to noodles Japan: used in noodles as stabilizer up to 12000 mg/kg to improve elasticity	
ALGINIC ACID	400	GMP		4	Adopt	EU: restrict to noodles Japan: used in noodles as stabilizer up to 10000 mg/kg to improve elasticity	
CALCIUM CARBONATE	170(i)	10000	58	4	]	EU: restrict to noodles	
CAROB BEAN GUM	410	GMP		4		EU: restrict to noodles Japan: used in noodles as stabilizer up to 10000 mg/kg to improve elasticity	

 $<sup>^{40}</sup>$  Note 211: For use in noodles only.

CARRAGEENAN	407	GMP	4
CURDLAN	424	GMP	4
DISTARCH PHOSPHATE	1412	200	4
GELLAN GUM	418	GMP	4
	110		
GUAR GUM	412	GMP	Δ
	712		
	414	GMP	л
	+14		7
KARAYA GUM	416	GMP	4
KONJAC FLOUR	425	GMP	4
LECITHIN	322(i)	GMP	4
MICROCRYSTALLINE	400(1)	0.115	
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	4
MONO- AND DI-GLYCERIDES			
OF FATTY ACIDS	471	GMP	4
	440	GMP	4
PHOSPHATED DISTARCH PHOSPHATE	1413	200	Δ
POTASSIUM CARBONATE	501(i)	GMP	4
PROCESSED EUCHEUMA			
SEAWEED (PES)	407a	GMP	4
SODIUM ALGINATE	401	GMP	4
CELLULOSE (CELLULOSE GUM)	466	50000	4

EU: restrict to noodles
Japan: used in noodles as stabilizer up to 30000 mg/kg to improve
elasticity
EU: restrict to noodles
Japan: used in noodles as stabilizer up to 10000 mg/kg to improve
elasticity
EU: restrict to noodles
EU: restrict to noodles
Japan: used in noodles as stabilizer up to 16000 mg/kg to improve
elasticity
EU: restrict to noodles
Japan: used in noodles as stabilizer up to 10000 mg/kg to improve
elasticity
EU: restrict to noodles
Japan: used in noodles as stabilizer up to 5000 mg/kg to improve
elasticity
AIDGUM supports adoption
EU: restrict to noodles
Japan: used in noodles as stabilizer up to 8000 mg/kg to improve
elasticity
EU: restrict to noodles
Japan: used in noodles as stabilizer up to 16000 mg/kg to improve
elasticity
EU: supports adopt
Japan: used in noodles as stabilizer up to 8000 mg/kg to improve
elasticity
EU, EFEMA, ELC: accepts proposal
Japan: used in hoodies as emulsiler up to 2200 mg/kg to avoid
EU. restrict to noodles
EU: restrict to peoples
EU: restrict to needles
EU. Testrici lo fiolodies
EU: restrict to noodles
EU: restrict to noodles
Japan: used in noodles as stabilizer up to 20000 mg/kg to improve
elasticity
EU: restrict to noodles
Japan: used in noodles as stabilizer up to 20000 mg/kg to improve
elasticity
Bioploymer: adopt at 10,000 mg/kg

				EU: restrict to noodles
				<b>Japan</b> : used in noodles as stabilizer up to 5000 mg/kg to improve
TRAGACANTH GUM	413	GMP	4	elasticity
				EU: restrict to noodles
				<b>Japan:</b> used in noodles as stabilizer up to 10000 mg/kg to improve
XANTHAN GUM	415	10000	4	elasticity

# Food Category No. 06.4.2 (Dried pastas and noodles and like products)

eWG Proposal for Horizontal Class Justification for proposal: comme Brazil - stabilizers are necessary to due to heat treatment	ssification ents by eWC prevent cha	of Food Categ G and in CX/FA anges on the st	ory: Justif 12/44/9 A ructure of o	ied dd 2. by dried pastas	Comments by eWG on horizontal classification proposal: Brazil, Costa Rica, IFAC, ICGMA: supports proposal, emulsifiers and stabilizers are used for binding EU: does not object to the use in noodles, however, for pastas the EU in only gluten free pasta and pasta intended for hypoproteic diets Spain: add note 122 "for use in noodles only". INS 1414, 1420 and 1422 are used only as T and 1400 as E/S by the industry. We would like to know if in Brazil these additives are used in			
	1		1		all kinds of dried pastas since in the EU legislation additives are only allowed in "gluten free and/or pasta intended for hypoproteic diets"			
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
AGAR	406	GMP		7				
ALGINIC ACID	400	GMP		7	1			
AMMONIUM ALGINATE	403	GMP		7	1			
CALCIUM ALGINATE	404	GMP		7				
CALCIUM CARBONATE	170(i)	10000	58	4				
CALCIUM SULFATE	516	5000		7				
CAROB BEAN GUM	410	GMP		7				
CARRAGEENAN	407	8330	37 <sup>41</sup>	7				
DISTARCH PHOSPHATE	1412	200		4				
GELLAN GUM	418	GMP		7	Adopt			
GUAR GUM	412	GMP		7	Адорг			
GUM ARABIC (ACACIA GUM)	414	GMP		7		AIDGUM: supports adoption		
KARAYA GUM	416	GMP		7				
KONJAC FLOUR	425	10000		7				
LECITHIN	322(i)	5000		7				
MANNITOL	421	GMP		7				
MICROCRYSTALLINE								
CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7				
MONO- AND DI-GLYCERIDES						EFEMA ELC: accepts proposal		
OF FATTY ACIDS	471	30000		7				

<sup>&</sup>lt;sup>41</sup> **Note 37:** As weight of nonfat milk solids.

PECTINS	440	GMP		7
PHOSPHATED DISTARCH				
PHOSPHATE	1413	200		4
POTASSIUM ALGINATE	402	GMP		7
POTASSIUM CARBONATE	501(i)	2600		7
POTASSIUM CHLORIDE	508	GMP		4
PROCESSED EUCHEUMA				
SEAWEED (PES)	407a	8330	37	7
SALTS OF MYRISTIC, PALMITIC				
AND STEARIC ACIDS WITH				
AMMONIA, CALCIUM,				
POTASSIUM AND SODIUM	470(i)	GMP		7
SODIUM ALGINATE	401	GMP		7
SODIUM CARBOXYMETHYL				
CELLULOSE (CELLULOSE GUM)	466	50000		4
SODIUM GLUCONATE	576	GMP		4
TARA GUM	417	GMP		7
TRAGACANTH GUM	413	GMP		7
XANTHAN GUM	415	10000		4

### Food Category No. 08.1 (Fresh meat, poultry, and game)

### Corresponding commodity standards: None

**eWG Proposal for Horizontal Classification of Food Category:** Not Justified move to FC 08.1.1 with Note 16 and FC 08.1.2 without adding Note 16 **Justification for proposal**: No consensus in comments to eWG; in CX/FA 12/44/9 Add 2. - Brazil: No food additives should be allowed in Food Category 08.1, except colors with Note 4 and 16 Comments by eWG on horizontal classification proposal: Costa Rica, ICGMA: some are used to manage water holding and for texture-thickening Brazil, EU, Spain, UK: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		7		
						Costa Rica, ICGMA: used to manage water holding and texture-
CARRAGEENAN	<del>407</del>	GMP		7		thickener
GELLAN GUM	<del>418</del>	GMP		7		
KARAYA GUM	<del>416</del>	GMP		7	Discontinue - move to FC	
KONJAC FLOUR	<del>425</del>	GMP		7	08.1.1 with Note 16 and	ICGMA: supports adoption
MANNITOL	<del>421</del>	GMP		4	FC 08.1.2 without adding	ICGMA: supports adoption
PECTINS	440	GMP		7	note	ICGMA: supports adoption
PROCESSED EUCHEUMA						ICCMA: supports adaption
SEAWEED (PES)	4 <del>07a</del>	GMP		4		ICGMA: supports adoption
TARA GUM	417	GMP		7		
XANTHAN GUM	4 <del>15</del>	GMP		7	]	

### Food Category No. 08.1.1 (Fresh meat, poultry, and game, whole pieces or cuts)

eWG Proposal for Horizontal Class	ssification	of Food Categ	ory: Justif	ied only with	Comments by eWG on horizontal classification proposal:			
Note 16 "For use in glaze, coatings	or decorati	ions for fruit, ve	getables, r	neat or fish"	Brazil: use not justified			
Justification for proposal: most proposal	rovisions a	nd eWG comme	ents in favo	or of use	Costa Rica, ICGMA: some	Costa Rica, ICGMA: some are used to manage water holding and for texture-thickening		
involve use of ES&T in glazes (Note	e 16 "For us	se in glaze, coa	tings or de	corations	EU: the use of additives in	fresh meat should be limited to colours for health marking; the EU		
for fruit, vegetables, meat or fish")					opposes to any other uses	; it should be discussed at Codex level how to deal with food		
					additives needed in this for	od category		
					Spain: use of additives as	glazing agents or carriers is not ES&T function		
	•		•		UK: supports proposal			
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
ACETIC AND FATTY ACID								
ESTERS OF GLYCEROL	472a	GMP	16	7				
ACETYLATED DISTARCH								
PHOSPHATE	1414	GMP	16	7				
AGAR	406	GMP						
			4 <sup>42</sup> &					
CALCIUM CARBONATE	170(i)	GMP	16	7				
CALCIUM CHLORIDE	509	15000		7				
						Costa Rica, ICGMA: used to manage water holding and texture-		
CARRAGEENAN	407	GMP				thickener		
CITRIC AND FATTY ACID						ICGMA: supports adoption		
ESTERS OF GLYCEROL	472c	GMP	16	7	4			
GELLAN GUM	418	GMP			4			
GUM ARABIC (ACACIA GUM)	414	GMP	16	7	Adopt as listed with Note	ICGMA, AIDGUM: supports adoption		
HYDROXYPROPYL CELLULOSE	463	GMP	16	7	16	ICGMA: supports adoption		
HYDROXYPROPYL METHYL				_		ICGMA: supports adoption		
CELLULOSE	464	GMP	16	7	4			
HYDROXYPROPYL STARCH	1440	GMP	16	7	4	ICGMA: supports adoption		
KARAYA GUM	416	GMP			4	AIDGUM: supports adoption		
	425	GMP			-	ICGMA: supports adoption		
	(70)	0.45	1.0	_				
ESTERS OF GLYCEROL	4/2b	GMP	16	/	4			
	322(1)	GMP	16	/	4	ICGMA: supports adoption		
	511	2260		(	4			
MANNIIOL	421	GMP	10		4	ICGMA: supports adoption		
METHYL CELLULOSE	461	GMP	16	7	4	ICGMA: supports adoption		
METHYL ETHYL CELLULOSE	465	GMP	16	7	4	ICGMA: supports adoption		
MICROCRYSTALLINE	460(i)	GMP	16	7		ICGMA: supports adoption		

<sup>&</sup>lt;sup>42</sup> **Note 4:** For decoration, stamping, marking or branding the product.

CELLULOSE (CELLULOSE GEL)						
MONO- AND DI-GLYCERIDES						ICCMA: supports adaption
OF FATTY ACIDS	471	GMP	16	7		
OXIDIZED STARCH	1404	GMP	16	7		
PECTINS	440	GMP				ICGMA: supports adoption
POTASSIUM CHLORIDE	508	GMP		7		ICGMA: supports adoption
POTASSIUM DIHYDROGEN						ICGMA: supports adoption
CITRATE	332(i)	GMP	16	7	_	
POWDERED CELLULOSE	460(ii)	GMP	16	7	_	ICGMA: supports adoption
PROCESSED EUCHEUMA	407					ICGMA: supports adoption
SEAWEED (PES)	407a	GMP			_	
SALIS OF MYRISTIC, PALMITIC						
AND STEARIC ACIDS WITH			10.0			
	470(:)		16 &	7		
	470(1)	GIMP	71	/	4	
CALCIUM, POTASSIUM AND	470(::)	CMD	16	7		
SODIUM	470(11)	GIMP	16	/	4	Cente Dies ICCMA: used to manage water holding and texture
						thickonor
						<b>USA:</b> sodium alginate is allowed for use in the US as a film forming
						agent in freshly dressed meat carcarses up to 15000 mg/kg of the
	401	15000		7		agent in neshiy diessed meat carcaises up to 15000 mg/kg of the carcaises woight (0CEP 424 21(c))
	401	13000		/	-	<b>USA</b> : sodium carboxymethyl cellulose is allowed for use in the US
						as a film forming agent in freshly dressed meat carcarses up to
SODIUM CARBOXYMETHYI						15000 mg/kg of the carcass weight (9CER 424 21(c))
CELLULOSE (CELLULOSE GUM)	466	15000		7		ICGMA: supports adoption
	100	10000		,	Adopt at 500 mg/kg with	
					Note 16 and new note	<b>USA:</b> sodium citrate is allowed for use in the USA on fresh meat
SODIUM DIHYDROGEN					"for use as a color	cuts as a color retention agent up to 500 mg/kg
CITRATE	331(i)	GMP	16	7	retention agent"	<b>ICGMA:</b> supports adoption at GMP with note 16
TARA GUM	417	GMP				
TRAGACANTH GUM	413	GMP	16	7	Adopt as listed with Note	AIDGUM supports adoption
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7	16	ICGMA: supports adoption
	(/				Adopt at 500 mg/kg with	
					Note 16 and new note	USA: sodium citrate is allowed for use in the USA on fresh meat
					"for use as a color	cuts as a color retention agent up to 500 mg/kg
TRISODIUM CITRATE	331(iii)	5000		7	retention agent"	ICGMA: supports adoption as listed with Note 16
		1		1	Adopt as listed with Note	
XANTHAN GUM	415	GMP			16	

### Food Category <u>No. 08.1.2 (Fresh meat, poultry, and game, comminuted)</u>

<b>eWG Proposal for Horizontal Classification of Food Category</b> : Justified <u>Justification for proposal</u> : comments by some eWG members indicate that ES&T are used in this food category, CX/FA 12/44/9 Add 1 recommends use of ES&T generally justified in FC 08.1.2, technological justification cited					<ul> <li>Comments by eWG on horizontal classification proposal:</li> <li>Brazil: ES&amp;T not justified in fresh products</li> <li>Costa Rica. ICGMA: some ES&amp;T are used to manage water holding and for texture-thickening</li> <li>EU: the use of additives in fresh meat should be limited to colours for health marking; the EU opposes to any other uses; no justification provided for this category</li> <li>Spain, UK: requests further information on use</li> <li>ELC: This category according to the FC descriptor, is eligible for certain food additives only: marking/branding (colors) and in glazings; waterbinding etc. is according to our understanding an extended product which would belong to FC 8.2 subcategories.</li> <li>ICGMA: modified food starch is used as a thickener in injected and tumbled poultry and in sausage-type products</li> </ul>	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID				_		
ESTERS OF GLYCEROL	472a	GMP		7		
ACETYLATED DISTARCH		0.10		-		
	1414	GMP		1	-	ICGMA: supports adoption
AGAR	406	GMP	4.0.40		-	
	170(1)	1500	4 & 16	7	-	
CAROB BEAN GUM	410	GMP		1	4	Ocoto Diag. 100004. use of to mean and use to be fully a serie to structure
CARRAGEENAN	407	GMP				thickener
CITRIC AND FATTY ACID						
ESTERS OF GLYCEROL	472c	GMP		7		ICGMA: supports adoption
GELLAN GUM	418	GMP				
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP		7	adopt as listed	AIDGUM, ICGMA: supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP		7		ICGMA: supports adoption
HYDROXYPROPYL METHYL						
CELLULOSE	464	GMP		7		ICGMA: supports adoption
HYDROXYPROPYL STARCH	1440	GMP		7		
KARAYA GUM	416	GMP				
KONJAC FLOUR	425	GMP				ICGMA: supports adoption
LACTIC AND FATTY ACID						
ESTERS OF GLYCEROL	472b	GMP		7		ICGMA: supports adoption
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7	]	ICGMA: supports adoption
MANNITOL	421	GMP				ICGMA: supports adoption
METHYL CELLULOSE	461	GMP		7	]	ICGMA: supports adoption
METHYL ETHYL CELLULOSE	465	GMP		7		ICGMA: supports adoption
MICROCRYSTALLINE						
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CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		
MONO- AND DI-GLYCERIDES						
OF FATTY ACIDS	471	GMP		7		
OXIDIZED STARCH	1404	GMP		7		
PECTINS	440	GMP				
POTASSIUM DIHYDROGEN						
CITRATE	332(i)	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP		7		
PROCESSED EUCHEUMA						
SEAWEED (PES)	407a	GMP				
SALTS OF MYRISTIC, PALMITIC						
AND STEARIC ACIDS WITH						
AMMONIA, CALCIUM,						
POTASSIUM AND SODIUM	470(i)	GMP	71	7		
SALTS OF OLEIC ACID WITH						
CALCIUM, POTASSIUM AND						
SODIUM	470(ii)	GMP		7		
				_		
SODIUM ALGINATE	401	8000		7		
SODIUM CARBOXYMETHYL	100	0.45		_		
CELLULOSE (CELLULOSE GUM)	466	GMP		/		
SODIUM DIHYDROGEN	004	0.45		_		
CITRATE	331(i)	GMP		7		
TARA GUM	417	GMP				
TRAGACANTH GUM	413	GMP		7		
TRICALCIUM CITRATE	333(iii)	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	GMP				

	CGMA: supports adoption
	CGMA: supports adoption
	<u>.</u>
	Costa Rica, ICGMA: used to manage water holding and texture-
t	Costa Rica, ICGMA: used to manage water holding and texture- hickener
t l	Costa Rica, ICGMA: used to manage water holding and texture- hickener JSA: sodium alginate is allowed in ground and formed raw poultr pieces in the US as a binder and extender up to 12400 mg/kg
t I	Costa Rica, ICGMA: used to manage water holding and texture- hickener JSA: sodium alginate is allowed in ground and formed raw poultr pieces in the US as a binder and extender up to 12400 mg/kg
t T	Costa Rica, ICGMA: used to manage water holding and texture- hickener JSA: sodium alginate is allowed in ground and formed raw poultr bieces in the US as a binder and extender up to 12400 mg/kg CGMA: supports adoption
t I F	Costa Rica, ICGMA: used to manage water holding and texture- hickener JSA: sodium alginate is allowed in ground and formed raw poultr pieces in the US as a binder and extender up to 12400 mg/kg CGMA: supports adoption
t I I	Costa Rica, ICGMA: used to manage water holding and texture- hickener JSA: sodium alginate is allowed in ground and formed raw poultr bieces in the US as a binder and extender up to 12400 mg/kg CGMA: supports adoption CGMA: supports adoption
t 1	Costa Rica, ICGMA: used to manage water holding and texture- hickener JSA: sodium alginate is allowed in ground and formed raw poultr bieces in the US as a binder and extender up to 12400 mg/kg CGMA: supports adoption CGMA: supports adoption
	Costa Rica, ICGMA: used to manage water holding and texture- hickener USA: sodium alginate is allowed in ground and formed raw poultr bieces in the US as a binder and extender up to 12400 mg/kg CGMA: supports adoption CGMA: supports adoption
	Costa Rica, ICGMA: used to manage water holding and texture- hickener USA: sodium alginate is allowed in ground and formed raw poultr bieces in the US as a binder and extender up to 12400 mg/kg CGMA: supports adoption CGMA: supports adoption
	Costa Rica, ICGMA: used to manage water holding and texture- hickener USA: sodium alginate is allowed in ground and formed raw poultr bieces in the US as a binder and extender up to 12400 mg/kg CGMA: supports adoption CGMA: supports adoption

# Food Category <u>No. 09.1 (Fresh fish and fish products, including mollusks, crustaceans, and echinoderms)</u>

Corresponding commodity standards: None; 292-2008 corresponds to subcategory 09.1.2

eWG Proposal for Horizontal Clas	sification	of Food Categ	ory: Not J	ustified	Comments by eWG on horizontal classification proposal:				
Justification for proposal: No info	rmation su	pporting use pro	ovided in e	WG	EU: not appropriate at this parental food category. Moreover, additives are generally not				
					permitted in CS 292-2008. The glazing therein refers to applying a protective coating of ice (ice				
					glaze) to frozen seafood products. If additives were used in this process they would have been				
					mentioned in the standard.				
					Spain: glazing agents or ca	arriers are not an ES&T function			
					UK: provisions in parent ca	tegory should be discontinued as may conflict with subcategories			
					ELC: humectants are techr	nologically justified in frozen and deep-frozen fish only to avoid			
					thawing losses. Labeling of	f non-prepackaged food is subject to national legislation. However			
					this document is restricted	to deal with emulsifiers, stabilizers and thickeners only.			
Additive	INS		Notes	Step /	eWG proposal	Comments by eWG members on proposal			
		(mg/kg)		Adopted					
	470-		40	7					
	472a	GMP	16	/	-				
		CMD	10	7					
	1414	GMP	10	1	-				
	407	GMP		4	4				
	170	0145	4.0	-					
ESTERS OF GLYCEROL	472c	GMP	16	/	-				
GELLAN GUM	418	GMP		7	-				
GUM ARABIC (ACACIA GUM)	414	GMP	16	7	4	AIDGUM supports adoption			
HYDROXYPROPYL CELLULOSE	463	GMP	16	7	-				
HYDROXYPROPYL METHYL	101	0.45	10	_					
CELLULOSE	464	GMP	16	/	-				
HYDROXYPROPYL STARCH	1440	GMP	16	7	4				
KONJAC FLOUR	425	GMP		4	Discontinue				
LACTIC AND FATTY ACID				_	2.000				
ESTERS OF GLYCEROL	472b	GMP	16	7	4				
LECITHIN	322(i)	GMP	16	7	_				
MAGNESIUM CHLORIDE	511	GMP	16	7	_				
MANNITOL	421	GMP		4	_				
METHYL CELLULOSE	461	GMP	16	7					
METHYL ETHYL CELLULOSE	465	GMP	16	7					
MICROCRYSTALLINE									
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	16	7	1				
MONO- AND DI-GLYCERIDES									
OF FATTY ACIDS	471	GMP	16	7	1				
OXIDIZED STARCH	1404	GMP	16	7	1				
POTASSIUM DIHYDROGEN									
CITRATE	332(i)	GMP		7					

POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA						
SEAWEED (PES)	407a	GMP		4		
SALTS OF MYRISTIC, PALMITIC						
AND STEARIC ACIDS WITH						
AMMONIA, CALCIUM,			16 &			
POTASSIUM AND SODIUM	470(i)	GMP	71	7		
SALTS OF OLEIC ACID WITH						
CALCIUM, POTASSIUM AND						
SODIUM	470(ii)	GMP	16	7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL						
CELLULOSE (CELLULOSE GUM)	4466	GMP	16	7		
					Refer to discussion on Appendix 2, possibly	
					used as Acidity	
SODIUM DIHYDROGEN				_	Regulator, if not	
CITRATE	331(i)	GMP		7	Discontinue	
SODIUM GLUCONATE	576	GMP		4	Discontinue	
TRAGACANTH GUM	413	GMP	16	7	Discontinue	AIDGUM supports adoption
TRICALCIUM CITRATE	333(iii)	GMP		7	Refer to discussion on	
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	Appendix 2, possibly	
					used as Acidity	
					Regulator, if not	
TRISODIUM CITRATE	331(iii)	GMP		7	Discontinue	

# Food Category No. 09.1.1 (Fresh fish)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: No information supporting use provided in eWG	EU: does not support
	<b>Spain:</b> use discussed (glazing agents, carriers or water retention agents) are not ES&T
	functions, may mislead consumers
	ELC: humectants are technologically justified in frozen and deep-frozen fish only to avoid
	thawing losses. Labelling of non-prepackaged food is subject to national legislation. However
	this document is restricted to deal with emulsifiers, stabilizers and thickeners only.

#### Food Category No. 09.1.2 (Fresh mollusks, crustaceans, and echinoderms)

**Corresponding commodity standards:** 292-2008: food additives not allowed in live bivalve molluscs, only antioxidants allowed in raw bivalve molluscs (chilled shucked molluscs) as per provisions in FC 09.1.2

eWG Proposal for Horizontal Clas	ssification	of Food Categ	ory: Not J	ustified	Comments by eWG on horizontal classification proposal:		
Justification for proposal: No tec	hnological ju	ustification supp	porting use	e provided in	EU: additives are generally not permitted in CS 292-2008. The glazing therein refers to applying		
eWG					a protective coating of ice	(ice glaze) to frozen seafood products. If additives were used in this	
					process they would have b	een mentioned in the standard.	
					Spain: glazing agents, car	riers or water retention agents are not an ES&T function, may	
					mislead consumers		
					ELC: humectants are technologically justified in frozen and deep-frozen fish only to avoid		
					thawing losses. Labeling of non-prepackaged food is subject to national legislation. However		
					this document is restricted	to deal with emulsifiers, stabilizers and thickeners only.	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CALCIUM CARBONATE	170(i)	GMP	4 & 16	7	Discontinue	IFAC: adopt as listed	

#### Food Category No. 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms)

**Corresponding commodity standards:** None; subcategories have corresponding commodity standards

eWG Proposal for Horizontal Class discontinue provisions and move to Justification for proposal: several subcategories or the use of ES&T is	sification subcatego subcatego not justifie	of Food Categ ries ries require not d	<u>ory</u> : Not J es specific	ustified - : to those	Comments by eWG on ho EU, Spain: supports propo	prizontal classification proposal: sal
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ALGINIC ACID	400	GMP		4		
CALCIUM CARBONATE	<del>170(i)</del>	<del>10000</del>	<del>58</del>	4	Discontinue - move to	
CALCIUM CHLORIDE	<del>509</del>	<del>10000</del>	<del>58</del>	4	appropriate	
CAROB BEAN GUM	<del>410</del>	GMP		7	subcategories	
DEXTRINS, ROASTED STARCH	1400	GMP		4		

GELLAN GUM	<del>418</del>	GMP	7
GUAR GUM	412	GMP	4
KARAYA GUM	<del>416</del>	GMP	7
KONJAC FLOUR	4 <del>25</del>	GMP	7
MICROCRYSTALLINE			
CELLULOSE (CELLULOSE GEL)	4 <del>60(i)</del>	10000	7
MONO- AND DI-GLYCERIDES			
OF FATTY ACIDS	471	<del>10000</del>	7
POTASSIUM CARBONATE	<del>501(i)</del>	GMP	4
POTASSIUM CHLORIDE	<del>508</del>	GMP	4
SODIUM GLUCONATE	<del>576</del>	GMP	4

#### Food Category No. 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)

**Corresponding commodity standards**: Frozen 092-1981, 95-1981, 190-1995: does not allow ES&T; 165-1989: allows INS 401 as water retention agent in all fish products, in minced fish only allows thickeners (INS 412, 410, 440, 466, 415, 407, 407a, 461 @ GMP) and INS 331 & 332 as acidity regulators; 36-1981: allows specific antioxidants; 191-1995: does not allow food additives; 292-2008: food additives not allowed in live bivalve molluscs, only antioxidants allowed in raw bivalve molluscs (raw frozen molluscs) as per provisions in FC 09.2.1. - None of these standards discuss glazing ingredients

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Justified, when used in fish meat requires note "for use as texturizing agent" <b>Justification for proposal</b> : Although the CODEX STANs which correspond to this FC only allow ES&Ts in very limited products (minced fish), comments from the eWG on specific food additive provisions indicate that ES&Ts are used in this FC by several Codex Members					Comments by eWG on horizontal classification proposal: Brazil: does not support the use of emulsifiers, stabilizers and thickeners in this food category. The use of such food additives as water retention agents may lead to fraud and misleading of the consumers. The justification provided is for battered products, therefore the corresponding provisions should be discussed under subcategory 09.2.2. <b>EU:</b> does not support. The textural properties of fish relate to its freshness. The use of "texturizing agents" in whole fish would therefore mislead the consumer. Furthemore, there is a conflict with several CSs UK: accept all initial proposals IFAC: Thickeners and stabilizers are used in this FC to protect the product from structure changes during the freeze-thaw cycles during handling and storage, by decreasing the freezing		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Adopt with new note "for		
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7	use as texturizing agent"		
AGAR	406	20000	3 <sup>43</sup> & 53 <sup>44</sup>	7	Adopt as listed		

<sup>&</sup>lt;sup>43</sup> **Note 3:** Surface treatment.

<sup>&</sup>lt;sup>44</sup> **Note 53**: For use in coatings only.

						IFAC: 7500 mg/kg needed to protect from structure changes during
					Adopt at 7500 mg/kg with	freeze/thaw
					new note ""for use as	Marinalg: GMP or 7500 mg/kg needed; decreases freezing point
					texturizing agent"	depression, protects structure during freeze-thaw cycles during
ALGINIC ACID	400	5000		7	3 4 3 4 4	handling & storage,
					Adopt with new note "for	
ALGINIC ACID	400	GMP			use as texturizing agent"	
						<b>IFAC:</b> 7500 mg/kg needed to protect from structure changes during
					Adopt at 7500 mg/kg with	freeze/thaw
					new note ""for use as	Marinalg: GMP or 7500 mg/kg needed; decreases freezing point
					texturizing agent"	depression, protects structure during freeze-thaw cycles during
AMMONIUM ALGINATE	403	5000		7		handling & storage,
						<b>IFAC:</b> 7500 mg/kg needed to protect from structure changes during
					Adopt at 7500 mg/kg with	freeze/thaw
					new note ""for use as	Marinalg: GMP or 7500 mg/kg needed; decreases freezing point
					texturizing agent"	depression, protects structure during freeze-thaw cycles during
CALCIUM ALGINATE	404	5000		7		handling & storage,
					Adopt as listed - note 95	
					excludes use from	
					products covered by	
					commodity standards	
CALCIUM CARBONATE	170(i)	GMP	95 <sup>45</sup>	7	which do not allow ES&T	
					Adopt as listed with new	
					note "for use as	
CALCIUM CHLORIDE	509	10000	58		texturizing agent"	
					Adopt with note 61 -	
					corresponds to Codex	
CAROB BEAN GUM	410	GMP			STAN 165-1989	
					Adopt at GMP with new	
					note "for use as	
					texturizing agent" (no	
					Note 61) - GMP & Note	
					61 Corresponds to	
					CODE STAN 165-1989,	
					but Note 61 would	
					restrict note to minced	IFAC: GMP with Note 61 corresponds to codex stan 165-1989
					fish only which does not	Marinalg: GMP or 7500 mg/kg needed; decreases freezing point
			46		cover use from Marinalg	depression, protects structure during freeze-thaw cycles during
CARRAGEENAN	407	5000	61"⁰	7	comment	handling & storage,
CITRIC AND FATTY ACID					Adopt with new note "for	
ESTERS OF GLYCEROL	472c	GMP		7	use as texturizing agent"	

 <sup>&</sup>lt;sup>45</sup> Note 95: For use in surimi and fish roe products only.
<sup>46</sup> Note 61: For use in minced fish only.

DEXTRINS, ROASTED STARCH	1400	20000	3 & 53	7	Adopt as listed	
					Adopt with new note "for	
GELLAN GUM	418	GMP			use as texturizing agent"	
					Adopt with Note 61 and	
					new note "as glaze	
					thickener for frozen crab"	
					- see comments from	
					Japan, Note 61	
					Corresponds to CODE	
	440	0145	61 &	-	STAN 165-1989, Note 73	Japan: supports proposal - added to improve adnesion of glaze to
	412	GMP	73	/ 7	not necessary	crab, CODEX STAN 165-1989 does not cover frozen crab.
	414	GMP	-	/	4	AIDGUM supports adoption
	463	GMP	-	1	4	
	101	0.45		-		
	464	GMP	-	/	4	
HYDROXYPROPYL STARCH	1440	GMP	-	1		
	416	GMP			Adopt with new note "for	
	425	GMP			use as texturizing agent	
	470h	CMD		7		
	4720	GMP		7	-	
	3ZZ(I)	GMP	_	7	-	
	101	GMP		7	-	
MANNITOL	421	GIVIP		1	Adapt on listed	
					Adopt as listed -	
	161	GMP	61	7		
	401	GMP	01	7	STAN 105-1989	
	403	Givir		1	-	
CELLULOSE (CELLULOSE GEL)	460(i)	10000			Adopt with new note "for	
MONO- AND DI-GLYCERIDES					use as texturizing agent"	
OF FATTY ACIDS	471	10000			abb do toxtanzing agoin	
OXIDIZED STARCH	1404	GMP		7	1	
					Adopt at GMP with note	
					61 - GMP and note 61	
					corresponds to CODEX	
PECTINS	440	20000	16	7	STAN 165-1989	IFAC: GMP with note 61 corresponds to Codex Stan 165-1989
					Adopt with new note "for	
POLYDEXTROSES	1200	GMP		7	use as texturizing agent"	
					Adopt at 7500 mg/kg with	Marinalg, IFAC: GMP or 7500 mg/kg needed; decreases freezing
					new note ""for use as	point depression, protects structure during freeze-thaw cycles
POTASSIUM ALGINATE	402	5000		7	texturizing agent"	during handling & storage,
POTASSIUM CARBONATE	501(i)	GMP			Adopt with new note "for	

<sup>47</sup> **Note 73:** Except whole fish.

POTASSIUM CHLORIDE	508	30000		7	use as texturizing agent"	
					Adopt with note 61 -	
POTASSIUM DIHYDROGEN					corresponds to Codex	
CITRATE	332(i)	GMP	61	7	STAN 165-1989	
					Adopt with new note "for	
POWDERED CELLULOSE	460(ii)	GMP		7	use as texturizing agent"	
					Adopt at GMP with new	
					note "for use as	
					texturizing agent" - GMP	
					with note 61 corresponds	
					to CODEX STAN 165-	IFAC: GMP with note 61 corresponds to Codex Stan 165-1989
					1989 but Note 61 does	Marinalg: GMP needed; decreases freezing point depression,
PROCESSED EUCHEUMA					not address Marinalg's	protects structure during freeze-thaw cycles during handling &
SEAWEED (PES)	407a	5000		7	use in all fish	storage,
SALTS OF MYRISTIC, PALMITIC					Adopt with note 71 &	
AND STEARIC ACIDS WITH					new note "for use as	
AMMONIA, CALCIUM,					texturizing agent"	
POTASSIUM AND SODIUM	470(i)	GMP	71	7		
SALTS OF OLEIC ACID WITH					Adopt with new note "for	
CALCIUM, POTASSIUM AND					use as texturizing agent"	
SODIUM	470(ii)	GMP		7	doo do toxtalizing agoint	
					Adopt at GMP -	IFAC: GMP corresponds to Codex Stan 165-1989
					corresponds to CODEX	Marinalg: GMP or 7500 mg/kg needed; decreases freezing point
				_	STAN 165-1989	depression, protects structure during freeze-thaw cycles during
SODIUM ALGINATE	401	5000		7		handling & storage,
					Adopt with note 61 -	
SODIUM CARBOXYMETHYL				_	corresponds to Codex	
CELLULOSE (CELLULOSE GUM)	466	GMP		7	STAN 165-1989	
					Adopt with note 61 -	
SODIUM DIHYDROGEN				_	corresponds to Codex	
CITRATE	331(i)	GMP		7	STAN 165-1989	
					Adopt with new note "for	
SODIUM GLUCONATE	576	GMP			use as texturizing agent"	
TARA GUM	417	GMP	73	7	Adopt as listed	
TRAGACANTH GUM	413	GMP		7	Adopt with new note "for	AIDGUM supports adoption
TRICALCIUM CITRATE	333(iii)	GMP		7	use as texturizing agent"	
					Adopt with note 61 -	
					corresponds to Codex	
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	STAN 165-1989	
TRISODIUM CITRATE	331(iii)	GMP		7		

				Adopt at GMP with Note 61 and new note "as	
				glaze thickener for frozen	
				crab" - see comments	Japan: supports proposal - added to improve adhesion of glaze to
				from Japan, Note 61	crab, CODEX STAN 165-1989 does not cover frozen crab.
				Corresponds to CODE	<b>Biopolymer, IFAC</b> : adopt at GMP with note 61 to align with Codex
XANTHAN GUM	415	160	7	STAN 165-1989	Stan 165-1989

#### Food Category <u>No. 09.2.2 (Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)</u>

**Corresponding commodity standards**: 166-1989: allows specific additives in coatings: (Thickeners: INS 401, 412, 410, 440, 466, 415, 407, 407a, 461, 463, 464, 465 @ GMP), INS 471 & 322 as emulsifiers, INS 501 as leavening agent, and modified starches (INS 1401, 1402, 1404, 1410, 1412, 1414, 1413, 1420, 1421, 1422, 1440, 1442) 166-1989: allows INS 401 as water retention agent in fish fillets and minced fish, in minced fish only allows thickeners (INS 412, 410, 440, 466, 415, 407, 407a, 461, 407, 407a, 461 @ GMP) and INS 331 & 332 as acidity regulators

eWG Proposal for Horizontal Clas	ssification	of Food Categ	ory: Justif	ied with	Comments by eWG on horizontal classification proposal:			
Note 41 <sup>12</sup> "Use in breading or batte Justification for proposal: CODE: batter.	r coatings o X STAN 166	niy" 3 allow use of s	pecific thic	keners in	batters to improve adhesio batter. They also protect th during handling and storag EU: supports use only in ba UK: accepts all initial propo ICGMA: modified food star IFAC: supports proposal	<b>4/9 add 2 for FC 09.2</b> - Thickeners and stabilizers are used in n, reduce fat uptake during frying and improve the crispiness of the e product from structure changes during the freeze-thaw cycles e, by decreasing the freezing point depression. atter coatings osals ches are used in breadings and batters as stabilizers		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)			
ACETYLATED DISTARCH ADIPATE	1422	GMP	41	7	Adopt as listed -			
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	41	7	STAN 166-1989			
ACID TREATED STARCH	1401	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)			
AGAR	406	GMP		7	Adopt with note 53 (limited in 9.2.1 to coatings only)			

<sup>&</sup>lt;sup>48</sup> **Note 41:** Use in breading or batter coatings only.

					Adopt as listed (also	
					listed in 09.2.1 for use in	
ALGINIC ACID	400	GMP			all fish meat)	
					Adopt as listed -	
					corresponds to CODEX	
					STAN 166-1981 (also	
					listed in 09.2.1 for use in	
ALKALINE TREATED STARCH	1402	GMP	41	7	all fish meat)	
					Adopt as listed (also	
					listed in 09.2.1 with Note	
CALCIUM CARBONATE	170(i)	GMP	16	7	95)	
					Adopt as listed (also	
					listed in 09.2.1 for use in	
CALCIUM CHLORIDE	509	10000	58		all fish meat)	
					Adopt with notes 41 & 61	
					- in CODEX STAN 166-	
					1981 allowed in batter for	
					all fish products & in	
CAROB BEAN GUM	410	GMP			minced fish meat	
					Adopt with notes 41 & 61	
					- in CODEX STAN 166-	
					1981 allowed in batter for	
					all fish products & in	
					minced fish meat (also in	
			41 &		09.2.1 for use in all fish	
CARRAGEENAN	407	GMP	61	7	meat)	
					Adopt as listed (also	
CITRIC AND FATTY ACID					listed in 09.2.1 for use in	
ESTERS OF GLYCEROL	472c	GMP	16	7	all fish meat)	
					Adopt as listed (also	
					listed in 09.2.1 for use in	
DEXTRINS, ROASTED STARCH	1400	GMP	41	7	coatings only)	
					Adopt as listed -	
					corresponds to CODEX	
DISTARCH PHOSPHATE	1412	GMP	41	7	STAN 166-1981	
					Adopt as listed (also	
					listed in 09.2.1 for use in	
GELLAN GUM	418	GMP			coatings only)	
					Adopt at GMP with notes	
					41 & 61 - in CODEX	
					STAN 166-1981 allowed	<b>FAC:</b> CMD with note 61 corresponds to opday stan 166 1000
					in batter for all fish	FAC. GMF WITHOUS OF CORESPONDS to CODEX Start 100-1909
					products & in minced fish	
GUAR GUM	412	2000		7	meat	

					Adopt as listed (also	
	111	GMP	16	7	listed in 09.2.1 for use in all fish meat)	AIDGUM: supports adoption
	414	Givir	10	'	Adont as listed -	
					corresponds to CODEX	
					STAN 166-1981 (also	
					listed in 09.2.1 for use in	
HYDROXYPROPYL CELLULOSE	463	GMP	41	7	all fish meat)	
					Adopt as listed -	
HYDROXYPROPYL DISTARCH					corresponds to CODEX	
PHOSPHATE	1442	GMP	41	7	STAN 166-1981	
HYDROXYPROPYL METHYL					Adopt as listed -	
CELLULOSE	464	GMP	41	7	corresponds to CODEX	
					STAN 166-1981 (also	
	4.4.0	0.10		-	listed in 09.2.1 for use in	
HYDROXYPROPYL STARCH	1440	GMP	41	1	all fish meat)	
	416	GMP			Adopt as listed (also	AIDGUM: supports adoption
	425	GIMP			listed in 09.2.1 for use in	
	4706	CMD	10	7	all fish meat)	
ESTERS OF GLICEROL	4720	GIMP	16	/	Adapt on listed	
					Adopt as listed -	
					STAN 166-1981 (also	
					listed in 09.2.1 for use in	
LECITHIN	322(i)	GMP	41	7	all fish meat)	
MAGNESIUM CHLORIDE	511	GMP	16	7	Adopt as listed (also	
	011		10	•	listed in 09.2.1 for use in	
MANNITOL	421	GMP		4	all fish meat)	
					Adopt as listed -	
			41 &		corresponds to CODEX	
METHYL CELLULOSE	461	GMP	61	7	STAN 166-1981	
					Adopt as listed -	
					corresponds to CODEX	
					STAN 166-1981 (also	
				_	listed in 09.2.1 for use in	
METHYL ETHYL CELLULOSE	465	GMP	41	/	all fish meat)	
					Adopt as listed (listed in	
	460(1)	10000			09.2.1 for use in all fish	
CELLOLOSE (CELLOLOSE GEL)	400(1)	10000			Adopt at GMD with pate	
					Auopi al Givie with hote	
					CODEX STAN 166-1981	
MONO- AND DI-GI YCERIDES					(also listed in 09.2.1 for	
OF FATTY ACIDS	471	10000			use in all fish meat)	

					Adopt as listed -	
					corresponds to CODEX	
MONOSTARCH PHOSPHATE	1410	GMP	41	7	STAN 166-1989	
	1110	Civii			Adopt as listed -	
					corresponds to CODEX	
					STAN 166 1080 (also	
					STAIN 100-1909 (also	
	1 10 1	CMD	4.4	7	ilsted in 09.2.1 for use in	
OXIDIZED STARCH	1404	GIMP	41	/	all lish meat)	
					Adopt as listed -	
			41 &	_	corresponds to CODEX	
PECTINS	440	GMP	61	7	STAN 166-1981	
					Adopt as listed -	
PHOSPHATED DISTARCH					corresponds to CODEX	
PHOSPHATE	1413	GMP	41	7	STAN 166-1989	
					Adopt as listed -	
					corresponds to CODEX	
					STAN 166-1989 (also	
					listed in 09.2.1 for use in	
POTASSIUM CARBONATE	501(i)	GMP	41	7	all fish meat)	
		_			Adopt as listed (also	
					listed in 09.2.1 for use in	
POTASSIUM CHI ORIDE	508	GMP			fish all meat)	
		•			Adopt as listed -	
					corresponds to CODEX	
	332(i)	GMP	61	7		
OIIIAIL	332(1)	Givir	01	'	Adapt og ligtad	
					Adopt as listed -	
	F04(::)		4.4	7		
CARBONATE	501(11)	GIMP	41	/	STAN 166-1989	
					Adopt as listed (also	
				_	listed in 09.2.1 for use in	
POWDERED CELLULOSE	460(ii)	GMP	16	7	all fish meat)	
					Adopt at GMP with notes	
					41 & 61 - in CODEX	
					STAN 166-1981 allowed	
					in batter for all fish	<b>IEAC:</b> CMP with note 61 corresponds to codex stan 166 1080
					products & in minced fish	IFAC. GIVIF WITHOUS OF CORESPONDS TO CODEX STAIL TOO-1909
					meat (also listed in	
PROCESSED EUCHEUMA					09.2.1 for use in all fish	
SEAWEED (PES)	407a	5000		7	meat)	
SALTS OF MYRISTIC. PALMITIC	1					
AND STEARIC ACIDS WITH						
AMMONIA. CALCIUM			16 &		Adopt as listed (also	
POTASSIUM AND SODIUM	470(i)	GMP	71	7	listed in 09.2.1 for use in	
SALTS OF OLEIC ACID WITH					all fish meat)	
	470(::)	GMP	16	7		
	// / / / / / /					

SODIUM						
SODIUM ALGINATE	401	GMP	41 & 99	7	Adopt as listed - complies with CODEX STAN 166-1981	
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	41 & 61	7	Adopt as listed -	
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	61	7	STAN 166-1981	
SODIUM GLUCONATE	576	GMP			Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
STARCH ACETATE	1420	GMP	41	7	Adopt as listed - complies with CODEX STAN 166-1981	
TARA GUM	417	GMP	73	7	Adopt as listed (also listed in 09.2.1 with note 73)	
TRAGACANTH GUM	413	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	AIDGUM: supports adoption
TRIPOTASSIUM CITRATE	332(ii)	GMP	61	7	Adopt as listed -	
TRISODIUM CITRATE	331(iii)	GMP	61	7	complies with CODEX STAN 166-1981	
XANTHAN GUM	415	GMP	41 & 61	7	Adopt as listed - complies with CODEX STAN 166-1981	

# Food Category <u>No. 09.2.3 (Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms)</u>

eWG Proposal for Horizontal Clas Justification for proposal: no con	ssification responding	of Food Categ commodity star	<u>ory</u> : Justif idard	ied	Comments by eWG on horizontal classification proposal: UK: unclear how glazes are used on minced fish products (note 16) ICGMA: modified food starch used in creamed products as stabilizers		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC AND FATTY ACID	4720	CMD	16	7			
ACETYLATED DISTARCH	472a	GIMF	10	-	Adopt as listed		
AGAR	1414 406	GMP	16	7			
	400	GMP		1			

					Refer to discussion in	
	( <b>— •</b> (1)			_	Appendix 2 – possibly	
CALCIUM CARBONATE	170(i)	GMP	16	7	used as AR	
CALCIUM CHLORIDE	509	10000	58		_	
CARRAGEENAN	407	GMP		7	_	
CAROB BEAN GUM	410	GMP			_	
CITRIC AND FATTY ACID				_		
ESTERS OF GLYCEROL	472c	GMP	16	7	_	
DEXTRINS, ROASTED STARCH	1400	GMP			_	
GELLAN GUM	418	GMP			_	
GUAR GUM	412	GMP		7	_	
GUM ARABIC (ACACIA GUM)	414	GMP	16	7		AIDGUM: supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	16	7		
HYDROXYPROPYL METHYL						
CELLULOSE	464	GMP	16	7		
HYDROXYPROPYL STARCH	1440	GMP	16	7		
KARAYA GUM	416	GMP			Adopt as listed	
KONJAC FLOUR	425	GMP			Adopt as listed	
LACTIC AND FATTY ACID						
ESTERS OF GLYCEROL	472b	GMP	16	7		
LECITHIN	322(i)	GMP	16	7		
MAGNESIUM CHLORIDE	511	GMP	16	7		
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP	16	7		
METHYL ETHYL CELLULOSE	465	GMP	16	7		
MICROCRYSTALLINE						
CELLULOSE (CELLULOSE GEL)	460(i)	10000				
MONO- AND DI-GLYCERIDES						
OF FATTY ACIDS	471	10000				
OXIDIZED STARCH	1404	GMP	16	7		
PECTINS	440	GMP		7		
POTASSIUM DIHYDROGEN					Refer to discussion in	
CITRATE	332(i)	GMP	16	7	Appendix 2 – possibly	
					used as AR (adopt with	
POTASSIUM CARBONATE	501(i)	GMP			note 16)	
POTASSIUM CHLORIDE	508	GMP				
POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA						
SEAWEED (PES)	407a	GMP		7	_	
SALTS OF MYRISTIC, PALMITIC					Adopt as listed	
AND STEARIC ACIDS WITH						
AMMONIA, CALCIUM,			16 &			
POTASSIUM AND SODIUM	470(i)	GMP	71	7	_	
SALTS OF OLEIC ACID WITH	470(ii)	GMP	16	7		

CALCIUM, POTASSIUM AND						
SODIUM						
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL						
CELLULOSE (CELLULOSE GUM)	466	GMP	16	7		
					Refer to discussion in	
SODIUM DIHYDROGEN					Appendix 2 – possibly	
CITRATE	331(i)	GMP	16	7	used as AR	
SODIUM GLUCONATE	576	GMP				
TARA GUM	417	GMP		7	Adopt as listed	
TRAGACANTH GUM	413	GMP	16	7		
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7	Refer to discussion in	
					Appendix 2 – possibly	
TRISODIUM CITRATE	331(iii)	GMP	16	7	used as AR	
XANTHAN GUM	415	GMP		7	Adopt as listed	

# Food Category <u>No. 09.2.4 (Cooked and/or fried fish and fish products, including molluscs, crustaceans, and echinoderms)</u>

eWG Proposal for Horizontal Class notes 41 "Use in breading or batter coatings or decorations for fruit, veg Justification for proposal: no corr justification provided in comments b	ssification coatings or getables, mo esponding by eWG (ge	of Food Categ hly." and 16 "Fo eat or fish." commodity star neral to FC and	<b>ory</b> : Justif r use in gla ndard, tech l for specifi	ied only with aze, nological ic	Comments by eWG on horizontal classification proposal: Brazil: no technological justification provided Costa Rica: modified starch in batters and breadings are used as stabilizers. Spain: use as glazing agent or carrier not an ES&T function. No tech justification provided. ICGMA: modified food starch are used as thickeners in this food category		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Adopt at GMP with new note "for use in summi products only"	Japan: add new note "for use in surimi products only" - additive is used to blend fish paste with seasonings entirely for keeping the quality uniform. Neither Note 16 nor Note 41 covers the use in fish paste since fish paste is mixed with seasoning during processing of surimi products.	
ACETYLATED DISTARCH PHOSPHATE AGAR	1414 406 <b>400</b>	GMP GMP		7 7	Adopt at GMP with notes 16 & 41	Japan: supports proposal, use improves viscosity for adhesion of seasoning to fish	
CALCIUM CARBONATE CALCIUM CHLORIDE CAROB BEAN GUM	170(i) 509 410	10000 10000 GMP	58 58		Adopt as listed - used as AR- see Appendix 2 Adopt at GMP with notes 16 & 41	sed as 2 n notes	

				Adopt at GMP with new	<b>Japan</b> : add new note "for use in surimi products only" - additive is used to maintain texture by retnetion of air in surimi products.
				note "for use in summi	Neither Note 16 nor Note 41 covers the use in surimi products
CARRAGEENAN	407	GMP	7	products only	surimi products
CITRIC AND FATTY ACID	101		,		
ESTERS OF GLYCEROL	472c	GMP	7	Adopt at GMP with notes	
DEXTRINS, ROASTED STARCH	1400	GMP		16 & 41	
GELLAN GUM	418	GMP			
GUAR GUM	412	GMP	7	Adopt at GMP with new note "for use in summi products only"	Japan: add new note "for use in surimi products only" - additive is used to maintain texture by retention of air in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with guar gum during processing of surimi products.
GUM ARABIC (ACACIA GUM)	414	GMP	7	Adopt at GMP with new note "for use in summi products only"	Japan: add new note "for use in surimi products only" - additive is used to make texture smooth by keeping moisture in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with gum arabic during processing of surimi products. AIDGUM supports adoption
HYDROXYPROPYL CELLULÓSE	463	GMP	7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	7		
HYDROXYPROPYL STARCH	1440	GMP	7	16 & 41	<b>Costa Rica:</b> modified starch is used as a stabilizer in batters and breadings
KARAYA GUM	416	GMP			AIDGUM supports adoption
KONJAC FLOUR	425	GMP			
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	7	Adopt at GMP with new note "for use in summi products only"	Japan: add new note "for use in surimi products only" - additive is used to blend fish paste with seasonings entirely for keeping the quality uniform. Neither Note 16 nor Note 41 covers the use in fish paste since fish paste is mixed with seasoning during processing of surimi products.
LECITHIN	322(i)	GMP	7		
MAGNESIUM CHLORIDE	511	GMP	7		
MANNITOL	421	GMP	4		
METHYL CELLULOSE	461	GMP	7		
METHYL ETHYL CELLULOSE	465	GMP	7	Adopt at GMP with notes	
MICROCRYSTALLINE				16 & 41	
CELLULOSE (CELLULOSE GEL)	460(i)	10000		4	
MONO- AND DI-GLYCERIDES	474	40000			
	4/1	10000		4	Costs Dissumedified starsh is used as a stabilizer in hetters and
OXIDIZED STARCH	1404	GMP	7		breadings

PECTINS	440	GMP	7	Adopt at GMP with new note "for use in summi products only"	Japan: add new note "for use in surimi products only" - additive is used to maintain texture by retnetion of air in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with pectin during processing of surimi products.
				Adopt at GMP with notes	
POLYDEXTROSES	1200	GMP	7	16 & 41	
POTASSIUM DIHYDROGEN				Adopt as listed - used as	
CITRATE	332(i)	GMP	7	AB - see Appendix 2	
POTASSIUM CARBONATE	501(i)	GMP		AIX - See Appendix 2	
POTASSIUM CHLORIDE	508	GMP			
POWDERED CELLULOSE	460(ii)	GMP	7		
PROCESSED EUCHEUMA					
SEAWEED (PES)	407a	GMP			
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM,				Adopt at GMP with notes 16 & 41	
POTASSIUM AND SODIUM	470(i)	GMP	7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	7		
SODIUM ALGINATE	401	GMP	4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	7	Adopt at GMP with new note "for use in summi products only"	Japan: add new note "for use in surimi products only" - additive is used to make texture smooth by keeping moisture in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with additive during processing of surimi products.
SODIUM DIHYDROGEN				Adopt - used as AR, see	
CITRATE	331(i)	GMP	7	Appendix 2	
SODIUM GLUCONATE	576	GMP		Adopt at GMP with notes	
TARA GUM	417	GMP	7	16 & 41	
TRAGACANTH GUM	413	GMP	7		AIDGUM: supports adoption
TRICALCIUM CITRATE	333(iii)	GMP	7		
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	Anopri - used as AIX, see	
TRISODIUM CITRATE	331(iii)	GMP	7		
XANTHAN GUM	415	GMP	7	Adopt at GMP with notes 16 & 41	Japan: supports proposal, additive improves viscosity for adhesion of seasoning sauce to fish

# Food Category No. 09.2.4.1 (Cooked fish and fish products)

# Corresponding commodity standards: None

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Justified only with notes 41 and 16 <b>Justification for proposal</b> : no corresponding commodity standard, technological justification provided in comments in parent category address use in coatings/glaze only.					Comments by eWG on hc Brazil: no technological jus Costa Rica, ICGMA: modif Spain: use as glazing ager UK: accept proposal	prizontal classification proposal: tification provided fied starch is used as a thickener. ht or carrier not an ES&T function. No tech justification provided.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	<del>170(i)</del>	GMP		7	Discontinue, adopt in	
					parent FC 09.2.4 at GMP	
					with Notes 41, 16 -	
PROCESSED EUCHEUMA					similar provision in all	
SEAWEED (PES)	4 <del>07a</del>	<del>5000</del>		7	subcategories	

# Food Category <u>No. 09.2.4.2 (Cooked mollusks, crustaceans, and echinoderms)</u>

eWG Proposal for Horizontal Clas	sification	of Food Catego	ory: Justif	ied only with	Comments by eWG on ho	prizontal classification proposal:
notes 41 and 16					Brazil: no technological just	stification provided
Justification for proposal: no corre	esponding o	commodity stan	dard, tech	nological	Costa Rica, ICGMA: modi	fied starch is used as a thickener.
justification provided in comments in	parent cat	egory address	use in coa	tings/glaze	Spain: use as glazing ager	nt or carrier not an ES&T function. No tech justification provided.
only.		-			UK: accept proposal	
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	<del>170(i)</del>	GMP		7	Discontinue, adopt in	
					parent FC 09.2.4 at GMP	
					with Notes 41, 16 -	
PROCESSED EUCHEUMA					similar provision in all	
SEAWEED (PES)	<del>407a</del>	GMP		4	subcategories	

#### Food Category No. 09.2.4.3 (Fried fish and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: None

#### eWG Proposal for Horizontal Classification of Food Category: Justified only with Comments by eWG on horizontal classification proposal: notes 41 and 16 Brazil: no technological justification provided Justification for proposal: no corresponding commodity standard, technological Spain: use as glazing agent or carrier not an ES&T function. No tech justification provided. justification provided in comments in parent category address use in coatings/glaze UK: accept proposal only. Max Level Step / Additive INS Notes eWG proposal Comments by eWG members on proposal Adopted (mg/kg) CALCIUM CARBONATE 170(i) GMP 16 7 Discontinue, adopt in parent FC 09.2.4 at GMP with Notes 41. 16 -PROCESSED FUCHEUMA similar provision in all SEAWEED (PES) 407a GMP 4 subcategories

#### Food Category No. 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: 244-2004, 167-1989, 222-2001: do not list ES&T; 189-1993, 236-2003: food additives are not permitted

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified – discontinue all provisions for ES&Ts in this food category

<u>Justification for proposal</u>: No information provided supporting use with exception of comment by Japan for Xantham gum - water retention would not appear to be necessary for foods covered by this FC

<u>Comments by eWG on horizontal classification proposal</u>: Brazil: no technological justification provided for use of ES&T in this food category Spain: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID						
ESTERS OF GLYCEROL	472a	GMP		7		
ACETYLATED DISTARCH					Discontinue	
PHOSPHATE	1414	GMP		7		
AGAR	406	GMP		7		
					used as AR, refer to discussion in Appendix 2 - adopt with new note "except for use in foods covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001" and "not for use in salted atlantic	
CALCIUM CARBONATE	170(i)	GMP		7	herring and sprat"	
CARRAGEENAN	407	GMP		7	Discontinue	
CITRIC AND FATTY ACID	472c	GMP		7	Discontinue	

ESTERS OF GLYCEROL					
GUAR GUM	412	GMP	7		
GUM ARABIC (ACACIA GUM)	414	GMP	7		
HYDROXYPROPYL CELLULOSE	463	GMP	7		
HYDROXYPROPYL METHYL					
CELLULOSE	464	GMP	7		
HYDROXYPROPYL STARCH	1440	GMP	7		
LACTIC AND FATTY ACID					
ESTERS OF GLYCEROL	472b	GMP	7		
LECITHIN	322(i)	GMP	7		
MAGNESIUM CHLORIDE	511	GMP	7		
MANNITOL	421	GMP	4		
METHYL CELLULOSE	461	GMP	7		
METHYL ETHYL CELLULOSE	465	GMP	7		
OXIDIZED STARCH	1404	GMP	7		
PECTINS	440	GMP	7		
POTASSIUM CARBONATE	501(i)	GMP		used as AR - refer to	
POTASSIUM DIHYDROGEN CITRATE POWDERED CELLULOSE	332(i) 460(ii)	<u>GMP</u> GMP	7	discussion in Appendix 2 - adopt with new note "except for use in foods covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001" and "not for use in salted atlantic herring and sprat"	
PROCESSED FUCHEUMA	100(11)				
SEAWEED (PES)	407a	GMP	4		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	7	Discontinue	
SALTS OF OLEIC ACID WITH	- \'/	-			
CALCIUM, POTASSIUM AND					
SODIUM	470(ii)	GMP	7		
SODIUM ALGINATE	401	GMP	4	1	
SODIUM CARBOXYMETHYL				1	
CELLULOSE (CELLULOSE GUM)	466	GMP	7		

SODIUM DIHYDROGEN		0.15	_	covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001" and "not for use in salted atlantic	
TADA CUM	331(I)	GMP	/ 7	nerring and sprat	
TRACACANITH CUM	+17	GMP	 7	Discontinue	
	+13 332(ii)	GMP	7	used as AR refer to	
TRISODIUM CITRATE 3	331(iii)	GMP	7	discussion in Appendix 2 - adopt with new note "except for use in foods covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001" and "not for use in salted atlantic herring and sprat"	
		0.115		Discontinue	<b>Japan:</b> add new note as "for use as stabilizer or texturizing agent". Xanthan gum is used to prevent separation of seasoning sauce and food by increasing adhesivness of the sauce, or to maintain texture by retaining water of the fish. Therefore, the term

Food Category <u>No. 10.1 (Fresh eggs)</u>

Corresponding commodity standards: None

**<u>eWG Proposal for Horizontal Classification of Food Category</u>:** Not Justified <u>Justification for proposal</u>: No information provided supporting use of ES&T in this category

Comments by eWG on horizontal classification proposal: Brazil, EU, Spain: supports proposal

# Food Category No. 10.2.1 (Liquid egg products)

eWG Proposal for Horizontal Clas	sification	of Food Categ	ory: Justif	ied	Comments by eWG on horizontal classification proposal:		
Justification for proposal: comme	nts by eW0	G and in CX/FA	12/44/9 a	dd 2:	EU, UK, ICGMA, IFAC:	supports proposal	
Thickeners and stabilizers are used	to restore t	the viscosity that	at is typica	lly lost			
through pasteurisation of liquid egg	products	-		-			
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
AGAR	406	GMP		7			
CALCIUM ALGINATE	404	6000		7		USA: calcium alginate is allowed for use in egg products as a stabilizer/thickener up to 6000 mg/kg Marlinga, IFAC: GMP for EU alignment	
CAROB BEAN GUM	410	GMP		7			
CARRAGEENAN	407	GMP		7		ICGMA:used to control viscosity	
GELLAN GUM	418	GMP		7			
GUAR GUM	412	GMP		7		Japan: agree, prevents coagulation of protein during pasteurization ICGMA: used to control viscosity	
GUM ARABIC (ACACIA GUM)	414	GMP		7		AIDGUM: supports adoption	
KARAYA GUM	416	GMP		7			
KONJAC FLOUR	425	GMP		7			
LECITHIN	322(i)	GMP		7			
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7	]	ELC: accepts proposal	
PECTINS	440	GMP		7	Adopt at GMP	Japan: agree, prevents coagulation of protein during pasteurization	
POLYDEXTROSES	1200	GMP		7			
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4			
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7			
SODIUM ALGINATE	401	GMP		4			
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		4			
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7			
TARA GUM	417	GMP		7	1		
TRISODIUM CITRATE	331(iii)	GMP		7			
XANTHAN GUM	415	GMP		7		Japan: agree, prevents coagulation of protein during pasteurization ICGMA: used to control viscosity	

# Food Category No. 10.2.2 (Frozen egg products)

eWG Proposal for Horizontal Clas	al for Horizontal Classification of Food Category: Justified					Comments by eWG on horizontal classification proposal:		
Justification for proposal: comme	nts by eW0	G and in CX/FA	12/44/9 a	dd 2:	EU, UK, ICGMA, IFAC:	supports proposal		
Thickeners and stabilizers are need	ed to provid	de freeze-thaw	stability ar	nd restore				
lost viscosity that is typically lost three	ough paste	urisation.						
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
AGAR	406	GMP		7				
	404	6000		7		USA: calcium alginate is allowed for use in egg products as a stabilizer/thickener up to 6000 mg/kg IFAC, Marlinga: GMP for EU alignment		
CAROB BEAN GUM	410	GMP		/	4			
CARRAGEENAN	407	GMP		7	-			
GELLAN GUM	418	GMP		7	4			
GUAR GUM	412	GMP		7		Japan: agree, prevents protein denatuation caused by freezing ICGMA: to control viscosity		
GUM ARABIC (ACACIA GUM)	414	GMP		7		AIDGUM: supports adoption		
KARAYA GUM	416	GMP		7				
KONJAC FLOUR	425	GMP		7				
LECITHIN	322(i)	GMP		7				
MANNITOL	421	GMP		4				
MICROCRYSTALLINE								
CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7				
MONO- AND DI-GLYCERIDES					Adopt at GMP	EFEMA: adopt at GMP		
OF FATTY ACIDS	471	GMP		7				
PECTINS	440	GMP		7		Japan: agree, prevents protein denatuation caused by freezing		
POLYDEXTROSES	1200	GMP		7				
PROCESSED EUCHEUMA								
SEAWEED (PES)	407a	GMP		4				
SALTS OF MYRISTIC, PALMITIC								
AND STEARIC ACIDS WITH								
AMMONIA, CALCIUM,	( <b>— •</b> ( <b>)</b>			_				
POTASSIUM AND SODIUM	470(i)	GMP		7				
SODIUM ALGINATE	401	GMP		4	4			
SODIUM CARBOXYMETHYL								
CELLULOSE (CELLULOSE GUM)	466	GMP		4	4			
SODIUM DIHYDROGEN	004			_				
	331(i)	GMP		7	4			
TARA GUM	417	GMP		7	4			
TRISODIUM CITRATE	331(iii)	GMP	1	7				

				Japan: agree, prevents protein denaturation caused by freezin	Japan: agree, prevents protein denaturation caused b
XANTHAN GUM	415	GMP	7	ICGMA: to control viscosity	ICGMA: to control viscosity

#### Food Category No. 11.1 (Refined and raw sugars)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners; commodity standards for subcategories do not allow ES&T

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: CODEX STAN 212-1999 does not permit emulsifiers,	Brazil, EU, Iran, Spain, CEFS: supports proposal
stabilizers or thickeners.	

#### Food Category No. 11.1.1 (White sugar, dextrose anhydrous, dextrose monohydrate, fructose)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: CODEX STAN 212-1999 does not permit emulsifiers,	Brazil, EU, Iran, Spain, CEFS: supports proposal
stabilizers or thickeners.	

#### Food Category No. 11.1.2 (Powdered sugar, powdered dextrose)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: ODEX STAN 212-1999 does not permit emulsifiers,	Brazil, EU, Iran, Spain, CEFS: supports proposal
stabilizers or thickeners.	ICGMA: modified food starch is used in this category

#### Food Category No. 11.1.3 (Soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: CODEX STAN 212-1999 does not permit emulsifiers,	EU, Iran, Spain, CEFS: supports proposal
stabilizers or thickeners.	

#### Food Category <u>No. 11.1.3.1 (Dried glucose syrup used to manufacture sugar confectionery)</u>

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: CODEX STAN 212-1999 does not permit emulsifiers,	Brazil, EU, Iran, Spain, CEFS: supports proposal
stabilizers or thickeners.	

#### Food Category No. 11.1.3.2 (Glucose syrup used to manufacture sugar confectionery)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: CODEX STAN 212-1999 does not permit emulsifiers,	Brazil, EU, Iran, Spain, CEFS: supports proposal
stabilizers or thickeners.	

#### Food Category No. 11.1.4 (Lactose)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: CODEX STAN 212-1999 does not permit emulsifiers,	EU, Iran, Spain, CEFS: supports proposal
stabilizers or thickeners.	

#### Food Category No. 11.1.5 (Plantation or mill white sugar)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: CODEX STAN 212-1999 does not permit emulsifiers
stabilizers or thickeners.

Comments by eWG on horizontal classification proposal: EU, Iran, Spain, CEFS: supports proposal

# Food Category <u>No. 11.2 (Brown sugar, excluding products of food category 11.1.3 (soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar)</u>

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Not Justified <b>Justification for proposal</b> : comments to eWG that ES&T are not needed in this food category.			ustified d in this	Comments by eWG on horizontal classification proposal: EU, Spain, UK, CEFS: supports proposal		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		4	Discontinue	UK, CEFS: discontinue - technological need questioned
POLYDEXTROSES	1200	GMP		7		UK, CEFS: discontinue - technological need questioned

# Food Category <u>No. 11.3 (Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3</u> (soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar))

### Corresponding commodity standards: None

<b>eWG Proposal for Horizontal Classification of Food Category</b> : Not Justified <b>Justification for proposal</b> : comments to eWG that ES&T are not needed in this food category.			ustified ed in this	Comments by eWG on horizontal classification proposal: EU, Spain, UK, CEFS: supports proposal		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
GELLAN GUM	418	500		7		UK, CEFS: discontinue - technological need questioned
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		4	Discontinue	UK, CEFS: discontinue - technological need questioned
POLYDEXTROSES	1200	GMP		7	]	UK, CEFS: discontinue - technological need questioned

#### Food Category <u>No. 11.4 (Other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)</u>

eWG Proposal for Horizontal Clas	ssification	of Food Categ	ory: Justif	ied	Comments by eWG on	horizontal classification proposal:
Justification for proposal: comments by eWG members and recommendation in			ndation in	EU, UK: Supports propos	sal	
CX/FA 12/44/9 Add 1						
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID						EEEMA ELC: accents proposal
ESTERS OF GLYCEROL	472a	GMP		7		
ACETYLATED DISTARCH						
ADIPATE	1422	10000		7		
ACETYLATED DISTARCH						
PHOSPHATE	1414	10000		7		
ACID TREATED STARCH	1401	10000		7		
AGAR	406	GMP		7		
ALGINIC ACID	400	10000		7		
ALKALINE TREATED STARCH	1402	10000		7	Adapt on listed	
AMMONIUM ALGINATE	403	10000		7	Adopt as listed	
BLEACHED STARCH	1403	10000		7		
					]	USA: calcium acetate is allowed in the USA for use in toppings and
CALCIUM ACETATE	263	1500		7	]	syrups as a thickener at levels up to 0.15% (1500 mg/kg)
CALCIUM ALGINATE	404	10000		7		
CAROB BEAN GUM	410	5000		7		
CARRAGEENAN	407	5000		7	]	
CITRIC AND FATTY ACID					]	
ESTERS OF GLYCEROL	472c	GMP		7		EFEINIA, ELC. accepts proposal
DISTARCH PHOSPHATE	1412	10000		7	]	

GELLAN GUM	418	500		7
GUAR GUM	412	10000		7
GUM ARABIC (ACACIA GUM)	414	GMP		7
HYDROXYPROPYL CELLULOSE	463	GMP		7
HYDROXYPROPYL DISTARCH				
PHOSPHATE	1442	10000		7
HYDROXYPROPYL METHYL				
CELLULOSE	464	GMP		7
HYDROXYPROPYL STARCH	1440	10000		7
KARAYA GUM	416	GMP		7
KONJAC FLOUR	425	GMP		7
LACTIC AND FATTY ACID				
ESTERS OF GLYCEROL	472b	GMP		7
LECITHIN	322(i)	GMP		7
MAGNESIUM CHLORIDE	511	GMP		7
MANNITOL	421	GMP		4
METHYL CELLULOSE	461	GMP		7
METHYL ETHYL CELLULOSE	465	GMP		7
MICROCRYSTALLINE				
CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7
MONO- AND DI-GLYCERIDES				
OF FATTY ACIDS	471	6000		7
MONOSTARCH PHOSPHATE	1410	10000		7
OXIDIZED STARCH	1404	10000		7
PECTINS	440	GMP		7
PHOSPHATED DISTARCH				
PHOSPHATE	1413	10000		7
POLYDEXTROSES	1200	GMP		7
POTASSIUM ALGINATE	402	10000		7
POTASSIUM DIHYDROGEN				
CITRATE	332(i)	GMP		7
POWDERED CELLULOSE	460(ii)	GMP		7
PROCESSED EUCHEUMA				
SEAWEED (PES)	407a	GMP		4
SALTS OF MYRISTIC, PALMITIC				
AND STEARIC ACIDS WITH				
AMMONIA, CALCIUM,				
POTASSIUM AND SODIUM	470(i)	GMP	71	7
SALTS OF OLEIC ACID WITH				
CALCIUM, POTASSIUM AND				
SODIUM	470(ii)	GMP		7
SODIUM ALGINATE	401	10000		7
SODIUM CARBOXYMETHYL				
CELLULOSE (CELLULOSE GUM)	466	5000		7

IFAC: adopt at GMP
AIDCUM: supports adoption
EFEMA, ELC: accepts proposal
EFEMA, ELC: accepts proposal

SODIUM DIHYDROGEN			
CITRATE	331(i)	GMP	7
STARCHES, ENZYME TREATED	1405	10000	7
TRAGACANTH GUM	413	GMP	7
TRIPOTASSIUM CITRATE	332(ii)	GMP	7
TRISODIUM CITRATE	331(iii)	GMP	7
XANTHAN GUM	415	5000	7

AIDGUM: supports adoption

# Food Category No. 11.5 (Honey)

Corresponding commodity standards: 012-1981: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. 2 that	Brazil, EU, Spain: supports proposal
emulsifiers, stabilizers & thickeners are not justified in FC 11.5	

# Food Category No. 12.1 (Salt and salt substitutes)

**Corresponding commodity standards:** None; subcategories have corresponding commodity standards which do not exclude ES&Ts

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments to eWG that Technical function of ES&T not	EU, Spain, UK: supports proposal
needed in salt; adopted provisions for food additives with ES&T function in	
subcategory 12.1.1 (Salt) are for their use as anticaking agents, not as ES&T	

# Food Category No. 12.1.1 (Salt)

**Corresponding commodity standards:** 150-1985: allows food additives as per FC 12.1.1 Tables 1 & 2

eWG Proposal for Horizontal Classification of Food Category: Not Justified					Comments by eWG on h	orizontal classification proposal:	
Justification for proposal: Comments to eWG that Technical function of ES&T not					EU, Spain, UK: supports proposal		
needed in salt; adopted provisions for	or food add	itives with ES&	T function	in this food			
are for their use as anticaking agent	s, not as ES	S&T					
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CALCIUM CARBONATE	170(i)	GMP		Adopted		UK: retain adopted - used as anti-caking agents not as ES&T	
SALTS OF MYRISTIC, PALMITIC							
AND STEARIC ACIDS WITH					Retain Adopted		
AMMONIA, CALCIUM,							
POTASSIUM AND SODIUM	470(i)	GMP	71	Adopted		UK: retain adopted - used as anti-caking agents not as ES&T	

### Food Category No. 12.1.2 (Salt substitutes)

Corresponding commodity standards: 053-1981: does not discuss food additives

**eWG Proposal for Horizontal Classification of Food Category:** Justified **Justification for proposal**: Comments by eWG members and in CX/FA 12/44/9 Add 2. - stabilizers used to cause different salt substitute ingredients to adhere to each other so that when they reach the tongue the synergistic effect of the compounds in creating a salty taste remains intact.

# Comments by eWG on horizontal classification proposal:

#### UK: accepts proposal

**ICGMA** - Modified Food Starches would be used as stabilizers to cause different salt substitute ingredients to adhere to each other so that when they reach the tongue the synergistic effect of the compounds in creating a salty taste remains intact. Without something to hold the ingredients together they would separate and the perceived salty taste could be lost.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID						EEEMA ELC: acconte proposal
ESTERS OF GLYCEROL	472a	5000		7		EFEMA, ELC. accepts proposal
ACETYLATED DISTARCH						
PHOSPHATE	1414	GMP		7		
AGAR	406	GMP		7		
ALGINIC ACID	400	GMP		4		
CALCIUM CARBONATE	170(i)	10000	58	4		
CALCIUM CHLORIDE	509	10000	58	4		
CARRAGEENAN	407	GMP		7		
CITRIC AND FATTY ACID						EEEMA ELC: accents proposal
ESTERS OF GLYCEROL	472c	GMP		7		
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		
					Adopt as listed	USA: accept proposal AIDGUM: supports adoption CCC, Tate & Lyle: adopt at GMP, used to stabilize smaller salt crystals to allow same salt taste on tongue in reduced sodium
GUM ARABIC (ACACIA GUM)	414	GMP		7		products
HYDROXYPROPYL CELLULOSE	463	GMP		7		
HYDROXYPROPYL METHYL						
CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID				_		EFEMA, ELC: accepts proposal
ESTERS OF GLYCEROL	472b	5000		7	4	
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7		
MANNITOL	421	60000		4		
METHYL CELLULOSE	461	GMP		7	1	
METHYL ETHYL CELLULOSE	465	GMP		7	1	
MICROCRYSTALLINE	460(i)	22000		7		

CELLULOSE (CELLULOSE GEL)				
MONO- AND DI-GLYCERIDES				
OF FATTY ACIDS	471	5000	7	EFEIMA, ELC: accepts proposal
OXIDIZED STARCH	1404	GMP	7	
PECTINS	440	GMP	7	
POTASSIUM CHLORIDE	508	GMP	4	
POTASSIUM DIHYDROGEN				
CITRATE	332(i)	GMP	7	
POWDERED CELLULOSE	460(ii)	GMP	7	
SALTS OF MYRISTIC, PALMITIC				
AND STEARIC ACIDS WITH				
AMMONIA, CALCIUM,				
POTASSIUM AND SODIUM	470(i)	GMP	7	
SALTS OF OLEIC ACID WITH				
CALCIUM, POTASSIUM AND				
SODIUM	470(ii)	GMP	7	
SODIUM CARBOXYMETHYL				
CELLULOSE (CELLULOSE GUM)	466	GMP	7	
SODIUM DIHYDROGEN				
CITRATE	331(i)	GMP	7	
SODIUM GLUCONATE	576	GMP	4	
TRAGACANTH GUM	413	GMP	7	
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	
TRISODIUM CITRATE	331(iii)	GMP	7	
XANTHAN GUM	415	GMP	7	

Food Category No. 12.2.1 (Herbs and spices)

Corresponding commodity standards: None

eWG Proposal for Horizontal Cla Justification for proposal: Comm Add 2 ES&T not needed in this F	ssification ents by eW C	of Food Categ G members and	<u>ory</u> : Not J d in CX/FA	ustified 12/44/9	<u>Comments by eWG on ho</u> Brazil, EU, Spain, UK, ICC	orizontal classification proposal: GMA: supports proposal
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	5000	51 <sup>49</sup>	7		
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	51	7	Discontinue	
AGAR	406	GMP	51	7	Discontinue	
ALGINIC ACID	400	GMP	51	4		
CALCIUM CARBONATE	170(i)	10000	51& 58	4		
CALCIUM CHLORIDE	509	10000	51 &	4		

<sup>49</sup> **Note 51:** For use in herbs only.

			58	
CAROB BEAN GUM	410	GMP	51	7
CARRAGEENAN	407	GMP	51	7
CITRIC AND FATTY ACID				
ESTERS OF GLYCEROL	472c	GMP	51	7
GELLAN GUM	418	GMP	51	7
GUAR GUM	412	GMP	51	7
GUM ARABIC (ACACIA GUM)	414	GMP	51	7
HYDROXYPROPYL CELLULOSE	463	GMP	51	7
HYDROXYPROPYL METHYL				
CELLULOSE	464	GMP	51	7
HYDROXYPROPYL STARCH	1440	GMP	51	7
KARAYA GUM	416	GMP	51	7
KONJAC FLOUR	425	GMP	51	7
LACTIC AND FATTY ACID				
ESTERS OF GLYCEROL	472b	5000	51	7
LECITHIN	322(i)	GMP	51	7
MAGNESIUM CHLORIDE	511	GMP	51	7
MANNITOL	421	60000	51	4
METHYL CELLULOSE	461	GMP	51	7
METHYL ETHYL CELLULOSE	465	GMP	51	7
MICROCRYSTALLINE				
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	51	7
MONO- AND DI-GLYCERIDES				
OF FATTY ACIDS	471	5000	51	7
OXIDIZED STARCH	1404	GMP	51	7
PECTINS	440	GMP	51	7
POLYDEXTROSES	1200	GMP	51	7
POTASSIUM CHLORIDE	508	GMP	51	4
POTASSIUM DIHYDROGEN				
CITRATE	332(i)	GMP	51	7
POWDERED CELLULOSE	460(ii)	GMP	51	7
PROCESSED EUCHEUMA				
SEAWEED (PES)	407a	GMP	51	7
SALTS OF MYRISTIC, PALMITIC				
AND STEARIC ACIDS WITH				
AMMONIA, CALCIUM,	470()	0145	<b>5</b> 4	-
POTASSIUM AND SODIUM	470(1)	GMP	51	/
SALTS OF OLEIC ACID WITH				
	470(::)	CMD	<b>E</b> 1	7
	47U(II)	GIVIP	51	/
	166	CMP	51	7
	400 331/i)		51	7
	331(1)	GIVIE	51	1

CITRATE					
SODIUM GLUCONATE	576	GMP	51	4	
TARA GUM	417	GMP	51	7	
TRAGACANTH GUM	413	GMP	51	7	
TRICALCIUM CITRATE	333(iii)	GMP	51	7	

# Food Category No. 13.1 (Infant formulae, follow-up formulae, and formulae for special medical purposes for infants)

Corresponding commodity standards: 150-1985: allows food additives as per FC 12.1.1 Tables 1 & 2

eWG Proposal for Horizontal Clas Justification for proposal: Comm subcategories should be specifically	ssification ents to eW0 y evaluated	of Food Categ G that the use o for use in that f	iory: Case of all additiv food categ	-by-Case /es in ory.	Comments by eWG on horizontal classification proposal: Brazil, EU, Spain, UK: supports proposal ICGMA: Thickeners help suspend nutrients, particularly insoluble minerals, preserving the			
					nutritional quality of the foc in the manufacture of form enhances the keeping qua nutrients	od (specifically nutrient delivery to the infant). Emulsifiers provide aid ulas to prevent separation of the macronutrient entities, which lity or stability of the formula and helps ensure even distribution of		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
		0.115			Discontinue and move to FC 13.1.1 & 13.1.3 - although not included in adopted 072-1981, CCNFSDU has proposed it for adoption in that standard (see Alinorm 07/30/26 Appendix III). It has not been proposed	UK: accept proposal to adopt in FC 13.1		

# Food Category No. 13.1.1 (Infant formulae)

Corresponding commodity standards: 072-1981: allows thickeners (INS 412. 410. 1412, 1414, 1413, 1440, 407) and emulsifiers (INS 322, 471); also allows INS 501, 332 and 331 as acidity regulators

oWG Bronocol for Harizontal Cla	acification	of Food Catoo	Cooo	By Cooo	Comments by eWG on horizontal classification proposal			
ewo Proposal for proposal Car	assincation	Of FOOD Calley	todditives	-Dy-Case	Continue of the response of the rest of th			
Justification for proposal: Comm	nents to evv	G that the use c	or additives	in this FC	Spain: supports proposal			
should be specifically evaluated to	r use in that	food category			UK: accept proposals only	In accordance with Codex Standards in this sentitive food category		
					ICGMA: Thickeners help s	suspend nutrients, particularly insoluble minerals, preserving the		
					nutritional quality of the foo	od (specifically nutrient delivery to the infant). Emulsifiers provide aid		
					in the manufacture of form	ulas to prevent separation of the macronutrient entities, which		
					enhances the keeping qua	lity or stability of the formula and helps ensure even distribution of		
					nutrients			
Additivo	INC	Max Level	Notos	Step /	oWC proposal	Comments by eWG members on proposal		
Additive	1113	(mg/kg)	Notes	Adopted	ewo proposal	comments by ewe members on proposal		
ACETYLATED DISTARCH			$72^{50}$ &					
PHOSPHATE	1414	5000	150 <sup>51</sup>	7				
CAROB BEAN GUM	410	1000	72	7	Adopt as listed -			
			72 &		corresponds to CODEX STAN 072-1981			
DISTARCH PHOSPHATE	1412	5000	150	7				
			14 <sup>52</sup> &					
GUAR GUM	412	1000	72	7				
					Adopt - corresponds to			
					proposal by CCNFSDU	AIDGUM supports adoption		
					(see Alinorm 07/30/26			
GUM ARABIC (ACACIA GUM)	414	GMP			Appendix III)			
			72 &					
HYDROXYPROPYL STARCH	1440	5000	150	7				
LECITHIN	322(i)	5000	72	7		Japan: agree, used for uniform emulsion		
MONO- AND DI-GLYCERIDES						EFEMA ELC: accents the proposal		
OF FATTY ACIDS	471	4000	72	7				
PHOSPHATED DISTARCH			72 &		Adopt as listed -			
PHOSPHATE	1413	5000	150	7	corresponds to CODEX			
			55 <sup>53</sup> &		STAN 072-1981			
POTASSIUM CARBONATE	501(i)	2000	72	7				
POTASSIUM DIHYDROGEN								
CITRATE	332(i)	GMP	72	7	1			
POTASSIUM HYDROGEN			55 &					
CARBONATE	501(ii)	2000	72	7				

 <sup>&</sup>lt;sup>50</sup> Note 72: Ready-to-eat basis.
<sup>51</sup> Note 150: Use level for soy-based formula; 25 000 mg/kg for hydrolyzed protein and/or amino acid-based formula.
<sup>52</sup> Note 14: For use in hydrolyzed protein liquid formula only.
<sup>53</sup> Note 55: Singly or in combination, within the limits for sodium, calcium, and potassium specified in the commodity standard.

SODIUM DIHYDROGEN					
CITRATE	331(i)	GMP	72	4	
					Japan: chelating effect of citrate prevents sedimentation of
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7	minerals such as calcium
TRISODIUM CITRATE	331(iii)	GMP	72	7	

#### Food Category No. 13.1.2 (Follow-up formulae)

**Corresponding commodity standards:** 156-1987: allows thickeners (INS 412, 410, 1412, 1414, 1413, 1422, 407, 440) and emulsifiers (INS 322i, 471), and INS 332i-ii, 501i-ii, 331iii, & 331i as acidity regulators

eWG Proposal for Horizontal Cla Justification for proposal: Comm should be specifically evaluated for	ssification hents to eW( r use in that	of Food Categ G that the use o food category	<u>ory</u> : Case f additives	-By-Case in this FC	Comments by eWG on h Spain: supports proposal UK: accept proposals only ICGMA: Thickeners help s nutritional quality of the foc in the manufacture of form enhances the keeping qua nutrients	orizontal classification proposal: in accordance with Codex Standards in this sentitive food category suspend nutrients, particularly insoluble minerals, preserving the od (specifically nutrient delivery to the infant). Emulsifiers provide aid nulas to prevent separation of the macronutrient entities, which lity or stability of the formula and helps ensure even distribution of
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETYLATED DISTARCH ADIPATE	1422	5000	72 & 150	7		
ACETYLATED DISTARCH PHOSPHATE	1414	5000	72 & 150	7		
CAROB BEAN GUM	410	1000	72	7		
CARRAGEENAN	407	300	72 & 151 <sup>54</sup>	7		
DISTARCH PHOSPHATE	1412	5000	72 & 150	7		
GUAR GUM	412	1000	72	7	Adopt as listed -	
LECITHIN	322(i)	5000	72	7	corresponds to CODEX	Japan: agree, used for uniform emulsion
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	4000	72	7	STAN 072-1981	EFEMA, ELC: accepts the proposal
PECTINS	440	10000	72	7		
PHOSPHATED DISTARCH			72 &			
PHOSPHATE	1413	5000	150	7		
POTASSIUM CARBONATE	501(i)	GMP	72	7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	72	4		
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP	72	7		

<sup>&</sup>lt;sup>54</sup> **Note 151:** Use level for soy-based formula; 1 000 mg/kg for hydrolyzed protein and/or amino acid-based formula.

SODIUM DIHYDROGEN					
CITRATE	331(i)	GMP	72	4	
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7	
TRISODIUM CITRATE	331(iii)	GMP	72	7	

# Food Category <u>No. 13.1.3 (Formulae for special medical purposes for infants)</u>

**Corresponding commodity standards:** 072-1981: allows thickeners (INS 412. 410. 1412, 1414, 1413, 1440, 407) and emulsifiers (INS 322, 471); also allows INS 501, 332 and 331 as acidity regulators

eWG Proposal for Horizontal Cla Justification for proposal: Comm should be specifically evaluated fo	nents to eWo r use in that	of Food Categ G that the use of food category	ory: Case f additives	-By-Case in this FC	Comments by eWG on horizontal classification proposal: Spain: supports proposal UK: accept proposals only in accordance with Codex Standards in this sentitive food category ICGMA: Thickeners help suspend nutrients, particularly insoluble minerals, preserving the nutritional quality of the food (specifically nutrient delivery to the infant). Emulsifiers provide aid in the manufacture of formulas to provent separation of the macronutrient entities, which		
					enhances the keeping quality or stability of the formula and helps ensure even distribution of nutrients		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
ACETYLATED DISTARCH		5000	72 &	7	Adopt as listed - corresponds to CODEX STAN 072-1981		
	1414 410	1000	150 72	7			
DISTARCH PHOSPHATE	1412	5000	72 & 150	7			
GUAR GUM	412	1000	14 & 72	7			
GUM ARABIC (ACACIA GUM)	414	GMP			Adopt - corresponds to proposal by CCNFSDU (see Alinorm 07/30/26 Appendix III)	AIDGUM supports adoption	
HYDROXYPROPYL STARCH	1440	5000	72 & 150	7			
LECITHIN	322(i)	5000	72	7	1	Japan: agree, prevents fat separation	
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	4000	72	7	Adopt as listed - corresponds to CODEX STAN 072-1981	Japan: agree, prevents fat separation EFEMA, ELC: accepts the proposal	
PHOSPHATED DISTARCH PHOSPHATE	1413	5000	72 & 150	7			
POTASSIUM CARBONATE	501(i)	2000	55 & 72	7			
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	72	7			
POTASSIUM HYDROGEN CARBONATE	501(ii)	2000	55 & 72	7			

SODIUM DIHYDROGEN					
CITRATE	331(i)	GMP	72	4	
					Japan: chelating effect of citrate prevents sedimentation of
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7	minerals such as calcium
TRISODIUM CITRATE	331(iii)	GMP	72	7	

#### Food Category No. 13.2 (Complementary foods for infants and young children)

**Corresponding commodity standards:** 073-1981: allows thickeners (INS 412, 410, 1412, 1422, 1413, 1440, 1414, 440) and emulsifiers (INS 322, 471), also allows INS 501i-ii, 333iii, 331i & 170i as acidity regulators; 074-1981: allows thickener (INS 410, 412,414, 415, 440, 1404, 1410, 1412, 1413, 1414, 1420, 1450, 1451) and emulsifiers (INS 322, 471, 472a, 472b, 472c), also allows INS 501i-ii, 263, 331i-ii, 332i, iii, 333 (only 333iii in GSFA) as acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Case-By-Case					Comments by eWG on horizontal classification proposal:		
Justification for proposal: Con	nments to eW	G that the use o	of additives	in this FC	Spain: supports proposal		
should be specifically evaluated	for use in that	food category			UK: accept proposals only in accordance with Codex Standards in this sensitive food category		
		•••			ELC: 074-1981 (CODEX STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR		
					INFANTS AND YOUNG CHILDREN) includes several provisions for PHOSPHATES (@440mg/kg as P, for pH-adjustment only). These provisions should be taken up		
					ICGMA: modified food star	ch is used as a general thickener and stabilizer in this category	
Additivo	INC	Max Level	Natao	Step /	eWC prepage		
Additive	INS	(mg/kg)	Notes	Adopted	ewg proposal	Comments by ewG members on proposal	
					Adopt as listed with new		
					note "singly or in		
					combination with INS	IIK: accept proposal	
					471, 472a, 472b, & 472c"	<b>UR.</b> accept proposal	
ACETIC AND FATTY ACID					- corresponds to CODEX		
ESTERS OF GLYCEROL	472a	5000		7	STAN 74-1981		
ACETYLATED DISTARCH					Adopt at 50000 mg/kg		
ADIPATE	1422	60000		7	with new note "singly or	<b>OR.</b> accept proposal	
ACETYLATED DISTARCH					in combination with other		
PHOSPHATE	1414	60000		7	starch thickeners" (as		
					per CODEX STAN 74-		
					1981) & "60000 mg/kg in		
					canned baby food only"	UK: accept proposal	
ACETYLATED OXIDIZED					(as per CODEX STAN		
STARCH	1451	5000	72	4	73-1981)		
AGAR	406	GMP		7	Adopt - corresponding		
ALGINIC ACID	400	5000		7	commodity standards		
AMMONIUM ALGINATE	403	5000		7	allow some ES&T		
					Adopt as listed -		
					corresponds to CODEX	UK: accept proposal	
CALCIUM ACETATE	263	GMP		7	STAN 74-1981		
					Adopt - corresponding		
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					commodity standards		
CALCIUM ALGINATE	404	5000		7	allow ES&T		
					Adopt as listed -		
					corresponds to CODEX	UK: accept proposal	
CALCIUM CARBONATE	170(i)	GMP		7	STAN 74-1981; 73-1981		
					Adopt at 10000 mg/kg		
					with notes "singly or in		
					combination with INS		
					410, 412, 414, 415, and		
					440" & "20000 mg/kg in	UK: accept proposal	
					gluten-free cereal-based		
					foods only" (both notes		
					as per CODEX STAN 74-		
CAROB BEAN GUM	410	20000		7	1981)		
					Adopt - corresponding		
					commodity standards		
CARRAGEENAN	407	GMP		7	allow some ES&T		
		_			Adopt at 5000 mg/kg with		
					new note "singly or in		
					combination with INS		
					471, 472a, 472b, & 472c"	UK, EFEMA, ELC: accept proposal	
CITRIC AND FATTY ACID					(as per CODEX STAN		
ESTERS OF GLYCEROL	472c	5000		7	74-1981)		
					Adopt at 50000 mg/kg		
					with new note "singly or		
					in combination with other		
					starch thickeners" (as		
					per CODEX STAN 74-	IIK. accept proposal	
					1981) "60000 mg/kg in		
					canned baby foods only"		
					(as per CODEX STAN		
DISTARCH PHOSPHATE	1412	60000		7	73-1981)		
	1712	00000	1		Adopt - corresponding		
					commodity standards		
GELLAN GUM	418	GMP		7	allow some ES&T		
	710	<b>U</b>	1	'			

				Adopt at 10000 mg/kg	
				with notes "singly or in	
				combination with INS	
				410, 412, 414, 415, and	
				440" (as per CODEX	
				STAN 74-1981), "20000	UK: accept proposal
				ma/ka in aluten-free	
				cereal-based foods only"	
				& "2000 mg/kg in canned	
				baby foods only" (as per	
GUAR GUM	412	20000	7	CODEX STAN 73-1981)	
		20000		Adopt at 10000 mg/kg	
				with notes "singly or in	
				combination with INS	
				410 412 414 415 and	
				440" & "20000 mg/kg in	UK: accept proposal
				duten-free cereal-based	AIDGUM: supports adoption
				foods only" (both notos	
				ac per CODEX STAN 74	
	111	20000	7		
	114	GMP	1	Discontinue	IIK: accent proposal
	1440	60000	7	Adopt corresponding	
	1440	GMP	7	Adopt - corresponding	
	410	GIVIP	7		
KONJAC FLOUR	425	GMP	/		
				Adopt with new note	
				"singly or in combination	
				with INS 4/1, 4/2a,	UK: accept proposal
LACTIC AND FATTY ACID			_	4/2b, & 4/2c" (as per	
ESTERS OF GLYCEROL	472b	5000	7	CODEX STAN 74-1981)	
				Adopt at 5000 mg/kg (as	
				per CODEX STAN 73-	
				1981) with note "15000	
				mg/kg in processed	IIK: accept proposal
				cereal-based foods for	
				infants and young	
				children" (as per CODEX	
LECITHIN	322(i)	15000	7	STAN 74-1981)	
MANNITOL	421	GMP	7	Adopt - corresponding	
MICROCRYSTALLINE				commodity standards	
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	7	allow some ES&T	

MONO- AND DI-GLYCERIDES OF FATTY ACIDS         471         5000         7         Adopt with new note "singly or in combination with INS 471, 472a, 472b, 8472, 482 pr CODEX STAN 74-1981 and "1500 mg/kg for use (as per 73-1981)         UK, EFEMA, ELC: accept proposal           MONO- AND DI-GLYCERIDES OF FATTY ACIDS         471         5000         7         Adopt with new note "singly or in combination with other starch thickeners" (as per 74- 1981)         UK, EFEMA, ELC: accept proposal           OXIDIZED STARCH         1404         50000         7         Adopt with new note "singly or in combination with other starch thickeners" (as per 74- 1981)         UK: accept proposal           PECTINS         440         20000         7         (as per 74- 1981) & "no camb atopin or combination with new starch thickeners" (as per 74- 1981) & "no camb atopin mg/kg in camb atoping mg/kg ind						
MONO-AND DI-GLYCERIDES         471         5000         7         Singly or in combination with INS 472° (sp per CODEX STA 74-1891)         UK, EFEMA, ELC: accept proposal           MONO-AND DI-GLYCERIDES         471         5000         7         (as per 73-1681) and 11500 mg/kg for use in canned bay foods: in canned fuil- based bay foods: in combination with INS 410, 412, 414, 415, and 440 % 20000         UK: accept proposal           PECTINS         440         20000         7         (as per 73-1981) 4000 mg/kg or in combination with INS 410, 412, 414, 415, and 400 % 20000 mg/kg hord in combination with INS 410, 412, 414, 415, and 400 % 20000 mg/kg hord in combination with INS 410, 412, 414, 415, and 400 % 20000 mg/kg hord in combination with INS starch thickenes" (as per 74-1981)         UK: accept proposal           PECTINS         440         20000         7         (as per 73-1981)         UK: accept proposal           PHOSPHATED DISTARCH         1413         60000         7         Telestion mg/kg in canned bay to cod mg/kg in canned bay to cod mg/kg user 73-         UK: accept proposal           PHOSPHATE         1413         60000         7         Discoronue - not allowed in obth corresponding         UK: accept proposal           POTASSIUM ALGINATE<					Adopt with new note	
MONO- AND DI-GLYCERIDES OF FATTY ACIDS         471         5000         7         Ad2pt St 200 mg/kg for use in canned baby foods'         UK, EFEMA, ELC: accept proposal           MONO- AND DI-GLYCERIDES OF FATTY ACIDS         471         5000         7         Adopt with new note "singly or in combination with other starch thickeners" (as per 74- 1060 g v ni combination with theres" (as per 74- 1060 g v ni combination with other starch thickeners" (as per 74- 1060 g v ni combination with other starch thickeners" (as per 74- 1000 g v ni combination with other starch thickeners" (as per 74- 1000 g v ni combination with other starch thickeners" (as per 74- 1000 g v ni combination with other starch thickeners" (as per 74- 1000 g v ni combination with other starch thickeners" (as per 73- 1081)         UK: accept proposal           PECTINS         440         20000         7         Adopt at 10000 mg/kg with notes "singly or in combination with other starch thickeners" (as per 74-1981) & in canned fruit- based baby foods only' (as per 73-1981)         UK: accept proposal           PHOSPHATED DISTARCH         1413         60000         7         1981)         uK: accept proposal           PHOSPHATE         1413         60000         7         1981)         uK: accept proposal           PHOSPHATE         1413         60000         7         1981)         uK: accept proposal           POTASSIUM ALGINATE         402         5000         7         1981)         uK: accept proposal           POTASSIUM CARBONATE					"singly or in combination	
MONO- AND DI-GLYCERIDES OF FATTY ACIDS     471     5000     7     (as per 73-1891) and "1500 mg/kg for use in canned baby foods" (as per 73-1891)     UK. EFEMA, ELC: accept proposal       MONOSTARCH PHOSPHATE     1410     5000     7     Adopt with new note singly or in combination with other starch thickeners" (as per 74- 1981)     UK: accept proposal       OXIDIZED STARCH     1404     5000     7     Hash of thickeners" (as per 74- 1981)     UK: accept proposal       OXIDIZED STARCH     1404     5000     7     Adopt at 1000 mg/kg with notes" singly or in combination with other starch thickeners" (as per 74- 1981)     UK: accept proposal       PECTINS     440     20000     7     Keet Starch tode singly or in combination with other starch thickeners" (as per 74-1981)     UK: accept proposal       PHOSPHATED DISTARCH     1413     60000     7     Discontinue - not allowed in corresponding commodity standards     UK: accept proposal       POTASSIUM ALGINATE     5010     GMP     7     Adopt at 5000 mg/kg are 73- 1981)     UK: accept proposal       POTASSIUM CARBONATE     5010     GMP     7     Adopt as listed - corresponding corresponding     UK: accept proposal       POTASSIUM CARBONATE     5010     GMP     7     Adopt as listed - corresponding     UK: accept proposal       POTASSIUM ALGINATE     5010     GMP     7     Adopt as listed - corresponding     UK: accep					with INS 471, 472a,	
CODEX STAN 74.1981) and "1500 mg/kg for use in canned baby foods"       CODEX STAN 74.1981) and "1500 mg/kg for use in canned baby foods"         MONO-AND DI-CLYCERIDES OF FATTY ACIDS       471       5000       7       Adopt with new note "singly or in combination with other starch thickeners" (as per 74- 1981)       UK: accept proposal         MONOSTARCH PHOSPHATE       1404       50000       7       1881)       UK: accept proposal         OXIDIZED STARCH       1404       50000       7       1881)       UK: accept proposal         VIDIZED STARCH       1404       50000       7       1881)       UK: accept proposal         PECTINS       440       20000       7       Adopt at 10000 mg/kg in gluten-free cereal-based foods only" (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PHOSPHATED DISTARCH PHOSPHATE       1413       60000       7       1981(in carned baby foods only" (as per 73- 1981)       UK: accept proposal         POTASSIUM ALGINATE       501(i)       GMP       7       commodity standards in corresponding commodity standards       UK: accept proposal         POTASSIUM CARBONATE       501(i)       GMP       7       Adopt as listed - corresponding corresponding       UK: accept proposal         POTASSIUM CARBONATE					472b, & 472c" (as per	IIK FEEMA FLC: accept proposal
MONO-AND DI-GLYCERIDES OF FATTY ACIDS47150007and "1500 mixels for use in camed baby foods" (as per 73-1981)ONO-AND DI-GLYCERIDES OF FATTY ACIDS1410500007Adopt with new note "singly or in combination with other starch thickeners" (as per 74- 1981)					CODEX STAN 74-1981)	
MONO-AND DI-GLYCERIDES OF FATT 4CIDS     471     5000     7     (as per 73-1981)       MONOSTARCH PHOSPHATE     1410     50000     7     Adopt with new note "singly or in combination with other starch thickeners" (as per 74- 1981)     UK: accept proposal       OXIDIZED STARCH     1404     50000     7     Hereits and thickeners" (as per 74- 1981)     UK: accept proposal       PECTINS     440     20000     7     Adopt at 10000 mg/kg with notes "singly or in combination with NIS 410, 412, 414, 415, and 440°, 420°, 414, 51, and 440°, 42°, 20000 mg/kg in gluten-free careal-based foods only" (as per 74- 1981) & 'in cambination with other starch thickeners" (as per 73- 1981)     UK: accept proposal       PECTINS     440     20000     7     Adopt at 50000 mg/kg with new note 'singly' food only' (as per 73- 1981) & 'in cambination with other starch thickeners' (as per 74-1981) as 'in cambination with other starch thickeners' (as per 74-1981)     UK: accept proposal       PHOSPHATED DISTARCH     1413     60000     7     commodity standards       POTASSIUM ALGINATE     402     5000     7     commodity standards       POTASSIUM CARBONATE     501(i)     GMP     7     Adopt as listed - corresponding     UK: accept proposal       POTASSIUM HYDROGEN CARBONATE     501(ii)     GMP     7     Adopt as listed - corresponding     UK: accept proposal					and "1500 mg/kg for use	
OF FATTY ACIDS       471       5000       7       (as per 73-1981)         MONOSTARCH PHOSPHATE       1410       50000       7       Adopt with new note "singly or in combination with other starch thickeners" (as per 74- 1981)       UK: accept proposal         OXIDIZED STARCH       1404       50000       7       1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PHOSPHATED DISTARCH       PHOSPHATE       1413       60000       7       1981) & "60000 mg/kg in combination with other starch thickeners" (as per 73-1981) & "60000 mg/kg in combination with other starch thickeners" (as per 73-1981) & "60000       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       Liberotinue - not allowed in corresponding commodity standards       UK: accept proposal         POTASSIUM ALGINATE       501(ii)       GMP       7       corresponding commodity standards       UK: accept proposal         POTAS	MONO- AND DI-GLYCERIDES				in canned baby foods"	
MONOSTARCH PHOSPHATE       1410       50000       7       Adopt with wennote with other starch thickeners' (as per 74- 1981)         OXIDIZED STARCH       1404       50000       7       1981)       UK: accept proposal         OXIDIZED STARCH       1404       50000       7       1981)       UK: accept proposal         OXIDIZED STARCH       1404       50000       7       1981)       UK: accept proposal         OXIDIZED STARCH       1404       50000       7       1481,5, and 40°, 8':2000 mg/kg in gluten-free cereal-based foods only' (as per 73- 1981) & 'in canned fruit- based baby foods only'i as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73- 1981)       UK: accept proposal         PHOSPHATED DISTARCH PHOSPHATE       1413       60000       7       1981)       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       1981)       UK: accept proposal         POTASSIUM CARBONATE       501(ii)       GMP       7       Adopt stogonding acidity regulators allowed in both corresponding corresponding to both corresponding corresponding to both corresponding in both corresponding to both corresponding corresponding to both corresponding corresponding to both corresponding corresponding to both corresponding corresponding to both corresponding in both corresponding to correspondis to CODEX STAN 74-1981       UK: accept propo	OF FATTY ACIDS	471	5000	7	(as per 73-1981)	
OXIDIZED STARCH       1404       50000       7       1881)       UK: accept proposal         OXIDIZED STARCH       1404       50000       7       1881)       UK: accept proposal         OXIDIZED STARCH       1404       50000       7       1881)       UK: accept proposal         PECTINS       440       20000       7       Kapt at 1000 mg/kg in gluten-free creat-based todos only' (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PHOSPHATED DISTARCH       1413       60000       7       1981) & in combination with other starth thickeners' (as per 73-1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981) & in combination with other starth thickeners' (as per 73-1981)       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       1981)       UK: accept proposal         POTASSIUM CARBONATE       501(i)       GMP       7       Adopt at standards       UK: accept proposal         POTASSIUM HYDROGEN       32(i)       GMP       7       Adopt as listed - coresponding in both crossponding in both crossponding in	MONOSTARCH PHOSPHATE	1410	50000	7	Adopt with new note	
OXIDIZED STARCH         1404         50000         7         1981) Adopt at 1000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440° 8°2000 mg/kg in gluten-free cereal-based foods only" (as per 74- 1981) & "in canned fruit- based baby foods only" (as per 73-1981)         UK: accept proposal           PECTINS         440         20000         7         (as per 73-1981)         UK: accept proposal           PECTINS         440         20000         7         (as per 73-1981)         UK: accept proposal           PECTINS         440         20000         7         (as per 73-1981)         UK: accept proposal           PHOSPHATED DISTARCH PHOSPHATE         1413         60000         7         Ios per 74-1981) & "Koona         UK: accept proposal           POTASSIUM ALGINATE         402         5000         7         commodity standards in corresponding oromesponding         UK: accept proposal           POTASSIUM CARBONATE         501(i)         GMP         7         Adopt at company data         UK: accept proposal           POTASSIUM HYDROGEN CARBONATE         501(i)         GMP         7         Adopt at company data         UK: accept proposal           UK: accept proposal         UK: accept proposal         Corresponding corresponding         UK: accept proposal					"singly or in combination	
OXIDIZED STARCH14045000071891)Ut: accept proposalOXIDIZED STARCH14045000071891)Adopt at 10000 mg/kg with notes "singly or in gluten-free cereal-based based baby foods only" (as per 74- 1981) & 'n canned fruit- based baby foods only" (as per 73-1981)UK: accept proposalPECTINS440200007(as per 73-1981) (as per 73-1981)UK: accept proposalPHOSPHATED DISTARCH14136000071981)VK: accept proposalPHOSPHATE14136000071981)VK: accept proposalPHOSPHATE14136000071981)VK: accept proposalPHOSPHATE14136000071981)VK: accept proposalPHOSPHATE14136000071981)VK: accept proposalPHOSPHATE14136000071981)VK: accept proposalPHOSPHATE14136000071981)VK: accept proposalPOTASSIUM ALGINATE40250007commodity standardsPOTASSIUM CARBONATE501(i)GMP7Adopt as alisted - corresponding commodity standardsPOTASSIUM HYDROGEN CARBONATE501(ii)GMP7Adopt as alisted - correspondis to CODEX STAN 74-1981VK: accept proposalVK: accept proposalUK: accept proposalVK: accept proposal					with other starch	
OXIDIZED STARCH       1404       50000       7       1981)       Adopt at 10000 mg/kg with notes "singly or in combination with INS 440". & "20000 mg/kg in gluten-free creal-based foods only" (as per 74-1981) & "in canned fruit-based baby foods only" (as per 74-1981) & "in canned fruit-based baby foods only" (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PHOSPHATED DISTARCH       1413       60000       7       1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       commodity standards acidity regulators allowed in corresponding commodity standards       Adopt or potasuium hydrogen carbonate and acidity regulators allowed in obto corresponding torenesponding corresponding to to corresponding to to cor					thickeners" (as per 74-	UK: accept proposal
PECTINS         440         20000         7         Addopt 3 (5000 mg/kg) with nuss 'singly or in combination with INS 410, 412, 414, 415, and 40.8 *2000 mg/kg in gluten-free cereal-based foods only' (as per 74-1981) & 'in canned fruit-based baby foods only' (as per 73-1981)         UK: accept proposal           PHOSPHATED DISTARCH         440         20000         7         (as per 73-1981)         UK: accept proposal           PHOSPHATED DISTARCH         1413         60000         7         Discontinue - not allowed in corresponding commodity standards         UK: accept proposal           PHOSPHATE         1413         60000         7         Discontinue - not allowed in corresponding commodity standards         UK: accept proposal           POTASSIUM ALGINATE         402         5000         7         commodity standards         UK: accept proposal           POTASSIUM CARBONATE         501(i)         GMP         7         Adopt as listed - corresponding to bot corresponding torresponding corresponding to constex and acidity regulators all	OXIDIZED STARCH	1404	50000	7	1981)	
PECTINS       440       20000       7       (as per 73-1981) (as per 74-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981) (as per 74-1981)       UK: accept proposal         PHOSPHATED DISTARCH PHOSPHATE       1413       60000       7       (as per 73-1981) (accept proposal       UK: accept proposal         PHOSPHATE       1413       60000       7       UK: accept proposal       UK: accept proposal         PHOSPHATE       1413       60000       7       UK: accept proposal       UK: accept proposal         PHOSPHATE       1413       60000       7       UK: accept proposal       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       Discontinue - not allowed in corresponding commodity standards acidity regulators allowed in both corresponding acidity regulators allowed in both corresponding       UK: accept proposal         POTASSIUM CARBONATE       501(i)       GMP       7       Adopt as listed - correspondial standards       UK: accept proposal         POTASSIUM HYDROGEN       GMP       7       Adopt as listed - correspondial standards       UK: accept proposal         CITRATE       501(ii)       GMP       7       Adopt as listed - correspondial standards       UK: accept proposal					Adopt at 10000 mg/kg	
PECTINS     440     20000     7     Combination with INS 410, 412, 414, 415, and 404 % 20000 mg/kg in gluten-free cereal-based foods only" (as per 74- 1981) & "in canned fruit- based baby foods only"     UK: accept proposal       PECTINS     440     20000     7     Adopt at 50000 mg/kg in with new note" singly or in combination with other starch thickeners" (as per 74-1981) & "60000     UK: accept proposal       PHOSPHATED DISTARCH PHOSPHATE     1413     60000     7     1981)     UK: accept proposal       POTASSIUM ALGINATE     402     5000     7     1981)     UK: accept proposal       POTASSIUM CARBONATE     501(i)     GMP     7     2000     Visicontinue - not allowed in corresponding commodity standards       POTASSIUM CARBONATE     501(i)     GMP     7     Adopt a plastard     UK: accept proposal       POTASSIUM HYDROGEN CITRATE     332(i)     GMP     7     Adopt as listed - corresponding corresponding corresponding     UK: accept proposal       VIK: accept proposal     Corresponding corresponding corresponding     UK: accept proposal					with notes "singly or in	
PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PHOSPHATED DISTARCH       Adopt at 50000 mg/kg with new note 'singly or in combination with other starch thicknerse' (as per 73-1981)       UK: accept proposal       UK: accept proposal         PHOSPHATED DISTARCH       1413       60000       7       1981)       * With new note 'singly or in combination with other starch thicknerse' (as per 73-1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       * With new note 'singly or in combination with other starch thicknerse' (as per 73-1981)       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       commodity standards       UK: accept proposal         POTASSIUM ALGINATE       501(i)       GMP       7       Adopt a isted - corresponding corresponding corresponding corresponding in both corresponding coresponding corresponding corresponding coresp					combination with INS	
PECTINS       440       20000       7       430* & "20000 mg/kg in gluten-free cereal-based foods only" (as per 74-1981)       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PHOSPHATED DISTARCH       1413       60000       7       1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       1981)       UK: accept proposal         POTASSIUM CARBONATE       501(i)       GMP       7       corresponding composal       UK: accept proposal         POTASSIUM CARBONATE       501(ii)       GMP       7       corresponding composal       UK: accept proposal         POTASSIUM ALGINATE       501(ii)       GMP       7       corresponding composal       UK: accept proposal         POTASSIUM PHYDROGEN       501(ii)       GMP       7       corresponding composal       UK: accept proposal         CARBONATE       501(ii)       GMP       7       corresponding composal       UK: accept proposal         UK: accept proposal       UK: accept proposal </td <td></td> <td></td> <td></td> <td></td> <td>410 412 414 415 and</td> <td></td>					410 412 414 415 and	
PECTINS       440       20000       7       (as per 74-1981) & "in canned fruit-based foods only" (as per 74-1981) & "in canned fruit-based baby foods only"       UK: accept proposal         PECTINS       440       20000       7       (as per 73-1981)       UK: accept proposal         PHOSPHATED DISTARCH       Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per 74-1981) & "io connection with standards in both corresponding connection standards in bothec					110, 112, 111, 110, and 110, 8 "20000 mg/kg in	
PECTINS       440       20000       7       (as per 74- 1981) & "in canned fruit- based baby foods only" (as per 73-1981)         PHOSPHATED DISTARCH       Adopt at 50000 mg/kg with new note 'singly or in combination with other starch thickeners" (as per 74-1981) & 60000 mg/kg in caned baby food only" (as per 73- 1981)       UK: accept proposal         PHOSPHATED DISTARCH       1413       60000       7       1981)         PHOSPHATE       1413       60000       7       1981)         POTASSIUM ALGINATE       402       5000       7       commodity standards         POTASSIUM CARBONATE       501(i)       GMP       7       commodity standards         POTASSIUM CARBONATE       501(i)       GMP       7       Adopt as listed - corresponding       UK: accept proposal         POTASSIUM HYDROGEN CITRATE       332(i)       GMP       7       Adopt as listed - corresponds to CODEX STAN 74-1981       UK: accept proposal					duten-free cereal-based	UK: accept proposal
PECTINS     440     20000     7     (as per 73-1981)       PECTINS     440     20000     7     (as per 73-1981)       Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per 74-1981) & "60000 mg/kg in canned baby food only" (as per 73- 1981)     UK: accept proposal       PHOSPHATED DISTARCH PHOSPHATE     1413     60000     7     1981)       PHOSPHATE     1413     60000     7     1981)       POTASSIUM ALGINATE     402     5000     7     commodity standards       POTASSIUM CARBONATE     501(i)     GMP     7     commodity standards       POTASSIUM POROGEN CITRATE     332(i)     GMP     7     Adopt as listed - corresponding     UK: accept proposal       UK: accept proposal     CARBONATE     501(ii)     GMP     7     Adopt as listed - corresponding to COMMARKE					foods only" (as par 74	
PECTINS       440       20000       7       (as per 73-1981) (as per 73-1981)       Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per 74-1981) & "60000 mg/kg in caned baby food only" (as per 73- PHOSPHATE       UK: accept proposal         PHOSPHATED DISTARCH       1413       60000       7       1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       commodity standards         POTASSIUM CARBONATE       501(i)       GMP       7       commodity standards         POTASSIUM HYDROGEN CITRATE       332(i)       GMP       7       Adopt as listed - corresponds to CODEX       UK: accept proposal         UK: accept proposal       UK: accept proposal       UK: accept proposal					10005 Unity (as per 74-	
PECTINS       440       20000       7       (as per 73-1981)         PHOSPHATED DISTARCH       1413       60000       7       (as per 73-1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       commodity standards         POTASSIUM CARBONATE       501(i)       GMP       7       commodity standards         POTASSIUM DIHYDROGEN       332(i)       GMP       7       Adopt as listed - corresponding corresponds to CODEX         POTASSIUM HYDROGEN       501(ii)       GMP       7       Adopt as listed - corresponding corresponds to CODEX         CARBONATE       501(ii)       GMP       7       Adopt as listed - corresponding corresponds to CODEX         VEX       STAN 74-1981       TA       Adopt as listed - correspond to CODEX       UK: accept proposal					1901) & In canned nuit-	
PECTINS       440       2000       7       (as per 73-1981)         Adopt at 5000 mg/kg with new note "singly or in combination with other starch thickeners" (as per 74-1981) & "6000 mg/kg in caned baby food only" (as per 73- 1981)       UK: accept proposal         PHOSPHATED DISTARCH PHOSPHATE       1413       60000       7       1981)         POTASSIUM ALGINATE       402       5000       7       commodity standards acidity regulators allowed in both corresponding commodity standards       UK: accept proposal         POTASSIUM CARBONATE       501(i)       GMP       7       Adopt at listed - corresponds to CODEX STAN 74-1981       UK: accept proposal	DECTING	110	20000	7	based baby loods only	
Adopt at SU00U mg/kg with new note "singly or in combination with other starch thickeners" (as per 74-1981) & "60000 mg/kg in caned baby food only" (as per 73- 1981)UK: accept proposalPHOSPHATE14136000071981)POTASSIUM ALGINATE40250007Discontinue - not allowed in corresponding commodity standardsDiscontinue - not allowed in correspondingPOTASSIUM ALGINATE40250007Commodity standardsPOTASSIUM CARBONATE501(i)GMP7Adopt - potassium hydrogen carbonate and acidity regulators allowed in both corresponding correspondingUK: accept proposalPOTASSIUM DIHYDROGEN CITRATE332(i)GMP7Adopt as listed - corresponds to CODEX STAN 74-1981UK: accept proposal	PECTINS	440	20000	1	(as per 73-1981)	
With new note "singly or in combination with other starch thickeners" (as per 74-1981) & "60000 mg/kg in caned baby food only" (as per 73- 1981)UK: accept proposalPHOSPHATE14136000071981)POTASSIUM ALGINATE40250007commodity standardsPOTASSIUM ALGINATE40250007commodity standardsPOTASSIUM CARBONATE501(i)GMP7commodity standardsPOTASSIUM DIHYDROGEN CITRATE332(i)GMP7Adopt as listed - corresponds to CODEX STAN 74-1981UK: accept proposalUK: accept proposalUK: accept proposal					Adopt at 50000 mg/kg	
PHOSPHATED DISTARCH       1413       60000       r       1981)       UK: accept proposal         PHOSPHATE       1413       60000       7       1981)       UK: accept proposal         POTASSIUM ALGINATE       402       5000       7       commodity standards       Adopt - potassium         POTASSIUM CARBONATE       501(i)       GMP       7       Adopt - potassium       hydrogen carbonate and acidity regulators allowed in both corresponding       UK: accept proposal         POTASSIUM DIHYDROGEN       332(i)       GMP       7       Adopt as listed - corresponds to CODEX       UK: accept proposal         POTASSIUM HYDROGEN       332(i)       GMP       7       Adopt as listed - corresponds to CODEX       UK: accept proposal         VK: accept proposal       UK: accept proposal       UK: accept proposal					with new note "singly or	
PHOSPHATED DISTARCH PHOSPHATE1413600007starch thickeners" (as per 74-1981) & "60000 mg/kg in caned baby food only" (as per 73- 1981)UK: accept proposalPOTASSIUM ALGINATE40250007Discontinue - not allowed in corresponding commodity standardsDiscontinue - not allowed in correspondingPOTASSIUM ALGINATE40250007Adopt - potassium hydrogen carbonate and acidity regulators allowed in bth correspondingVK: accept proposalPOTASSIUM CARBONATE501(i)GMP7Adopt as listed - corresponds to CODEXUK: accept proposalPOTASSIUM HYDROGEN CARBONATE332(i)GMP7Adopt as listed - corresponds to CODEXUK: accept proposalPOTASSIUM HYDROGEN CARBONATE501(ii)GMP7STAN 74-1981UK: accept proposal					in combination with other	
PHOSPHATED DISTARCH PHOSPHATE141360000ref 74-1981) & "60000 mg/kg in caned baby food only" (as per 73- 1981)end does propositionPOTASSIUM ALGINATE14136000071981)Discontinue - not allowed in corresponding commodity standardsPOTASSIUM ALGINATE40250007commodity standardsPOTASSIUM CARBONATE501(i)GMP7commodity standardsPOTASSIUM DIHYDROGEN CITRATE332(i)GMP7Adopt as listed - corresponds to CODEX STAN 74-1981UK: accept proposalUK: accept proposal					starch thickeners" (as	UK: accept proposal
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PHOSPHATED DISTARCH       1413       60000       7       food only" (as per 73-1981)         PHOSPHATE       1413       60000       7       1981)         POTASSIUM ALGINATE       402       5000       7       commodity standards         POTASSIUM ALGINATE       402       5000       7       commodity standards         POTASSIUM CARBONATE       501(i)       GMP       7       Adopt - potassium hydrogen carbonate and acidity regulators allowed in both corresponding commodity standards         POTASSIUM DIHYDROGEN       332(i)       GMP       7       Adopt as listed - corresponds to CODEX STAN 74-1981       UK: accept proposal         VK: accept proposal       UK: accept proposal       UK: accept proposal       UK: accept proposal					mg/kg in caned baby	
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CITRATE     332(i)     GMP     7     Adopt as listed - corresponds to CODEX STAN 74-1981     UK: accept proposal       VDTASSIUM HYDROGEN CARBONATE     501(ii)     GMP     7     Adopt as listed - corresponds to CODEX STAN 74-1981     UK: accept proposal	POTASSIUM DIHYDROGEN		-			
POTASSIUM HYDROGEN     Corresponds to CODEX       CARBONATE     501(ii)       GMP     7	CITRATE	332(i)	GMP	7	Adopt as listed -	UK: accept proposal
CARBONATE 501(ii) GMP 7 STAN /4-1981 UK: accept proposal	POTASSIUM HYDROGEN				corresponds to CODEX	
	CARBONATE	501(ii)	GMP	7	51AN /4-1981	UN: accept proposal

POWDERED CELLULOSE	460(ii)	GMP	7		
PROCESSED EUCHEUMA				Adapt corresponding	
SEAWEED (PES)	407a	GMP	4	Adopt - corresponding	
SODIUM ALGINATE	401	5000	7		
SODIUM CARBOXYMETHYL				allow some ES&I	
CELLULOSE (CELLULOSE GUM)	466	GMP	4		
				Adopt at GMP with new	5000 ma/kg Corresponds to CODEX STAN 073-1081 GMP to 74-
SODIUM DIHYDROGEN				note "5000 mg/kg in	
CITRATE	331(i)	5000	4	canned baby foods"	1901
				Adopt at 50000 mg/kg	
				with new note "singly or	
				in combination with other	LIK: accent proposal
				starch thickeners" (as	
				per CODEX STAN 74-	
STARCH ACETATE	1420	50000	7	1981)	
				Adopt at 50000 mg/kg	
				with new note "singly or	
				in combination with other	UK: accept proposal
				starch thickeners" (as	
STARCH SODIUM OCTENYL			_	per CODEX STAN 74-	
SUCCINATE	1450	50000	7	1981)	
				Adopt - corresponding	
			_	commodity standards	
TARA GUM	417	GMP	7	allow some ES&T	
TRICALCIUM CITRATE	333(iii)	GMP	7	Adopt as listed -	UK: accept proposal
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	corresponds to CODEX	UK: accept proposal
TRISODIUM CITRATE	331(iii)	5000	7	STAN 74-1981	UK: accept proposal
				Adopt at 10000 mg/kg	
				with notes "singly or in	
				combination with INS	
				410, 412, 414, 415, and	LIK: accent proposal
				440" & "20000 mg/kg in	
				gluten-free cereal-based	
				foods only" (as per	
XANTHAN GUM	415	20000	7	CODEX STAN 74-1981)	

#### Food Category No. 14.1.1 (Waters)

Corresponding commodity standards: None, 108-1981 corresponds to subcategory 14.1.1.1 & 227-2001 corresponds to 14.1.1.2

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. that the	EU, Iran, Spain, UK: supports proposal
use of additives in this food category is not justified	

#### Food Category No. 14.1.1.1 (Natural mineral waters and source waters)

Corresponding commodity standards: 108-1981: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. that the	EU, Iran, Spain, UK: supports proposal
use of additives in this food category is not justified	

#### Food Category No. 14.1.1.2 (Table waters and soda waters)

Corresponding commodity standards: 227-2001: does not discuss food additives

**eWG Proposal for Horizontal Classification of Food Category**: Not Justified **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of additives in this food category is not justified

Comments by eWG on horizontal classification proposal: EU, Spain, UK: supports proposal

Food Category No. 14.1.2 (Fruit and vegetable juices)

Corresponding commodity standards: None, 247-2005 corresponds to most subcategories and allows food additives as per Tables 1 & 2

eWG Proposal for Horizontal Classification of Food Category: Justified only with	Comments by eWG on horizontal classification proposal:
note 35 "for use in cloudy juices only"	Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. that the	stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids.
use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products	EU: use should be restricted as outlined in CTS 247-2005
may present decantation of insoluble solids during shelf life. The use of stabilizers is	UK: does not support since CX standard 247-2005 restricts ESTs to only those that are
justified to keep the products uniform	components of foods e.g. Pectins.

# Food Category No. 14.1.2.1 (Fruit juice)

Corresponding commodity standards: 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Justified only with note 35 <sup>55</sup> "for use in cloudy juices only" <b>Justification for proposal</b> : Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform				ied only with dd. that the y products stabilizers is	Comments by eWG on ho Costa Rica, ICGMA: Gum stabilize e.g., pectin, xanth EU: use should be restricted Iran: supports proposal, bu UK: does not support since components of foods e.g. F IFU: use pectin in cloudy ju	prizontal classification proposal: s and thickeners are used to thicken and adjust mouth feel and to um, maltodextrin, other hydrocolloids. ad as outlined in CTS 247-2005 to the standard CX standard 247-2005 must be amended to match e CX standard 247-2005 restricts ESTs to only those that are Pectins. nices
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	GMP	35	Adopted	Retain Adopted as listed	Japan, IFU: agree, prevents nectar precipitation

<sup>&</sup>lt;sup>55</sup> **Note 35:** For use in cloudy juices only.

# Food Category No. 14.1.2.2 (Vegetable juice)

#### Corresponding commodity standards: none

eWG Proposal for Horizontal Classification of Food Category: Justified only with	Comments by eWG on horizontal classification proposal:
note 35 "for use in cloudy juices only"	Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. that the	stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids.
use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products	EU: use should be restricted as outlined in CTS 247-2005
may present decantation of insoluble solids during shelf life. The use of stabilizers is	<b>Iran:</b> supports proposal, but the standard CX standard 247-2005 must be amended to match
justified to keep the products uniform	UK: does not support since CX standard 247-2005 restricts ESTs to only those that are
	components of foods e.g. Pectins.
	IFU: use pectin in cloudy juices

# Food Category No. 14.1.2.3 (Concentrates for fruit juice)

# Corresponding commodity standards: 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

<b><u>ewc</u></b> Proposal for Horizontal Classification of Food Category: Justified only with note 35 "for use in cloudy juices only" <u>Justification for proposal</u> : Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform					Comments by eWG on he Costa Rica, ICGMA: Gum stabilize e.g., pectin, xanth EU: use should be restricted Iran: supports proposal, bu UK: does not support since components of foods e.g. F	prizontal classification proposal: s and thickeners are used to thicken and adjust mouth feel and to um, maltodextrin, other hydrocolloids. ed as outlined in CTS 247-2005 ut the standard CX standard 247-2005 must be amended to match e CX standard 247-2005 restricts ESTs to only those that are Pectins.
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	GMP	35 & 127 <sup>56</sup>	Adopted	Retain Adopted as listed	IFU: agree

#### Food Category No. 14.1.2.4 (Concentrates for vegetable juice)

# Corresponding commodity standards: none

eWG Proposal for Horizontal Classification of Food Category: Justified only with	Comments by eWG on horizontal classification proposal:
note 35 "for use in cloudy juices only"	Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. that the	stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids.
use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products	Iran: supports proposal, but the standard CX standard 247-2005 must be amended to match
may present decantation of insoluble solids during shelf life. The use of stabilizers is	UK: does not support since CX standard 247-2005 restricts ESTs to only those that are
justified to keep the products uniform	components of foods e.g. Pectins.
	IFU: use pectin in cloudy juices

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<sup>&</sup>lt;sup>56</sup> **Note 127:** As served to the consumer.

#### Food Category No. 14.1.3 (Fruit and vegetable nectars)

Corresponding commodity standards: None, 247-2005: allows food additives listed in Tables 1 & 2 in subcategories 14.1.3.1, & 14.1.3.3

eWG Proposal for Horizontal Classification of Food Category: Justified only with	Comments by eWG on horizontal classification proposal:
note "for use in cloudy nectars only"	Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. that the	stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids.
use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products	EU: use should be restricted as outlined in CTS 247-2005
may present decantation of insoluble solids during shelf life. The use of stabilizers is	Iran: supports proposal, but the standard CX standard 247-2005 must be amended to match
justified to keep the products uniform	UK: does not support since CX standard 247-2005 restricts ESTs to only those that are
	components of foods e.g. Pectins.
	IFU: use pectin in cloudy juices

#### Food Category No. 14.1.3.1 (Fruit nectar)

Corresponding commodity standards: None, 247-2005: allows food additives listed in Tables 1 & 2 in 14.1.3.1, & 14.1.3.3

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "for use in cloudy nectars only"					Comments by eWG on horizontal classification proposal: Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to		
<u>Justification for proposal</u> : Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform			d. that the / products tabilizers is	stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. <b>EU:</b> use should be restricted as outlined in CTS 247-2005			
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	

# Food Category No. 14.1.3.2 (Vegetable nectar)

#### Corresponding commodity standards: None

 eWG Proposal for Horizontal Classification of Food Category:
 Justified only with
 Comments by eWG on horizontal classification proposal:

 note "for use in cloudy nectars only"
 Justification for proposal:
 Comments to eWG and in CX/FA 12/44/9 Add. that the
 Costa Rica, ICGMA:
 Gums and thickeners are used to thicken and adjust mouth feel and to

 Justification for proposal:
 Comments to eWG and in CX/FA 12/44/9 Add. that the
 Loss a Rica, ICGMA:
 Gums and thickeners are used to thicken and adjust mouth feel and to

 use of stabilizers are necessary in pulpy juices and nectars.
 Highly pulpy products
 Iran: supports proposal, but the standard CX standard 247-2005 must be amended to match

 ijustified to keep the products uniform
 INS
 Max Level (mar/kg)
 Notes
 Step /
 Adonted

 Additive
 INS
 Max Level (mar/kg)
 Notes
 Step /
 eWG proposal
 Comments by eWG members on proposal

ustified to keep the products unifo	m					
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
					Adopt as listed with note	
					"for use in cloudy nectars	UK, IFU: accepts proposal
PECTINS	440	3000		4	only"	

## Food Category No. 14.1.3.3 (Concentrates for fruit nectar)

Corresponding commodity standards: None, 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Justified only with note "for use in cloudy nectars only" <b>Justification for proposal</b> : Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform				ied only with dd. that the y products stabilizers is	Comments by eWG on horizontal classification proposal: Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. EU: use should be restricted as outlined in CTS 247-2005			
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
PECTINS	440	GMP	127	Adopted	Retain Adopted but with new note "for use in cloudy nectars only"	Iran, UK, IDF: accepts proposal		
Food Category No. <u>14.1.3.4 (Concentrates for vegetable nectar)</u> Corresponding commodity standards: None								
<b>eWG Proposal for Horizontal Classification of Food Category:</b> Justified only with note "for use in cloudy nectars only" <b>Justification for proposal</b> : Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is instituted to know the products uniform.					<u>Comments by eWG on horizontal classification proposal:</u> Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids.			
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal		
PECTINS	440	3000		4	Adopt with note "for use in cloudy nectars only"	UK, IFU: accepts proposal		
Food Category <u>No. 14.1.5 (Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa)</u> Corresponding commodity standards: None								

eWG Proposal for Horizontal Classification of Food Category: Justified Comments by eWG on horizontal classification proposal: Justification for proposal: No corresponding Commodity Standard, Comments to EU: not justified in coffee and unflavoured tea **UK:** add footnote 142 "Excluding coffee and tea" to all proposed provisions **ICGMA:** multiple emulsifiers and thickeners utilized in this category 1st Circular by Codex Members that ES&T are used in all products in this category. Max Level Step / Additive INS Notes eWG proposal Comments by eWG members on proposal (mg/kg) Adopted ACETIC AND FATTY ACID ESTERS OF GLYCEROL 472a GMP 7 Adopt as listed ACETYLATED DISTARCH 10000 7 ADIPATE 1422

PHOSPHATE       1414       10000       7         ACID TREATED STARCH       1401       10000       7         AGAR       406       GMP       7         ALGINIC ACID       400       GMP       4         ALKALINE TREATED STARCH       1402       10000       7         BLEACHED STARCH       1402       10000       7         BLEACHED STARCH       1403       10000       7         CALCIUM CARBONATE       170(i)       10000       58 &         CALCIUM CHLORIDE       509       10000       58       4         CAROB BEAN GUM       410       GMP       7         CITRIC AND FATTY ACID       ESTERS OF GLYCEROL       472c       GMP       7         ESTERS OF GLYCEROL       472c       GMP       7       7         DISTARCH PHOSPHATE       1412       10000       7       7         GUAR GUM       418       GMP       7       7         GUM ARABIC (ACAIA GUM)       414       GMP       7       7         GUM ARABIC (ACAIA GUM)       414       GMP       7       7         HYDROXYPROPYL DISTARCH       1442       10000       7       7         HYDROXYPROPYL METHYL <th>ACETYLATED DISTARCH</th> <th></th> <th></th> <th></th> <th></th>	ACETYLATED DISTARCH				
ACID TREATED STARCH       1401       10000       7         AGAR       406       GMP       7         ALGINIC ACID       400       GMP       4         ALKALINE TREATED STARCH       1402       10000       7         BLEACHED STARCH       1403       10000       7         CALCIUM CARBONATE       170(i)       10000       160 <sup>57</sup> 4         CALCIUM CARBONATE       170(i)       10000       58       4         CAROB BEAN GUM       410       GMP       7         CITRIC AND FATTY ACID       ESTERS OF GLYCEROL       472c       GMP       7         DEXTRINS, ROASTED STARCH       1400       GMP       90 <sup>98</sup> 7         DISTARCH PHOSPHATE       1412       10000       7       6         GUM ARABIC (ACACIA GUM)       418       GMP       7       7         HYDROXYPROPYL DELLULOSE       463       GMP       7       7         HYDROXYPROPYL STARCH       1442       10000       7       7         HYDROXYPROPYL METHYL       CELLULOSE       463       GMP       7       7         HYDROXYPROPYL STARCH       1440       10000       7       7       7         HYDROXYPROPYL	PHOSPHATE	1414	10000		7
AGAR     406     GMP     7       ALGINIC ACID     400     GMP     4       ALKALINE TREATED STARCH     1402     10000     7       BLEACHED STARCH     1402     10000     7       BLEACHED STARCH     1402     10000     7       CALCIUM CARBONATE     170(i)     10000     58 &       CALCIUM CARBONATE     170(i)     10000     58 &       CALCIUM CHLORIDE     509     10000     58 &       CAROB BEAN GUM     410     GMP     7       CITRIC AND FATTY ACID     ESTERS OF GLYCEROL     472c     GMP     7       DEXTRINS, ROASTED STARCH     1400     GMP     7       DISTARCH PHOSPHATE     1412     10000     7       GELLAN GUM     418     GMP     7       GUM ARABIC (ACACIA GUM)     414     GMP     7       HYDROXYPROPYL CELLULOSE     463     GMP     7       HYDROXYPROPYL DISTARCH     1442     10000     7       HYDROXYPROPYL METHYL     GMP     7       CELLULOSE     464     GMP     7       HYDROXYPROPYL METHYL     GMP     7       CHUCOSE     464     GMP     7       HYDROXYPROPYL STARCH     1440     10000     7       KA	ACID TREATED STARCH	1401	10000		7
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BLEACHED STARCH         1403         1000         7           CALCIUM CARBONATE         170(i)         10000         160 <sup>57</sup> 4           CALCIUM CARBONATE         170(i)         10000         58 &         4           CALCIUM CHLORIDE         509         10000         58 & 4         4           CAROB BEAN GUM         410         GMP         7         7           CARRAGEENAN         407         GMP         7         7           CITRIC AND FATTY ACID         ESTERS OF GLYCEROL         472c         GMP         7           DEXTRINS, ROASTED STARCH         1400         GMP         90 <sup>58</sup> 7           DISTARCH PHOSPHATE         1412         10000         7         7           GUAR GUM         418         GMP         7         7           GUAR GUM         414         GMP         7         7           HYDROXYPROPYL CELLULOSE         463         GMP         7         7           HYDROXYPROPYL DISTARCH         1442         10000         7         7           HYDROXYPROPYL STARCH         1440         10000         7         7           HYDROXYPROPYL STARCH         1440         10000         7         7	ALKALINE TREATED STARCH	1402	10000		7
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CALCIUM CARBONATE         170(i)         10000         160 <sup>57</sup> 4           CALCIUM CHLORIDE         509         10000         58         4           CAROB BEAN GUM         410         GMP         7           CAROB BEAN GUM         410         GMP         7           CARRAGEENAN         407         GMP         7           CITRIC AND FATTY ACID         ESTERS OF GLYCEROL         472c         GMP         7           DISTARCH PHOSPHATE         14100         GMP         90 <sup>58</sup> 7           DISTARCH PHOSPHATE         1412         10000         7         GUAR GUM         418         GMP         7           GUAR GUM         418         GMP         7         7         142         10000         7           GUAR GUM         412         GMP         7         1442         10000         7           HYDROXYPROPYL CELLULOSE         463         GMP         7         1442         10000         7           HYDROXYPROPYL METHYL         CELLULOSE         464         GMP         7         1442         10000         7           HYDROXYPROPYL STARCH         1440         10000         7         7         1442         10000		1100	10000	58 &	
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CALCIUM CHLORIDE         509         10000         58         4           CAROB BEAN GUM         410         GMP         7           CAROB BEAN GUM         410         GMP         7           CAROB BEAN GUM         407         GMP         7           CARRAGEENAN         407         GMP         7           CITRIC AND FATTY ACID         EstERS OF GLYCEROL         472c         GMP         7           DEXTRINS, ROASTED STARCH         1400         GMP         90 <sup>58</sup> 7           DISTARCH PHOSPHATE         1412         10000         7         GUAR GUM         418         GMP         7           GUAR GUM         412         GMP         7         7         GUAR ABIC (ACACIA GUM)         414         GMP         7           HYDROXYPROPYL CELLULOSE         463         GMP         7         7         7           HYDROXYPROPYL METHYL         CELLULOSE         464         GMP         7         7           HYDROXYPROPYL METHYL         CELULUOSE         464         GMP         7         7           HYDROXYPROPYL STARCH         1440         10000         7         7         7         7           HYDROXYPROPYL METHYL         CELU					
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GUM ARABIC (ACACIA GUM)     414     GMP     7       HYDROXYPROPYL CELLULOSE     463     GMP     7       HYDROXYPROPYL DISTARCH     PHOSPHATE     1442     10000     7       HYDROXYPROPYL METHYL     CELLULOSE     464     GMP     7       HYDROXYPROPYL STARCH     1440     10000     7       HYDROXYPROPYL STARCH     1440     10000     7       KARAYA GUM     416     GMP     7       KONJAC FLOUR     425     GMP     7       LACTIC AND FATTY ACID     ESTERS OF GLYCEROL     472b     GMP     7	GUAR GUM	412	GMP		7
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HYDROXYPROPYL STARCH     1440     10000     7       KARAYA GUM     416     GMP     7       KONJAC FLOUR     425     GMP     7       LACTIC AND FATTY ACID     ESTERS OF GLYCEROL     472b     GMP     7	CFLLULOSE	464	GMP		7
KARAYA GUM     416     GMP     7       KONJAC FLOUR     425     GMP     7       LACTIC AND FATTY ACID     ESTERS OF GLYCEROL     472b     GMP     7	HYDROXYPROPYL STARCH	1440	10000		7
KONJAC FLOUR     425     GMP     7       LACTIC AND FATTY ACID     ESTERS OF GLYCEROL     472b     GMP     7	KARAYA GUM	416	GMP		7
LACTIC AND FATTY ACID ESTERS OF GLYCEROL 472b GMP 7	KONJAC ELOUR	425	GMP		7
ESTERS OF GLYCEROL 472b GMP 7		120			,
	ESTERS OF GLYCEROL	472b	GMP		7

 <sup>&</sup>lt;sup>57</sup> Note 160: For use in ready-to-drink products and pre-mixes for ready-to-drink products only.
 <sup>58</sup> Note 90: For use in milk-sucrose mixtures used in the finished product.

					Japan: supports proposal Lecithin is used to prevent separation of
					milk fat in canned tea with milk and canned coffee with milk
					Reported from industry, these kind of drinks are produced in Japan
					and part of Asian countries. According to the Food Category
					Descriptors of CSEA, ready to drink products (including connod
					products) are included in this feed estegary
					<b>LISA:</b> Legithin is allowed for use in the LISA in newdered
	222(i)	GMP	7		bovoragos un to 20 mg/"conving"
	522(1)	GMP	 7	4	beverages up to 20 mg/ serving
	311	GMP	 7	4 –	
METHYL CELLULOSE	461	GMP	 /	4 –	
METHYL ETHYL CELLULOSE	465	GMP	 1	4 – –	
MICROCRYSTALLINE			_		
CELLULOSE (CELLULOSE GEL)	460(i)	GMP	 7	4 – – – –	
					Japan: supports proposal. additive is used to prevent separation of
					milk fat in canned tea with milk and canned coffee with milk.
					Reported from industry, these kind of drinks are produced in Japan
					and part of Asian countries. According to the Food Category
MONO- AND DI-GLYCERIDES					Descriptors of GSFA, ready-to-drink products (including canned
OF FATTY ACIDS	471	GMP	7		products) are included in this food category.
MONOSTARCH PHOSPHATE	1410	10000	7		
OXIDIZED STARCH	1404	10000	7	1	
PECTINS	440	GMP	7	1 Γ	ICGMA: used in coffee drinks and substitutes
PHOSPHATED DISTARCH				1 Г	
PHOSPHATE	1413	10000	7		
POTASSIUM CARBONATE	501(i)	GMP	4	1 Г	
POTASSIUM CHLORIDE	508	GMP	4	1 F	
POTASSIUM DIHYDROGEN				1 Г	
CITRATE	332(i)	GMP	7		
POWDERED CELLULOSE	460(ii)	GMP	7	1 Γ	
PROCESSED EUCHEUMA				1 [	
SEAWEED (PES)	407a	GMP	7		
SALTS OF MYRISTIC, PALMITIC				1 Γ	
AND STEARIC ACIDS WITH					
AMMONIA, CALCIUM,					
POTASSIUM AND SODIUM	470(i)	GMP	7		
SALTS OF OLEIC ACID WITH				] Γ	
CALCIUM, POTASSIUM AND					
SODIUM	470(ii)	GMP	7		
SODIUM ALGINATE	401	GMP	4	] [	

SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	7	Japan: supports proposal. Additive is used to prevent separation of oil included in coffee bean. In addition, Sodium carboxymethyl cellulose is used to prevent separation of milk fat in canned tea with milk and anned coffee with milk. Reported from industry, these kind of drinks are produced in Japan and part of Asian countries. According to the Food Category Descriptors of GSFA, ready-to- drink products (including canned products) are included in this food category
SODIUM DIHYDROGEN				
CITRATE	331(i)	GMP	7	
SODIUM GLUCONATE	576	GMP	4	
STARCHES, ENZYME TREATED	1405	10000	7	
TARA GUM	417	GMP	7	
TRAGACANTH GUM	413	GMP	7	
TRIPOTASSIUM CITRATE	332(ii)	GMP	7	
TRISODIUM CITRATE	331(iii)	GMP	7	
XANTHAN GUM	415	GMP	7	

# Food Category No. 14.2.3 (Grape wines)

# Corresponding commodity standards: None

<b><u>eWG Proposal for Horizontal Classification of Food Category</u>:</b> Justified <u>Justification for proposal</u> : No corresponding commodity standard, Comments to eWG on specific provisions demonstrate that ES&T are used in this category					Comments by eWG on horizontal classification proposal: EU: The food category "grape wine" is identified in the GSFA as the wine defined by the International Code of Oenological Practices, established by the International Organisation for Vine and Wine (footnote 87 of the Codex General Standard for Food Additives - CODEX STAN 192-1995 as amended). The International Code of Oenological Practice corresponds to a commodity standard. The list of additives in the GSFA should be analysed on case-by-case basis to be coherent with the additives listed in the International Code of Oenological Practices. Emulsifiers are not justified for grape wine. NZ: proposes use of Agar (INS 406) and carob bean gum (INS 410) @ GMP.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CALCIUM CARBONATE	170(i)	3500		7	Adopt at GMP	EU: discontinue - Calcium carbonate is allowed in EU for deacidification of the must and the wine; it precipitates the free tartaric acid, it is a processing aid (1) - out of the scope of GSFA NZ: JECFA ADI no specified - adopt a GMP - used to acidify wine USA: calcium carbonate is allowed in the USA for use in formula wines as an acidity regulator at a level of 30 lbs/1000 gallons (approximately 3500 mg/kg)	
CAROB BEAN GUM	410	GMP		7		EU: does not support, not allowed by OIV NZ: adopt at GMP OIV - discontinue - comments to CX/FA 12/44/9 Add 2	
GELLAN GUM	418	GMP		7	Discontinue	EU: does not support, not allowed by OIV OIV: use of gellan gum in this FC not recognized by OIV	

GUAR GUM	412	GMP	7		EU: does not support, not allowed by OIV
GUM ARABIC (ACACIA GUM)	414	GMP	4		EU: supports 300 mg/kg level, gum arabic is allowed in EU as
					thickener and stabilizer (to prevent precipitation of tartar, copper,
					iron and anthocyanins)
					Canada: does not object to a maximum level consistent with GMP
					for the use of gum arabic in wine as Canada permits gum arabic to
					be used as a fining agent in wine at a maximum level consistent
				Adapt at CMD	with GMP and the Canadian wine industry has requested that gum
				Discontinuo et 200 mg/kg	arabic be added to the GSFA for use in wine at a level of GMP to
				Discontinue at 500 mg/kg	clarify and to stabilize wine.
					NZ: adopt @ GMP, used to stabilize collidal forms of natural
					coloring pigments, prevents their coagulation and sedimentation in
					red wines
					<b>USA:</b> gum arabic is allowed for use in the USA for use in wine as a
					clarifiy/thickener up to a level of 2 lb/1000 gal (~2.4 mg/kg)
GUM ARABIC (ACACIA GUM)	414	300	7		OIV: adopt at 300 mg/kg - comments to CX/FA 12/44/9 Add 2
KARAYA GUM	416	GMP	7		EU: does not support, not allowed by OIV
KONJAC FLOUR	425	GMP	7		OIV - discontinue - comments to CX/FA 12/44/9 Add 2
MONO- AND DI-GLYCERIDES				Discontinue	EU: does not support, not allowed by OIV - out of scope, used as
OF FATTY ACIDS	471	18	7	Discontinue	antifoaming agent
					EU: does not support, not allowed by OIV
PECTINS	440	GMP	7		OIV - discontinue - comments to CX/FA 12/44/9 Add 2
					EU: does not support, not allowed by OIV, increases instability of
					wine
					NZ: supports at GMP
					<b>USA:</b> potassium carbonate is allowed in the USA for use in formula
POTASSIUM CARBONATE	501(i)	5000	7	Adopt at GMP	wine as an acidity regulator up to 5000 mg/kg
					EU: does not support, not allowed by OIV, increases instability of
					wine
					NZ: supports at GMP
POTASSIUM HYDROGEN	504(")	5000	-		USA: potassium carbonate is allowed in the USA for use in formula
	501(II)	5000	/ 7		wine as an acidity regulator up to 5000 mg/kg
	417		 /		EU: does not support, not allowed by OIV
TRAGACANTH GUM	413	GMP	/	Discontinue	OIV - discontinue - comments to CX/FA 12/44/9 Add 2
XANTHAN GUM	415	GMP	7		

# Food Category No. 14.2.3.1 (Still grape wine)

## Corresponding commodity standards: none

eWG Proposal for Horizontal Classification of Food Category: Justified	Comments by eWG on horizontal classification proposal:
Justification for proposal: No corresponding commodity standard, Comments to	EU: to be considered on a case-by-case basis. Some thickeners and stabilizers affect quality
eWG on specific provisions demonstrate that ES&T are used in the parent category	characteristics of wine and must be carefully considered

# Food Category No. 14.2.3.2 (Sparkling and semi-sparkling grape wines)

Corresponding commodity standards: None

<b>eWG Proposal for Horizontal Classification of Food Category:</b> Justified <b>Justification for proposal</b> : No corresponding commodity standard, Comments to eWG on specific provisions demonstrate that ES&T are used in the parent category				Comments by eWG on horizontal classification proposal: EU: to be considered on a case-by-case basis. Some thickeners and stabilizers affect quality characteristics of wine and must be carefully considered.		
Additive INS Max Level (mg/kg) Notes Adopted			eWG proposal	Comments by eWG members on proposal		
GMP		7	Discontinue	EU: does not support, although used in EU for clarification it is a		
g E	g commodity star ES&T are used i Max Level (mg/kg) GMP GMP	g commodity standard, Com ES&T are used in the parent Max Level (mg/kg) GMP GMP	g commodity standard, Comments to       ES&T are used in the parent category       Max Level (mg/kg)     Notes       GMP     7       GMP     7	g commodity standard, Comments to ES&T are used in the parent category     EU: to be considered on a characteristics of wine and       Max Level (mg/kg)     Notes     Step / Adopted     eWG proposal       GMP     7     Discontinue		

#### Food Category No. 14.2.3.3 (Fortified grape wine, grape liquor wine, and sweet grape wine)

### Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified					Comments by eWG on h	orizontal classification proposal:	
Justification for proposal: No corresponding commodity standard, Comments to					EU: to be considered on a case-by-case basis. Some thickeners and stabilizers affect quality		
eWG on specific provisions demonstrate that ES&T are used in the parent category				nt category	characteristics of wine and must be carefully considered.		
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal	
CALCIUM SULFATE	516	2000		7	Adopt	EU: could support its use as an acidity regulator in some traditionnal products as "vino generoso", up to 2500mg/l. USA: calcium sulfate is allowed for use in formula wine as an acidity regulator up to 2 g/L (~ 2000 mg/kg)	