CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 5(a) **CX/FA 13/45/7**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

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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 43rd 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.[1]

2. To facilitate the consideration of these groups of food additives, the 43rd 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.

3. The eWG on the GSFA for the 44th Session of the CCFA prepared proposals for the horizontal approach for both "acidity regulators" and "emulsifiers, stabilizers, thickeners".[2] The pWG on the GSFA at the 44th Session of the CCFA considered the horizontal approach for "acidity regulators" proposed by the eWG and provided subsequent recommendations to the 44th Session of the CCFA.[3] 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.

[1] REP 11/FA, paras. 71-72.
[2] CX/FA 12/44/9 Add 1.
[3] FA 44/CRD 2, Appendix 8.
[4] 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 44th 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 44th 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 44th 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 44th 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.[5] The hierarchical nature of the food category system is reflected by including subcategories affected by the listing of a parent food category in the Annex to Table 3. Information on commodity standards that correspond to each 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 44th 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 underlining 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

[5] 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.[6] The hierarchical nature of the food category system is reflected by including subcategories affected by the listing of a parent food category in the Annex to Table 3. Information on 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).

[6] 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)

44th 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 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~~	~~331(iii)~~	~~GMP~~		~~7~~	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 44th 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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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	Adopt with note "For use in heat-treated buttermilk only"	**UK, IDF:** supports proposals **ELC:** the definition as laid down in the FC includes processed 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 prevent thermal coagulation. The majority of potential acidity
MAGNESIUM HYDROXIDE	528	GMP		7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP		7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POTASSIUM LACTATE	326	GMP		7		
SODIUM DIHYDROGEN	331(i)	GMP		7		

CITRATE						regulators have more functions that just AR, therefore the discussion should be restricted to the functional class as such. All 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 gelling
SODIUM LACTATE	325	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	**331(iii)**	**GMP**		**7**		

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

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

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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 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 **Justification for proposal**: Acidity regulators are not listed for use in plain fermented milks in CODEX STAN 243-2003.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, UK, IDF:** Supports proposal

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 Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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
AMMONIUM HYDROXIDE	527	GMP		4	Adopt	**Brazil, Costa Rica, EU, Spain, UK, ICGMA, IDF:** support proposals. **USA:** Citiric acid is allowed for use in the USA in acidified milk in the US as an acidity regulator at GMP and in cultured milk as a "flavour precursor" at 1500 mg/k **IDF:** There is a one-to-one relationship between this category and the Codex STAN 243-2003
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		
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		
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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: No technological justification provided for provisions by eWG Members

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
CALCIUM CARBONATE	170(i)	GMP		7	Postpone until discussion of FC 01.2.2 in Appendix 3 - used as ES&T	
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	Postpone until discussion of FC 01.2.2 in Appendix 3 - used as ES&T	
SODIUM DIHYDROGEN 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 Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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 provided by eWG members: **Brazil:** Not Justified. CODEX STAN 288-1976: "With regard to the durability, special consideration should be given to the level of heat treatment applied since some minimally pasteurized products do not require the use of certain additives." **IDF:** Supports general classification. Technological justification: to ensure product stability and the integrity of the emulsion and taking into consideration the fat content and the durability expected of the product.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	GMP		7	Postpone until discussion of FC 01.4.1 in Appendix 3 - used as ES&T	
CALCIUM LACTATE	327	GMP		7	Adopt at GMP – corresponds to CODEX STAN 288-1976	
CITRIC ACID	330	GMP		7		
LACTIC ACID, L-, D- and DL-	270	GMP		4		
POTASSIUM CARBONATE	501(i)	GMP		7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	Postpone until discussion of FC 01.4.1 in Appendix 3 - used as ES&T	
POTASSIUM HYDROGEN CARBONATE	501(ii)	2000		7	Adopt at GMP – corresponds to CODEX STAN 288-1976	**IDF:** supports adoption at GMP
POTASSIUM LACTATE	326	GMP		7		
SODIUM CARBONATE	500(i)	GMP		7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Postpone until discussion of FC 01.4.1 in Appendix 3 - used as ES&T	
SODIUM HYDROGEN CARBONATE	500(ii)	GMP		7	Adopt at GMP – corresponds to CODEX STAN 288-1976	
SODIUM LACTATE	325	GMP		7		
SODIUM SESQUICARBONATE	500(iii)	GMP		7		**USA:** sodium sesquicarbonate is considered GRAS in the USA for use as an acidity regulator for use in cream (FC 01.4) at GMP
TRICALCIUM CITRATE	333(iii)	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	Postpone until discussion of FC 01.4.1 in Appendix 3 - used as ES&T	

TRISODIUM CITRATE	331(iii)	1000		7	Adopt at GMP – corresponds to CODEX 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 Classification of Food Category:

Comments by eWG on horizontal classification proposal:
The decision of the pWG on the GSFA at the 44th 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
CALCIUM CARBONATE	170(i)	5000		7	Postpone discussion until Appendix 3 – listed as stabilizer/thickener at GMP in CODEX STAN 288-1976	**Brazil:** Accepts proposals. Note that provisions overlap with those in EST circular. **Costa Rica and Spain:** Those additives listed in CODEX STAN 288-1976 as stabilizer/thickener are already addressed in the EST working document. Agree with the proposal to list all as GMP without notes. **EU:** supports **Iran:** supports adoption of Citric acid (INS 330) at GMP **Japan**: Do not support use of new note "for use of stabilizer/thickener" as additives with this note are not listed as thickeners in the INS. **UK:** Accepts proposals **IDF:** Supports proposals for those acidity regulators listed in Codex Stan 288-1976. Technological justification: to ensure product stability and the integrity of the emulsion and taking into consideration the fat content and the durability expected of the product.
CALCIUM LACTATE	327	GMP		4	Adopt at GMP - corresponds to CODEX STAN 288-1976	
CITRIC ACID	330	GMP		7		
LACTIC ACID, L-, D- and DL-	270	GMP		4		
POTASSIUM CARBONATE	501(i)	GMP		7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	Postpone discussion until Appendix 3 – listed as stabilizer/thickener at GMP in CODEX STAN 288-1976	
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
POTASSIUM LACTATE	326	GMP		7		
SODIUM CARBONATE	500(i)	GMP		7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Postpone discussion until Appendix 3 – listed as stabilizer/thickener at GMP in CODEX STAN 288-1976	
SODIUM HYDROGEN CARBONATE	500(ii)	GMP		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
SODIUM LACTATE	325	GMP		7		
SODIUM SESQUICARBONATE	500(iii)	GMP		7		
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 288-1976	
TRISODIUM CITRATE	331(iii)	5000		7		

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 **Justification for proposal**: There are no proposed provisions for Acidity Regulators in this FC.	**Comments by eWG on horizontal classification proposal:** **Spain, IDF:** Supports proposal **IFAC:** 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

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: 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 horizontal classification proposal:** **Costa Rica, Spain, UK, US and IDF:** Support proposal **EU:** Case-by-Case but supports retaining adopted provisions **ICGMA:** Acidification to create proper pH balance needed for coagulation of milk to occur when producing ricotta cheese

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP		Adopted	Retain Adopted	
CITRIC ACID	330	GMP		Adopted		
GLUCONO DELTA-LACTONE	575	GMP		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
Justification for proposal: For food additives CODEX STAN 289-1995 refers to provisions in FC 01.8.2 in Tables 1 & 2. Food category 01.8.2 contains adopted provisions for additives with the technological function of acidity regulators.

Comments by eWG on horizontal classification proposal:
Costa Rica, UK: Support proposal.
Spain: questions whether it is appropriate or in the tasks of this eWG to address additives that are used as anticaking agents, not acidity regulators.
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.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	10000		Adopted	Retain Adopted	**IDF:** Not justified as ACR, but justified as anticaking agent
CALCIUM HYDROXIDE	526	GMP		Adopted		**IDF**: Justified
MAGNESIUM CARBONATE	504(i)	10000		Adopted		**IDF**: Not justified as ACR, but justified as anticaking agent
POTASSIUM CARBONATE	501(i)	GMP		Adopted		**IDF**: Not justified as ACR but justified as stabilizer
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		Adopted		**IDF**: Not justified as ACR but justified as stabilizer
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP		Adopted		**IDF**: Not justified as ACR but justified as stabilizer
POTASSIUM HYDROXIDE	525	GMP		Adopted		**IDF**: Justified
SODIUM CARBONATE	500(i)	GMP		Adopted		**IDF:** Not justified as ACR but justified as stabilizer
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		Adopted		**IDF:** Not justified as ACR but justified as stabilizer
SODIUM HYDROGEN CARBONATE	500(ii)	GMP		Adopted		**IDF:** Not justified as ACR but justified as stabilizer
SODIUM HYDROXIDE	524	GMP		Adopted		**IDF**: Justified
SODIUM SESQUICARBONATE	500(iii)	GMP		Adopted		**IDF:** Not justified as ACR but justified as stabilizer
TRIPOTASSIUM CITRATE	332(ii)	GMP		Adopted		**IDF:** 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 **Justification for proposal**: Different commodity standards, some of which do not allow acidity regulatrors, apply to subcategories. Therefore not justified in this parent category.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain:** Support proposal **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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Based upon comments from eWG members, the currently adopted provisions in FC 02.1.1 for food additives with the technical function of acidity regulators is for use as antioxidants/ antioxidant synergists.	**Comments by eWG on horizontal classification proposal:** **EU, Spain, IDF:** support proposal **UK:** Codex standard does not specifically refer to acidity regulators. Additives listed in 02.1.1 likely act as antioxidants or emulsifiers. No sound technological justification for the generic use of acidity regulators in this category has been presented. **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. **ICGMA**: The listed 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
CITRIC ACID	330	GMP	171[7]	Adopted	Retain adopted	**ICGMA:** used as antioxidant synergist - retain adopted **IDF:** Not justified as ACR but justified as antioxidant
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	171	Adopted		**IDF:** Not justified as ACR but justified as antioxidant
TRISODIUM CITRATE	331(iii)	GMP	171	Adopted		**IDF:** Not justified as ACR but justified as antioxidant

[7] **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 Classification of Food Category: Not Justified **Justification for proposal**: Corresponding commodity standards do not allow acidity regulators. Comments from eWG members indicate that proposed provisions for food additives with the technical function of acidity regulators is for their use as antioxidants/ antioxidant synergists.	**Comments by eWG on horizontal classification proposal:** **Brazil:** Supports use of acidity regulators. **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. **EU:** Supports proposal – the proposed provisions do not relate to the use of these additives as acidity regulators. **Japan:** Is of the view that foodstuffs covered by FC 2.1.2 are categorized in one of corresponding CODEX STANs **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, 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	Discontinue	**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
ASCORBIC ACID, L-	300	200		7		**Costa Rica:** Industry uses ascorbic acid in vegetable oils and fats to prevent metal oxidative breakdown. **Japan:** supports proposal, not allowed in corresponding commodity standards.
CALCIUM LACTATE	327	GMP		7		**Japan:** supports proposal, not allowed in corresponding commodity standards.

CITRIC ACID	330	100	15[8]	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"	**Costa Rica:** Industry uses citric acid in vegetable oils and fats to prevent metal oxidative breakdown. **Japan:** supports proposal, allowed at GMP without Note 15 in corresponding commodity standards.
GLUCONO DELTA-LACTONE	575	GMP		7	Discontinue	**Japan:** supports proposal, not allowed in corresponding commodity standards.
LACTIC ACID, L-, D- and DL-	270	GMP		7		
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		**Japan:** supports proposal, not allowed in corresponding commodity standards.
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POTASSIUM LACTATE	326	GMP		7		
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"	**Japan:** supports proposal allowed at GMP in corresponding commodity standards.
SODIUM HYDROGEN CARBONATE	500(ii)	GMP		7	Discontinue	**Japan:** supports proposals, not allowed in corresponding commodity standards.
SODIUM LACTATE	325	GMP		7		
SODIUM SESQUICARBONATE	500(iii)	GMP		7		
TRICALCIUM CITRATE	333(iii)	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		

[8] **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"	**Japan:** supports proposal allowed at GMP in corresponding commodity standards.

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 Classification of Food Category: Not Justified **Justification for proposal**: Corresponding commodity standards do not allow acidity regulators. Comments from eWG members indicate that proposed provisions for food additives with the technical function of acidity regulators is for their use as antioxidants/ antioxidant synergists.	**Comments by eWG on horizontal classification proposal:** **Brazil:** Supports use of acidity regulators. **EU:** Supports proposal – the proposed provisions do not relate to the use of these additives as acidity regulators. **Japan:** Is of the view that foodstuffs covered by FC 2.1.3 are categorized in one of corresponding CODEX STANs **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. It could be appropriate to change the wording of the new note in order to use the term "antioxidant synergist" as stated in the commodity standard **UK: T**here is no acceptance 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 (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	5000		7	Discontinue	**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 **Japan:** seeks information about technological justification for the use of acidity regulator in vegetable fats and oils
ASCORBIC ACID, L-	300	200		7		**ICGMA:** Currently, industry uses ascorbic acid in FC 02.1.3. Serves primarily as chelator (to prevent metal-catalyzed oxidative breakdown – antioxidant or antioxidant synergist)
CALCIUM LACTATE	327	GMP		7		**Japan:** supports proposal, not allowed in corresponding commodity standards.

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 standards.
LACTIC ACID, L-, D- and DL-	270	GMP		7		
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	332(i)	GMP		7	Discontinue	**Japan:** supports proposal, not allowed in corresponding commodity standards.
POTASSIUM LACTATE	326	GMP		7		
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"	**Japan:** supports proposal allowed at GMP in corresponding commodity standards.
SODIUM HYDROGEN CARBONATE	500(ii)	GMP		7	Discontinue	**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
SODIUM HYDROXIDE	524	GMP		7		**Japan:** supports proposals, not allowed in corresponding commodity standards.
SODIUM LACTATE	325	GMP		7		
SODIUM SESQUICARBONATE	500(iii)	GMP		7		
TRICALCIUM CITRATE	333(iii)	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		

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"	**Japan:** supports proposal allowed at GMP in corresponding commodity standards.

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 Classification of Food Category: Justified only with note "for use in soured cream butter only" **Justification for proposal**: Comments from eWG members that acidity regulators are only allowed in certain types of butter.	**Comments by eWG on horizontal classification proposal:** **Brazil:** Case-by-Case basis, but retain adopted provisions. **EU:** Case-by-Case basis. Acidity regulators are generally not justified in butter. To our knowledge only sodium carbonates are used to stabilise pH of a very specific product - soured cream butter **UK:** Technological Justification? Standard 279 doesn't specifically mention acidity regulators. Without a convincing case we favour removal of these provisions from GSFA. **IDF comments:** IDF recommends that the limited number of Acidity Regulators listed below are 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 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	Retain adopted	**Brazil:** retain adopted **EU:** revoke provisions for INS 526 & 524, restrict INS 500(i) & (ii) to "soured cream butter only" **UK:** Revoke provisions **IDF:** Adopted provisions are technologically justified.
SODIUM CARBONATE	500(i)	GMP		Adopted		
SODIUM HYDROGEN CARBONATE	500(ii)	GMP		Adopted		
SODIUM HYDROXIDE	524	GMP		Adopted		

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 44th 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; 215-1999; 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 **Justification for proposal**: Food additives are not allowed in the corresponding commodity standards. There are no existing provisions for acidity regulators in the GSFA for this food category.	**Comments by eWG on horizontal classification proposal:** **EU, Brazil, Spain, UK:** Support proposal

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 44th 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 acidity 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

Corresponding commodity standards: None

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

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 Classification of Food Category: Not Justified – Discontinue all provisions and move to subcategories where appropriate. **Justification for proposal**: Use of acidity regulators are not justified in all subcategories (04.2.1.3), Commodity standards corresponding to subcategories require the use of notes specific to the subcategory.	**Comments by eWG on horizontal classification proposal:** **EU, Brazil, Spain, UK:** Support proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~ACETIC ACID, GLACIAL~~	~~260~~	~~GMP~~		~~7~~	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 FC.	
~~ASCORBIC ACID, L-~~	~~300~~	~~500~~		~~7~~	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 moved to that FC.	
~~CITRIC ACID~~	~~330~~	~~GMP~~		~~7~~	Discontinue in FC 04.2.1	

~~LACTIC ACID, L-, D- and DL-~~	~~270~~	~~GMP~~		~~7~~		
~~MALIC ACID, DL-~~	~~296~~	~~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 FC.	
~~SODIUM ACETATE~~	~~262(i)~~	~~GMP~~		~~7~~		
~~SODIUM DIHYDROGEN CITRATE~~	~~331(i)~~	~~GMP~~		~~7~~	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 discussion until Appendix 3.	
~~SODIUM LACTATE~~	~~325~~	~~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 FC	
~~TRISODIUM CITRATE~~	~~331(iii)~~	~~2000~~		~~7~~		

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 Classification of Food Category: Justified only with notes limiting use to edible fungi and fungus products **Justification for proposal**: Acidity regulators are only allowed in one corresponding commodity standard ("Standard for edible fungi and fungus products" 038-1981)	**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 **UK**: Case-by-Case

Additive	INS	Max Level (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 "for use in edible fungi" & "Citric Acid (INS 220) and Lactic acid (INS 270) 5 g/kg singly or in combination in sterilized fungi"	
LACTIC ACID, L-, D- and DL-	**270**	**GMP**				

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Comments to eWG indicate that proposed provisions in this food category for food additives with acidity regulator function are for use of the additives as film thickening/stabilizing agents.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, UK:** questions technological need. **Costa Rica:** These types of additives are technologically justified for use in surface-treated fresh vegetables. Modified food starches are typically used with components such as organic acids. **ICGMA:** Modified food starches 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 order that it adhere to the surface of the fresh fruits and vegetables. These types of additives are technologically justified for use in surface-treated fresh vegetables.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	**260**	**GMP**			Do not move from FC 04.2.1	
ASCORBIC ACID, L-	**300**	**500**				
CALCIUM CARBONATE	170(i)	GMP	4[9] & 16[10]	7	Postpone until discussion of this FC in Appendix 3	**EU:** used as a firming agent - out of the scope of eWG
CALCIUM GLUCONATE	578	800	58[11]	7	Adopt with Note 3 "Surface treatment", Note 58 "as calcium" and new note "for use as firming agent"	**Brazil:** supports adoption for use as firming agents **EU:** used as a firming agent - out of the scope of eWG
CALCIUM HYDROXIDE	526	800	58	7		
CITRIC ACID	**330**	**GMP**			Do not move from FC 04.2.1	
LACTIC ACID, L-, D- and DL-	**270**	**GMP**				
MAGNESIUM CARBONATE	504(i)	GMP	16	7	Discontinue	
MAGNESIUM HYDROXIDE	528	GMP	16	7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP	16	7		
MALIC ACID, DL-	**296**	**GMP**			Do not move from FC 04.2.1	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	16	7	Postpone until discussion of this FC in Appendix 3	
SODIUM ACETATE	**262(i)**	**GMP**			Discontinue	
SODIUM DIHYDROGEN CITRATE	**331(i)**	**GMP**			Postpone until discussion of this FC in Appendix 3	
SODIUM LACTATE	**325**	**GMP**			Discontinue	

[9] **Note 4:** For decoration, stamping, marking or branding the product.
[10] **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.
[11] **Note 58:** As calcium.

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

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

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)

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. 110-1981, 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 **Justification for proposal**: 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 allowed in corresponding commodity standards	**Brazil:** ascorbic acid is necessary as an antioxidant, calcium gluconate and calcium hydroxide are used as firming agents **EU:** use is out of the scope of eWG discussion
CALCIUM GLUCONATE	578	1000	58	7		
CALCIUM HYDROXIDE	526	1000	58	7		

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

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>:	The decision of the pWG on the GSFA at the 44th 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
ASCORBIC ACID, L-	300	GMP		4		

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[12]	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 <u>No. 06.1 (Whole, broken, or flaked grain, including rice)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified
<u>Justification for proposal</u>: Comments to eWG indicate that proposed provisions in this food category for food additives with acidity regulator function are for use of the additives as anti-caking agents or processing aids.

<u>Comments by eWG on horizontal classification proposal</u>:
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[13]	7	Adopt with Note 184 and new note "for use as an anticaking agent"	**Brazil:** supports the adoption of this provision, noting that calcium carbonate is used as anticaking agent. **UK:** Agree with this proposal.
SODIUM ACETATE	262(i)	6000		7	Discontinue	**Brazil**: supports the adoption of this provision. **UK**: Can agree if Note 184 is added. Otherwise wish to see a technological justification before proceeding. **USA**: sodium acetate allowed for use in Grains (FC 06.0) as an acidity regulator up to 6000 mg/kg **IFAC:** higher processing pH improves starch gellation allowing for less harsh processing conditions.

[12] **Note 36:** Residual level.
[13] **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 Classification of Food Category: Not Justified
Justification for proposal: Comments to eWG indicate that the use of acidity regulators is limited in subcategories to FC 06.2. Therefore broad use of acidity regulators in the parent category is not justified.

Comments by eWG on horizontal classification proposal:
Brazil: supports proposals to discontinue and move to subcategories
EU, Spain: Supports Proposal
UK: These substances are probably being used as components of raising agent systems so that it is more appropriate for them to be included within FC 07.2 or its sub-categories. Then flour supplied for making fine bakery wares, can include raising agents because of the carryover principle

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. Refer to discussion on general approach in subcategories 06.2.1 & 06.2.2 to determine if provisions should be moved to those subcategories	
~~HYDROCHLORIC ACID~~	~~507~~	~~GMP~~		~~7~~		
~~SODIUM ACETATE~~	~~262(i)~~	~~6000~~		~~7~~		**USA:** 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~~		
~~TRISODIUM CITRATE~~	~~331(iii)~~	~~GMP~~		~~4~~		

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

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: 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 horizontal classification proposal:
UK: Supports proposal, no technological justification for acidity regulators is presented or available from a commodity standard. (Whilst 301 R - 2011 references FC 6.2.1 that FC in the GSFA does not include any acidity regulators.)
Spain: Questions whether it is appropriate or in the tasks of this eWG to address additives that are used as flour treatment 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"	**Brazil:** suggests adoption with maximum use level of GMP, with Note 186. **USA:** ascorbic acid is allowed in flour as a flour treatment agent up to 200 mg/kg. **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.

CALCIUM CARBONATE	170(i)	GMP	57[14]	7	Adopt with Notes 57, 186[15], & new note "for use as a flour treatment agent"	**Brazil:** 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	**USA:** 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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: Comments to eWG indicate that proposed provision for sodium hydroxide in this food category is for use as a processing aid.

Comments by eWG on horizontal classification 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)**	**10000**	**58**		Do not move from FC 06.2	
HYDROCHLORIC ACID	**507**	**GMP**				
SODIUM ACETATE	**262(i)**	**6000**				
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

[14] **Note 57:** GMP is 1 part benzoyl peroxide and not more than 6 parts of the subject additive by weight.
[15] **Note 186:** For use in flours with additives only.

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

Food Category <u>No. 06.4.1 (Fresh pastas and noodles and like products)</u>

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

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: comments by eWG members that acidity regulators are used in fresh pastas and noodles by at least some Codex members.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil:** supports adoption of all provisions **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
CITRIC ACID	330	GMP		4		**Brazil, EU:** supports adoption **Japan:** used in noodles to prolong shelf life by adjusting pH. It is used up to 10000 mg/kg
FUMARIC ACID	297	600		4		**Brazil:** supports adoption **EU:** does not support in fresh pastas **Japan** proposes to change maximum use level to 700 mg/kg. Fumaric acid is used in noodle to prolong shelf life by adjusting pH.
GLUCONO DELTA-LACTONE	575	GMP		4		**Brazil:** supports adoption **EU:** does not support in fresh pasta
LACTIC ACID, L-, D- and DL-	270	GMP		4	Adopt	**Brazil, EU:** supports adoption **Japan:** used in noodles to prolong shelf life by adjusting pH. It is used up to 10000 mg/kg
POTASSIUM CARBONATE	501(i)	2600		7		**Brazil:** supports adoption **EU:** does not support in fresh pastas **Japan:** used to harden alkaline noodle. It is used up to 11000 mg/kg.
SODIUM ACETATE	262(i)	6000		7		**Brazil:** supports adoption **EU:** does not support in fresh pasta
SODIUM CARBONATE	500(i)	2600		7		**Brazil:** supports adoption **EU:** does not support in fresh pastas **Japan:** used to harden alkaline noodle. It is used up to 10000 mg/kg.
SODIUM DL-MALATE	350(ii)	GMP		4		**Brazil:** supports adoption **EU:** does not support in fresh pastas **Japan:** used in noodle to improve water retention by adjusting pH. It is used up to 4000 mg/kg.

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

Food Category <u>No. 06.4.2 (Dried pastas and noodles and like products)</u>

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

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: comments by eWG members that acidity regulators are used in fresh pastas and noodles by at least some Codex members.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil:** (CX/FA 12/44/9 Add. 2): - acidity regulators necessary to prevent undesired changes 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	Adopt	**EU:** can accept these provisions in noodles and in gluten free pasta and pasta intended for hypoproteic diets
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		
POTASSIUM CARBONATE	501(i)	2600		7		
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 No. 08.1 (Fresh meat, poultry, and game)

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**: From comments by eWG members on specific provisions and on subcategories, all justifications for use appear to be for a technological function other than as acidity regulators.	**Comments by eWG on horizontal classification proposal:** **EU, Spain:** Supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~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"	**Spain and UK**: Agree with discontinuation **USA**: 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	**Spain and UK**: Agree with discontinuation **USA**: 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"	**Spain and UK**: Agree with discontinuation **USA**: 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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: From comments by eWG members on specific provisions and on subcategories, all justifications for use appear to be for a technological function other than use as acidity regulators.	**Comments by eWG on horizontal classification proposal:** **Brazil:** Strongly oppose to the adoption of these provisions. There is no technological need for the use of acidity regulators in fresh meat, even with note 4 and 16. The justification of adding to the surface of fresh meat is not clear. **EU:** supports proposal; does not support the use of food additives in fresh meat except for certain colours for health marking **Spain:** supports proposal **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 control agent. **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
ACETIC ACID, GLACIAL	260	GMP		7	Discontinue	**USA:** acetic acid is allowed in the USA at GMP in meat products (FC 08.0) for general food additive use.
ASCORBIC ACID, L-	**300**	**2000**		**7**	Adopt at 500 mg/kg with Note 16 and new note "for use as a color retention agent"	**USA:** 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 mg/kg
CALCIUM CARBONATE	170(i)	GMP	4 & 16	7	Postpone discussion until Appendix 3 – possibly used as ES&T	
CALCIUM HYDROXIDE	526	GMP		7	Discontinue	
CALCIUM OXIDE	529	GMP		7		
CITRIC ACID	330	2000		7	Adopt at 500 mg/kg with Note 16 and new note "for use as a color retention agent"	**USA:** citric acid is allowed for use in the USA on fresh meat cuts as a color retention agent at levels up to 500 mg/kg and an anticoagulant in fresh blood of livestock at up to 2000 mg/kg
MAGNESIUM CARBONATE	504(i)	GMP	16	7	Discontinue	
MAGNESIUM HYDROXIDE	528	GMP	16	7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP	16	7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	16	7	Postpone discussion until Appendix 3 – possibly used as ES&T	
POTASSIUM HYDROXIDE	525	GMP		7	Discontinue	
SODIUM ACETATE	262(i)	GMP		7		
SODIUM CARBONATE	500(i)	GMP		7		

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

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: From comments by eWG members on specific provisions and on subcategories, all justifications for use appear to be for a technological function other than as acidity regulators.

Comments by eWG on horizontal classification proposal:
Brazil, Spain, UK: Supports proposal
EU: supports proposal; does not support the use of food additives in fresh meat except for 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
CALCIUM CARBONATE	170(i)	1500	4 & 16	7	Postpone discussion until Appendix 3 – possibly used as ES&T	
CALCIUM LACTATE	327	6000		7	Adopt with new note "for use as a binder"	**USA:** calcium lactate is allowed for use in the USA as a binder in ground and formed raw poultry pieces up to 6000 mg/kg.
CITRIC ACID	330	100	15	7	Discontinue	
LACTIC ACID, L-, D- and DL-	270	6000		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 control agent
MAGNESIUM CARBONATE	504(i)	GMP		7		
MAGNESIUM HYDROXIDE	528	GMP		7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP		7		

POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	Postpone discussion until Appendix 3 – possibly used as ES&T	
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
TRICALCIUM CITRATE	333(iii)	GMP		7		
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 Classification of Food Category: Not Justified
Justification for proposal: Use of acidity regulators not justified in subcategory 09.1.1 as per the decision of the pWG on the GSFA at the 44th Session of the CCFA. Therefore, use in broader parent category is not justified.

Comments by eWG on horizontal classification proposal:
EU, Spain: supports proposal
IFAC: acidity regulators are needed in this category to assist in the neutralization of pH to remove bitter taste in some species, as well as to assist with flavor, firmness, and shelf-life control.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~ASCORBIC ACID, L-~~	~~300~~	~~200~~		~~7~~	Discontinue	
~~CALCIUM LACTATE~~	~~327~~	~~10000~~	~~58~~	~~4~~		
~~CITRIC ACID~~	~~330~~	~~GMP~~		~~7~~		
~~GLUCONO DELTA-LACTONE~~	~~575~~	~~100~~		~~4~~		
~~MAGNESIUM CARBONATE~~	~~504(i)~~	~~GMP~~	~~16~~	~~7~~		
~~MAGNESIUM HYDROXIDE~~	~~528~~	~~GMP~~	~~16~~	~~7~~		
~~MAGNESIUM HYDROXIDE CARBONATE~~	~~504(ii)~~	~~GMP~~	~~16~~	~~7~~		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		~~7~~	Postpone until discussion in Appendix 3 – possibly used as ES&T in FC 09.1.	
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
TRICALCIUM CITRATE	333(iii)	GMP		~~7~~		
TRIPOTASSIUM CITRATE	332(ii)	GMP		~~7~~		
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 44th 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	
CALCIUM CARBONATE	170(i)	GMP	4 & 16	7	Potpones decision until discussion of FC 09.1.2 in Appendix 3. – possibly used as ES&T.	**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. **EU**: it seems that INS 170(i) is a food colour use **Spain**: Bivalve molluscs should be excluded in order to be consistent with CODEX STAN 292-2008
CALCIUM LACTATE	**327**	**10000**	**58**		Do not move from FC 09.1	
CITRIC ACID	**330**	**GMP**				
GLUCONO DELTA-LACTONE	**575**	**100**				
MAGNESIUM CARBONATE	**504(i)**	**GMP**	**16**			
MAGNESIUM HYDROXIDE	**528**	**GMP**	**16**			
MAGNESIUM HYDROXIDE CARBONATE	**504(ii)**	**GMP**	**16**			

POTASSIUM DIHYDROGEN CITRATE	**332(i)**	**GMP**			Postpone until discussion of Appendix 3 - possibly used as ES&T in FC 09.1. If so, adopt in FC 09.1 as per discussion of 09.1 in Appendix 3	
SODIUM DIHYDROGEN CITRATE	**331(i)**	**GMP**				
TRICALCIUM CITRATE	**333(iii)**	**GMP**				
TRIPOTASSIUM CITRATE	**332(ii)**	**GMP**				
TRISODIUM CITRATE	**331(iii)**	**GMP**				

Food Category <u>No. 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified – discontinue provisions and move to subcategories
<u>Justification for proposal</u>: Several subcategories require notes specific to those subcategories or are case-by-case.

<u>Comments by eWG on horizontal classification proposal</u>:
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 conditions, and the use of acetic acid may have a negative effect on GMP.
Spain, UK: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~ACETIC ACID, GLACIAL~~	~~260~~	~~GMP~~		~~4~~	Discontinue, adopt in subcategories as appropriate	
~~ASCORBIC ACID, L-~~	~~300~~	~~GMP~~		~~4~~		
~~CALCIUM CARBONATE~~	~~170(i)~~	~~10000~~	~~58~~	~~4~~		
~~CALCIUM LACTATE~~	~~327~~	~~10000~~	~~58~~	~~4~~		
~~CITRIC ACID~~	~~330~~	~~GMP~~		~~4~~		
~~FUMARIC ACID~~	~~297~~	~~GMP~~		~~4~~		
~~MAGNESIUM CARBONATE~~	~~504(i)~~	~~5000~~	~~36~~	~~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		

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 Classification of Food Category: Leave as "Case-by-Case" **Justification for proposal**: No consensus in eWG, various allowances for the use of acidity regulators in corresponding commodity standards.	**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, since no information on the technological need has been provided. Specific provisions for minced fish products should be under the corresponding subcategory (09.2.3). INS 300, 330, 331 and 332 could be included with appropriate notes referring to specific products. **Spain:** agree with the proposal but we wonder whether it is appropriate or in the tasks of this eWG to address additives that are used as antioxidants or texturizing agents instead of AR given that they are different functional classes. **UK:** Accepts proposals.

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[16]	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	504(i)	GMP		7	Discontinue	
MAGNESIUM HYDROXIDE	528	GMP		7		

[16] **Note 95:** For use in surimi and fish roe products only.

MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP		7		
POTASSIUM CARBONATE	**501(i)**	**GMP**			Postpone until discussion in Appendix 3 – possibly used as texturizing agent	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	61[17]	7	Adopt with note 61 - corresponds to CODEX STAN 165-1989	
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
TRICALCIUM CITRATE	333(iii)	GMP		7	Postpone until discussion in Appendix 3 – possibly used as texturizing agent	
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	Adopt with note 61 - corresponds to CODEX STAN 165-1989	
TRISODIUM CITRATE	331(iii)	GMP		7		

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 Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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[18]	7	Adopt	
ASCORBIC ACID, L-	300	GMP		7		**Costa Rica, ICGMA:** used as an anti-oxidant **USA:** ascorbic acid is allowed in the USA for use as a preservative 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	Adopt	
MAGNESIUM HYDROXIDE	528	GMP	16	7		

[17] **Note 61:** For use in minced fish only.
[18] **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	Adopt	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	61	7		**Costa Rica, ICGMA:** used as an anti-oxidant
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 CITRATE	331(i)	GMP	61	7	Adopt - complies with CODEX STAN 166-1989	**Costa Rica, ICGMA:** used as an anti-oxidant
SODIUM FUMARATES	**365**	**GMP**			Adopt with Note 41	
SODIUM HYDROGEN CARBONATE	500(ii)	GMP	41	7	Adopt	
SODIUM LACTATE	325	GMP		4	Adopt with Note 41	
SODIUM SESQUICARBONATE	500(iii)	GMP	41	7	Adopt	
TRIPOTASSIUM CITRATE	332(ii)	GMP	61	7		
TRISODIUM CITRATE	331(iii)	GMP	61	7		

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

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

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>:	The decision of the pWG on the GSFA at the 44th 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 16	
ASCORBIC ACID, L-	**300**	**GMP**				
CALCIUM CARBONATE	170(i)	GMP	16	7	Adopt	
CALCIUM LACTATE	**327**	**10000**	**58**		Adopt at GMP with Note 16	
CITRIC ACID	**330**	**GMP**			Adopt with Note 16	
FUMARIC ACID	**297**	**GMP**				
MAGNESIUM CARBONATE	504(i)	GMP	16	7	Adopt	
MAGNESIUM HYDROXIDE	528	GMP	16	7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP	16	7		
MALIC ACID, DL-	**296**	**GMP**			Adopt with Note 16	

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

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

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

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>:	The decision of the pWG on the GSFA at the 44th 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	**Brazil:** 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**			**Japan:** 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**			
CITRIC ACID	**330**	**GMP**				
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		**Japan** supports proposal. Justification: Trisodium citrate is used for some kind of surimi products to elute protein effectively by adjusting pH.

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

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>:	The decision of the pWG on the GSFA at the 44th 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~~	~~170(i)~~	~~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 Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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~~	~~170(i)~~	~~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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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~~	~~170(i)~~	~~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 with new note "except for use in foods covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001"
Justification for proposal: This food category covers both standardized and non-standardized foods. Use of note will exclude use in standardized foods where the corresponding commodity standard does not allow acidity regulators.

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

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	**260**	**GMP**			Adopt with proposed new note for FC and new note "not for use in salted Atlantic herring and sprat"	**Brazil:** 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**	**GMP**			Adopt with proposed new note for FC only (corresponds to CODEX STAN 244-2004)	
CALCIUM CARBONATE	170(i)	GMP		7	Adopt at GMP with proposed new note for FC and new note "not for use in salted Atlantic herring and sprat"	
CALCIUM LACTATE	**327**	**10000**	**58**			
CITRIC ACID	**330**	**GMP**			Adopt with proposed new note for FC only (corresponds to CODEX STAN 244-2004)	
FUMARIC ACID	**297**	**GMP**			Adopt with proposed new note for FC and new note "not for use in salted Atlantic herring and sprat"	
MAGNESIUM CARBONATE	504(i)	GMP		7		
MAGNESIUM HYDROXIDE	528	GMP		7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP		7		
MALIC ACID, DL-	**296**	**GMP**				
POTASSIUM CARBONATE	**501(i)**	**GMP**				
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**				
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

<u>eWG Proposal for Horizontal Classification of Food Category</u>:	The decision of the pWG on the GSFA at the 44th 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 <u>No. 10.2.1 (Liquid egg products)</u>

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

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>:	The decision of the pWG on the GSFA at the 44th 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		7	Adopt	**UK:** Accepts proposals **Costa Rica:** They are generally used to stabilize color **ICGMA**: AR are primarily used to stabilize color - 330 Citric acid, monosodium phosphate, and monopotassium phosphate, 524 sodium hydroxide, Calcium sulphate, Citric Acid, Phosphoric Acid, Sodium Bicarbonate, 500(i) Sodium Carbonate, 331(i) and 331(iii) Sodium Citrate, Sodium Hexametaphosphate, 524 Sodium Hydroxide, Sodium Phosphate dibasic, Sodium Phosphate, monobasic **Spain:** agree with the proposal but questiosn whether it is appropriate or in the tasks of this eWG to address additives used as colour stabilizers instead of AR given that they are different functional classes
CITRIC ACID	330	GMP		7		
LACTIC ACID, L-, D- and DL-	270	GMP		7		
SODIUM ACETATE	262(i)	GMP		7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
SODIUM LACTATE	325	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		

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 Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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 not discussed 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	Adopt	See comments to FC 10.2.1
CITRIC ACID	330	GMP		7		
LACTIC ACID, L-, D- and DL-	270	GMP		7		
SODIUM ACETATE	262(i)	GMP		7		
SODIUM DIHYDROGEN 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 **Justification for proposal**: Corresponding commodity standards for this food category and subcategories do not allow acidity regulators. There are no provisions for acidity regulators in this food category in the GSFA.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain, UK, CEFS:** Supports proposal

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

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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: 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.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain, UK, CEFS:** 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[19]	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 No. 11.1.3 (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: 212-1999: does not permit acidity regulators

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

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

[19] **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 **Justification for proposal**: Corresponding commodity standard for this food category does not allow acidity regulators. There are no provisions for acidity regulators in this food category in the GSFA.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain, UK, CEFS:** Supports proposal

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

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

Food Category 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))

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 **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:** **Brazil, EU, Spain, UK, CEFS:** Supports proposal

Food Category No. 11.3 (Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3 (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 **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:** **Brazil, EU, Spain, UK, CEFS:** Supports proposal

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 Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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 ACETATE	263	1500		7	Adopt	**USA:** calcium acetate is allowed in the USA for use in toppings and 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		
POTASSIUM DIHYDROGEN 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 **Justification for proposal**: Comments to the eWG indicate that acidity regulators are not used in subcategory 12.1.1, therefore not justified in the parent food category 12.1.	**Comments by eWG on horizontal classification proposal:** **Brazil:** Provisions for acidity regulators should be discussed under the subcategories. **EU, Spain:** supports proposal **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 Classification of Food Category: Not Justified **Justification for proposal**: Comments to the eWG indicate that the provisions for the food additives with acidity regulator function listed in this FC are for the use of these food additives as anti-caking agents, not as acidity regulators.	**Comments by eWG on horizontal classification proposal:** **Brazil:** Could not find any provisions for acidity regulators in CODEX STAN 150-1985, which makes reference to tables 1 and 2 of the GSFA. INS 170(i) calcium carbonate and INS 504(i) magnesium carbonate are used as anticaking agents. **EU, Spain:** supports proposal **UK: T**here is no technological justification for the use of acidity regulators in salt itself.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	GMP		Adopted	Retain Adopted	**UK:** Agree to retain these two adopted provisions on the basis the carbonates are used as anti-caking agents
MAGNESIUM CARBONATE	504(i)	GMP		Adopted		

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 Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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		7	Adopt	
ASCORBIC ACID, L-	300	GMP		4		
CALCIUM CARBONATE	170(i)	10000	58	4		
CALCIUM LACTATE	327	10000	58	4		
CITRIC ACID	330	GMP		7		

FUMARIC ACID	297	GMP		4		
LACTIC 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		**Japan:** Sodium DL- malate is used to enhance salty taste.
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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified **<u>Justification for proposal</u>**: Comments from eWG members indicate that acidity regulators are not used in this food category.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Spain, UK:** Support proposal **ICGMA**: Acidity Regulators (AR) are not technologically justified for straight herbs. And, upon further clarification, for straight spices & herbs, neither anticaking agents nor antioxidants are used.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	GMP	51[20]	7		
ASCORBIC ACID, L-	300	GMP	51	4		
CALCIUM CARBONATE	170(i)	10000	51& 58	4		
CALCIUM LACTATE	327	10000	51 & 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		
MAGNESIUM CARBONATE	504(i)	5000	36 & 51	4		
MAGNESIUM HYDROXIDE	528	GMP	51	7		

[20] **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 <u>No. 13.1 (Infant formulae, follow-up formulae, and 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: None; 072-1981 applies to subcategories 13.1.1 & 13.1.3; 156-1987 applies to subcategory 13.1.2

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-by-Case **<u>Justification for proposal</u>**: Comments by eWG members that the use of all additives in this food category and related subcategories should be specifically evaluated for use in that food category.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Spain, UK:** Accepts proposal **ICGMA:** 525 potassium hydroxide, 330 citric acid, 526 calcium hydroxide. These might be 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 <u>No. 13.1.1 (Infant formulae)</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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-by-Case **<u>Justification for proposal</u>**: Comments by eWG members that the use of all additives in this food category and related subcategories should be specifically evaluated for use in that food category.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Japan, 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
CALCIUM HYDROXIDE	526	2000	55[21] & 72[22]	7	Adopt as listed - Corresponds to CODEX	**Japan:** Citric acid is used to stabilize emulsion by adjusting pH.

[21] **Note 55:** Singly or in combination, within the limits for sodium, calcium, and potassium specified in the commodity standard.
[22] **Note 72:** Ready-to-eat basis.

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

Food Category <u>No. 13.1.2 (Follow-up formulae)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-by-Case **<u>Justification for proposal</u>**: Comments by eWG members that the use of all additives in this food category and related subcategories should be specifically evaluated for use in that food category.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Japan, 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
ASCORBIC ACID, L-	300	50	72	7	Adopt with note 72 & New Note "for use as an antioxidant"- corresponds to CODEX STAN 156-1987	

[23] **Note 83:** L(+)-form only.

CALCIUM HYDROXIDE	526	GMP	72	7	Adopt as listed - corresponds to CODEX STAN 156-1987	
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		**USA**: lactic acid is not considered GRAS in the USA for use in infant foods (21 CFR 184.1063)
POTASSIUM CARBONATE	501(i)	GMP	72	7		**Japan:** Potassium carbonate is used to stabilize emulsion by adjusting pH.
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	72	4		
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP	72	7		
POTASSIUM HYDROXIDE	525	GMP	72	7		
SODIUM CARBONATE	500(i)	GMP	72	7		
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		
TRISODIUM CITRATE	331(iii)	GMP	72	7		**Japan:** Trisodium citrate is used to stabilize emulsion by adjusting 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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-by-Case **<u>Justification for proposal</u>**: Comments by eWG members that the use of all additives in this food category and related subcategories should be specifically evaluated for use in that food category.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Japan, Spain, 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
CALCIUM HYDROXIDE	526	2000	55 & 72	4	Adopt as listed - corresponds to CODEX STAN 072-1981	
CITRIC ACID	330	GMP	72	4		**Japan:** Citric acid is used to stabilize emulsion by adjusting pH.
LACTIC ACID, L-, D- and DL-	270	GMP	72 & 83	4		**USA**: lactic acid is not considered GRAS in the USA for use in infant foods (21 CFR 184.1063)
POTASSIUM CARBONATE	501(i)	2000	55 & 72	4		**Japan**: Potassium carbonate is used to stabilize emulsion by adjusting pH.
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	72	4		
POTASSIUM HYDROGEN CARBONATE	501(ii)	2000	55 & 72	4		

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

Food Category <u>No. 13.2 (Complementary foods for infants and young children)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-by-Case **<u>Justification for proposal</u>**: Comments by eWG members that the use of all additives in this food category and related subcategories should be specifically evaluated for use in that food category.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Japan, UK:** Supports proposal and adoption of all proposed provisions **ELC**: CODEX STAN 074 – 1981 includes several provisions for PHOSPHATES (@440mg/kg as P, for pH-adjustment only). These provisions should be taken up.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC ACID, GLACIAL	260	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
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
ASCORBIC ACID, L-	300	3000		7	Adopt at 500 mg/kg with new notes "as ascorbic acid" & "as an antioxidant"	Corresponds to CODEX STAN 073-1981 & 074-1981
CALCIUM ACETATE	263	GMP		7	Adopt	GMP Corresponds to CODEX STAN 074-1981
CALCIUM CARBONATE	170(i)	GMP		7		GMP Corresponds to CODEX STAN 073-1981 & 074-1981
CALCIUM HYDROXIDE	526	GMP		7		GMP Corresponds to CODEX STAN 074-1981
CALCIUM LACTATE	327	GMP		7		GMP Corresponds to CODEX STAN 074-1981 **USA**: calcium lactate is not GRAS in the USA for use in infant formula and infant foods.

CITRIC ACID	330	25000		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
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
LACTIC ACID, L-, D- and DL-	270	15000		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 infant foods (21 CFR 184.1063)
MAGNESIUM CARBONATE	504(i)	GMP		7	Adopt	acidity regulators used in both corresponding commodity standards
MALIC ACID, DL-	296	GMP		7		GMP Corresponds to CODEX STAN 074-1981
POTASSIUM ACETATES	261	GMP		7		GMP Corresponds to CODEX STAN 074-1981
POTASSIUM CARBONATE	501(i)	GMP		7		potassium hydrogen carbonate and acidity regulators allowed in both corresponding commodity standards
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		GMP Corresponds to CODEX STAN 074-1981
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP		7		GMP Corresponds to CODEX STAN 073-1981 & 074-1981
POTASSIUM HYDROXIDE	525	GMP		7		GMP Corresponds to CODEX STAN 074-1981
POTASSIUM LACTATE	326	GMP		7		GMP Corresponds to CODEX STAN 074-1981 **USA:** potassium lactate is prohibited in the USA from use in infant 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
TRISODIUM CITRATE	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 **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:** **Brazil, EU, Spain, UK:** Supports proposal

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 **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:** **Brazil, EU, Spain, UK:** Supports proposal

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 **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:** **Brazil, EU, Spain, UK:** Supports proposal

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 **Justification for proposal**:.Comments from eWG members indicate that adopted provisions in subcategories 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:** Provisions are presented under the subcategories, hence they are not necessary here. **EU:** does not support acidity regulators in this broad category - not appropriate for fruit juices **UK:** 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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: 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 Juices and Nectars (fruit juices) is 1:1 with GSFA

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ASCORBIC ACID, L-	300	GMP		Adopted	Retain Adopted	**IFU, ICGMA:** agrees to retain adopted; **Japan:** ascorbic acid is used as antioxidant to prevent products from distaining.
CITRIC ACID	330	3000	122[24]	Adopted		**IFU, ICGMA:** agrees to retain adopted **Japan:** Citric acid is used as an acidity regulator to balance sourness and sweetness.
MALIC ACID, DL-	296	GMP	115[25]	Adopted		**IFU, ICGMA:** agrees to retain adopted

[24] **Note 122:** Subject to national legislation of the importing country.
[25] **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 44th 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	**IFU:** agrees to adopt; **Japan:** 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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: 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 Ascorbic Acid 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	127[26]	Adopted	Retain Adopted	**Japan:** Ascorbic acid is used as antioxidant to prevent products from distaining. **UK**: Retain adopted

[26] **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 <u>No. 14.1.2.4 (Concentrates for vegetable juice)</u>

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

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: The decision of the pWG on the GSFA at the 44th 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	**Costa Rica:** Heat treatment and high acid products may need citric acid; citrates, malic acid ; **Brazil, EU, UK:** Accepts proposals **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
CITRIC ACID	330	3000		4		
MALIC ACID, DL-	296	3000		4		

Food Category <u>No. 14.1.3 (Fruit and vegetable nectars)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified
<u>Justification for proposal</u>: Comments from eWG members indicate that adopted provisions in subcategories for food additives with acidity regulator function are for their use as anti-oxidants, not as acidity regulators

<u>Comments by eWG on horizontal classification proposal</u>:
comments from Brazil in CX/FA 12/44/9 Add. 2 that the use of acidity regulators are necessary in acidic fruit and vegetable nectars to adjust sensorial characteristics
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

Food Category No. 14.1.3.1 (Fruit nectar)

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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: 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	Retain Adopted	**IFU:** agrees to retain adopted; **Japan**: Ascorbic acid is used as antioxidant to prevent products from distaining.
CITRIC ACID	330	5000		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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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	**Brazil, EU, UK, IFU:** Accepts proposals **ICGMA:** Hot fill, high acid products may need 330 Citric acid; 296 Malic Acid
CITRIC ACID	330	5000		4		
MALIC ACID, DL-	296	3000		4		

Food Category No. 14.1.3.3 (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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: 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:** **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:** Frozen and aseptic 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	127	Adopted	Retain Adopted	**IFU :**agrees to retain adopted
CITRIC ACID	330	5000	127	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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category:	The decision of the pWG on the GSFA at the 44th 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	**Brazil, EU, UK, IFU:** Accepts proposals. **Costa Rica, ICGMA:** This products may need citric acid; malic acid
CITRIC ACID	330	5000		4		
MALIC ACID, DL-	296	3000		4		

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[27] "excluding coffee and tea" – however, in some cases include Note 160[28] "For use in ready-to-drink products and pre-mixes for ready-to-drink 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	Adopt as listed with Note 142	
ASCORBIC ACID, L-	300	500		4		
CALCIUM CARBONATE	170(i)	10000	58 & 160	4		
CALCIUM LACTATE	327	10000	58	4		
CITRIC ACID	330	GMP		4	Adopt with Note 160	**Brazil**: supports adoption **Japan:** 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[29]	7	Adopt as listed with Note 142	
MAGNESIUM CARBONATE	504(i)	GMP		7		
MAGNESIUM HYDROXIDE	528	GMP		7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP		7		
MALIC ACID, DL-	296	GMP		4	Adopt with Note 160	**Brazil**: supports adoption **Japan:** 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	Adopt as listed with Note 142	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
SODIUM ACETATE	262(i)	GMP		4		

[27] **Note 142:** Excluding coffee and tea.
[28] **Note 160:** For use in ready-to-drink products and pre-mixes for ready-to-drink products only.
[29] **Note 2:** On dry 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		
TRISODIUM CITRATE	331(iii)	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 included in this food category.

Food Category <u>No. 14.2.3 (Grape wines)</u>

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

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: No corresponding commodity standard, Comments to eWG on specific provisions demonstrate that acidity regulators are used in this category	**<u>Comments by eWG on horizontal classification proposal</u>:** **EU:** Case-by-Case. Some ARs affect quality of wine and must be carefully considered. A general limit for wine acidification should be established. **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
ASCORBIC ACID, L-	300	250		4	Adopt at GMP	**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 **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. **NZ:** adopt at GMP. Ascorbic acid has also long been used in the wine industry as an anti-oxidant. Also used in the removal of disulphide **USA:** Ascorbic acid, L- is allowed in the USA for use in formula wine as an antioxidant up to GMP levels **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).

CALCIUM CARBONATE	170(i)	3500		7		**Brazil:** Supports adoption **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 (2) - out of the scope of the GSFA **NZ**: proposes adopt at GMP. Calcium and potassium carbonate are used to deacidify 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)
CALCIUM MALATE, D,L-	352(ii)	GMP		7		**EU:** does not support - not recognised by OIV; negative impact on the quality - it increases the instability of the wine; other acids are available to acidify **USA:** calcium malates are 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) **OIV**: OIV has not recognized the use of Calcium Malate, D-L in the acidification of wines.The OIV recommends to discuss further this provision providing technical justification.
CITRIC ACID	330	4000		4		**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 by OIV is 1000 mg/l in the final product **Canada:** Canada permits the use of citric acid as a pH adjusting agent in wine at a maximum level consistent with GMP and the Canadian wine industry has requested that citric acid be listed in the GSFA as an acidity regulator at a maximum level of GMP. **Japan:** Propose to change maximum level to 4500 mg/kg, citric acid is used to balance sourness and sweetness. **NZ:** proposes GMP. Sometimes, citric acid is added to finished wines specifically to increase acidity and improve acid balance. In small quantities, it provides a fresh, citric characteristic, and the citric quality is often appreciated in white table wines. Significant 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/1000 gallons (approximately 700 mg/kg);

FUMARIC ACID	297	3000	109[30]	7		**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 N**Z** 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. **USA:** fumaric acid is allowed in the USA for use in wine as an acidity regulator at a level of 25 lbs/1000 gallons (approximately 3000 mg/kg)
LACTIC ACID, L-, D- and DL-	270	4000		4		**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 **USA:** Lactic Acid (L-, D-, and DL-) is allowed in the USA for use in formula wine as an acidity regulator up to GMP levels
MALIC ACID, DL-	296	4000		4		**EU, Brazil:** supports adoption at 4000 mg/kg **Canada**: Canada propses GMP, Canada permits the use of malic acid as a pH adjusting agent in wine at a maximum level of GMP. **USA:** 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 acid DL- is used to balance sourness and sweetness.
POTASSIUM CARBONATE	501(i)	5000		7		**EU:** 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 **USA**: potassium carbonate is allowed in the USA for use in formula wine as an acidity regulator up to 5000 mg/kg

[30] **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.

POTASSIUM HYDROGEN CARBONATE	501(ii)	5000		7		**Brazil:** Supports adoption at 5000 mg/kg **EU**: 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 **NZ:** proposes GMP Potassium bicarbonate reduces the acid level of wine by neutralization and precipitation. It neutralizes acid by converting one to the hydrogen ions of tartaric acid to water and then combining with the remaining tartrate ion to form relatively insoluble potassium bitartrate (KHT.) **USA:** potassium hydrogen carbonate is allowed in the USA for use 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 **Justification for proposal**: Comments by eWG members that some acidity regulators can affect the quality of the wine. No corresponding commodity standard, acidity regulators are used in the parent category.	**Comments by eWG on horizontal classification proposal:** **Brazil:** provisions in these subcatgories of grape wines should be considered on a case-by-case basis **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 **Justification for proposal**: Comments by eWG members that some acidity regulators can affect the quality of the wine. No corresponding commodity standard, acidity regulators are used in the parent category.	**Comments by eWG on horizontal classification proposal:** **Brazil:** provisions in these subcatgories of grape wines should be considered on a case-by-case basis **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

Corresponding commodity standards: None

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

Appendix 3: Emulsifiers, Stabilizers and Thickeners

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified – discontinue all provisions for ES&Ts in this food category **Justification for proposal**: Codex Stan 206-1999 defines milk as “normal mammary secretion of milking animals… without… addition to it”, the descriptor for FC 0.1.1.1 in Annex B of the GSFA states that this category “includes reconstituted plain milk that contains only dairy ingredients".	**Comments by eWG on horizontal classification proposal:** **Iran, Japan, Spain, ELC, IDF:** Supports proposal**,** No provisions in this food category as per the Codex General standard for the use of dairy terms (Codex Stan 206-1999) and descriptor in GSFA. **Brazil:** stabilizers necessary when adding micronutrients to milk to keep uniform product **Costa Rica. ICGMA**: ES&T justified in buttermilk **UK**: accept provision with note limiting to processed milks from certain species only **ICGMA**: ES&T used in small amount in low fat milk for increased mouthfeel **IFAC:** all listed additives should 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~~	Discontinue in FC 01.1.1, move to FC 01.1.1.2 with note "For use in certain recombined, reconstituted or UHT heat-treated buttermilks, from certain species only, e.g. buttermilk from goat’s milk"	
~~GELLAN GUM~~	~~418~~	~~GMP~~		~~7~~		
~~GUAR GUM~~	~~412~~	~~6000~~		~~7~~		
~~KARAYA GUM~~	~~416~~	~~200~~		~~7~~		
~~KONJAC FLOUR~~	~~425~~	~~GMP~~		~~7~~		
~~MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)~~	~~460(i)~~	~~GMP~~		~~7~~		
~~MONO- AND DI-GLYCERIDES OF FATTY ACIDS~~	~~471~~	~~10000~~		~~7~~		**ICGMA:** supports use
~~PECTINS~~	~~440~~	~~GMP~~		~~7~~		
~~POLYDEXTROSES~~	~~1200~~	~~GMP~~		~~7~~		
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~GMP~~		~~4~~		
~~TARA GUM~~	~~417~~	~~GMP~~		~~7~~		
~~TRISODIUM CITRATE~~	~~331(iii)~~	~~GMP~~		~~7~~		**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 **IDF:** retain INS 331(iii) with note limiting to "recombined, reconstituted or UHT heat-treated milks from certain species only, e.g. goat's milk"

Food Category No. 01.1.1.1 (Milk (plain))

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified – discontinue all provisions for ES&Ts in this food category **Justification for proposal**: Codex Stan 206-1999 defines milk as "normal mammary secretion of milking animals… without… addition to it"	**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 **IFAC:** all listed additives should be permitted at listed maximum level

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CAROB BEAN GUM	410	GMP		7	Discontinue all provisions in this FC	
CARRAGEENAN	407	10000		7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		4		
XANTHAN GUM	415	GMP		7		

Food Category No. 01.1.1.2 (Buttermilk (plain))

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "For use in certain recombined, reconstituted or UHT heat-treated buttermilks, from certain species only, e.g. buttermilk from goat's milk" **Justification for proposal**: Buttermilk is not defined in Codex Stan 206-1999, comments by eWG members.	**Comments by eWG on horizontal classification proposal:** **Iran, Spain, ELC, IDF:** supports proposal **Costa Rica. ICGMA**: ES&T justified in buttermilk **Brazil:** Case-by-case **UK**: accept provisions with note limiting to processed milks from certain species only **IDF:** instead of proposed note recommends "For use in certain UHT heat-treated buttermilks, 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 (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 use in certain recombined, reconstituted or UHT heat-treated buttermilks,	**EFEMA, ELC, IFAC:** accepts proposal
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
AGAR	**406**	**4000**				

ALGINIC ACID	400	6000		7	from certain species only, e.g. buttermilk from goat's milk"	
CALCIUM ALGINATE	404	6000		7		
CAROB BEAN GUM	410	5000		7		
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		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	Refer to discussion on Appendix 2, possibly used as acidity regulator	
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		7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7		
SODIUM ALGINATE	401	6000		7		
SODIUM CARBOXYMETHYL	466	2000		7		

Adopt with new note: "For use in certain recombined, reconstituted or UHT heat-treated buttermilks, from certain species only, e.g. buttermilk from goat's milk"

CELLULOSE (CELLULOSE GUM)						
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Refer to discussion on Appendix 2, possibly 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

eWG Proposal for Horizontal Classification of Food Category: Not Justified – Recommend provisions currently in FC 01.2 be discontinued and moved to subcategories with appropriate notes

Justification for proposal: 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.

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

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~ACETYLATED DISTARCH ADIPATE~~	~~1422~~	~~GMP~~		~~4~~	discontinue; adopt in subcategory 01.2.2 unchanged; adopt in subcategory 01.2.1.1 with new notes "for use as stabilizer or thickener only" & "use restricted to reconstitution and recombination only"; adopt in subcategory 01.2.1.2 with the new note "for use as stabilizer or thickener only	
~~ACETYLATED DISTARCH PHOSPHATE~~	~~1414~~	~~GMP~~		~~4~~		
~~ACID TREATED STARCH~~	~~1401~~	~~GMP~~		~~4~~		
~~AGAR~~	~~406~~	~~5000~~		~~7~~		**JAPAN:** include in FC 01.2.1.2 - used for yoghurt heat-treated after fermentation to prevent syneresis & separation during storage
~~ALKALINE TREATED STARCH~~	~~1402~~	~~GMP~~		~~4~~		
~~BLEACHED STARCH~~	~~1403~~	~~GMP~~		~~4~~		
~~CAROB BEAN GUM~~	~~410~~	~~GMP~~		~~4~~		
~~CARRAGEENAN~~	~~407~~	~~5000~~		~~7~~		**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
~~DEXTRINS, ROASTED STARCH~~	~~1400~~	~~GMP~~		~~4~~		
~~DISTARCH PHOSPHATE~~	~~1412~~	~~GMP~~		~~4~~		
~~GUAR GUM~~	~~412~~	~~GMP~~		~~4~~		**USA:** guar gum is allowed in the US for use in milk products as a stabilizer/thickener up to 6000 mg/kg
~~GUM ARABIC (ACACIA GUM)~~	~~414~~	~~GMP~~		~~4~~		
~~HYDROXYPROPYL DISTARCH PHOSPHATE~~	~~1442~~	~~GMP~~		~~4~~		
~~HYDROXYPROPYL STARCH~~	~~1440~~	~~GMP~~		~~4~~		
~~KONJAC FLOUR~~	~~425~~	~~GMP~~		~~4~~		

~~MONO- AND DI-GLYCERIDES OF FATTY ACIDS~~	~~471~~	~~5000~~		~~7~~		**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
~~MONOSTARCH PHOSPHATE~~	~~1410~~	~~GMP~~		~~4~~		
~~OXIDIZED STARCH~~	~~1404~~	~~GMP~~		~~4~~		
~~PHOSPHATED DISTARCH PHOSPHATE~~	~~1413~~	~~GMP~~		~~4~~		
~~POLYDEXTROSES~~	~~1200~~	~~GMP~~		~~7~~		
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~5000~~		~~7~~		
~~SODIUM ALGINATE~~	~~401~~	~~GMP~~		~~4~~		
~~SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)~~	~~466~~	~~GMP~~		~~4~~		
~~STARCH ACETATE~~	~~1420~~	~~GMP~~		~~4~~		
~~STARCH SODIUM OCTENYL SUCCINATE~~	~~1450~~	~~GMP~~		~~4~~		
~~STARCHES, ENZYME TREATED~~	~~1405~~	~~GMP~~		~~4~~		
~~XANTHAN GUM~~	~~415~~	~~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 **Justification for proposal**: 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.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, 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).

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

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

eWG Proposal for Horizontal Classification of Food Category Justified only with notes "for use as stabilizer or thickener only" & "use restricted to reconstitution and recombination only" **Justification for proposal**: 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 ADIPATE	**1422**	**GMP**			adopt at GMP with new notes "for use as stabilizer or thickener only" & "use restricted to	
ACETYLATED DISTARCH PHOSPHATE	**1414**	**GMP**				

ACID TREATED STARCH	**1401**	**GMP**			reconstitution and recombination only"	
AGAR	**406**	**~~5000~~**				
ALKALINE TREATED STARCH	**1402**	**GMP**				
BLEACHED STARCH	**1403**	**GMP**				
CAROB BEAN GUM	**410**	**GMP**				**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
CARRAGEENAN	**407**	**~~5000~~**				**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
DEXTRINS, ROASTED STARCH	**1400**	**GMP**				
DISTARCH PHOSPHATE	**1412**	**GMP**				
GELLAN GUM	418	GMP		4		**USA:** guar gum is allowed in the US for use in milk products as a stabilizer/thickener up to 6000 mg/kg **IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
GUAR GUM	**412**	**GMP**				**AIDGUM:** supports adoption
GUM ARABIC (ACACIA GUM)	**414**	**GMP**				
HYDROXYPROPYL DISTARCH PHOSPHATE	**1442**	**GMP**				
HYDROXYPROPYL STARCH	**1440**	**GMP**				
KARAYA GUM	416	GMP		7		**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
KONJAC FLOUR	425	GMP				
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	**471**	**5000**				**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
MONOSTARCH PHOSPHATE	**1410**	**GMP**				
OXIDIZED STARCH	**1404**	**GMP**				
PECTINS	440	GMP		7		**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
PHOSPHATED DISTARCH PHOSPHATE	**1413**	**GMP**				
POLYDEXTROSES	**1200**	**GMP**				
POWDERED CELLULOSE	460(ii)	GMP		4		
PROCESSED EUCHEUMA SEAWEED (PES)	**407a**	**5000**				**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
SODIUM ALGINATE	**401**	**GMP**				**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	**466**	**GMP**				**IFAC:** adopt at GMP, corresponds to the Codex Standard 243-2003
STARCH ACETATE	**1420**	**GMP**				
STARCH SODIUM OCTENYL SUCCINATE	**1450**	**GMP**				

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

Food Category <u>No. 01.2.1.2 (Fermented milks (plain), heat-treated after fermentation)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u> Justified only with notes "for use as stabilizer or thickener only" **<u>Justification for proposal</u>**: Specific stabilizers and thickeners are allowed in CODEX STAN 243-2003.	**<u>Comments by eWG on horizontal classification proposal</u>:** **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
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	adopt at GMP with new note "for use as stabilizer or thickener only	
ACETYLATED DISTARCH ADIPATE	**1422**	**GMP**				
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
ACID TREATED STARCH	**1401**	**GMP**				
AGAR	**406**	**5000**				**Iran, Japan:** supports proposal - used for yoghurt heat-treated after fermentation to prevent syneresis & separation during storage
ALGINIC ACID	400	5000		7		**Iran, IDF, IFAC, Marlinga:** support proposal, consistent with Codex Stan 243-2003
ALKALINE TREATED STARCH	**1402**	**GMP**				
AMMONIUM ALGINATE	403	5000		7		**Iran, IDF, IFAC, Marlinga:** support proposal, consistent with Codex Stan 243-2003
BLEACHED STARCH	**1403**	**GMP**				
CALCIUM ALGINATE	404	5000		7		**Iran, IDF, IFAC, Marlinga:** support proposal, consistent with Codex Stan 243-2003
CALCIUM CARBONATE	170(i)	GMP		4	adopt as listed, can also be used as acidity regulator in this FC (see AR document)	
CAROB BEAN GUM	410	5000		7	adopt at GMP with new note "for use as stabilizer or thickener only"	**Iran, IDF:** support proposal, consistent with Codex Stan 243-2003
CARRAGEENAN	**407**	**GMP**				**Iran, IDF:** support proposal, consistent with Codex Stan 243-2003
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7		
DEXTRINS, ROASTED STARCH	**1400**	**GMP**				
DISTARCH PHOSPHATE	**1412**	**GMP**				

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

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

Food Category <u>No. 01.2.2 (Renneted milk (plain))</u>

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	**<u>Comments by eWG on horizontal classification proposal</u>:** **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**				

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		**USA:** guar gum is allowed in the US for use in milk products as a stabilizer/thickener up to 6000 mg/kg
GUM ARABIC (ACACIA GUM)	414	GMP		7		**AIDGUM**: supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP		7		
HYDROXYPROPYL DISTARCH PHOSPHATE	**1442**	**GMP**				
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		
KONJAC FLOUR	**425**	**GMP**				**ICGMA:** supports use
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**	**5000**				
MONOSTARCH PHOSPHATE	**1410**	**GMP**				
OXIDIZED STARCH	1404	GMP		7		**ICGMA:** supports use
PECTINS	440	GMP		7		
PHOSPHATED DISTARCH PHOSPHATE	**1413**	**GMP**				
POLYDEXTROSES	**1200**	**GMP**				
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP		7		
PROCESSED EUCHEUMA	**407a**	**5000**				

SEAWEED (PES)						
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 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 <u>No. 01.4.1 (Pasteurized cream (plain))</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: CODEX STAN 288-1976 allows specific emulsifiers, stabilizers and thickeners	**<u>Comments by eWG on horizontal classification proposal</u>:** **Spain, UK, ELC, ICGMA, IDF, IFAC:** supports proposal **Brazil:** not justified. CODEX STAN 288-1976 states additives may be used when needed to ensure product stability... special consideration should be given to the level of heat applies since some minimally pasteurized products do not require the use of certain additives. **ELC:** current provisions for PHOSPHATES in CODEX STAN 288-1976 (@1100mg/kg as P) as stabilizer and thickener in the corresponding subcategories are not reflected in discussion. **ICGMA**: used in many products, for example, thickeners give pasteurized cream its thickening properties **IDF**: Technological justification to ensure product stability and the integrity of the emulsion and taking into consideration the fat content and the durability expected of the product. With regard to the durability, special consideration should be given to the level of heat treatment applied since some minimally pasteurized products do not require the use of certain additives. Add note suggested below for 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

ACETYLATED DISTARCH ADIPATE	1422	GMP		7	STAN 288-1976	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
AGAR	406	GMP		7		
ALGINIC ACID	400	1000		7		**Iran, IDF:** accept proposal
AMMONIUM ALGINATE	403	100		7		**Iran, IDF:** accept proposal
CALCIUM ALGINATE	404	1000		7		**Iran, IDF:** accept proposal
CALCIUM CARBONATE	170(i)	GMP		7		
CALCIUM CHLORIDE	509	GMP		7		
CALCIUM SULFATE	516	GMP		4		
CAROB BEAN GUM	410	5000		7		**Iran, IDF:** accept proposal **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		
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 CELLULOSE	463	GMP		7		
HYDROXYPROPYL DISTARCH PHOSPHATE	1442	GMP		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		**ICGMA:** supports use
KONJAC FLOUR	425	GMP		7	Adopt - emulsifiers, stabilizers and thickeners are used in these products	**IDF:** add note "for use only in products not covered by Codex Stan 288"
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	10000		7		**Iran, IDF:** accept proposal
LECITHIN	322(i)	5000		7		**IDF:** add note "for use only in products not covered by Codex Stan 288" **(lecithin is listed in codex stan 288 @ GMP)**
METHYL CELLULOSE	461	GMP		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
METHYL ETHYL CELLULOSE	465	GMP		7		
MICROCRYSTALLINE 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
OXIDIZED STARCH	1404	GMP		7	Adopt - emulsifiers, stabilizers and thickeners	**ICGMA:** supports use **IDF:** add note "for use only in products not covered by Codex Stan

					are used in these products	288"
PECTINS	440	GMP		7		
PHOSPHATED DISTARCH PHOSPHATE	1413	GMP		7		
POTASSIUM ALGINATE	402	1000		7		**Iran, IDF:** accept proposal **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		**Iran, IDF:** accept proposal
POWDERED CELLULOSE	460(ii)	GMP		7		**Iran, IDF:** accept proposal
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		7		
SODIUM ALGINATE	401	1000		7		**Iran, IDF:** accept proposal **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		
TARA GUM	417	GMP		7	Adopt - emulsifiers, stabilizers and thickeners are used in these products	**IDF:** add note "for use only in products not covered by Codex Stan 288"
TRAGACANTH GUM	413	GMP		7		**AIDGUM** supports adoption **IDF**: add note "for use only in products not covered by Codex Stan 288"
TRICALCIUM CITRATE	333(iii)	GMP		7	adopt at GMP - corresponds to CODEX STAN 288-1976	**IDF:** allowed in Codex Stan 288 as an acidity regulator
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	331(iii)	1000		7		**Iran, IDF:** accept proposal
XANTHAN GUM	415	GMP		7		

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 Classification of Food Category: Justified **Justification for proposal**: CODEX STAN 288-1976 allows specific emulsifiers, stabilizers and thickeners	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain, UK, IFAC, ICGMA, IDF:** Supports proposal No provisions in this food 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 PHOSPHATES in CODEX STAN 288-1976 (@1100mg/kg as P) as stabilizer and thickener in the corresponding subcategories are not reflected in discussion. **ICGMA**: used in many products, for example, thickeners give pasteurized cream its thickening properties **IDF**: Technological justification to ensure product stability and the integrity of the emulsion and taking into consideration the fat content and the durability expected of the product. With regard to the durability, special consideration should be given to the level of heat treatment applied since some minimally pasteurized products do not require the use of certain additives. Add note suggested below for 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 STAN 288-1976	**EFEMA, ELC:** adopt at GMP
ACETYLATED DISTARCH ADIPATE	1422	GMP		7		**JAPAN:** agree, prevents syneresis
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
ACID TREATED STARCH	1401	GMP		7	Adopt -emulsifiers, stabilizers and thickeners are used in these products	**IDF:** add note "for use only in products not covered by Codex Stan 288"
AGAR	406	5000		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
ALGINIC ACID	400	5000		7		**Marlinga:** accept proposal
AMMONIUM ALGINATE	403	5000		7		**Marlinga:** accept proposal
BLEACHED STARCH	1403	GMP		7	Adopt -emulsifiers, stabilizers and thickeners are used in these products	**IDF:** add note "for use only in products not covered by Codex Stan 288"
CALCIUM ALGINATE	404	5000		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
CALCIUM CARBONATE	170(i)	5000		7		**Marlinga:** accept proposal
CALCIUM CHLORIDE	509	GMP		7		
CALCIUM SULFATE	516	GMP		4		
CAROB BEAN GUM	410	5000		7		
CARRAGEENAN	407	5000		7		**Japan:** agree, prevents creaming during shelf-life **Marlinga:** accept proposal
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	5000		7		**Japan:** agree, prevents fat seperation **UK, EFEMA, ELC:** adopt at GMP

DEXTRINS, ROASTED STARCH	1400	GMP		7	Adopt -emulsifiers, stabilizers and thickeners are used in these products	**Japan:** agree, prevents creaming during shelf-life **IDF:** add note "for use only in products not covered by Codex Stan 288"
DISTARCH PHOSPHATE	1412	GMP		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
GELLAN GUM	418	GMP		7		**Japan:** agree, prevents creaming during shelf-life
GUAR GUM	412	5000		7		**Japan:** agree, prevents creaming during shelf-life **AIDGUM, IFAC:** adopt at GMP
GUM ARABIC (ACACIA GUM)	414	5000		7	Discontinue	
GUM ARABIC (ACACIA GUM)	414	GMP		4	Adopt at GMP - corresponds to CODEX STAN 288-1976	**Japan, AIDGUM:** supports proposal
HYDROXYPROPYL CELLULOSE	463	GMP		7		
HYDROXYPROPYL DISTARCH PHOSPHATE	1442	GMP		7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		
KONJAC FLOUR	425	2000		7	Adopt -emulsifiers, stabilizers and thickeners are used in these products	**IDF:** add note "for use only in products not covered by Codex Stan 288"
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	10000		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	**EFEMA, ELC:** adopt at GMP
LECITHIN	322(i)	5000		7		**Japan:** agree, prevent fat seperation
METHYL CELLULOSE	461	GMP		7		
METHYL ETHYL CELLULOSE	465	GMP		7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	5000		7		**Japan:** agree, prevents creaming, increases viscosity for shape retention
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	5000		7		**Japan:** agree, maintains emulsion **EFEMA, ELC:** adopt at GMP
MONOSTARCH PHOSPHATE	1410	GMP		7		
OXIDIZED STARCH	1401	GMP		7	Adopt -emulsifiers, stabilizers and thickeners are used in these products	**IDF:** add note "for use only in products not covered by Codex Stan 288"
PECTINS	110	5000		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
PHOSPHATED DISTARCH PHOSPHATE	1413	GMP		7		
POLYDEXTROSES	1200	GMP		7	Adopt -emulsifiers, stabilizers and thickeners are used in these products	**IDF:** add note "for use only in products not covered by Codex Stan 288"
POTASSIUM ALGINATE	402	5000		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	**Marlinga:** accept proposal
POTASSIUM CARBONATE	501(i)	GMP		7		
POTASSIUM CHLORIDE	508	GMP		7		

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		
TARA GUM	417	GMP		7	Adopt -emulsifiers, stabilizers and thickeners are used in these products	**IDF:** add note "for use only in products not covered by Codex Stan 288"
TRAGACANTH GUM	413	GMP		7		**AIDGUM:** supports adoption **IDF:** add note "for use only in products not covered by Codex Stan 288"
TRICALCIUM CITRATE	333(iii)	GMP		7	Adopt at GMP - corresponds to CODEX STAN 288-1976	
TRIPOTASSIUM CITRATE	332(ii)	5000		7		
TRISODIUM CITRATE	331(iii)	5000		7		**Japan:** agree, prevents creaming during shelf-life
XANTHAN GUM	415	5000		7		**Japan:** agree, prevents creaming during shelf-life **Biopolymer:** adopt at GMP

Food Category <u>No. 01.6.3 (Whey cheese)</u>

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

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

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

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: 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
CALCIUM CARBONATE	170(i)	10000		Adopted	Retain adopted - corresponds to CODEX STAN 289-1995	**IDF:** only allowed as anticaking agent in original CODX STAN 289-1995
CALCIUM CHLORIDE	509	GMP		Adopted		
HYDROXYPROPYL DISTARCH PHOSPHATE	1442	10000		Adopted		**IDF:** only allowed as anticaking agent in original CODX STAN 289-1995
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	10000		Adopted		**IDF:** only allowed as anticaking agent in original CODX STAN 289-1995
POTASSIUM CARBONATE	501(i)	GMP		Adopted		
POTASSIUM CHLORIDE	508	GMP		Adopted		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		Adopted		
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP		Adopted		
POWDERED CELLULOSE	460(ii)	10000		Adopted		**IDF:** only allowed as anticaking agent in original CODX STAN 289-1995
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 **Justification for proposal**: CODEX STAN 019-1981 does not allow Emulsifiers, Stabilizers or Thickeners, several commodity standards apply to subcategories so it would not be appropriate to use horizontal approach here	**Comments by eWG on horizontal classification proposal:** **EU, Spain:** Supports proposal **Brazil:** Case-By-Case

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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Although CODEX STAN 280-1973 refers to provisions in Tables 1 and 2, the exisiting provisions for additives with ES&T function in FC 02.1.1 are for use as antioxidant synergists (see IDF comment)	**Comments by eWG on horizontal classification proposal:** **EU, Spain, IDF:** Supports proposal; food additives below are allowed as antioxidant synergist in original CODEX STAN 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[31]	Adopted	Retain adopted	**IDF:** only allowed as antioxidant synergist in original CODX STAN 280-1973
TRISODIUM CITRATE	331(iii)	GMP	171	Adopted		**IDF:** 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

eWG Proposal for Horizontal Classification of Food Category: 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 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	472a	GMP		7	Adopt - comment by	**Costa Rica:** used as emulsifier/stabilizer in this category

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

HYDROXYPROPYL DISTARCH PHOSPHATE	1442	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
HYDROXYPROPYL STARCH	1440	GMP		7		**Japan:** supports proposal
KARAYA GUM	416	GMP		7		**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	**Costa Rica:** used as emulsifier/stabilizer in this category **Japan:** requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils **ICGMA:** used at GMP
MONOSTARCH PHOSPHATE	1410	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
OXIDIZED STARCH	1404	GMP		7		**Japan:** supports proposal
PECTINS	440	GMP		7		**Japan:** supports proposal
PHOSPHATED DISTARCH PHOSPHATE	1413	GMP		7		**Japan:** supports proposal
POTASSIUM ALGINATE	402	GMP		7		**Japan:** supports proposal
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		**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		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
STARCH SODIUM OCTENYL SUCCINATE	1450	GMP		7		**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 in commodity standards, no information provided supporting use	**Japan:** supports proposal
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		**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 <u>No. 02.1.3 (Lard, tallow, fish oil, and other animal fats)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-By-Case **<u>Justification for proposal</u>**: 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.	**<u>Comments by eWG on horizontal classification proposal</u>:** **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	**Costa Rica:** used as an emulsifer/stabilizer in this category **Japan:** requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils
ACETYLATED DISTARCH ADIPATE	1422	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		**Japan:** supports proposal
ACID TREATED STARCH	1401	GMP		7		**Japan:** supports proposal
AGAR	406	GMP		7		**Japan:** supports proposal
ALGINIC ACID	400	GMP		7		**Japan:** supports proposal
ALKALINE TREATED STARCH	1402	GMP		7		**Japan:** supports proposal

AMMONIUM ALGINATE	403	5000		7	Adopt - comment from USA	**Japan:** requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils **USA:** ammonium alginate is allowed for use in fats and oils as a stabilizer/thickener up to 5000 mg/kg
BLEACHED STARCH	1403	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
CALCIUM ALGINATE	404	5000		7	Adopt - comment from USA	**Japan:** requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils **USA:** calcium alginate is allowed for use in fats and oils as a stabilizer/thickener up to 5000 mg/kg
CAROB BEAN GUM	410	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
CARRAGEENAN	407	GMP		7		**Japan:** supports proposal
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7	Adopt - comment from Costa Rica	**Costa Rica:** used as an emulsifer/stabilizer in this category **Japan:** supports proposal
DEXTRINS, ROASTED STARCH	1400	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
DISTARCH PHOSPHATE	1412	GMP		7		**Japan:** supports proposal
GELLAN GUM	418	GMP		7		**Japan:** supports proposal
GUAR GUM	412	20000		7	Adopt - comment from USA & IFAC	**Japan:** requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils **USA:** Guar gum is allowed for use in the US as a stabilizer and thickener in fats and oils up to 20000 mg/kg **IFAC:** adopt at GMP
GUM ARABIC (ACACIA GUM)	414	15000		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
HYDROXYPROPYL DISTARCH PHOSPHATE	1442	GMP		7		**Japan:** supports proposal
HYDROXYPROPYL STARCH	1440	GMP		7		**Japan:** supports proposal
KARAYA GUM	416	GMP		7		**Japan:** supports proposal
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	80000		7	Adopt at GMP - comment from Costa Rica & USA	**Costa Rica:** used as an emulsifer/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 and rendered animal fats at levels up to GMP
LECITHIN	322(i)	30000		7	Adopt at GMP - comment from Costa Rica & ICGMA	**Costa Rica:** used as an emulsifer/stabilizer in this category **Japan:** requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils **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	100000		7	Adopt at GMP - comment from Costa Rica & ICGMA	**Costa Rica:** used as an emulsifer/stabilizer in this category **Japan:** requests information on tech justification for emulsifiers/stabilizers in vegetable fats & oils **ICGMA:** used at GMP
MONOSTARCH PHOSPHATE	1410	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**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		**Japan:** supports proposal
POTASSIUM ALGINATE	402	GMP		7		**Japan:** supports proposal
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		**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 note "for use as antioxidant synergist" - for compliance with 19-1981 & 211-1999	**Japan:** supports proposal
STARCH ACETATE	1420	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
STARCH SODIUM OCTENYL SUCCINATE	1450	GMP		7		**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
TRICALCIUM CITRATE	333(iii)	GMP		7	Discontinue - not allowed in commodity standards, no information provided supporting use	**Japan:** supports proposal
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		**Japan:** supports proposal
TRISODIUM CITRATE	331(iii)	GMP		7	Adopt with note "for use as antioxidant synergist" - for compliance with 19-1981 & 211-1999	**Japan:** supports proposal

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

Food Category No. 02.2.1 (Butter)

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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Comments by eWG	**Comments by eWG on horizontal classification proposal:** **EU, Spain, UK, IDF:** Supports proposal; E &S are used in margarine, not butter. **Brazil:** case-by-case **IDF:** The specific food additive provisions as contained in the original Codex Standard 279 1971 were already incorporated into the GSFA in 2008. There were no provisions for Emulsifiers, stabilizers and thickeners in the original standard as adopted. The relevant additives are justified as acidity regulators. **ICGMA:** E &S are used in margarine, not butter.

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 No. 04.1.1 (Fresh fruit)

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 **Justification for proposal**: Several commodity standards which apply to subcategories do not allow food additives.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain:** Supports proposal

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; 215-1999; 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 **Justification for proposal**: Corresponding commodity standards do not allow food additives.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain:** Supports proposal

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 Classification of Food Category: Justified only with Note 16 "For use in glaze, coatings or decorations for fruit, vegetables, meat or fish." **Justification for proposal**: Comments by eWG members. Corresponding commodity standard does not address coatings.	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Emulsifiers are used in wax coatings for citrus and other fruit **Brazil:** Case-by-Case **EU** - the use of additives should be limited in fresh fruit; the EU wonders whether the justification is relevant for all the provisions listed **Spain:** glazing agents of carriers are different functional classes from ES&T and not subject of WG discussion. **UK:** is the use of an emulsifier 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.

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[32]	7	adopt with Note 16	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		**ICGMA:** adopt with note “for use as emulsifier”
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		
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		

[32] **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		**ICGMA:** adopt with note "for use as emulsifier"
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, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71[33]	7		**Brazil:** adopt with note "for use as emulsifier"
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7		**Brazil:** adopt with note "for use as emulsifier"
SODIUM ALGINATE	401	GMP		7		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	16	7		
TARA GUM	417	GMP		7		
TRAGACANTH GUM	413	GMP	16	7		**AIDGUM:** supports proposal
XANTHAN GUM	413	GMP		7		

Food Category <u>No. 04.1.1.3 (Peeled or cut fresh fruit)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified
<u>Justification for proposal</u>: No support provided by eWG members

<u>Comments by eWG on horizontal classification proposal</u>:
EU, Spain: support proposal
UK: questions technological 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		

[33] **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 <u>No. 04.2.1 (Fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)</u>

Corresponding commodity standards: None; subcategories have corresponding commodity standards

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified - discontinue provisions and move to subcategories 04.2.1.2 & 04.2.1.3
<u>Justification for proposal</u>: Emulsifiers, Stabilizers and Thickeners are not allowed in commodity standards corresponding to subcategory 04.2.1.1

<u>Comments by eWG on horizontal classification proposal</u>:
Brazil, EU, Spain, UK: support proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~GUM ARABIC (ACACIA GUM)~~	~~414~~	~~83000~~	~~79~~[34]	~~7~~	Discontinue, adopt in subcategories 04.2.1.2 (add Note 3) & 04.2.1.3 (add note "as stabilizer")	
~~SODIUM DIHYDROGEN CITRATE~~	~~331(i)~~	~~GMP~~		~~7~~	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) & 04.2.1.3 (add note "as stabilizer")	
~~TRISODIUM CITRATE~~	~~331(iii)~~	~~2000~~		~~7~~	Discontinue, adopt in subcategories 04.2.1.2 (add Note 3) & 04.2.1.3 (add note "as stabilizer")	

[34] **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

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 note 3 "surface treatment" **Justification for proposal**: no corresponding commodity standards, Comments in CX/FA12/44/9 Add. 2 from ICGMA: ES&T are technologically justified in FC 04.2.1.2 are used to thicken & stabilize the film forming mixture in order that it adheres to the surface of the fresh fruit/veg.	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Stabilizers are technologically justified for use in surface-treated vegetables. Modified food starches are typically used with components such as organic acids (lemon juice, citric, etc) and coating agents in spray applications to thicken and stabilize the film forming mixture in order that it adhere to the surface of the fresh fruits and vegetables. **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

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 with note 16 & 3	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		
AGAR	406	GMP		7	Adopt with note 3	**ICGMA:** accept proposal
ALGINIC ACID	400	GMP		7		
AMMONIUM ALGINATE	403	GMP		7		
CALCIUM ALGINATE	404	GMP		7		
CALCIUM CARBONATE	170(i)	GMP	4[35] & 16	7	Adopt with note 4, 16 & 3	
CALCIUM CHLORIDE	509	800	58[36]	7	Adopt with note 3 & 58	**Brazil:** supports proposal
CALCIUM SULFATE	516	800	58	7		**Brazil:** supports proposal
CAROB BEAN GUM	410	GMP		7	Adopt with note 3	

[35] **Note 4:** For decoration, stamping, marking or branding the product.
[36] **Note 58:** As calcium.

CARRAGEENAN	407	GMP		7		
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7	Adopt with note 16 & 3	
GELLAN GUM	418	GMP		7	Adopt with note 3	
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	**414**	**83000**	**79**		Adopt with note 79 & 3	**AIDGUM:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	16	7	Adopt with note 16 & 3	
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	16	7		
HYDROXYPROPYL STARCH	1440	GMP	16	7		**ICGMA:** accept proposal
KARAYA GUM	416	GMP		7	Adopt with note 3	
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7	Adopt with note 16 & 3	
LECITHIN	322(i)	GMP	16	7		
MAGNESIUM CHLORIDE	511	GMP	16	7		
MANNITOL	421	GMP		4	Adopt with note 3	
METHYL CELLULOSE	461	GMP	16	7	Adopt with note 16 & 3	
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		**ICGMA:** accept proposal
PECTINS	440	GMP		7	Adopt with note 3	
POTASSIUM ALGINATE	402	GMP		7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	16	7	Adopt with note 16 & 3	
POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		7	Adopt with note 3	
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7	Adopt with note 16, 71 & 3	
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7	Adopt with note 16 & 3	
SODIUM ALGINATE	401	GMP		7	Adopt with note 3	
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	16	7	Adopt with note 16 & 3	
SODIUM DIHYDROGEN CITRATE	**331(i)**	**GMP**			Adopt with note 3	
TARA GUM	417	GMP		7	Adopt with note 3	

TRAGACANTH GUM	413	GMP	16	7	Adopt with note 16 & 3	**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	Adopt with note 3 & 58	
CALCIUM HYDROXIDE	526	800	58	7		
MAGNESIUM CARBONATE	504(i)	GMP	16	7	Adopt with note 16 & 3	
MAGNESIUM HYDROXIDE	528	GMP	16	7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP	16	7		
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)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "as stabilizer"
Justification for proposal: Recommendation in CX/FA 12/44/9 Add.1 Annex 2;comments from Brazil on specific food additives

Comments by eWG on horizontal classification proposal:
Brazil: Case-by-Case
EU, UK: questions technological need.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		7	Adopt as listed with note “as stabilizer”	
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**			**AIDGUM:** supports adoption
KARAYA GUM	416	GMP		7		
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		

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

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>

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, 133-1981, 132-1981, & 104-1981: do not allow food additives

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: Comments from some eWG members and CX/FA12/44/9 Add. 2 from IFAC that stabilization is needed in these products to maintain color (especially in potatoes) and to maintain the texture or firmness of the vegetables. Emulsifiers, stabilizers, and thickeners provide this stabilization.	**<u>Comments by eWG on horizontal classification proposal</u>:** **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 PHOSPHATE	1414	10000		7	Adopt	
AGAR	406	GMP		7		
CALCIUM CHLORIDE	509	4000		7		**Brazil:** supports proposal **Costa Rica:** added to frozen vegetables to maintain texture/firmness **ICGMA:** added to frozen potatoes, jalapeno peppers & dices tomatoes to maintain texture/firmness.
CALCIUM SULFATE	516	3500		7		**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 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)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified
<u>Justification for proposal</u>: Emulsifiers, stabilizers and thickeners allowed in some corresponding commodity standards, food category covers standardized and non-standardized foods

<u>Comments by eWG on horizontal classification proposal</u>:
Brazil, EU, Spain, UK: Supports Proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ALGINIC ACID	400	GMP		4	Adopt	
CALCIUM CARBONATE	170(i)	10000	58	4		
CALCIUM CHLORIDE	509	10000	58	4	Adopt: allowed in CODEX STAN 260-2007	
CARRAGEENAN	407	GMP		4	Adopt: allowed in CODEX STAN 223-2001	**Japan:** supports proposal, improves viscosity which improves adhesion of seasoning
CITRIC AND FATTY ACID	472c	GMP		4	Adopt	

ESTERS OF GLYCEROL						
DEXTRINS, ROASTED STARCH	1400	GMP		4		
GUAR GUM	412	GMP		4	Adopt: allowed in CODEX STAN 294R-2009	
LECITHIN	322(i)	GMP		4	Adopt	
PECTINS	440	GMP		4		
POTASSIUM CARBONATE	501(i)	GMP		4		
POTASSIUM CHLORIDE	508	GMP		4		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		
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 <u>No. 06.1 (Whole, broken, or flaked grain, including rice)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified
<u>Justification for proposal</u>: Emulsifiers, stabilizers and thickeners not allowed in corresponding commodity standards

<u>Comments by eWG on horizontal classification proposal</u>:
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[37]	7	Adopt with Note 184 & new note “for use as anticaking agent” (see Appendix 2)	
CAROB BEAN GUM	41	GMP		7	Discontinue	
GUAR GUM	412	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP		7		
TARA GUM	417	GMP		7		

[37] **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 Classification of Food Category: Not Justified - Move all provisions to FC 06.2.1 with Note 186[38] "for use in flours with additives only" **Justification for proposal**: No provisions in FC 06.2.2 for ES&T.	**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	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	10000	58	~~4~~	Discontinue, keep GMP provision in 06.2.1 add note 186	
~~LECITHIN~~	~~322(i)~~	~~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	I**CGMA**: soy flour requires lecithin as emulsifier
~~TRISODIUM CITRATE~~	~~331(iii)~~	~~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 Classification of Food Category: Justified only with Note 186 "for use in flours with additives" **Justification for proposal**: Comments from Brazil	**Comments by eWG on horizontal classification proposal:** **Brazil:** Supports proposal, Emulsifiers and stabilizers are needed for flours in general. **EU, UK:** questions technological need **Spain:** use of additives as flour treatment agents is not an ES&T function

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	GMP	57[39]	7	Adopt with notes 57 and 186	
CALCIUM SULFATE	516	GMP	57	7		**USA:** calcium sulfate is allowed in flour as a bleaching agent up to 60000 mg/kg **EU:** bleaching agent is not a ES&T function

[38] **Note 186:** For use in flours with additives only.
[39] **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	I**CGMA**: soy flour requires lecithin as emulsifier, add note "for use in soy flour"
TRISODIUM CITRATE	**331(iii)**	**GMP**			Adopt with note 186	

Food Category <u>No. 06.2.2 (Starches)</u>

Corresponding commodity standards: None

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

Food Category <u>No. 06.4.1 (Fresh pastas and noodles and like products)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: 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	**<u>Comments by eWG on horizontal classification proposal</u>:** **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". Consider use of Note 211[40] "for use in noodles only"

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		4	Adopt	**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 12000 mg/kg to improve elasticity
ALGINIC ACID	400	GMP		4		**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

[40] **Note 211:** For use in noodles only.

CARRAGEENAN	407	GMP		4		**EU**: restrict to noodles **Japan**: used in noodles as stabilizer up to 30000 mg/kg to improve elasticity
CURDLAN	424	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 10000 mg/kg to improve elasticity
DISTARCH PHOSPHATE	1412	200		4		**EU**: restrict to noodles
GELLAN GUM	418	GMP		4		**EU**: restrict to noodles **Japan**: used in noodles as stabilizer up to 16000 mg/kg to improve elasticity
GUAR GUM	412	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 10000 mg/kg to improve elasticity
GUM ARABIC (ACACIA GUM)	414	GMP		4		**EU:** restrict to noodles **Japan**: used in noodles as stabilizer up to 5000 mg/kg to improve elasticity **AIDGUM** supports adoption
KARAYA GUM	416	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 8000 mg/kg to improve elasticity
KONJAC FLOUR	425	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 16000 mg/kg to improve elasticity
LECITHIN	322(i)	GMP		4		**EU:** supports adopt **Japan:** used in noodles as stabilizer up to 8000 mg/kg to improve elasticity
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		4		**EU**: restrict to noodles
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP		4		**EU, EFEMA, ELC:** accepts proposal **Japan:** used in noodles as emulsifer up to 2200 mg/kg to avoid retrogradation of starch.
PECTINS	440	GMP		4		**EU**: restrict to noodles
PHOSPHATED DISTARCH PHOSPHATE	1413	200		4		**EU**: restrict to noodles
POTASSIUM CARBONATE	501(i)	GMP		4		**EU**: restrict to noodles
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		**EU**: restrict to noodles
SODIUM ALGINATE	401	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 20000 mg/kg to improve elasticity
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	50000		4		**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

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

Food Category <u>No. 06.4.2 (Dried pastas and noodles and like products)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: comments by eWG and in CX/FA 12/44/9 Add 2. by Brazil - stabilizers are necessary to prevent changes on the structure of dried pastas due to heat treatment	**<u>Comments by eWG on horizontal classification proposal</u>:** **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 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	Adopt	
ALGINIC ACID	400	GMP		7		
AMMONIUM ALGINATE	403	GMP		7		
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[41]	7		
DISTARCH PHOSPHATE	1412	200		4		
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		
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 OF FATTY ACIDS	471	30000		7		**EFEMA, ELC:** accepts proposal

[41] **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 <u>No. 08.1 (Fresh meat, poultry, and game)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified - move to FC 08.1.1 with Note 16 and FC 08.1.2 without adding Note 16 **<u>Justification for proposal</u>**: 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	**<u>Comments by eWG on horizontal classification proposal</u>:** **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	Discontinue - move to FC 08.1.1 with Note 16 and FC 08.1.2 without adding note	
~~CARRAGEENAN~~	~~407~~	~~GMP~~		7		**Costa Rica, ICGMA:** used to manage water holding and texture-thickener
~~GELLAN GUM~~	~~418~~	~~GMP~~		7		
~~KARAYA GUM~~	~~416~~	~~GMP~~		7		
~~KONJAC FLOUR~~	~~425~~	~~GMP~~		7		**ICGMA:** supports adoption
~~MANNITOL~~	~~421~~	~~GMP~~		4		**ICGMA:** supports adoption
~~PECTINS~~	~~440~~	~~GMP~~		7		**ICGMA:** supports adoption
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~GMP~~		4		**ICGMA:** supports adoption
~~TARA GUM~~	~~417~~	~~GMP~~		7		
~~XANTHAN GUM~~	~~415~~	~~GMP~~		7		

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with Note 16 "For use in glaze, coatings or decorations for fruit, vegetables, meat or fish" **Justification for proposal**: most provisions and eWG comments in favor of use involve use of ES&T in glazes (Note 16 "For use in glaze, coatings or decorations for fruit, vegetables, meat or fish")	**Comments by eWG on horizontal classification proposal:** **Brazil:** use not justified **Costa Rica, ICGMA:** some are used to manage water holding and for texture-thickening **EU**: the use of additives in fresh meat should be limited to colours for health marking; the EU opposes to any other uses; it should be discussed at Codex level how to deal with food additives needed in this food 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	Adopt as listed with Note 16	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		
AGAR	**406**	**GMP**				
CALCIUM CARBONATE	170(i)	GMP	4[42] & 16	7		
CALCIUM CHLORIDE	509	15000		7		
CARRAGEENAN	**407**	**GMP**				**Costa Rica, ICGMA:** used to manage water holding and texture-thickener
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7		**ICGMA:** supports adoption
GELLAN GUM	**418**	**GMP**				
GUM ARABIC (ACACIA GUM)	414	GMP	16	7		**ICGMA, AIDGUM:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	16	7		**ICGMA:** supports adoption
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	16	7		**ICGMA:** supports adoption
HYDROXYPROPYL STARCH	1440	GMP	16	7		**ICGMA:** supports adoption
KARAYA GUM	**416**	**GMP**				**AIDGUM:** supports adoption
KONJAC FLOUR	**425**	**GMP**				**ICGMA:** supports adoption
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7		
LECITHIN	322(i)	GMP	16	7		**ICGMA:** supports adoption
MAGNESIUM CHLORIDE	511	2260		7		
MANNITOL	**421**	**GMP**				**ICGMA:** supports adoption
METHYL CELLULOSE	461	GMP	16	7		**ICGMA:** supports adoption
METHYL ETHYL CELLULOSE	465	GMP	16	7		**ICGMA:** supports adoption
MICROCRYSTALLINE	460(i)	GMP	16	7		**ICGMA:** supports adoption

[42] **Note 4:** For decoration, stamping, marking or branding the product.

CELLULOSE (CELLULOSE GEL)						
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP	16	7		**ICGMA:** supports adoption
OXIDIZED STARCH	1404	GMP	16	7		
PECTINS	**440**	**GMP**				**ICGMA:** supports adoption
POTASSIUM CHLORIDE	508	GMP		7		**ICGMA:** supports adoption
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	16	7		**ICGMA:** supports adoption
POWDERED CELLULOSE	460(ii)	GMP	16	7		**ICGMA:** supports adoption
PROCESSED EUCHEUMA SEAWEED (PES)	**407a**	**GMP**				**ICGMA:** supports adoption
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7		
SODIUM ALGINATE	401	15000		7		**Costa Rica, ICGMA:** used to manage water holding and texture-thickener **USA**: 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 carcass weight (9CFR 424.21(c))
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	15000		7		**USA**: sodium carboxymethyl cellulose is allowed for use in the US as a film forming agent in freshly dressed meat carcarses up to 15000 mg/kg of the carcass weight (9CFR 424.21(c)). **ICGMA:** supports adoption
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	16	7	Adopt at 500 mg/kg with Note 16 and new note "for use as a color retention agent"	**USA:** sodium citrate is allowed for use in the USA on fresh meat cuts as a color retention agent up to 500 mg/kg **ICGMA:** supports adoption at GMP with note 16
TARA GUM	**417**	**GMP**			Adopt as listed with Note 16	
TRAGACANTH GUM	413	GMP	16	7		**AIDGUM supports adoption**
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7		**ICGMA:** supports adoption
TRISODIUM CITRATE	331(iii)	5000		7	Adopt at 500 mg/kg with Note 16 and new note "for use as a color retention agent"	**USA:** sodium citrate is allowed for use in the USA on fresh meat cuts as a color retention agent up to 500 mg/kg **ICGMA:** supports adoption as listed with Note 16
XANTHAN GUM	**415**	**GMP**			Adopt as listed with Note 16	

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: 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	**Comments by eWG on horizontal classification proposal:** **Brazil:** ES&T not justified in fresh products **Costa Rica. ICGMA**: some ES&T are used to manage water holding and for texture-thickening **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 **Spain, UK:** requests further information on use **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. **ICGMA:** modified food starch is used as a thickener in injected and tumbled poultry and in sausage-type products

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 as listed	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		**ICGMA:** supports adoption
AGAR	**406**	**GMP**				
CALCIUM CARBONATE	170(i)	1500	4 & 16	7		
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	**407**	**GMP**				**Costa Rica, ICGMA:** used to manage water holding and texture-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		**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 CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		**ICGMA:** supports adoption
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP		7		
OXIDIZED STARCH	1404	GMP		7		**ICGMA:** supports adoption
PECTINS	**440**	**GMP**				**ICGMA:** supports adoption
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		**ICGMA:** supports adoption
POWDERED CELLULOSE	460(ii)	GMP		7		
PROCESSED EUCHEUMA SEAWEED (PES)	**407a**	**GMP**				**ICGMA:** supports adoption
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		**Costa Rica, ICGMA:** used to manage water holding and texture-thickener **USA**: sodium alginate is allowed in ground and formed raw poultry pieces in the US as a binder and extender up to 12400 mg/kg
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		7		**ICGMA:** supports adoption
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		**ICGMA:** supports adoption
TARA GUM	**417**	**GMP**				
TRAGACANTH GUM	413	GMP		7		
TRICALCIUM CITRATE	333(iii)	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		**ICGMA:** supports adoption
TRISODIUM CITRATE	331(iii)	GMP		7		**ICGMA:** supports adoption
XANTHAN GUM	**415**	**GMP**				

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

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

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal:** No information supporting use provided in eWG	**Comments by eWG on horizontal classification proposal:** **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 carriers are not an ES&T function **UK**: provisions in parent category should be discontinued as may conflict with subcategories **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
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	16	7	Discontinue	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		
CARRAGEENAN	407	GMP		4		
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7		
GELLAN GUM	418	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		
KONJAC FLOUR	425	GMP		4		
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)	GMP	16	7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP	16	7		
OXIDIZED STARCH	1404	GMP	16	7		
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, POTASSIUM AND SODIUM	470(i)	GMP	16 & 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		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Refer to discussion on Appendix 2, possibly used as Acidity Regulator, if not Discontinue	
SODIUM GLUCONATE	576	GMP		4	Discontinue	
TRAGACANTH GUM	413	GMP	16	7		**AIDGUM** supports adoption
TRICALCIUM CITRATE	333(iii)	GMP		7	Refer to discussion on Appendix 2, possibly used as Acidity Regulator, if not Discontinue	
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		

Food Category No. 09.1.1 (Fresh fish)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal:** No information supporting use provided in eWG	**Comments by eWG on horizontal classification proposal:** **EU:** does not support **Spain:** 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 Classification of Food Category: Not Justified **Justification for proposal:** No technological justification supporting use provided in eWG	**Comments by eWG on horizontal classification proposal:** **EU**: 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, carriers 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 Classification of Food Category: Not Justified - discontinue provisions and move to subcategories **Justification for proposal:** several subcategories require notes specific to those subcategories or the use of ES&T is not justified	**Comments by eWG on horizontal classification proposal:** **EU, Spain**: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~ALGINIC ACID~~	~~400~~	~~GMP~~		~~4~~	Discontinue - move to appropriate subcategories	
~~CALCIUM CARBONATE~~	~~170(i)~~	~~10000~~	~~58~~	~~4~~		
~~CALCIUM CHLORIDE~~	~~509~~	~~10000~~	~~58~~	~~4~~		
~~CAROB BEAN GUM~~	~~410~~	~~GMP~~		~~7~~		
~~DEXTRINS, ROASTED STARCH~~	~~1400~~	~~GMP~~		~~4~~		

~~GELLAN GUM~~	~~418~~	~~GMP~~		~~7~~		
~~GUAR GUM~~	~~412~~	~~GMP~~		~~4~~		
~~KARAYA GUM~~	~~416~~	~~GMP~~		~~7~~		
~~KONJAC FLOUR~~	~~425~~	~~GMP~~		~~7~~		
~~MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)~~	~~460(i)~~	~~10000~~		~~7~~		
~~MONO- AND DI-GLYCERIDES OF FATTY ACIDS~~	~~471~~	~~10000~~		~~7~~		
~~POTASSIUM CARBONATE~~	~~501(i)~~	~~GMP~~		~~4~~		
~~POTASSIUM CHLORIDE~~	~~508~~	~~GMP~~		~~4~~		
~~SODIUM GLUCONATE~~	~~576~~	~~GMP~~		~~4~~		

Food Category <u>No. 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified, when used in fish meat requires note "for use as texturizing agent" **<u>Justification for proposal</u>**: 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	**<u>Comments by eWG on horizontal classification proposal</u>:** **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. **EU:** 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 point depression

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 use as texturizing agent"	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
AGAR	406	20000	3[43] & 53[44]	7	Adopt as listed	

[43] **Note 3:** Surface treatment.
[44] **Note 53**: For use in coatings only.

ALGINIC ACID	400	5000		7	Adopt at 7500 mg/kg with new note ""for use as texturizing agent"	**IFAC:** 7500 mg/kg needed to protect from structure changes during freeze/thaw **Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
ALGINIC ACID	**400**	**GMP**			Adopt with new note "for use as texturizing agent"	
AMMONIUM ALGINATE	403	5000		7	Adopt at 7500 mg/kg with new note ""for use as texturizing agent"	**IFAC:** 7500 mg/kg needed to protect from structure changes during freeze/thaw **Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
CALCIUM ALGINATE	404	5000		7	Adopt at 7500 mg/kg with new note ""for use as texturizing agent"	**IFAC:** 7500 mg/kg needed to protect from structure changes during freeze/thaw **Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
CALCIUM CARBONATE	170(i)	GMP	95[45]	7	Adopt as listed - note 95 excludes use from products covered by commodity standards which do not allow ES&T	
CALCIUM CHLORIDE	**509**	**10000**	**58**		Adopt as listed with new note "for use as texturizing agent"	
CAROB BEAN GUM	**410**	**GMP**			Adopt with note 61 - corresponds to Codex STAN 165-1989	
CARRAGEENAN	407	5000	61[46]	7	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 fish only which does not cover use from Marinalg comment	**IFAC:** GMP with Note 61 corresponds to codex stan 165-1989 **Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7	Adopt with new note "for use as texturizing agent"	

[45] **Note 95:** For use in surimi and fish roe products only.
[46] **Note 61:** For use in minced fish only.

DEXTRINS, ROASTED STARCH	1400	20000	3 & 53	7	Adopt as listed	
GELLAN GUM	**418**	**GMP**			Adopt with new note "for use as texturizing agent"	
GUAR GUM	412	GMP	61 & 73[47]	7	Adopt with Note 61 and new note "as glaze thickener for frozen crab" - see comments from Japan, Note 61 Corresponds to CODE STAN 165-1989, Note 73 not necessary	**Japan:** supports proposal - added to improve adhesion of glaze to crab, CODEX STAN 165-1989 does not cover frozen crab.
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**	**GMP**			Adopt with new note "for use as texturizing agent"	**AIDGUM** supports adoption
KONJAC FLOUR	**425**	**GMP**				
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7		
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7		
MANNITOL	421	GMP		7		
METHYL CELLULOSE	461	GMP	61	7	Adopt as listed - Corresponds to CODE STAN 165-1989	
METHYL ETHYL CELLULOSE	465	GMP		7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	**460(i)**	**10000**			Adopt with new note "for use as texturizing agent"	
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	**471**	**10000**				
OXIDIZED STARCH	1404	GMP		7		
PECTINS	440	20000	16	7	Adopt at GMP with note 61 - GMP and note 61 corresponds to CODEX STAN 165-1989	**IFAC:** GMP with note 61 corresponds to Codex Stan 165-1989
POLYDEXTROSES	1200	GMP		7	Adopt with new note "for use as texturizing agent"	
POTASSIUM ALGINATE	402	5000		7	Adopt at 7500 mg/kg with new note ""for use as texturizing agent"	**Marinalg, IFAC**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
POTASSIUM CARBONATE	**501(i)**	**GMP**			Adopt with new note "for	

[47] **Note 73:** Except whole fish.

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

XANTHAN GUM	415	160		7	Adopt at GMP with Note 61 and new note "as glaze thickener for frozen crab" - see comments from Japan, Note 61 Corresponds to CODE STAN 165-1989	**Japan:** supports proposal - added to improve adhesion of glaze to crab, CODEX STAN 165-1989 does not cover frozen crab. **Biopolymer, IFAC**: adopt at GMP with note 61 to align with Codex 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 @ GMP) and INS 331 & 332 as acidity regulators

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified with Note 41[48] "Use in breading or batter coatings only" **<u>Justification for proposal</u>**: CODEX STAN 166 allow use of specific thickeners in batter.	**<u>Comments by eWG on horizontal classification proposal</u>:** **comments in CX/FA 12/44/9 add 2 for FC 09.2** - Thickeners and stabilizers are used in batters to improve adhesion, reduce fat uptake during frying and improve the crispiness of the batter. They also protect the product from structure changes during the freeze-thaw cycles during handling and storage, by decreasing the freezing point depression. **EU:** supports use only in batter coatings **UK:** accepts all initial proposals **ICGMA:** modified food starches are used in breadings and batters as stabilizers **IFAC:** 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	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 - corresponds to CODEX STAN 166-1989	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	41	7		
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)	

[48] **Note 41:** Use in breading or batter coatings only.

ALGINIC ACID	**400**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
ALKALINE TREATED STARCH	1402	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
CALCIUM CARBONATE	170(i)	GMP	16	7	Adopt as listed (also listed in 09.2.1 with Note 95)	
CALCIUM CHLORIDE	**509**	**10000**	**58**		Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
CAROB BEAN GUM	**410**	**GMP**			Adopt with notes 41 & 61 - in CODEX STAN 166-1981 allowed in batter for all fish products & in minced fish meat	
CARRAGEENAN	407	GMP	41 & 61	7	Adopt with notes 41 & 61 - in CODEX STAN 166-1981 allowed in batter for all fish products & in minced fish meat (also in 09.2.1 for use in all fish meat)	
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
DEXTRINS, ROASTED STARCH	1400	GMP	41	7	Adopt as listed (also listed in 09.2.1 for use in coatings only)	
DISTARCH PHOSPHATE	1412	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981	
GELLAN GUM	**418**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in coatings only)	
GUAR GUM	412	2000		7	Adopt at GMP with notes 41 & 61 - in CODEX STAN 166-1981 allowed in batter for all fish products & in minced fish meat	I**FAC:** GMP with note 61 corresponds to codex stan 166-1989

GUM ARABIC (ACACIA GUM)	414	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	**AIDGUM:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
HYDROXYPROPYL DISTARCH PHOSPHATE	1442	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981	
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
HYDROXYPROPYL STARCH	1440	GMP	41	7		
KARAYA GUM	**416**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in all fish meat)	**AIDGUM:** supports adoption
KONJAC FLOUR	**425**	**GMP**				
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7		
LECITHIN	322(i)	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
MAGNESIUM CHLORIDE	511	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP	41 & 61	7	Adopt as listed - corresponds to CODEX STAN 166-1981	
METHYL ETHYL CELLULOSE	465	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	**460(i)**	**10000**			Adopt as listed (listed in 09.2.1 for use in all fish meat)	
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	**471**	**10000**			Adopt at GMP with note 41 - Corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	

MONOSTARCH PHOSPHATE	1410	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
OXIDIZED STARCH	1404	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989 (also listed in 09.2.1 for use in all fish meat)	
PECTINS	440	GMP	41 & 61	7	Adopt as listed - corresponds to CODEX STAN 166-1981	
PHOSPHATED DISTARCH PHOSPHATE	1413	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
POTASSIUM CARBONATE	501(i)	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989 (also listed in 09.2.1 for use in all fish meat)	
POTASSIUM CHLORIDE	**508**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in fish all meat)	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	61	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
POWDERED CELLULOSE	460(ii)	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
PROCESSED EUCHEUMA SEAWEED (PES)	407a	5000		7	Adopt at GMP with notes 41 & 61 - in CODEX STAN 166-1981 allowed in batter for all fish products & in minced fish meat (also listed in 09.2.1 for use in all fish meat)	**IFAC:** GMP with note 61 corresponds to codex stan 166-1989
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND	470(ii)	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 - complies with CODEX STAN 166-1981	
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	61	7		
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 - complies with CODEX STAN 166-1981	
TRISODIUM CITRATE	331(iii)	GMP	61	7		
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>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: no corresponding commodity standard	**<u>Comments by eWG on horizontal classification proposal</u>:** **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 ESTERS OF GLYCEROL	472a	GMP	16	7	Adopt as listed	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		
AGAR	406	GMP		7		
ALGINIC ACID	**400**	**GMP**				

CALCIUM CARBONATE	170(i)	GMP	16	7	Refer to discussion in Appendix 2 – possibly 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**				
KONJAC FLOUR	**425**	**GMP**				
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 CITRATE	332(i)	GMP	16	7	Refer to discussion in Appendix 2 – possibly used as AR (adopt with note 16)	
POTASSIUM CARBONATE	**501(i)**	**GMP**				
POTASSIUM CHLORIDE	**508**	**GMP**				
POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		7		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7	Adopt as listed	
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		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	16	7	Refer to discussion in Appendix 2 – possibly 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 used as AR	
TRISODIUM CITRATE	331(iii)	GMP	16	7		
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>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified only with notes 41 "Use in breading or batter coatings only." and 16 "For use in glaze, coatings or decorations for fruit, vegetables, meat or fish." **<u>Justification for proposal</u>**: no corresponding commodity standard, technological justification provided in comments by eWG (general to FC and for specific provisions) address use in coatings/glaze only	**<u>Comments by eWG on horizontal classification proposal</u>:** **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	1414	GMP		7	Adopt at GMP with notes 16 & 41	**Japan:** supports proposal, use improves viscosity for adhesion of seasoning to fish
AGAR	406	GMP		7		
ALGINIC ACID	**400**	**GMP**				
CALCIUM CARBONATE	**170(i)**	**10000**	**58**		Adopt as listed - used as AR- see Appendix 2	
CALCIUM CHLORIDE	**509**	**10000**	**58**		Adopt at GMP with notes 16 & 41	
CAROB BEAN GUM	**410**	**GMP**				

CARRAGEENAN	407	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 carrageenan during processing of surimi products.
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7	Adopt at GMP with notes 16 & 41	
DEXTRINS, ROASTED STARCH	**1400**	**GMP**				
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 CELLULOSE	463	GMP		7	Adopt at GMP with notes 16 & 41	
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		**Costa Rica:** 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	Adopt at GMP with notes 16 & 41	
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)**	**10000**				
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	**471**	**10000**				
OXIDIZED STARCH	1404	GMP		7		**Costa Rica:** modified starch is used as a stabilizer in batters and 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.
POLYDEXTROSES	1200	GMP		7	Adopt at GMP with notes 16 & 41	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	Adopt as listed - used as AR - see Appendix 2	
POTASSIUM CARBONATE	**501(i)**	**GMP**				
POTASSIUM CHLORIDE	**508**	**GMP**			Adopt at GMP with notes 16 & 41	
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		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 CITRATE	331(i)	GMP		7	Adopt - used as AR, see Appendix 2	
SODIUM GLUCONATE	**576**	**GMP**			Adopt at GMP with notes 16 & 41	
TARA GUM	417	GMP		7		
TRAGACANTH GUM	413	GMP		7		**AIDGUM:** supports adoption
TRICALCIUM CITRATE	333(iii)	GMP		7	Adopt - used as AR, see Appendix 2	
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
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

eWG Proposal for Horizontal Classification of Food Category: Justified only with notes 41 and 16 **Justification for proposal**: no corresponding commodity standard, technological justification provided in comments in parent category address use in coatings/glaze only.	**Comments by eWG on horizontal classification proposal:** **Brazil:** no technological justification provided **Costa Rica, ICGMA:** modified starch is used as a thickener. **Spain:** use as glazing agent or carrier not an ES&T function. No tech justification provided. **UK:** accept proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~CALCIUM CARBONATE~~	~~170(i)~~	~~GMP~~		~~7~~	Discontinue, adopt in parent FC 09.2.4 at GMP with Notes 41, 16 - similar provision in all subcategories	
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~5000~~		~~7~~		

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with notes 41 and 16 **Justification for proposal**: no corresponding commodity standard, technological justification provided in comments in parent category address use in coatings/glaze only.	**Comments by eWG on horizontal classification proposal:** **Brazil:** no technological justification provided **Costa Rica, ICGMA:** modified starch is used as a thickener. **Spain:** use as glazing agent or carrier not an ES&T function. No tech justification provided. **UK:** accept proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~CALCIUM CARBONATE~~	~~170(i)~~	~~GMP~~		~~7~~	Discontinue, adopt in parent FC 09.2.4 at GMP with Notes 41, 16 - similar provision in all subcategories	
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~GMP~~		~~4~~		

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 notes 41 and 16 **Justification for proposal**: no corresponding commodity standard, technological justification provided in comments in parent category address use in coatings/glaze only.	**Comments by eWG on horizontal classification proposal:** **Brazil:** no technological justification provided **Spain:** use as glazing agent or carrier not an ES&T function. No tech justification provided. **UK:** accept proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~CALCIUM CARBONATE~~	~~170(i)~~	~~GMP~~	16	~~7~~	Discontinue, adopt in parent FC 09.2.4 at GMP with Notes 41, 16 - similar provision in all subcategories	
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~GMP~~		~~4~~		

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

eWG Proposal for Horizontal Classification of Food Category: Not Justified – discontinue all provisions for ES&Ts in this food category **Justification for proposal**: 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	**Comments by eWG on horizontal classification proposal:** **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	Discontinue	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
AGAR	406	GMP		7		
CALCIUM CARBONATE	170(i)	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 herring and sprat"	
CARRAGEENAN	407	GMP		7	Discontinue	
CITRIC AND FATTY ACID	472c	GMP		7		

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 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"	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP		7	Discontinue	
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		
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 ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		7		

SODIUM DIHYDROGEN CITRATE	331(i)	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 herring and sprat"	
TARA GUM	417	GMP		7	Discontinue	
TRAGACANTH GUM	413	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	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 herring and sprat"	
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	GMP		7	Discontinue	**Japan:** 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 "stabilizer" should be added to new note.

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	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Spain:** supports proposal

Food Category No. 10.2.1 (Liquid egg products)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified
Justification for proposal: comments by eWG and in CX/FA 12/44/9 add 2: Thickeners and stabilizers are used to restore the viscosity that is typically lost through pasteurisation of liquid egg products

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

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		7	Adopt at GMP	
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		**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		
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)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: comments by eWG and in CX/FA 12/44/9 add 2: Thickeners and stabilizers are needed to provide freeze-thaw stability and restore lost viscosity that is typically lost through pasteurisation.	**Comments by eWG on horizontal classification proposal:** **EU, UK, ICGMA, IFAC:** supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		7	Adopt at GMP	
CALCIUM ALGINATE	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		7		
CARRAGEENAN	407	GMP		7		
GELLAN GUM	418	GMP		7		
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 OF FATTY ACIDS	471	GMP		7		**EFEMA:** adopt at GMP
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, 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		
TRISODIUM CITRATE	331(iii)	GMP		7		

XANTHAN GUM	415	GMP		7		**Japan:** agree, prevents protein denaturation caused by freezing **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 **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal

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 **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal

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 **Justification for proposal**: ODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal **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 **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 No. 11.1.3.1 (Dried 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 **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal

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 **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal

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 **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 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 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))

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: comments to eWG that ES&T are not needed in this food category.	**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 No. 11.3 (Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3 (soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar))

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: comments to eWG that ES&T are not needed in this food category.

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	Discontinue	**UK, CEFS:** discontinue - technological need questioned
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		4		**UK, CEFS:** discontinue - technological need questioned
POLYDEXTROSES	1200	GMP		7		**UK, CEFS:** discontinue - technological need questioned

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified
Justification for proposal: comments by eWG members and recommendation in CX/FA 12/44/9 Add 1

Comments by eWG on horizontal classification proposal:
EU, 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	Adopt as listed	**EFEMA, ELC:** accepts proposal
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		
AMMONIUM ALGINATE	403	10000		7		
BLEACHED STARCH	1403	10000		7		
CALCIUM ACETATE	263	1500		7		**USA**: calcium acetate is allowed in the USA for use in toppings and 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		**EFEMA, ELC:** accepts proposal
DISTARCH PHOSPHATE	1412	10000		7		

GELLAN GUM	418	500		7		
GUAR GUM	412	10000		7		**IFAC:** adopt at GMP
GUM ARABIC (ACACIA GUM)	414	GMP		7		**AIDGUM:** supports adoption
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		**AIDGUM:** supports adoption
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7		**EFEMA, ELC:** accepts proposal
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		**EFEMA, ELC:** accepts proposal
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		

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

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

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 **Justification for proposal**: Comments to eWG that Technical function of ES&T not 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	**Comments by eWG on horizontal classification proposal:** **EU, Spain, UK:** supports proposal

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 **Justification for proposal**: Comments to eWG that Technical function of ES&T not needed in salt; adopted provisions for food additives with ES&T function in this food are for their use as anticaking agents, not as ES&T	**Comments by eWG on horizontal classification proposal:** **EU, Spain, UK:** supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	GMP		Adopted	Retain Adopted	**UK:** retain adopted - used as anti-caking agents not as ES&T
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH 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 ESTERS OF GLYCEROL	472a	5000		7	Adopt as listed	**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 ESTERS OF GLYCEROL	472c	GMP		7		**EFEMA, ELC:** accepts proposal
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP		7		**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 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 ESTERS OF GLYCEROL	472b	5000		7		**EFEMA, ELC:** accepts proposal
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7		
MANNITOL	421	60000		4		
METHYL CELLULOSE	461	GMP		7		
METHYL ETHYL CELLULOSE	465	GMP		7		
MICROCRYSTALLINE	460(i)	22000		7		

CELLULOSE (CELLULOSE GEL)						
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	5000		7		**EFEMA, 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 <u>No. 12.2.1 (Herbs and spices)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified
<u>Justification for proposal</u>: Comments by eWG members and in CX/FA 12/44/9 Add 2. - ES&T not needed in this FC

<u>Comments by eWG on horizontal classification proposal</u>:
Brazil, EU, Spain, UK, ICGMA: 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[49]	7		
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	51	7		
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		

[49] **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, POTASSIUM AND SODIUM	470(i)	GMP	51	7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	51	7		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	51	7		
SODIUM DIHYDROGEN	331(i)	GMP	51	7		

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 <u>No. 13.1 (Infant formulae, follow-up formulae, and formulae for special medical purposes for infants)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-by-Case **<u>Justification for proposal</u>**: Comments to eWG that the use of all additives in subcategories should be specifically evaluated for use in that food category.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Spain, UK:** supports proposal **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 prevent 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
~~GUM ARABIC (ACACIA GUM)~~	~~414~~	~~GMP~~		~~4~~	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 for addition to 156-1987	**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

eWG Proposal for Horizontal Classification of Food Category: Case-By-Case **Justification for proposal:** Comments to eWG that the use of additives in this FC should be specifically evaluated for use in that food category	**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 prevent 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 PHOSPHATE	1414	5000	72[50] & 150[51]	7	Adopt as listed - corresponds to CODEX STAN 072-1981	
CAROB BEAN GUM	410	1000	72	7		
DISTARCH PHOSPHATE	1412	5000	72 & 150	7		
GUAR GUM	412	1000	14[52] & 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	Adopt as listed - corresponds to CODEX STAN 072-1981	
LECITHIN	322(i)	5000	72	7		**Japan:** agree, used for uniform emulsion
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	4000	72	7		**EFEMA, ELC:** accepts the proposal
PHOSPHATED DISTARCH PHOSPHATE	1413	5000	72 & 150	7		
POTASSIUM CARBONATE	501(i)	2000	55[53] & 72	7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	72	7		
POTASSIUM HYDROGEN CARBONATE	501(ii)	2000	55 & 72	7		

[50] **Note 72:** Ready-to-eat basis.
[51] **Note 150:** Use level for soy-based formula; 25 000 mg/kg for hydrolyzed protein and/or amino acid-based formula.
[52] **Note 14:** For use in hydrolyzed protein liquid formula only.
[53] **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		
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7		**Japan:** chelating effect of citrate prevents sedimentation of 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 Classification of Food Category: Case-By-Case **Justification for proposal:** Comments to eWG that the use of additives in this FC should be specifically evaluated for use in that food category	**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 prevent 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 ADIPATE	1422	5000	72 & 150	7	Adopt as listed - corresponds to CODEX STAN 072-1981	
ACETYLATED DISTARCH PHOSPHATE	1414	5000	72 & 150	7		
CAROB BEAN GUM	410	1000	72	7		
CARRAGEENAN	407	300	72 & 151[54]	7		
DISTARCH PHOSPHATE	1412	5000	72 & 150	7		
GUAR GUM	412	1000	72	7		
LECITHIN	322(i)	5000	72	7		**Japan:** agree, used for uniform emulsion
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	4000	72	7		**EFEMA, ELC:** accepts the proposal
PECTINS	440	10000	72	7		
PHOSPHATED DISTARCH PHOSPHATE	1413	5000	72 & 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		

[54] **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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-By-Case **<u>Justification for proposal:</u>** Comments to eWG that the use of additives in this FC should be specifically evaluated for use in that food category	**<u>Comments by eWG on horizontal classification proposal</u>:** **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 prevent 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 PHOSPHATE	1414	5000	72 & 150	7	Adopt as listed - corresponds to CODEX STAN 072-1981	
CAROB BEAN GUM	410	1000	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	Adopt as listed - corresponds to CODEX STAN 072-1981	
LECITHIN	322(i)	5000	72	7		**Japan:** agree, prevents fat separation
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	4000	72	7		**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		
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7		**Japan:** chelating effect of citrate prevents sedimentation of minerals such as calcium
TRISODIUM CITRATE	331(iii)	GMP	72	7		

Food Category <u>No. 13.2 (Complementary foods for infants and young children)</u>

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

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-By-Case **<u>Justification for proposal:</u>** Comments to eWG that the use of additives in this FC should be specifically evaluated for use in that food category	**<u>Comments by eWG on horizontal classification proposal</u>:** **Spain:** supports proposal **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 starch is used as a general thickener and stabilizer in this 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	5000		7	Adopt as listed with new note "singly or in combination with INS 471, 472a, 472b, & 472c" - corresponds to CODEX STAN 74-1981	**UK:** accept proposal
ACETYLATED DISTARCH ADIPATE	1422	60000		7	Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per CODEX STAN 74-1981) & "60000 mg/kg in canned baby food only" (as per CODEX STAN 73-1981)	**UK:** accept proposal
ACETYLATED DISTARCH PHOSPHATE	1414	60000		7		**UK:** accept proposal
ACETYLATED OXIDIZED STARCH	1451	5000	72	4		**UK:** accept proposal
AGAR	406	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
ALGINIC ACID	400	5000		7		
AMMONIUM ALGINATE	403	5000		7		
CALCIUM ACETATE	263	GMP		7	Adopt as listed - corresponds to CODEX STAN 74-1981	**UK:** accept proposal

CALCIUM ALGINATE	404	5000		7	Adopt - corresponding commodity standards allow ES&T	
CALCIUM CARBONATE	170(i)	GMP		7	Adopt as listed - corresponds to CODEX STAN 74-1981; 73-1981	**UK:** accept proposal
CAROB BEAN GUM	410	20000		7	Adopt at 10000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440" & "20000 mg/kg in gluten-free cereal-based foods only" (both notes as per CODEX STAN 74-1981)	**UK:** accept proposal
CARRAGEENAN	407	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	5000		7	Adopt at 5000 mg/kg with new note "singly or in combination with INS 471, 472a, 472b, & 472c" (as per CODEX STAN 74-1981)	**UK, EFEMA, ELC:** accept proposal
DISTARCH PHOSPHATE	1412	60000		7	Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per CODEX STAN 74-1981), "60000 mg/kg in canned baby foods only" (as per CODEX STAN 73-1981)	**UK:** accept proposal
GELLAN GUM	418	GMP		7	Adopt - corresponding commodity standards allow some ES&T	

GUAR GUM	412	20000		7	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 mg/kg in gluten-free cereal-based foods only" & "2000 mg/kg in canned baby foods only" (as per CODEX STAN 73-1981)	**UK:** accept proposal
GUM ARABIC (ACACIA GUM)	414	20000		7	Adopt at 10000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440" & "20000 mg/kg in gluten-free cereal-based foods only" (both notes as per CODEX STAN 74-1981)	**UK:** accept proposal **AIDGUM:** supports adoption
GUM ARABIC (ACACIA GUM)	414	GMP		4	Discontinue	**UK:** accept proposal
HYDROXYPROPYL STARCH	1440	60000		7	Adopt - corresponding commodity standards allow some ES&T	
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	5000		7	Adopt with new note "singly or in combination with INS 471, 472a, 472b, & 472c" (as per CODEX STAN 74-1981)	**UK:** accept proposal
LECITHIN	322(i)	15000		7	Adopt at 5000 mg/kg (as per CODEX STAN 73-1981) with note "15000 mg/kg in processed cereal-based foods for infants and young children" (as per CODEX STAN 74-1981)	**UK:** accept proposal
MANNITOL	421	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		

MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	5000		7	Adopt with new note "singly or in combination with INS 471, 472a, 472b, & 472c" (as per CODEX STAN 74-1981) and "1500 mg/kg for use in canned baby foods" (as per 73-1981)	**UK, EFEMA, ELC:** accept proposal
MONOSTARCH PHOSPHATE	1410	50000		7	Adopt with new note "singly or in combination with other starch thickeners" (as per 74-1981)	
OXIDIZED STARCH	1404	50000		7		**UK:** accept proposal
PECTINS	440	20000		7	Adopt at 10000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440" & "20000 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 PHOSPHATE	1413	60000		7	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
POTASSIUM ALGINATE	402	5000		7	Discontinue - not allowed in corresponding commodity standards	
POTASSIUM CARBONATE	501(i)	GMP		7	Adopt - potassium hydrogen carbonate and acidity regulators allowed in both corresponding commodity standards	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	Adopt as listed - corresponds to CODEX STAN 74-1981	**UK:** accept proposal
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP		7		**UK:** accept proposal

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

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 **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, Iran, Spain, UK:** supports proposal

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 **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, Iran, Spain, UK:** supports proposal

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 note 35 "for use in cloudy juices only" **Justification for proposal**: 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 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 **UK:** does not support since CX standard 247-2005 restricts ESTs to only those that are 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

eWG Proposal for Horizontal Classification of Food Category: Justified only with note 35[55] "for use in cloudy juices only" **Justification for proposal**: 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 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 **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **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

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

[55] **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 note 35 "for use in cloudy juices only" **Justification for proposal**: 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 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 **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **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

eWG Proposal for Horizontal Classification of Food Category: Justified only with note 35 "for use in cloudy juices only" **Justification for proposal**: 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 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 **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **UK:** does not support since CX standard 247-2005 restricts ESTs to only those that are components of foods e.g. Pectins.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	GMP	35 & 127[56]	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 note 35 "for use in cloudy juices only" **Justification for proposal**: 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 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. **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **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

[56] **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 note "for use in cloudy nectars only" **Justification for proposal**: 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 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 **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **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" **Justification for proposal**: 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 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		Adopted	Retain Adopted at GMP but with new note “for use in cloudy nectars only”	**Japan:** agree, prevents nectar separation **UK, IFU:** accepts 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 note "for use in cloudy nectars only" **Justification for proposal**: 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 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. **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match

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

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

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "for use in cloudy nectars only" **Justification for proposal**: 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 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. 14.1.3.4 (Concentrates for vegetable nectar)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "for use in cloudy nectars only" **Justification for proposal**: 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 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.

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: No corresponding Commodity Standard, Comments to 1st Circular by Codex Members that ES&T are used in all products in this category.	**Comments by eWG on horizontal classification proposal:** **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

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 as listed	
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	GMP		4		
ALKALINE TREATED STARCH	1402	10000		7		
BLEACHED STARCH	1403	10000		7		
CALCIUM CARBONATE	170(i)	10000	58 & 160[57]	4		
CALCIUM CHLORIDE	509	10000	58	4		**USA**: calcium carbonate allowed for use in the USA in coffee and tea as a stabilizer/thickener up to 3200 mg/kg
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	407	GMP		7		**Japan:** supports proposal. Carageenan is used to prevent separation of oil included in coffee bean. Carrageenan 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 GSFA, ready-to-drink products (including canned products) are included in this food category.
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7		
DEXTRINS, ROASTED STARCH	1400	GMP	90[58]	7		
DISTARCH PHOSPHATE	1412	10000		7		
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP		7		**AIDGUM, ICGMA:** used in coffee drinks and substitutes
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		

[57] **Note 160:** For use in ready-to-drink products and pre-mixes for ready-to-drink products only.
[58] **Note 90:** For use in milk-sucrose mixtures used in the finished product.

LECITHIN	322(i)	GMP		7		**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 GSFA, ready-to-drink products (including canned products) are included in this food category **USA:** Lecithin is allowed for use in the USA in powdered beverages up to 20 mg/"serving"
MAGNESIUM CHLORIDE	511	GMP		7		
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	GMP		7		**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 Descriptors of GSFA, ready-to-drink products (including canned products) are included in this food category.
MONOSTARCH PHOSPHATE	1410	10000		7		
OXIDIZED STARCH	1404	10000		7		
PECTINS	440	GMP		7		**ICGMA:** used in coffee drinks and substitutes
PHOSPHATED DISTARCH PHOSPHATE	1413	10000		7		
POTASSIUM CARBONATE	501(i)	GMP		4		
POTASSIUM CHLORIDE	508	GMP		4		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP		7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	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 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 <u>No. 14.2.3 (Grape wines)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: 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	**<u>Comments by eWG on horizontal classification proposal</u>:** **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	Adopt at GMP, Discontinue at 300 mg/kg	**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 with GMP and the Canadian wine industry has requested that gum arabic be added to the GSFA for use in wine at a level of GMP to 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 **USA:** 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) **OIV:** adopt at 300 mg/kg - comments to CX/FA 12/44/9 Add 2
GUM ARABIC (ACACIA GUM)	414	300		7		
KARAYA GUM	416	GMP		7	Discontinue	**EU:** does not support, not allowed by OIV **OIV** - discontinue - comments to CX/FA 12/44/9 Add 2
KONJAC FLOUR	425	GMP		7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	18		7		**EU:** does not support, not allowed by OIV - out of scope, used as antifoaming agent
PECTINS	440	GMP		7		**EU:** does not support, not allowed by OIV **OIV** - discontinue - comments to CX/FA 12/44/9 Add 2
POTASSIUM CARBONATE	501(i)	5000		7	Adopt at GMP	**EU:** does not support, not allowed by OIV, increases instability of wine **NZ:** supports at GMP **USA:** potassium carbonate is allowed in the USA for use in formula wine as an acidity regulator up to 5000 mg/kg
POTASSIUM HYDROGEN CARBONATE	501(ii)	5000		7		**EU:** does not support, not allowed by OIV, increases instability of wine **NZ:** supports at GMP **USA:** potassium carbonate is allowed in the USA for use in formula wine as an acidity regulator up to 5000 mg/kg
TARA GUM	417	GMP		7	Discontinue	**EU:** does not support, not allowed by OIV **OIV** - discontinue - comments to CX/FA 12/44/9 Add 2
TRAGACANTH GUM	413	GMP		7		
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 **Justification for proposal**: 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

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

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: 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	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM ALGINATE	404	GMP		7	Discontinue	**EU:** does not support, although used in EU for clarification it is a processing aid and out of scope of working group
POTASSIUM ALGINATE	402	GMP		7		

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 **Justification for proposal**: 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	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)