

# codex alimentarius commission

FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD HEALTH  
ORGANIZATION

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**CX 4/30.2**

**CL 1999/15-FAC**  
**November 1999**

**TO:** - Codex Contact Points  
- Interested International Organizations

**FROM:** Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, FAO, Via delle Terme di Caracalla, 00100 Rome, Italy.

**SUBJECT:** **Request for Comments on the revised draft Codex General Standard for Food Additives (GSFA)**

**DEADLINE:** **15 JANUARY 2000**

**COMMENTS:**

<b>TO:</b> M.S.P. Hagenstein Ministry of Agriculture, Nature Management & Fisheries P.O. Box 20401 2500 EK The Hague, The Netherlands Fax: 31.70.378.6141 E-mail: <a href="mailto:s.p.j.hagenstein@vvm.agro.nl">s.p.j.hagenstein@vvm.agro.nl</a>	<b>COPY TO:</b> Secretary Codex Alimentarius Commission & Joint FAO/WHO Food Standards Programme FAO Viale delle Terme di Caracalla 00100 Rome, Italy Fax: 39.06.5705.4593 E-mail: <a href="mailto:codex@fao.org">codex@fao.org</a>
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**Due to the size of the document and the impracticality and cost of processing and postage, electronic versions of the revised Table 1 of the Draft GSFA and the recommendations of the quality control group are available by E-mail directly from the Codex Secretariat ([Codex@fao.org](mailto:Codex@fao.org)) and at the Codex Alimentarius Website (<http://www.fao.org/waicent/faoinfo/economic/esn/codex>). Governments and interested international organizations wishing to obtain a CD-ROM version of this material from which the text can be printed should contact the Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, FAO, Via delle Terme di Caracalla, 00100 Rome, Italy (Fax: 39.06.5705.4593 or E-mail: [Codex@fao.org](mailto:Codex@fao.org)).**

## COMMENTS

1. In addition to general considerations, Member States are requested to comment on the following specific issues based on the Background explanation below:

- Proposals for the use of additives listed in Table 1, **especially those additives reviewed by the quality control group** (Appendix I).
- Proposed numerical use levels corresponding to the GMP limitations for the use of additives contained in the revised Table 1.

## BACKGROUND

2. As a result of comments received in response to CX/FAC 99/6 and discussions at the 31<sup>st</sup> Session of the Codex Committee on Food Additives and Contaminants (CCFAC), the United States of America (USA) was charged with revising the Codex Draft GSFA.
3. This Circular Letter contains information on the following for comment and consideration by the 32<sup>nd</sup> CCFAC:
  - a) Recommendations of the CCFAC Quality Control Group (Appendix I).
  - b) Draft revised Table 1 of the GSFA.

### Recommendations of the CCFAC quality control group

3. At the suggestion of the representative of the European Commission (EC), the 31<sup>st</sup> CCFAC agreed to establish a quality control group to consider Tables 1 and 2 of the draft GSFA.<sup>1</sup> The group was composed of representatives from Australia, Brazil, Japan, South Africa, the United States and the EC. The group agreed to focus its efforts on a subset of the additives in Tables 1 and 2 of the Draft GSFA (Groups I-V, VIII)<sup>2</sup>. The group performed a quality control check on the source data submitted by Member States and international non-governmental organizations (INGOs) in support of the draft GSFA up through CX/FAC 99/6. Appendix I contains a summary of proposed use levels for the additives in Groups I-V and VIII based on these efforts. Recommended changes and additions are indicated by **bold** font and recommended deletions are indicated by ~~strikethrough~~ font. Group members reserve the right to provide the CCFAC with additional comments on specific provisions of the Draft GSFA.

### Revised Table 1 of the Draft GSFA

5. Table 1 of the draft GSFA was revised in accordance with comments submitted in response to CX/FAC 99/6, recommendations by the 31<sup>st</sup> CCFAC and the 23<sup>rd</sup> CAC (including adopted amendments to the food additive provisions in Codex Commodity Standards). For a description of the procedures used to construct Table 1 from the source data, please consult CX/FAC 97/7. Member States should note the following with respect to the Revised Draft Table 1:

- (i) The format of the Draft Table 1 is the same as in CX/FAC 99/6, except that a "Step" column has been added as agreed to by the 31<sup>st</sup> CCFAC. For convenience, only Steps 3, 5 or 8 are indicated (i.e., intermediate Steps 4, 6, and 7 are not indicated). Number "3" in the Step Column reflects a new proposed use of an additive. Number "5" in the Step Column indicates that the provision has been adopted at Step 5. Number "8" in the Step Column indicates that this provision has been adopted by the CAC as a Codex Standard.
- (ii) In cases where a new proposed use level of an additive is higher than a level previously adopted at Step 5 or 8, there are two entries for a specific food category. Thus, in some instances there may be more than one provision for the use of an additive in a specific food category (e.g., Acesulfame Potassium has two entries listed for use in food category 04.1.2.4, one at Step 5 [350 mg/kg] and one at Step 3 [500 mg/kg]). Where possible, new proposed uses at the same step were compressed (i.e., Step 3 data was compressed only among Step 3 entries). See CX/FAC 97/7 for a complete description of the rules of compression.
- (iii) If a new proposed additive use level is less than or equal to the use level for an adopted (Step 5 or 8) entry, the proposal is not shown in the revised draft Table 1 because it is subsumed under the level for the adopted entry (Step 5 or 8).

<sup>1</sup> ALINORM 99/12A, para. 54.

<sup>2</sup> See CRD 1, Appendix 1, 31<sup>st</sup> CCFAC.

(iv) The provisions for use of the additives in Table 3 in the food categories listed in the Annex to Table 3 (ALINORM 99/12A, Appendix II) have been included in Table 1. Most of these provisions are listed at Step 3. These provisions are derived from previous submissions made by Codex Member States and INGOs.

(v) The additive provisions in Table 1 for the Table 3 additives that have been assigned a “group” ADI by JECFA are not grouped (e.g., "alginates") because different additives in the group may have different provisions for use. Therefore, these additives are listed individually in Tables 1 and 3.