

comisión del codex alimentarius



ORGANIZACIÓN DE LAS NACIONES
UNIDAS PARA LA AGRICULTURA
Y LA ALIMENTACIÓN

ORGANIZACIÓN
MUNDIAL
DE LA SALUD



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Tema 11 B del Programa

CX/FAC 02/13 – Add. 1

PROGRAMA CONJUNTO FAO/OMS SOBRE NORMAS ALIMENTARIAS

COMITÉ DEL CODEX SOBRE ADITIVOS ALIMENTARIOS Y CONTAMINANTES DE LOS ALIMENTOS

34ª Reunión

Rotterdam, Países Bajos, 11-15 de marzo de 2002

ESPECIFICACIONES DE IDENTIDAD Y PUREZA DE LOS ADITIVOS ALIMENTARIOS FORMULADAS POR EL JECFA EN SU 57ª REUNIÓN

Las observaciones siguientes se han recibido de AAC e AMFEP.

AAC (Asociación de Almidones de Cereales de la Unión Europea)

Tal como se indica en el punto 11 (b) del programa provisional, las Especificaciones de Identidad y Pureza de los Aditivos Alimentarios Formuladas por el JECFA en su 57ª Reunión serán examinadas en la reunión de marzo del CCFAC.

En ese marco está previsto examinar la recomendación del JECFA de dividir la monografía actual con respecto a los dieciséis almidones modificados en monografías más pequeñas porque el documento actual es demasiado largo y los cambios en una especificación requieren que se revise la monografía entera.

Nos gustaría informarle que a la industria europea de almidones le gustaría contribuir a esta labor y por consiguiente está actualmente reflexionando sobre la forma más conveniente de dividir la monografía. Aunque no podemos proporcionarle ahora una propuesta, estará lista a principios de marzo.

AMFEP (English only)

With reference to CX/FAC 02/13, the Association of Manufacturers of Fermentation Enzyme Products (AMFEP) hereby wants to express its comments on the 'General specifications and considerations for enzyme preparations used in food processing' and 'Principles Governing the Establishment and Revision of Specifications' in FAO Food and Nutrition Paper 52 Add. 9.

AMFEP finds that the following changes should be made in the text:

1. General specifications and considerations for enzyme preparations used in food processing'

- **Definition, page 37:**

The following would more correctly describe the situation:

Line 1 "biologically" should be changed to "*catalytically*".

Line 7-8 the text should be changed to read "... *insoluble in the processed food material by physical and/or chemical means*).".

- **Source materials, page 37:**

In line 18-19 the sentence "The reference or production strain number may be included in individual specifications" is inadequate.

AMFEP takes for granted that JECFA 57 has tried to summarize the latest considerations of JECFA 51 and JECFA 53 regarding microbial strain numbers in specifications. It is therefore regrettable that all the useful operational details have disappeared in the process, leaving the reader with only one not very helpful sentence. It does not indicate when such a number might be appropriate and without the earlier background information it is open for interpretation.

The essence of JECFA's earlier considerations should be included in the text.

This could be done in the form of the statement in JECFA 53 as well as in the previous specifications section that "*Identification at the strain level may impose unnecessary constraints on the development of production micro-organisms used to produce food-grade enzymes. In the case of a non-pathogenic, non-toxicogenic strain that belongs to a species that includes pathogenic and toxicogenic strains (e.g. Escherichia coli), there should be a requirement in the monograph that the strain be non-pathogenic and non-toxicogenic. Citation of a suitable strain number may be included by way of example.*"

At least the sentence should be expanded with the qualifying words " *.by way of example*".

- **Other considerations, page 38-39:**

Under Item 3 it is mentioned that 'an evaluation is required of the allergenic potential of the gene products encoded by inserted DNA'.

JECFA 57 has agreed that *this is not necessary if the DNA sequence of the enzyme is comparable to that coding for enzymes having a history of safe use in food. This should be included in the text.*

In fact enzyme proteins as such are not known as food allergens.

- **References, page 39:**

Most of the referenced guidelines for safety evaluation of food and food ingredients obtained through biotechnology were not made with enzymes in mind, and are therefore not particularly useful in the evaluation of enzymes.

To avoid irrelevant tests, it might be helpful to limit the list to those references which are pertinent to enzymes only.

2. General specifications and recommendations for enzyme preparations, Page 190-91:

As a purely editorial matter, the last two paragraphs of the text seem to be just alternative formulations of the same recommendation. One of these formulations should be selected and the other deleted.

AMFEP finds that the recommendation itself should be acted upon as soon as possible.

