

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 11 (c)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

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DISCUSSION PAPER ON THE HARMONIZATION OF TERMS USED BY CODEX AND JECFA - COMMENTS

The following comments have been received from: Canada, European Community (E.S.F), United States of America, and Organisation des Fabricants de Produits Cellulosiques Alimentaires (OFCA).

CANADA:

General comment

In Paragraph 14, it should not be surprising that JECFA has designated technological functions for substances that it has evaluated that do not occur in the Codex lists of food additive or processing aid functions. This is because JECFA is from time-to-time asked to evaluate substances that do not fit the restrictive Codex lists. There is no doubt that the INS Numbering system, with its attendant functional classes and technological functions, is restrictive and, insofar as it was designed for labeling of existing food additives, is unlikely to accommodate all substances that are referred to JECFA.

Comments on the Recommendations of the Secretariat (Section V of the Discussion Paper)

With regard to a.i., carriers (presumably liquid and solid ones) are the subject of Agenda Item 8 (Processing Aids and Carriers) of the 36th Session of CCFAC. The Drafting Group associated with that item recommends that CCFAC....

Defines the term “carrier”

Includes the agreed definition of “carrier” in the Preamble to the GSFA under Paragraph 2, “Definitions of terms used in this standard”

Provides a specific list of food additives that may be used as carriers as an additional Annex in the GSFA

Concerning a.ii. and a.iv., these are processing aids now and fit the designations, “Propellant and packaging gases” and “Clarifying agents/filtration aids,” respectively in the Technological Functions for Processing Aids Recognized by Codex in CAC/MISC 3 The Inventory of Processing Aids (Appendix II to the present document). Insofar as some countries, including Canada, recognize some of the classes of substances on this list as food additives, these technological functions, while not associated with the INS Numbering System, should nonetheless be recognized as legitimate terms for use in the GSFA. Five classes of substances in Appendix II (Antifoam agents; Enzyme Preparations; Lubricants, release and anti-stick agents, moulding aids; Propellants and packaging gases; and Solvents, extraction and processing) are generally (but not always) considered to be food additives in Canada.

With regard to a.iii., bleaching agents are usually (but not always) “Flour Treatment Agents” (see Appendix I).

Canada has no objection to describing crystallisation inhibitors, according to the Codex definitions, either as processing aids or food additives, but prefers them to be considered food additives if they leave a residue. Those that leave a residue, are considered food additives in Canada, e.g. oxystearin. Considering them as processing aids would require development of and addition of a new technological function to those shown in Appendix II and considering them food additives would require a new sub-class to be added opposite one of the functional classes shown in Appendix I.

Concerning b., a carbonating agent is added directly to a food, has a technical effect (carbonates and lowers pH), and is therefore arguably a food additive. It could be subsumed under the rubric “Acidity regulator” as a “pH adjusting agent.”

Canada has no objection to the recommendation contained in c., namely to replace the functional description, “synergist,” by the functional description, “antioxidant synergist.”

Regarding d., Canada has no objection to deletion of “generic” descriptors like “adjuvant,” which do not describe a technological function.

Concerning e., Canada has no objection to deletion of (Codex) processing aid functions like “enzyme” from GSFA entries provided that other terms are available or can be developed to describe the deleted function, but it should be recognized that enzymes are food additives in some countries, including Canada, and the term “enzyme” is used in the declaration of ingredients when an enzyme is used. Table V of Division 16 of the Canadian Food and Drug Regulations is entitled “Food Additives that may be used as Enzymes.”

With regard to f., while Canada agrees with this in principle, we do not see why the GSFA could not employ an expanded INS (Appendix I)-type system that would also borrow and encompass (Codex) Processing Aid terms from Appendix II or JECFA technological functions from Appendix III, without the need to consider changes in the Codex Labeling Standard.

Comments on Proposed CCFAC Recommended Actions in Appendix IV

Canada has no objection to deletion of the terms “enzyme” and “adjuvant” functional classes, as proposed under the various items of the table in this Appendix, provided that other terms are available or can be developed to describe the deleted function.

Canada is not aware of candelilla wax (INS 902) or carnauba wax (INS 903) as functioning as carriers.

With regard to carbon dioxide (INS 290), see Comment 5 above for Canada’s recommendation for the food additive functions. As a packaging gas, we agree that this is a processing aids function described in Appendix II by the technological function, “Propellant and packaging gases.”

Castor oil (INS 1503) is recognized for use as a carrier solvent (in oil-soluble annatto) in Canada.

For orthophosphoric acid (INS 338), see Comment 6 above for Canada’s position.

Canada prefers that oxystearin (INS 387) remain in the GSFA insofar as it is considered to be a food additive in Canada. See Comment 4 above re options suggested by Canada.

Canada also queries the role or use of polyethylene glycol (INS 1521) as a carrier solvent. The listings in the Canadian Food and Drug Regulations relate to its use as an antifoaming agent (maximum level, 10 mg/kg), a lubricant in table-top sweetener tablets containing aspartame (1.0%) and a tablet binder in L-lysine tablets (7.0%).

Polyglycerol esters of fatty acids (INS 475) is a food additive (emulsifier) and is permitted as such in unstandardised foods at levels consistent with “good manufacturing practice,” in vegetable oils at 0.025% and in calorie-reduced margarine at 0.2%. Canada is unaware of the use of this substance as a crystallisation inhibitor.

Regarding polyvinylpyrrolidone (Note: not-idine)(INS 1201), the recommendation of the Codex Secretariat is unclear here, although we agree with deletion of the term “adjuvant.”

Canada queries the role of protease (INS 1101) as a flavour enhancer.

Propylene glycol (INS 1520) is used extensively as a carrier solvent. Its area of use listings as a food additive in this regard under the Canadian Food and Drug Regulations include flavour extracts and essences, oil-soluble annatto, unstandardised flavouring preparations, colour mixtures and preparations and food additive preparations.

Sucrose esters of fatty acids (INS 473) has use as an emulsifier in carotenoid colour preparations (maximum level of use permitted in this use under Canadian regulations, 1.5%) and in unstandardised confectionery products at 0.5%. It is also used as a protective coating (“glazing agent”[#16 in INS functional classes, Appendix I]) on fruit and vegetables. As mentioned above, Canada has no objection to deletion of the term “adjuvant.”

Triethyl citrate (INS 1505) is recognized in Canada’s Food and Drug Regulations as a carrier solvent in standardised and unstandardised flavouring preparations (levels consistent with “good manufacturing practice”) and as a whipping agent (the term “foam stabilizer” given in the table is acceptable) in liquid and frozen egg white (liquid and frozen albumen) at a maximum level of use of 0.25%.

Position of Canada on the Discussion Paper

Canada commends the Secretariat on such a concise and thorough examination of this issue.

Canada continues to support this initiative but sees no reason to consider the harmonization of terms in such a rigid and formal manner. We do not see why the GSFA could not employ an expanded INS (Appendix I)-type system that would also borrow and encompass (Codex) Processing Aid terms from Appendix II or JECFA technological functions from Appendix III, without the need to consider changes in the Codex Labeling Standard.

EUROPEAN COMMUNITY: (English version)

The European Community thanks the Codex Secretariat for the time and effort put into this discussion paper on the harmonization of terms used by Codex and the JECFA.

As stated in the discussion paper, the 35th session of the CCFAC requested that the Codex Secretariat prepare a Discussion paper on the Harmonization of Terms used by Codex and JECFA for Sub-classes and Technological Functions.

The European Community welcomes this discussion paper and supports the recommendations for new and existing additives given in Section IV and V of the paper.

Concerning the recommendations for existing food additives the European Community would like to propose the following to paragraph 18.a in Section IV:

i) carrier solvent	Should be a sub-class to a new functional class “carriers” to be created
ii) packing gas	Should be assigned a new functional class
iii) bleaching agent	Should be classified as a sub-class under the functional class 13 “Flour treatment agent”, but should be properly referred to as “flour bleaching agent”
iv) filter aid	Should be considered as a processing aid function and deleted from GSFA entries
v) crystallization inhibitor	Should be considered as a processing aid function and deleted from GSFA entries

Concerning the table of functional classes, definitions and technological functions for food additives in Appendix I the European Community would like to propose the following:

Functional class	
3. Anticaking agent	The inclusion of the sub-class “release agents” should be reconsidered since this is a completely different function – for example INS number 551 silicon dioxide is an anticaking agent, drying agent and anti-stick agent, whereas INS numbers 1503 castor oil and 905a mineral oil (paraffin) are release agents

9. Emulsifier	This functional class should not include the sub-class “wetting agent” since it is already included under functional class 17 “humectants”
12. Flavour enhancer	The inclusion of the sub-class “tenderiser” should be reconsidered. Flavour enhancers do not act on the protein in food, changing its texture
13. Flour treatment agent	The sub-class “bleaching agent” should be properly referred to as “flour bleaching agent” to avoid confusion with other additives not used in flour
18. Preservative	The sub-classes “chemosterilant” and “disinfection agent” imply that highly contaminated ingredients are used, which would contradict the principles governing the use of additives
20. Raising agent	To avoid confusion, the term “chemical” should be added to the term “leavening agent”
21. Stabilizer	The sub-class “moisture/water retention agent” already features under class 17 “Humectant” and should therefore be deleted. Similarly, the sub-class “firming agent” should be deleted since it already exists as functional class 11.

EUROPEAN COMMUNITY: (Spanish version)

La Comunidad Europea agradece a la Secretaría del Codex el tiempo y el esfuerzo dedicados a este documento de debate sobre la armonización de los términos utilizados por el Codex y el JECFA.

Como se indica en el documento de debate, en la 35ª reunión del CCFAC se pidió a la Secretaría del Codex que preparara un documento de debate sobre la Armonización de los Términos Utilizados por el Codex y el JECFA para las Subcategorías y Funciones Tecnológicas de los Aditivos Alimentarios.

La Comunidad Europea acoge con satisfacción este documento de debate y apoya las recomendaciones hechas en sus secciones IV y V con respecto a aditivos nuevos y aditivos vigentes.

En cuanto a las recomendaciones sobre aditivos alimentarios vigentes, la Comunidad Europea querría proponer lo siguiente con respecto a la letra a) del apartado 18 de la sección IV:

i) disolvente inerte	Debería ser una subcategoría dentro de una nueva categoría funcional de «sustancias inertes/soportes» (carriers) todavía por crear
ii) gas de envasado	Debería asignársele una nueva categoría funcional
iii) blanqueador	Debería clasificarse como una subcategoría dentro de la categoría funcional 13, «agente para el tratamiento de las harinas», pero llamándolo con propiedad «blanqueador de harinas»
iv) coadyuvante de filtración	Debería considerarse como una función de coadyuvante de elaboración y suprimirse su entrada de la NGAA
v) inhibidor de la cristalización	Debería considerarse como una función de coadyuvante de elaboración y suprimirse su entrada de la NGAA

Con respecto al cuadro de categorías funcionales, definiciones y funciones tecnológicas para los aditivos alimentarios del Apéndice I, la Comunidad Europea desearía proponer lo siguiente:

Categoría funcional	
3. Antiaglutinante	Debería reconsiderarse la inclusión de la subcategoría «agente de desmoldeo», pues se trata de una función completamente distinta. Por ejemplo, el número SIN 551, dióxido de silicio, es un antiaglutinante, desecante y antiadherente, mientras que los números SIN 1503, aceite de ricino, y 905a, aceite mineral (parafina), son agentes de desmoldeo
9. Emulsionante	Esta categoría funcional no debería incluir la subcategoría «agente humectante», pues ésta ya está incluida en la categoría funcional 17, «humectante»
12. Saborizante	Debería reconsiderarse la inclusión de la subcategoría «ablandador», pues los saborizantes no actúan sobre la proteína del alimento modificando su textura
13. Agente para el tratamiento de las harinas	La subcategoría «blanqueador» debería llamarse con propiedad «blanqueador de harinas», para evitar confusiones con otros aditivos no utilizados en la harina
18. Conservante	Las subcategorías «esterilizante químico» y «desinfectante» implican el uso de ingredientes altamente contaminados, lo que iría en contra de los principios que rigen el empleo de aditivos
20. Gasificante	Para evitar confusiones, debería añadirse el término «química» al término «levadura»
21. Estabilizador	La subcategoría «agente de retención de humedad/agua» figura ya en la categoría 17, «humectante», y debería, por tanto, suprimirse. Igualmente, debería suprimirse la subcategoría «reforzador de la textura», pues ya existe como categoría funcional 11

EUROPEAN COMMUNITY: (French version)

La Communauté européenne remercie le secrétariat du Codex pour le temps et les efforts investis dans le document de réflexion sur l'harmonisation des termes utilisés par le Codex et le CMEAA.

Comme l'indique ce document, il a été demandé, lors de la 35e session du CCFAC, que le secrétariat du Codex prépare un document de réflexion sur l'harmonisation des termes utilisés par le Codex et le JECFA pour désigner les sous-catégories et les fonctions technologiques.

La Communauté européenne se félicite de ce document de réflexion et soutient les recommandations faites pour les additifs nouveaux et anciens dans les sections IV et V du document.

En ce qui concerne les recommandations concernant les additifs alimentaires actuels, la Communauté européenne aimerait proposer ce qui suit au paragraphe 18.a de la section IV:

i) solvant entraîneur	Devrait être une sous-catégorie d'une nouvelle catégorie fonctionnelle "Supports" à créer
ii) gaz de conditionnement	Devrait être classé dans une nouvelle catégorie fonctionnelle
iii) agent de blanchiment	Devrait être classé en tant que sous-catégorie de la catégorie fonctionnelle 13 "Agent de traitement des farines", mais la dénomination exacte devrait être "Agent de blanchiment des farines"
iv) auxiliaire de filtrage	Devrait être considéré comme une fonction d'auxiliaire technologique et supprimé des rubriques de la NGAA

v) inhibiteur de cristallisation	Devait être considéré comme une fonction d'auxiliaire technologique et supprimé des rubriques de la NGAA
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En ce qui concerne les catégories fonctionnelles, définitions et fonctions technologiques des additifs alimentaires figurant à l'annexe I, la Communauté européenne aimerait proposer ce qui suit:

Catégorie fonctionnelle	
3. Agent antiagglomérant	Il faudrait réexaminer l'existence de la sous-catégorie "Agent antiadhérent", car il s'agit d'une fonction entièrement différente – par exemple le n° SIN 551 Dioxyde de silicium est un agent antiagglomérant, dessicatif et agent anticollant, alors que les n° SIN 1503 Huile de ricin et 905a Huile minérale (paraffine) sont des agents antiadhérents
9. Émulsifiant	Cette catégorie fonctionnelle ne devrait pas inclure la sous-catégorie "Humectant" puisque celle-ci figure déjà dans la catégorie fonctionnelle 17 "Humectant"
12. Exalteur d'arôme	Il faudrait réexaminer l'existence de la sous-catégorie "Attendrisseur". En effet, les exalteurs d'arôme n'agissent pas sur la protéine des aliments en modifiant leur texture
13. Agent de traitement des farines	La sous-catégorie "Agent de blanchiment" devrait être correctement désignée comme "Agent de blanchiment des farines", afin d'éviter la confusion avec d'autres additifs non utilisés dans la farine
18. Agent de conservation	Les sous-catégories "Chimio-stérilisant" et "Désinfectant" impliquent l'utilisation d'ingrédients fortement contaminés, ce qui serait contraire aux principes qui régissent l'utilisation des additifs
20. Agent de levuration	Pour éviter toute confusion, le terme "chimique" devrait être ajouté aux termes "Agent de levuration"
21. Stabilisant	La sous-catégorie "Agent de rétention d'humidité/eau" figure déjà dans la catégorie 17 "Humectant" et devrait donc être supprimée. De la même manière, la sous-catégorie "Affermissant" devrait être supprimée puisqu'elle existe déjà en tant que catégorie fonctionnelle 11.

UNITED STATES OF AMERICA:

Comments on Part III: Interactions Between CCFAC and JECFA

As discussed in paragraph 15, JECFA has designated technological functions that do not appear in the Codex International Numbering System (INS) list, but are currently associated with a number of food additives in the General Standard for Food Additives (GSFA). The United States has previously provided suggestions for harmonizing CCFAC and JECFA technological functions (United States comment to CX/FAC 02/14, 34th CCFAC). In paragraph 15, the current discussion paper lists three options for resolving the inconsistency in technological functions in the Codex INS list, JECFA list, and the GSFA. We believe that all three options should be employed, depending upon the situation.

Option (a): The United States agrees with the recommendation that in cases where JECFA and the Codex INS system have identical class names, the JECFA sub-classes associated with the Class should be added to the Codex INS sub-class list. While we recognize that the Codex INS list of functional effect sub-classes is indicative rather than exhaustive (Class Names and the International Numbering System for Food Additives, XOT 04-1999), we feel that additional examples are useful. A list of JECFA sub-classes and the Codex INS Functional Class to which they can be added as sub-classes is provided in Table 1 (attached). In addition, a number of JECFA sub-classes can logically be placed under existing Codex INS Functional Classes. These recommendations are listed in Table 2 (attached).

Option (b): The United States agrees that, in some cases the GSFA entries should be modified to remove JECFA-designated technological functions. For example, the JECFA class “Adjuvant” is not suitably descriptive and should be removed from the GSFA.

Option (c): The United States agrees new INS Functional Classes should be added for harmonization, as necessary, in those cases where JECFA sub-classes do not reasonably fall under Codex INS Functional Classes.

Comments on Part V: Recommendations for Existing Food Additives

Regarding the status of the descriptors in paragraph 18a, the United States offers the following comments:

A carrier solvent, a type of carrier, is used to facilitate the delivery of another food additive or to maintain the integrity of another food additive in food as marketed to the consumer. The functional effect of the carrier is the release of the additive whose stability has been maintained or whose delivery has been facilitated. As an example, propylene glycol can be used as a carrier solvent for antioxidants, colors, and emulsifiers that are added to a variety of foods sold directly to consumers. We have previously provided other examples of the use of carriers in our comments at the 33rd CCFAC (CX/FAC 01/9). The United States believes that a carrier solvent, used as described, is a food additive. We recommend inclusion of “carrier solvent” as a sub-class under a newly created INS Functional Class called “Carrier.”

Depending upon the use, a packing gas may be considered a food additive or a processing aid.

Examples of food additive uses of a packing gas include the use of carbon dioxide and nitrous oxide in cream packaged under pressure and whipped cream. These uses are included under the Food Additives Section of the Codex Standard for Cream for Direct Consumption (Codex Stan A-9-1976) as “Harmless gases (for cream packaged under pressure and whipped creams only),” and of the Draft Revised Standard for Cream and Prepared Creams (ALINORM 03/11, Appendix II; adopted at Step 8 (26th CAC, ALINORM 03/41, Appendix V)) as “Packing Gases and Propellants.” In the case of cream packaged under pressure and whipped cream, the packing gas is a food additive because it is integral to the product and produces the desired appearance and texture of the food product.

An example of a processing aid use of a packing gas, such as carbon dioxide and nitrogen, is in the headspace of a container of fruit juice. The Draft Standard for Fruit Juices and Nectars (ALINORM 03/39A, Appendix II; at Step 5 (26th CAC, ALINORM 03/41, Appendix VI)) includes “Packing Gas” (carbon dioxide and nitrogen) in a separate list of processing aids.

We recommend that “Packing Gas” be introduced as a new INS Functional Class. It should also be retained in the Codex Inventory of Processing Aids (IPA; CAC/MS3).

The functional effect “Bleaching Agent” is employed in the GSFA for bleaching food ingredients other than flour. Bleaching agents for flour are included under the INS Functional Class “Flour Treatment Agent.” A number of Codex commodity standards currently specifically allow for the use of “bleaching agents” as food additives:

The Codex Standard for Canned Chestnuts and Chestnut Purée (Codex Stan 145-1985) lists sulfur dioxide at 30 mg/kg, except for use in purée.

The Codex Draft Revised Standard for Whey Powders (A-15-1995; revised in ALINORM 03/11, Appendix IV; adopted at Step 8 (26th CAC, ALINORM 03/41 paras. 99-100 and Appendix IV)) lists benzoyl peroxide at 100 mg/kg (to be included in the standard subject to satisfactory evaluation by JECFA in 2004).

The Codex Draft Standard for Aqueous Coconut Products – Coconut Milk and Coconut Cream (ALINORM 03/27, Appendix V; adopted at Step 8 (26th CAC, ALINORM 03/41 Appendix V)) lists sodium metabisulfite and potassium metabisulfite at 30 mg/kg.

Therefore, the United States recommends adding “Bleaching agent (non-flour use)” as a new Codex INS Functional Class.

A filter aid has no technical effect in food as marketed to the consumer. Therefore, a filter aid should be considered a processing aid. Because the CCFAC has agreed not to include processing aids in the GSFA, the United States recommends that the functional effect “Filter Aid” be removed from the functional effects listed in the GSFA. This technological function is already included in the Codex IPA under “Clarifying/filtration aids.”

A crystallization inhibitor is used to maintain an even emulsion in certain foods by preventing crystal formation. As an example, the United States allows the use of polyglycerol esters of fatty acids as a crystallization inhibitor in salad dressing [21 CFR 169.150]. The United States recommends that the functional effect “Crystallization Inhibitor” be considered a food additive and added as a sub-class under the INS Functional Class “Emulsifier.”

With regard to the status of the descriptor “Carbonating Agent” (paragraph 18b), the United States believes that a carbonating agent may be considered a food additive as it is integral to the food product and produces the desired appearance and texture of the food product (e.g., gas bubbles in a soft drink). We also note that the Draft Standard for Fruit Juices and Nectars (ALINORM 03/39A, Appendix II; at Step 5 (26th CAC, ALINORM 03/41, Appendix VI)) lists carbon dioxide for use at GMP as a “Carbonating Agent” under its Food Additive Section. The United States recommends adding “Carbonating Agent” as a new INS Functional Class in support of its food additive use.

The United States agrees with the recommendation (paragraph 18c) to delete the functional description “Synergist” as it applies to orthophosphoric acid in the draft GSFA and to replace it with the INS functional description “Antioxidant Synergist.” However, since “Antioxidant Synergist” is a sub-class of the functional class “Antioxidant,” and the INS functional class (not sub-class) names are being used for the purpose of the GSFA, the United States further proposes that the INS functional class name “Antioxidant” be used rather than “Antioxidant Synergist” (see Table 2).

The United States agrees with the recommendation (paragraph 18d) that the generic descriptor “Adjuvant” should be removed from GSFA entries. Appendix III of the discussion paper lists seven JECFA sub-classes under adjuvant. We propose that these sub-classes be reassigned in the following way:

The JECFA sub-class “Density adjustment agent for flavouring oils in beverages” should be included as a sub-class of the INS Functional Class “Emulsifier”.

The JECFA sub-classes “Diluent for color and other food additives;” “Encapsulating agent for food additives, flavorings and vitamins;” and “Excipient” should be placed under a newly-created INS Functional Class “Carrier.”

The JECFA sub-class “Formulation Aid” is too vague and should not be included in the GSFA.

The JECFA sub-classes “Tableting adjunct” and “Tableting aid/agent” should be combined to create a new INS Functional Class “Tableting aid/adjunct/adjuvant.”

The United States agrees with the recommendation (paragraph 18e) that processing aid functions should be removed from the GSFA. We recommend that the following functions be removed from the GSFA: “Enzyme,” “Filtering Aid,” and “Release Agent.” We note that the technological function “Freezing Agent” is included in the JECFA list, but is not currently used in the GSFA. The United States considers “Freezing Agent” to also be a processing aid function that should not be included in the GSFA.

The United States agrees with the recommendation (paragraph 18f) that, where possible, harmonization of INS and JECFA technological functions should avoid the creation of new INS Functional Classes. In some cases, however, the addition of a new INS Functional Class is necessary to allow for proper characterization of a functional effect where current classes are not adequate. We believe that new classes are necessary for the following functional effects as described above: “Carrier,” “Packing Gas,” “Bleaching Agent (non-flour use),” “Carbonating Agent,” and “Tableting aid/adjunct/adjuvant.”

General Comments

If the changes to the list of INS functional effects that have been recommended by the United States, above, are adopted, a number of changes to the list of functional effects associated with additives in the GSFA will be necessary. These changes would include addition or deletion of a Functional Class name, or the modification of a Functional Class name. Examples for such changes are provided below for food additives that have GSFA provisions that have been adopted at Step 8:

Cyclodextrin, Beta (INS 459): The JECFA-associated functional effects “Carrier” and “Thickener” would need to be added to the current functional effects of “Stabilizer” and “Binder” listed in the GSFA.

Alpha-Amylase (*Aspergillus oryzae* var.) (INS 1100): The GSFA currently lists the functional effects of “Adjuvant,” “Enzyme,” and “Flour Treatment Agent.” Based on the above recommendations, the functional effects “Adjuvant” and “Enzyme” would be removed from the list of functional effects associated with this additive in the GSFA.

Candelilla Wax (INS 902): The GSFA currently lists the functional effects of “Bulking Agent,” “Carrier Solvent,” “Glazing Agent,” and “Release Agent.” Based on the above recommendations, the term “Carrier Solvent” would be replaced by “Carrier,” and “Release Agent” would be deleted.

Table 1. JECFA sub-classes currently associated with JECFA Classes ¹ that have the same class names as the Codex INS Classes.	
INS Functional Class Title	JECFA sub-class
Acid	Acidulant
Acidity regulator	Neutralizing agent
Anticaking agent	Dusting agent
Antifoaming agent	Defoaming agent
Bulking agents	Component of chewing gum base
Colour	Decorative pigment, food colour, surface colorant
Colour retention agent	Antibleaching agent, colour adjunct, colour stabilizer
Emulsifier	Antispattering agent, emulsifying agent, suspending agent, suspension agent
Flavour enhancer	Salt substitute, seasoning agent
Flour treatment agent	Dough conditioner, dough strengthening agent, oxidizing agent
Glazing agent	Film coating, protective coating, surface finishing/treating agent
Preservative	Antibrowning agent, antimould and antirope agent, fumigant, fungistatic agent, sterilizing agent
Stabilizer	Colloidal stabilizer, emulsion stabilizer, stabilizing agent
Thickener	Binder, texturing agent, texturizing agent

Table 2 Proposed assignment of JECFA sub-classes into existing INS Functional Class Titles	
INS Functional Class Title	JECFA sub-class
Antioxidant	Synergist and solubilizer for antioxidants and flavouring agents
Emulsifier	Density adjustment agent for flavouring oils in beverages
Preservative	Antimicrobial synergist
Stabilizer	Clouding agent, Cloud producing agent

ORGANISATION DES FABRICANTS DE PRODUITS CELLULOSIQUES ALIMENTAIRES (OFCA):

OFCA, the “Organisation des Fabricants de produits Cellulosiques Alimentaires” represents the manufacturers of food grade cellulose derivatives in the European Union. OFCA has a recognised NGO status for the meetings of the Codex Committee on Food Additives and Contaminants.

INS 466, sodium carboxymethyl cellulose is both the title of the Jecfa specification as well as the name used in the INS listing. Over the past few years, OFCA has been working to define a difference between the highly purified food grade (purity $\geq 99.5\%$) and industrial grades of cellulose derivatives (purity $< 99.5\%$).

¹ Summary of Evaluations Performed by the Joint FAO/WHO Expert Committee on Food Additives (JECFA), Section 2, FAO/WHO, ILSI Press, 1999. See also updated version on: <http://jecfa.ilsa.org/>.

This highly purified food grade of Sodium Carboxymethyl Cellulose, a thickening agent, has been promoted to get clearance for the use of the name “Cellulose Gum” and is now added to the current designated name as a part of the recently published 5th amendment to EU Directive 95/2 and thus harmonized with the United States Food Chemicals Codex.

With the objective to globally harmonize the nomenclature for INS 466, OFCA would like to respectfully request the CCFAC to amend the current INS-listing by introducing a dual name for INS 466, i.e Cellulose Gum. For reasons of consistency the request has to be extended to the additives derived from INS 466, i.e INS 468, Crosslinked Carboxymethyl Cellulose and INS 469, Enzymatically Hydrolysed Carboxymethyl Cellulose.