

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 6 (a)

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

Thirty-eighth Session

The Hague, the Netherlands, 24 – 28 April 2006

DRAFT REVISION OF THE PREAMBLE OF THE GSFA
Comments at Step 6 in response to CL 2005/36-FAC by Norway

NORWAY

Norway would like to thank the electronic Working Group and especially its chair Dr Junshi Chen from China for their extensive work on the report on Working principles of the General Standard for Food Additives (GSFA).

General Comments

The relationship between the GSFA and the Commodity Standards has been an issue for several years at the CCFAC. Having taken into account the following considerations: consumer health, technological need and avoiding misleading the consumer, the objective of the GSFA is to be a harmonised tool for food additive legislation that would help in reducing barriers to trade. Norway welcomes an evolution of the GSFA toward a better structured, more functional and more complete standard that is harmonised with other Codex Alimentarius Standards. We believe there should be only one standard providing guidance on the use of food additives in foodstuffs in international trade, and that this should be the GSFA. At the same time, we are generally of the opinion that the commodity committees have the knowledge to examine the technological need of individual food additives in specific foodstuffs and refer this information to CCFAC for adoption. This information should be retained in the GSFA.

It has been emphasized at several CCFAC meetings that the GSFA is not a regulatory tool. It provides guidance, and the Member Countries do not have to endorse the provisions given in the GSFA. However, if the GSFA becomes too general, Member countries may feel that the provisions are too broad to provide proper guidance to national legislation. If national legislation in general deviates a lot from the GSFA, the objective of the standard – to be a harmonised tool for food additive legislation that would result in fewer barriers to trade - is not met.

PART I

Norway supports the Recommendations to part I.

PART II

Proposal for GSFA food categories with one-to-one correspondence to a single Codex commodity standard (paragraphs 33-37)

Norway supports the proposal to integrate all the food additive provisions in single commodity standards that have a one-to-one correspondence with a food category in the GSFA directly into the GSFA Tables.

Options for GSFA Food Categories that span several commodity standards (paragraphs 38-54)

Norway is of the opinion that the food additive provisions of the commodity standards should be integrated into the GSFA in a pragmatic and consistent way.

The Commodity Standards have their own section that describes which additives may be used in the standardised food. The focus of Commodity Standards is mostly technological need for the specific additive as well as quality aspects of the commodities. The Commodity Standards thus provide useful guidance on which additives are necessary in the standardised food.

Both options proposed in the report of the working group are complex. We are concerned that option 1 would generally increase the number of permitted additives in standardised foods. In addition, the maximum use levels applicable to a standardised food may be increased if the highest maximum level is to be applied among a group of commodity standards. Adherence to GMP should ensure that additives are used in the minimum amount required to accomplish the intended technical effect. However, we find it very likely that the use of food additives in standardised foods will increase.

Option 2 may seem the most pragmatic way to resolve inconsistencies between the GSFA and the commodity standards. However, bearing in mind that changes to the working principles should result in acceleration of the development of the GSFA rather than the opposite, this option may not seem optimal.

In conclusion, Norway finds it hard to support either of the proposed solutions on how to harmonize the Commodity Standards to the GSFA prior to the meeting of the Ad-hoc Working Group. An extensive discussion of the subject with other delegates at the 38 session of CCFAC is necessary before advancing any firm decision on this important issue.

PART III

Norway is of the opinion that the commodity committees should continue to look into the technological justification for the use of individual food additives rather than functional classes only.