

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 6 (b)

CX/FAC 06/38/9, Part 1
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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

FOOD ADDITIVES PROVISIONS OF THE CODEX GENERAL STANDARD FOR FOOD ADDITIVES

Comments (in response to CL 2005/34-FAC, CL 2005/45-FAC and CL 2005/50-FAC)

The following comments have been received from the following Codex Members: Brazil, Canada, European Community, Iran, Malaysia, Mexico, Sri Lanka and Venezuela,

BRAZIL

CARNAUBA WAX, INS: 903 (Anticaking Agent, Adjuvant, Bulking Agent, Carrier Solvent, Glazing Agent, Release Agent)

There is a technological need for the function glazing agent. However the proposed maximum level is too high and we suggest 5000 mg/kg.

Food Cat. No.	Food Category	Max Level		Note	Step
05.1.4	cocoa and chocolate products	10,000	mg/kg	Note 3 ¹	3
05.1.5	imitation chocolate, chocolate substitute products	10,000	mg/kg	Note 3	3
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	10,000	mg/kg	Note 3	3

There is a technological need for the function glazing agent. However the proposed maximum level is not enough to achieve the technological need. We suggest the level of 5000 mg/kg.

13.6	food supplements	500	mg/kg	Note 3	3
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Brazil supports the recommendation of discontinuing work on these provisions:

14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	200	mg/kg	Note 108 ²	3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa		GMP	Note 108	8
15.0	ready-to-eat savouries	2,000	mg/kg	Note 3	3
15.0	ready-to-eat savouries		GMP	Note 3	8

BENZOATES, INS 210-213 (Preservative)

Brazil supports the recommendation of discontinue work on those provisions:

04.1.2.5	jams, jellies and marmelades	1500	mg/kg	Note 13 ³	3
12.5.1	soups and broths	1000	mg/kg	Note 13	6

This provision should be endorsed.

There is a technological need for the function preservative

¹ **Note 3:** Surface treatment.

² **Note 108:** For use on coffee beans only.

³ **Note 13:** As benzoic acid.

The proposed maximum level is justified to achieve the intended technological need

12.9.1.3	other soybean products (including non-fermented soy sauce)	1000	mg/kg	Note 13	3
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POLYDIMETHYLSILOXANE, INS 900a (Anticaking Agent, Antifoaming Agent)

Brazil supports the recommendation of discontinuing work on these provisions

12.9.1.3	other soybean products (including non-fermented soy sauce)	50	mg/kg		6
12.10.3	fermented soybean paste (e.g., miso)	50	mg/kg		6

PROPYLENE GLYCOL ESTERS OF FATTY ACIDS, INS 477 (Emulsifier, Stabilizer)

Brazil supports the recommendation of discontinuing work on these provisions

02.2.1.3	blends of butter and margarine	10,000	mg/kg		3
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This provision should be endorsed.

There is a technological need for the function emulsifier and stabilizer.

The proposed maximum level is justified to achieve the intended technological need

02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	40,000	mg/kg		6
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CALCIUM DISODIUM ETHYLENE DIAMINE TETRA-ACETATE & DISODIUM ETHYLENE DIAMINE TETRA-ACETATE (EDTAS), INS 385, 386 (Antioxidant, Preservative, Sequestrant)

Brazil does not support the technological function of preservative for this food

04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	100	mg/kg	Notes 21 ⁴ & 110 ⁵	6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	25	mg/kg	Note 21	6

BUTYLATED HYDROXYANISOLE (BHA), INS 320 (Antioxidant)

Brazil supports the recommendation of discontinuing work on these provisions

Food Cat. No.	Food Category	Max Level		Note	Step
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	200	mg/kg	Notes 15 ⁶ , 88 ⁷ & 130 ⁸	3
01.3.1	condensed milk (plain)	200	mg/kg	Notes 15, 88 & 130	3
01.3.1	condensed milk (plain)	100	mg/kg	Notes 15, 88 & 130	6
01.5.1	milk powder and cream powder (plain)	200	mg/kg	Notes 15 & 130	6
01.5.2	milk and cream powder analogues	100	mg/kg	Notes 15 & 130	6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	2	mg/kg	Notes 15 & 130	6
04.1.2.2	dried fruit	200	mg/kg	Notes 15 & 130	6
04.1.2.7	candied fruit	32	mg/kg	Notes 15 & 130	6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	2	mg/kg	Notes 15 & 130	6
04.1.2.1	2 cooked fruit	100	mg/kg	Notes 15 & 130	6
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	200	mg/kg	Notes 15 & 130	6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	20	mg/kg	Notes 15 & 130	6
12.8	yeast and like products	1000	mg/kg	Notes 15 & 130	6
13.6	food supplements	400	mg/kg	Notes 15 & 130	6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	1000	mg/kg	Notes 15 & 130	6

These provisions should be endorsed.

⁴ **Note 21:** As anhydrous calcium disodium EDTA.

⁵ **Note 110:** For use in frozen French fried potatoes only.

⁶ **Note 15:** Fat or oil basis.

⁷ **Note 88:** Carryover from the ingredient.

⁸ **Note 130:** Singly or in combination: Butylated Hydroxyanisole (BHA, INS 320), Butylated Hydroxytoluene (BHT, INS 321), Tertiary Butylated Hydroquinone (TBHQ, INS 319), and Propyl Gallate (INS 310).

There is a technological need for the function antioxidant.

The proposed maximum level is justified to achieve the intended technological need

02.0	fats and oils, and fat emulsions	200	mg/kg	Notes 15 & 130	6
03.0	edible ices, including sherbet and sorbet	200	mg/kg	Notes 15 & 130	6
05.1.4	cocoa and chocolate products	200	mg/kg	Notes 15 & 130	6
05.1.5	imitation chocolate, chocolate substitute products	200	mg/kg	Notes 15 & 130	6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	200	mg/kg	Notes 15 & 130	6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	200	mg/kg	Notes 15 & 130	6
06.4.3	pre-cooked pastas and noodles and like products	200	mg/kg	Notes 15 & 130	3
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	2	mg/kg	Notes 15 & 130	6
07.0	bakery wares	200	mg/kg	Notes 15 & 130	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Notes 15 & 130	6
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Notes 15 & 130	6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Notes 15 & 130	6
12.5	soups and broths	200	mg/kg	Notes 15 & 130	6

The proposed maximum level is too high. We suggest the level of 400 mg/kg

05.3	chewing gum	750	mg/kg	Note 130	6
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Additional information is necessary on the technological need and maximum level of use

09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100 0	mg/kg	Notes 15 & 130	6
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Notes 15 & 130	6

The proposed maximum level is not enough to achieve the technological need. We suggest the level of 200

10.4	egg-based desserts (e.g., custard)	2	mg/kg	Notes 15 & 130	6
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BUTYLATED HYDROXYTOLUENE (BHT), INS 321 (Adjuvant, Antioxidant)

Brazil supports the recommendation of discontinuing work on these provisions

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	200	mg/kg	Notes 15 ⁹ , 88 ¹⁰ & 130 ¹¹	3
01.3.1	condensed milk (plain)	200	mg/kg	Notes 15, 88 & 130	3
01.3.1	condensed milk (plain)	100	mg/kg	Notes 15, 88 & 130	6
01.5.1	milk powder and cream powder (plain)	200	mg/kg	Notes 15 & 130	6
01.5.2	milk and cream powder analogues	100	mg/kg	Notes 15 & 130	6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	90	mg/kg	Notes 2, 15 & 130	6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	90	mg/kg	Notes 2, 15 & 130	6
04.1.2.1 2	cooked fruit	100	mg/kg	Notes 15 & 130	6
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	200	mg/kg	Notes 15 & 130	6
06.1	whole, broken, or flaked grain, including rice	200	mg/kg	Notes 15 & 130	6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	20	mg/kg	Notes 15 & 130	6
13.6	food supplements	400	mg/kg	Notes 15 & 130	6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	100 0	mg/kg	Notes 15 & 130	6

These provisions should be endorsed.

⁹ **Note 15:** Fat or oil basis.

¹⁰ **Note 88:** Carryover from the ingredient.

¹¹ **Note 130:** Singly or in combination: Butylated Hydroxyanisole (BHA, INS 320), Butylated Hydroxytoluene (BHT, INS 321), Tertiary Butylated Hydroquinone (TBHQ, INS 319), and Propyl Gallate (INS 310)

There is a technological need for the function antioxidant.

The proposed maximum level is justified to achieve the intended technological need

02.1	fats and oils essentially free from water	200	mg/kg	Notes 15 & 130	6
02.2.1.1	butter and concentrated butter	200	mg/kg	Notes 15 & 130	6
03.0	edible ices, including sherbet and sorbet	100	mg/kg	Notes 15 & 130	6
05.1.4	cocoa and chocolate products	200	mg/kg	Notes 15 & 130	6
05.1.5	imitation chocolate, chocolate substitute products	200	mg/kg	Notes 15 & 130	6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	200	mg/kg	Notes 15 & 130	6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	200	mg/kg	Notes 15 & 130	6
06.4.3	pre-cooked pastas and noodles and like products	200	mg/kg	Notes 15 & 130	6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	90	mg/kg	Notes 2, 15 & 130	6
07.0	bakery wares	200	mg/kg	Notes 15 & 130	6
08.2	processed meat, poultry, and game products in whole pieces or cuts	100	mg/kg	Notes 15 & 130	6
08.3	processed comminuted meat, poultry, and game products	100	mg/kg	Notes 15 & 130	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Notes 15 & 130	6
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Notes 15 & 130	6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Notes 15 & 130	6
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	200	mg/kg	Notes 15 & 130	6
12.5	soups and broths	200	mg/kg	Notes 15 & 130	6
15.0	ready-to-eat savouries	200	mg/kg	Notes 15 & 130	6

The proposed maximum level is too high. We suggest the level of 200 mg/kg. Also, we suggest for food category 02.0.

02.2.1.2	margarine and similar products	500	mg/kg	Notes 15 & 130	6
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The proposed maximum level is too high. We suggest the level of 100 mg/kg

12.6	sauces and like products	200	mg/kg	Notes 15 & 130	6
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The proposed maximum level is too high. We suggest the level of 400 mg/kg

05.3	chewing gum	750	mg/kg	Note 130	6
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The proposed maximum level is not enough to achieve the technological need. We suggest the level of 100

06.3	breakfast cereals, including rolled oats	50	mg/kg	Notes 15 & 130	6
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The proposed maximum level is not enough to achieve the technological need. We suggest the level of 200

10.4	egg-based desserts (e.g., custard)	90	mg/kg	Notes 2, 15 & 130	6
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Additional information is necessary on the technological need and maximum level of use

09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Notes 15 & 130	6
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Notes 15 & 130	6

TERTIARY BUTYL HYDROXYQUINONE (TBHQ), INS 319 (Antioxidant)

Brazil supports the recommendation of discontinuing work on these provisions

01.3.1	condensed milk (plain)	200	mg/kg	Notes 15 ¹² & 130 ¹³	3
	condensed milk (plain)	100	mg/kg	Notes 15, 88 ¹⁴ & 130	6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	200	mg/kg	Notes 15 & 130	6
04.1.2.2	dried fruit	200	mg/kg	Notes 15 & 130	6

¹² **Note 15:** Fat or oil basis.

¹³ **Note 130:** Singly or in combination: Butylated Hydroxyanisole (BHA, INS 320), Butylated Hydroxytoluene (BHT, INS 321), Tertiary Butylated Hydroquinone (TBHQ, INS 319), and Propyl Gallate (INS 310).

¹⁴ **Note 88:** Carryover from the ingredient.

04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	200	mg/kg	Notes 15 & 130	6
08.2	processed meat, poultry, and game products in whole pieces or cuts	100	mg/kg	Notes 15 & 130	6
08.3	processed comminuted meat, poultry, and game products	100	mg/kg	Notes 15 & 130	6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	100 0	mg/kg	Notes 15 & 130	6

These provisions should be endorsed.

There is a technological need for the function antioxidant.

The proposed maximum level is justified to achieve the intended technological need

02.0	fats and oils, and fat emulsions	200	mg/kg	Notes 15 & 130	6
02.1	fats and oils essentially free from water	200	mg/kg	Notes 15 & 130	8
02.2.1.2	margarine and similar products	200	mg/kg	Notes 15 & 130	8
02.2.1.3	blends of butter and margarine	200	mg/kg	Notes 15 & 130	8
02.2.2	emulsions containing less than 80% fat	200	mg/kg	Notes 15 & 130	8
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	200	mg/kg	Notes 15 & 130	8
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	200	mg/kg	Notes 15 & 130	8
03.0	edible ices, including sherbet and sorbet	200	mg/kg	Notes 15 & 130	6
05.1.4	cocoa and chocolate products	500	mg/kg	Notes 15 & 130	6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	200	mg/kg	Notes 15 & 130	6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	200	mg/kg	Notes 15 & 130	6
06.4.3	pre-cooked pastas and noodles and like products	200	mg/kg	Notes 15 & 130	3
07.1.1	breads and rolls	200	mg/kg	Notes 15 & 130	6
07.1.2	crackers, excluding sweet crackers	200	mg/kg	Notes 15 & 130	6
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	200	mg/kg	Notes 15 & 130	6
07.1.4	bread-type products, including bread stuffing and bread crumbs	200	mg/kg	Notes 15 & 130	6
12.4	mustards	200	mg/kg	Notes 15 & 130	6
12.5	soups and broths	200	mg/kg	Notes 15 & 130	6
12.5.2	mixes for soups and broths	200	mg/kg	Notes 15 & 130	8

The proposed maximum level is too high. We suggest the level of 400 mg/kg

05.3	chewing gum	750	mg/kg	Note 130	6
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Additional information is necessary on the technological need and maximum level of use

09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	1000	mg/kg	Notes 15 & 130	6
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DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL (INS 472e) (Emulsifier, Sequestrant, Stabilizer)

Brazil supports the recommendation of discontinuing work on these provisions

01.1.1.2	buttermilk (plain)	5000	mg/kg		3
01.4	cream (plain) and the like	5000	mg/kg		6
01.5.1	milk powder and cream powder (plain)	10000	mg/kg		6
01.6.1	unripened cheese	10000	mg/kg		3
03.0	edible ices, including sherbet and sorbet	10000	mg/kg		3
03.0	edible ices, including sherbet and sorbet	1000	mg/kg		6
04.1.1.2	surface-treated fresh fruit	10000	mg/kg	Note 16 ¹⁵	3
04.1.2.1 2	cooked fruit	2500	mg/kg		3
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	10000	mg/kg	Note 16	3
08.1.1	fresh meat, poultry, and game, whole pieces or cuts	10000	mg/kg	Note 16	3
08.1.2	fresh meat, poultry, and game, comminuted	10000	mg/kg		3
08.2.1	non-heat treated processed meat, poultry, and game products in whole pieces or cuts	10000	mg/kg		3

¹⁵ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

08.2.2	heat-treated processed meat, poultry, and game products in whole pieces or cuts	10000	mg/kg		3
08.2.3	frozen processed meat, poultry, and game products in whole pieces or cuts	10000	mg/kg	Note 16	3
08.3.1	non-heat treated processed comminuted meat, poultry, and game products	10000	mg/kg		3
08.3.2	heat-treated processed comminuted meat, poultry, and game products	10000	mg/kg		3
08.3.3	frozen processed comminuted meat, poultry, and game products	10000	mg/kg	Note 16	3
09.1	fresh fish and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg	Note 16	3
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg		3
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg	Note 16	3
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg	Note 16	3
09.2.4	cooked and/or fried fish and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg		3
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg		3
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	5000	mg/kg		3
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	1000	mg/kg		3
12.1.2	salt substitutes		GMP		6
12.2.1	herbs and spices		GMP		6
12.3	vinegars	1000	mg/kg		3
14.1.2.2	vegetable juice	5000	mg/kg		3
14.1.2.4	concentrates for vegetable juice	5000	mg/kg		3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	5000	mg/kg		3

The proposed maximum level is too high. We suggest the level of 5000 mg/kg.

Additional information is necessary on the technological need and maximum level of use.

02.1	fats and oils essentially free from water	10000	mg/kg		6
02.2	fat emulsions mainly of type water-in-oil	10000	mg/kg		6
06.4.2	dried pastas and noodles and like products	10000	mg/kg		6
07.0	bakery wares	20000	mg/kg		3
07.0	bakery wares	10000	mg/kg		6

Additional information is necessary on the technological need and maximum level of use.

08.4	edible casings (e.g., sausage casings)	10000	mg/kg		3
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These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

06.2	flours and starches (including soybean powder)	5000	mg/kg		6
13.1.1	infant formulae	5000	mg/kg		3
13.1.2	follow-up formulae	5000	mg/kg		3

SULFITES (INS 220, 221, 222, 223, 224, 225, 227, 228, 539) (Acidity Regulator, Adjuvant, Antioxidant, Bleaching Agent (Not for Flour), Flour Treatment Agent, Firming Agent, Preservative, Sequestrant, Stabilizer)

Brazil supports the recommendation of discontinuing work on these provisions

01.6.4.1	plain processed cheese	300	mg/kg	Note 44 ¹⁶	6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	100	mg/kg	Note 44	6
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	50	mg/kg	Note 44	3
03.0	edible ices, including sherbet and sorbet	100	mg/kg	Note 44	6
04.1.1.2	surface-treated fresh fruit	1000	mg/kg	Note 44	3
04.1.1.2	surface-treated fresh fruit	30	mg/kg	Note 44	6

¹⁶

Note 44: As residual SO₂.

04.1.2.1	frozen fruit	500	mg/kg	Note 44	6
04.1.2.3	fruit in vinegar, oil, or brine	350	mg/kg	Note 44	6
04.1.2.4	canned or bottled (pasteurized) fruit	350	mg/kg	Note 44	6
04.1.2.5	jams, jellies and marmalades	3000	mg/kg	Note 44	6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg	Note 44	6
04.1.2.7	candied fruit	350	mg/kg	Note 44	6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	750	mg/kg	Note 44	6
04.1.2.10	fermented fruit products	350	mg/kg	Note 44	6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	100	mg/kg	Note 44	6
05.3	chewing gum	150	mg/kg	Note 44	6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	100	mg/kg	Note 44	6
08.1.2	fresh meat, poultry, and game, comminuted	450	mg/kg	Note 44	6
08.3	processed comminuted meat, poultry, and game products	500	mg/kg	Note 44	6
08.4	edible casings (e.g., sausage casings)	500	mg/kg	Note 44	6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	50	mg/kg	Note 44	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Note 44	6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg	Note 44	6
11.2	brown sugar excluding products of food category 11.1.3	40	mg/kg	Note 44	3
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	500	mg/kg	Note 44	6
12.1.1	salt	1000	mg/kg	Note 29	6
12.4	mustards	250	mg/kg	Notes 44 & 106 ¹⁷	6
12.5	soups and broths	1000	mg/kg	Note 44	6
12.6	saucers and like products	300	mg/kg	Note 44	6
12.9.5	other protein products	500	mg/kg	Note 44	6
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	500	mg/kg	Note 44	6
16.0	composite foods - foods that could not be placed in categories 01 – 15	500	mg/kg	Note 44	6

The proposed maximum level is too high. We suggest the level of 1500 mg/kg

04.1.2.2	dried fruit	3000	mg/kg	Note 44	6
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The proposed maximum level is too high. We suggest the level of 300 mg/kg

04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	3000	mg/kg	Note 44	6
04.1.2.11	fruit fillings for pastries	350	mg/kg	Note 44	6
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	750	mg/kg	Note 44	6
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	800	mg/kg	Note 44	6

The proposed maximum level is too high. We suggest the level of 100 mg/kg

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	500	mg/kg	Notes 44 & 76 ¹⁸	6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	750	mg/kg	Note 44	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg	Note 44	6
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	2500	mg/kg	Notes 44 & 105 ¹⁹	6

¹⁷ **Note 106:** Except for use in Dijon mustard at 500 mg/kg.

¹⁸ **Note 76:** Use in potatoes only.

¹⁹ **Note 105:** Except for use in dried gourd strips (KAMPYO) at 5000 mg/kg.

06.2.1	flours	900	mg/kg	Note 44	6
06.2.2	starches	500	mg/kg	Note 44	6
12.2.2	seasonings and condiments	500	mg/kg	Note 44	3

The proposed maximum level is too high. We suggest the level of 50 mg/kg

Additional information is necessary on the technological need and maximum level of use

07.1.1	bread and rolls	100	mg/kg	Note 29 ²⁰	6
07.1.4	bread-type products, including bread stuffing and bread crumbs	500	mg/kg	Note 44	6
07.2	fine bakery wares (sweet, salty, savoury) and mixes	300	mg/kg	Note 44	6

The proposed maximum level is too high. We suggest the level of 40 mg/kg

14.1.4.1	carbonated water-based flavoured drinks	115	mg/kg	Note 44	6
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	250	mg/kg	Note 44	6
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	350	mg/kg	Note 44	6

The proposed maximum level is too high. We suggest the level of 250 mg/kg

Additional information is necessary on the technological need and maximum level of use

14.2.5	mead	350	mg/kg	Note 44	6
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Additional information is necessary on the technological need and maximum level of use

04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	750	mg/kg	Note 44	6
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	750	mg/kg	Note 44	6
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 category 12.10	1000	mg/kg	Note 44	6
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	750	mg/kg	Note 44	6
11.1.4	lactose	20	mg/kg	Note 44	6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	40	mg/kg	Note 44	6
14.1.2.2	vegetable juice	500	mg/kg	Note 44	6
14.1.2.4	concentrates for vegetable juice	70	mg/kg	Note 44	6
14.1.3.2	vegetable nectar	50	mg/kg	Note 44	6
14.1.3.4	concentrates for vegetable nectar	70	mg/kg	Note 44	6

Additional information is necessary on the NOTE 111

The proposed maximum level is not enough to achieve the technological need. We suggest the level of 40 mg/kg for glucose syrup

11.1.3	soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar	20	mg/kg	Notes 44 & 111 ²¹	6
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These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

06.4.3	pre-cooked pastas and noodles and like products	20	mg/kg	Note 44	6
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	50	mg/kg	Note 44	6
09.1.2	fresh mollusks, crustaceans, and echinoderms	150	mg/kg	Note 44	6
12.2.2	seasonings and condiments	200	mg/kg	Note 44	6
12.3	vinegars	200	mg/kg	Note 44	6
14.2.1	beer and malt beverages	100	mg/kg	Note 44	6
14.2.2	cider and perry	350	mg/kg	Note 44	6
14.2.3	grape wines	350	mg/kg	Notes 44 & 103 ²²	6

²⁰ **Note 29:** Reporting basis not specified.

²¹ **Note 111:** Excluding dried glucose syrup used in the manufacture of sugar confectionery at 150 mg/kg and glucose syrup used in the manufacture of sugar confectionery at 400 mg/kg.

²² **Note 103:** Except for use in special white wines at 400 mg/kg.

14.2.4	wines (other than grape)	350	mg/kg	Note 44	6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg	Note 44	6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	350	mg/kg	Note 44	6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	50	mg/kg	Note 44	6

BRILLIANT BLUE FCF (INS 133) (Colour)

Brazil supports the recommendation of discontinuing work on these provisions:

01.6.1	unripened cheese	200	mg/kg	Note 3 ²³	3
01.6.3	whey cheese	200	mg/kg	Note 3	3
02.1.3	lard, tallow, fish oil, and other animal fats	200	mg/kg		3
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg		6
04.1.2.5	jams, jellies and marmalades	500	mg/kg		6
04.1.2.7	candied fruit	200	mg/kg		6
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	500	mg/kg	Note 16	6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg		6
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg		6
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 category 12.10	500	mg/kg		3
05.1.3	cocoa-based spreads, including fillings	300	mg/kg		3
05.1.4	cocoa and chocolate products	300	mg/kg		3
05.1.4	cocoa and chocolate products	100	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	300	mg/kg		3
05.1.5	imitation chocolate, chocolate substitute products	100	mg/kg		6
07.1	bread and ordinary bakery wares	100	mg/kg		6
07.2	fine bakery wares (sweet, salty, savoury) and mixes	200	mg/kg		6
08.0	meat and meat products, including poultry and game	500	mg/kg	Note 16	6
09.2.4.1	cooked fish and fish products	500	mg/kg		6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		6
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	500	mg/kg		6
12.6	sauces and like products	500	mg/kg		6
12.9.5	other protein products	100	mg/kg		6
14.2.1	beer and malt beverages	200	mg/kg		3

The proposed maximum level is too high. We suggest the level of 50mg/kg

01.6.4	processed cheese	200	mg/kg		6
01.6.5	cheese analogues	200	mg/kg	Note 3	3
12.2.2	seasonings and condiments	500	mg/kg		6
12.5	soups and broths	300	mg/kg		6
16.0	composite foods - foods that could not be placed in categories 01 - 15	100	mg/kg	Note 2 ²⁴	6

The proposed maximum level is too high. We suggest the level of 100mg/kg

04.1.1.2	surface-treated fresh fruit	500	mg/kg	Note 16 ²⁵	6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 22 ²⁶	6

²³ **Note 3:** Surface treatment.

²⁴ **Note 2:** On dry ingredient, dry weight, dry mix or concentrate basis.

²⁵ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

²⁶ **Note 22:** For use in smoked fish products only.

The proposed maximum level is too high. We suggest the level of 100mg/kg

04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	500	mg/kg	except for coconut milk.	6
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These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

05.1.3	cocoa-based spreads, including fillings	100	mg/kg		6
12.4	mustards	300	mg/kg		6

CANTHAXANTHIN (INS 161g) (Colour)

This additive has a numerical ADI, therefore a numerical level of use should be established

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)		GMP		6
01.6	cheese and analogues		GMP		6
02.0	fats and oils, and fat emulsions		GMP		6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5		GMP		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk		GMP		6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts		GMP		6
04.1.2.1 1	fruit fillings for pastries		GMP		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces		GMP		6
09.3.3	salmon substitutes, caviar, and other fish roe products		GMP		6
16.0	composite foods - foods that could not be placed in categories 01 - 15	30	GMP	Note 2 ²⁷	6

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

04.1.2.5	jams, jellies and marmelades	200	mg/kg		6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	50	mg/kg		6
06.3	breakfast cereals, including rolled oats	50	mg/kg		3
14.2.6	distilled spirituous beverages containing more than 15% alcohol	5	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	5	mg/kg		3

Brazil supports the recommendation of discontinuing work on these provisions:

04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	8.2	mg/kg		6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce		GMP		6
05.3	chewing gum	300	mg/kg		6
06.3	breakfast cereals, including rolled oats	35	mg/kg		6
06.4.2	dried pastas and noodles and like products		GMP		6
06.4.3	pre-cooked pastas and noodles and like products		GMP		6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)		GMP		6
07.0	bakery wares		GMP		6
08.1.1	fresh meat, poultry, and game, whole pieces or cuts	100	mg/kg		6
08.1.2	fresh meat, poultry, and game, comminuted	1000	mg/kg	Note 94 ²⁸	6
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	100	mg/kg	Note 118 ²⁹	6
08.3.2	heat-treated processed comminuted meat, poultry, and game products	15	mg/kg		6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		GMP		6

²⁷ **Note 2:** On dry ingredient, dry weight, dry mix or concentrate basis.

²⁸ **Note 94:** For use in loganiza (fresh, uncured sausage) only.

²⁹ **Note 118:** Except for use in tocino (fresh, cured sausage) at 1000 mg/kg.

09.2.4.1	cooked fish and fish products	200	mg/kg		6
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms		GMP		6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 22 ³⁰	6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg		6
10.4	egg-based desserts (e.g., custard)		GMP		6
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3		GMP		6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)		GMP		6
12.2.2	seasonings and condiments		GMP		6
12.9.5	other protein products	100	mg/kg		6
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	5	mg/kg		6
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	100	mg/kg		6
14.2.1	beer and malt beverages	5	mg/kg		6
14.2.3	grape wines	5	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)		GMP		6

The proposed maximum level is too high. We suggest the level of 30mg/kg

12.5.2	mixes for soups and broths	100	mg/kg		6
12.6	sauces and like products	100	mg/kg		6

CARMINES (INS 120) (Colour)

Brazil supports the recommendation of discontinuing work on these provisions

01.6.1	unripened cheese		GMP	Note 3 ³¹	6
01.6.2.2	rind of ripened cheese		GMP		6
01.6.3	whey cheese		GMP	Note 3	6
01.6.5	cheese analogues		GMP	Note 3	6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
07.1	bread and ordinary bakery wares		GMP		6
07.1.4	bread-type products, including bread stuffing and bread crumbs	500	mg/kg		3
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16 ³²	6
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

02.2.1.3	blends of butter and margarine	500	mg/kg		3
02.2.2	emulsions containing less than 80% fat	500	mg/kg		3
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	500	mg/kg		6
06.4.2	dried pastas and noodles and like products	100	mg/kg		3
06.4.3	pre-cooked pastas and noodles and like products	100	mg/kg		3
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 85 ³³	3
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg		3
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	150	mg/kg		3
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		6

The proposed maximum level is too high. We suggest the level of 300mg/kg

³⁰ **Note 22:** For use in smoked fish products only.

³¹ **Note 3:** Surface treatment.

³² **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

³³ **Note 85:** Excluding use in surimi and fish roe products at 500 mg/kg.

05.3	chewing gum	1020	mg/kg		6
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The proposed maximum level is too high. We suggest the level of 100mg/kg

14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	1000	mg/kg		6
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Additional information is necessary on the technological need and maximum level of use

14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	500	mg/kg		3
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CAROTENES, VEGETABLE (160aii)

Brazil supports the recommendation of discontinuing work on these provisions

01.4	cream (plain) and the like	1000	mg/kg		3
01.6.3	whey cheese	1000	mg/kg	Note 3 ³⁴	3
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		GMP	Note 16	6
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	200	mg/kg		3
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	1320	mg/kg		3
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg		3
05.1.3	cocoa-based spreads, including fillings	1000	mg/kg		3
05.1.4	cocoa and chocolate products	1000	mg/kg		3
05.1.4	cocoa and chocolate products	500	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	1000	mg/kg		3
05.1.5	imitation chocolate, chocolate substitute products	500	mg/kg		6
08.1.1	fresh meat, poultry, and game, whole pieces or cuts	5000	mg/kg	Note 16	3
08.1.2	fresh meat, poultry, and game, comminuted	20	mg/kg	Note 117 ³⁵	6
09.1.1	fresh fish		GMP	Note 50 ³⁶	6
09.1.2	fresh mollusks, crustaceans, and echinoderms		GMP	Note 16	6
12.10.3	fermented soybean paste (e.g., miso)		GMP		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	25	mg/kg		6

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

02.2.1.2	margarine and similar products	1000	mg/kg		3
02.2.1.2	margarine and similar products	25	mg/kg		8
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	4	mg/kg	Except for coconut milk	6
04.1.2.1	fruit fillings for pastries	4	mg/kg		6
06.4.2	dried pastas and noodles and like products	1000	mg/kg		3
06.4.3	pre-cooked pastas and noodles and like products	1000	mg/kg		3
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	500	mg/kg		3
13.1.3	formulae for special medical purposes for infants	30	mg/kg	Note 84 ³⁷	3
14.1.2.2	vegetable juice	2000	mg/kg		3
14.1.2.4	concentrates for vegetable juice	2000	mg/kg		3
14.1.3.2	vegetable nectar	2000	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	1000	mg/kg		3
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	400	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	1000	mg/kg		3

³⁴ Note 3: Surface treatment

³⁵ Note 117: Except for use in loganiza (fresh, uncured sausage) at 1000 mg/kg

³⁶ Note 50: For use in fish roe only

³⁷ Note 84: For infants over 1 year of age only.

This additive has a numerical ADI, therefore a numerical level of use should be established

04.1.1.2	surface-treated fresh fruit	200	GMP	Note 16 ³⁸	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	200	GMP	Note 95 ³⁹	6
07.1.6	mixes for breads and ordinary bakery wares	1000	GMP		3

The proposed maximum level is too high. We suggest the level of 200mg/kg

09.2.4.1	cooked fish and fish products	1000	mg/kg		3
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The proposed maximum level is too high. We suggest the level of 1000mg/kg

15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	20000	mg/kg		3
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CHLOROPHYLLS, COPPER COMPLEXES (INS 141i & 141ii) (Colour)

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50	mg/kg		3
01.6.2.1	ripened cheese, includes rind	50	mg/kg		3
01.6.2.1	ripened cheese, includes rind	15	mg/kg		6
01.6.2.3	cheese powder (for reconstitution; e.g., for cheese sauces)	50	mg/kg		3
01.6.3	whey cheese	50	mg/kg		3
01.6.4	processed cheese	50	mg/kg		3
01.6.5	cheese analogues	50	mg/kg		3
01.6.6	whey protein cheese	50	mg/kg		3
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	200	mg/kg		6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	500	mg/kg		3
03.0	edible ices, including sherbet and sorbet	500	mg/kg		3
04.1.2.5	jams, jellies and marmelades	200	mg/kg		6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	150	mg/kg		6
04.1.2.7	candied fruit	250	mg/kg		3
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	150	mg/kg	Note 62	6
05.2.2	soft candy	100	mg/kg		6
05.2.3	nougats and marzipans	100	mg/kg		6
05.3	chewing gum	700	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	100	mg/kg		3
06.3	breakfast cereals, including rolled oats	100	mg/kg		3
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	75	mg/kg		3
09.3.3	salmon substitutes, caviar, and other fish roe products	200	mg/kg		3
10.4	egg-based desserts (e.g., custard)	300	mg/kg	Note 2 ⁴⁰	3
12.5.1	ready-to-eat soups and broths, including canned, bottled, and frozen	400	mg/kg		6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	300	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	350	mg/kg		3
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		3

Brazil supports the recommendation of discontinuing work on these provisions

01.6.1	unripened cheese	50	mg/kg		3
03.0	edible ices, including sherbet and sorbet	200	mg/kg		6
04.1.2.1	frozen fruit	100	mg/kg	Note 62 ⁴¹	6

³⁸ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

³⁹ **Note 95:** For use in surimi and fish roe products only.

⁴⁰ **Note 2:** On dry ingredient, dry weight, dry mix or concentrate basis.

⁴¹ **Note 62:** As copper.

04.1.2.2	dried fruit	100	mg/kg	Note 62	6
04.1.2.7	candied fruit	100	mg/kg	Note 62	6
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		GMP	Note 16	6
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	100	mg/kg	Note 62	6
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	100	mg/kg	Notes 62 & 89 ⁴²	6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	100	mg/kg	Note 62	6
05.1.2	cocoa mixes (syrups)	6.4	mg/kg	Note 62	3
05.1.3	cocoa-based spreads, including fillings	6.4	mg/kg	Note 62	3
05.1.4	cocoa and chocolate products	700	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	700	mg/kg		6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	6.4	mg/kg	Note 62	6
07.1.4	bread-type products, including bread stuffing and bread crumbs	6.4	mg/kg	Note 62	3
07.2	fine bakery wares (sweet, salty, savoury) and mixes	75	mg/kg		3
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)		GMP		6
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)		GMP		6
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	40	mg/kg		3
09.2.4.1	cooked fish and fish products	30	mg/kg	Note 62	6
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	40	mg/kg	Note 62	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg		3
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	40	mg/kg	Note 62	6
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	40	mg/kg		3
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	40	mg/kg		3
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	75	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6
12.9.5	other protein products		GMP		6
13.1.3	formulae for special medical purposes for infants	20	mg/kg	Note 84 ⁴³	3

The proposed maximum level is too high. We suggest the level of 15 mg/kg

01.6.2.2	rind of ripened cheese	75	mg/kg		3
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Additional information is necessary on the technological need and maximum level of use.

01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	500	mg/kg		3
05.2.1	hard candy	700	mg/kg		6
12.5.2	mixes for soups and broths	100	mg/kg		3
12.5.2	mixes for soups and broths	30	mg/kg	Note 127 ⁴⁴	6

This additive has a numerical ADI, therefore a numerical level of use should be established

02.0	fats and oils, and fat emulsions		GMP		6
04.1.1.2	surface-treated fresh fruit	200	GMP	Note 16 ⁴⁵	6
06.4.2	dried pastas and noodles and like products	100	GMP		6
06.4.3	pre-cooked pastas and noodles and like products	100	GMP		6

⁴² **Note 89:** Except for use in dried tangle (KONBU) at 150 mg/kg.

⁴³ **Note 84:** For infants over 1 year of age only.

⁴⁴ **Note 127:** As served to the consumer.

⁴⁵ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100	GMP	Note 95 ⁴⁶	6
12.4	mustards	500	GMP		6
13.6	food supplements		GMP		6
14.1.3.2	vegetable nectar		GMP		6
14.1.3.4	concentrates for vegetable nectar		GMP		6
14.2.2	cider and perry		GMP		6
14.2.4	wines (other than grape)		GMP		6
14.2.6	distilled spirituous beverages containing more than 15% alcohol		GMP		6

The proposed maximum level is not enough to achieve the technological need. We suggest the level of 500 mg/kg

12.2.2	seasonings and condiments	100	mg/kg		3
12.6	sauces and like products	100	mg/kg		3

Additional information is necessary on the technological need and maximum level of use.

This additive has a numerical ADI, therefore a numerical level of use should be established

13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)		GMP		6
13.4	dietetic formulae for slimming purposes and weight reduction		GMP		6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6		GMP		6

ERYTHROSINE (INS 127) (Colour)

Brazil supports the recommendation of discontinuing work on these provisions

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	mg/kg		6
01.6.2.2	rind of ripened cheese	100	mg/kg		6
01.6.4.2	flavoured processed cheese, including containing fruit, vegetables, meat, etc.	100	mg/kg	Notes 5 ⁴⁷ & 72 ⁴⁸	6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	300	mg/kg		6
02.1.3	lard, tallow, fish oil, and other animal fats	300	mg/kg		3
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	300	mg/kg		6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	300	mg/kg		6
04.1.2.4	canned or bottled (pasteurized) fruit	300	mg/kg		6
04.1.2.5	jams, jellies and marmelades	400	mg/kg		6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	300	mg/kg		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	300	mg/kg		6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	300	mg/kg		6
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 category 12.10	300	mg/kg		3
05.1.3	cocoa-based spreads, including fillings	100	mg/kg		6
07.0	bakery wares	300	mg/kg		6
08.1	fresh meat, poultry, and game	30	mg/kg	Notes 3 ⁴⁹ & 4 ⁵⁰	3
08.2	processed meat, poultry, and game products in whole pieces or cuts	30	mg/kg		6
08.3	processed comminuted meat, poultry, and game products	30	mg/kg		6
08.4	edible casings (e.g., sausage casings)	3000	mg/kg		3
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg		6
09.2.4.1	cooked fish and fish products	300	mg/kg		6

⁴⁶ **Note 95:** For use in surimi and fish roe products only.

⁴⁷ **Note 5:** Used in raw materials for manufacture of the finished food.

⁴⁸ **Note 72:** Ready-to-eat basis.

⁴⁹ **Note 3:** Surface treatment.

⁵⁰ **Note 4:** For decoration, stamping, marking or branding the product.

09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg		6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg		6
09.3.3	salmon substitutes, caviar, and other fish roe products	300	mg/kg		6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	1500	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg		6
10.1	fresh eggs	300	mg/kg	Note 4	3
10.4	egg-based desserts (e.g., custard)	300	mg/kg		6
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	300	mg/kg		6
11.6	table-top sweeteners, including those containing high-intensity sweeteners	300	mg/kg		6
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	300	mg/kg		6
12.9.5	other protein products	100	mg/kg	Note 2 ⁵¹	6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)		GMP		6
16.0	composite foods - foods that could not be placed in categories 01 - 15	300	mg/kg	Note 2 ⁵²	6

The proposed maximum level is too high. We suggest the level of 10 mg/kg

03.0	edible ices, including sherbet and sorbet	300	mg/kg		6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	300	mg/kg		6

The proposed maximum level is too high. We suggest the level of 50 mg/kg

04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	300	mg/kg		6
04.1.2.1	fruit fillings for pastries	300	mg/kg		6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	300	mg/kg		6
05.3	chewing gum	200	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	300	mg/kg		6
06.3	breakfast cereals, including rolled oats	300	mg/kg		6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	300	mg/kg		6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		6
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	300	mg/kg		6
13.6	food supplements	300	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	300	mg/kg		6

GRAPE SKIN EXTRACT (INS 163ii) (Colour)

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	1500	mg/kg		3
01.3.2	beverage whiteners	1500	mg/kg		3
01.5.2	milk and cream powder analogues	1500	mg/kg		3
01.6.1	unripened cheese	1000	mg/kg		3
01.6.2.1	ripened cheese, includes rind	125	mg/kg		6
01.6.2.2	rind of ripened cheese	1000	mg/kg		3
01.6.4.2	flavoured processed cheese, including containing fruit, vegetables, meat, etc.	1000	mg/kg		3

⁵¹ **Note 92:** On the weight of the protein before re-hydration.

⁵² **Note 2:** On dry ingredient, dry weight, dry mix or concentrate basis.

01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	100	mg/kg		6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	1500	mg/kg		3
03.0	edible ices, including sherbet and sorbet	1000	mg/kg		3
04.1.2.3	fruit in vinegar, oil, or brine	1500	mg/kg		3
04.1.2.4	canned or bottled (pasteurized) fruit	1500	mg/kg		3
04.1.2.5	jams, jellies and marmelades	1500	mg/kg		3
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		6
04.1.2.7	candied fruit	1500	mg/kg		3
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	1500	mg/kg	Except for coconut milk	3
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	1500	mg/kg		3
04.1.2.10	fermented fruit products	1500	mg/kg		3
04.1.2.11	fruit fillings for pastries	1500	mg/kg		3
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	1500	mg/kg		3
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	1500	mg/kg		3
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 category 12.10	1500	mg/kg		3
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	10000	mg/kg		3
05.3	chewing gum	10000	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	10000	mg/kg		3
06.3	breakfast cereals, including rolled oats	200	mg/kg		6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	1500	mg/kg		3
07.0	bakery wares	1500	mg/kg		3
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	1000	mg/kg	Note 22 ⁵³	3
09.3.3	salmon substitutes, caviar, and other fish roe products	1500	mg/kg		3
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	1500	mg/kg		3
12.4	mustards	500	mg/kg		3
12.5	soups and broths	1500	mg/kg		3
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	1500	mg/kg		3
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	500	mg/kg		3
12.6.3	mixes for sauces and gravies	500	mg/kg		3
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	1500	mg/kg		3
12.9.5	other protein products	500	mg/kg		3
13.4	dietetic formulae for slimming purposes and weight reduction	1500	mg/kg		3
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	1500	mg/kg		3
13.6	food supplements	1500	mg/kg		3
14.1.3.2	vegetable nectar	1500	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	1500	mg/kg		3
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	500	mg/kg		6
14.2.2	cider and perry	1500	mg/kg		3
14.2.6	distilled spirituous beverages containing more than 15% alcohol	1500	mg/kg		3
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	1500	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	1500	mg/kg		3

Brazil supports the recommendation of discontinuing work on these provisions

01.4	cream (plain) and the like	1500	mg/kg		3
01.6.3	whey cheese	1000	mg/kg		3
01.6.5	cheese analogues	1000	mg/kg		3
03.0	edible ices, including sherbet and sorbet	100	mg/kg		6
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		GMP	Note 16	6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	500	mg/kg		3
08.1.1	fresh meat, poultry, and game, whole pieces or cuts	5000	mg/kg	Note 16	3
08.1.2	fresh meat, poultry, and game, comminuted	1000	mg/kg	Note 94 ⁵⁴	6
08.2	processed meat, poultry, and game products in whole pieces or cuts	5000	mg/kg		3
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	5000	mg/kg		3
08.3.1.2	cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products	5000	mg/kg	Note 16	3
08.3.1.3	fermented non-heat treated processed comminuted meat, poultry, and game products	5000	mg/kg	Note 16	3
08.3.2	heat-treated processed comminuted meat, poultry, and game products	5000	mg/kg	Note 16	3
08.3.3	frozen processed comminuted meat, poultry, and game products	5000	mg/kg	Note 16	3
08.4	edible casings (e.g., sausage casings)	5000	mg/kg		3
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		3
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 16	6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	1000	mg/kg		3
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	1000	mg/kg	Note 16	3
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	500	mg/kg	Note 16	3
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	1500	mg/kg	Note 16	3
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	1500	mg/kg	Note 16	3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	1500	mg/kg		3
10.1	fresh eggs	1500	mg/kg	Note 4 ⁵⁵	3
13.1.3	formulae for special medical purposes for infants	20	mg/kg	Note 84 ⁵⁶	3
14.2.1	beer and malt beverages	1500	mg/kg		3
14.2.4	wines (other than grape)	1500	mg/kg		3
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	10000	mg/kg		3
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	10000	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	10	mg/kg		3

This additive has a numerical ADI, therefore a numerical level of use should be established

04.1.1.2	surface-treated fresh fruit	200	GMP	Note 16 ⁵⁷	6
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The proposed maximum level is too high. We suggest the level of 200 mg/kg

09.2.4.1	cooked fish and fish products	500	mg/kg		3
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The proposed maximum level is too high. We suggest the level of 150 mg/kg

10.4	egg-based desserts (e.g., custard)	500	mg/kg		3
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Additional information is necessary on the technological need and maximum level of use

13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	1500	mg/kg		3
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⁵⁴ **Note 94:** For use in loganiza (fresh, uncured sausage) only.

⁵⁵ **Note 4:** For decoration, stamping, marking or branding the product.

⁵⁶ **Note 84:** For infants over 1 year of age only.

⁵⁷ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

14.2.3.2	sparkling and semi-sparkling grape wines	1500	mg/kg		3
14.2.3.3	fortified grape wine, grape liquor wine, and sweet grape wine	1500	mg/kg		3

IRON OXIDES (INS 172i, 172ii, 172iii) (Colour)

Brazil supports the recommendation of discontinuing work on these provisions

01.3.2	beverage whiteners		GMP		6
01.4	cream (plain) and the like		GMP		6
01.5.2	milk and cream powder analogues		GMP		6
01.6.1	unripened cheese		GMP		6
01.6.3	whey cheese		GMP	Note 3 ⁵⁸	6
01.6.5	cheese analogues		GMP		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk		GMP		6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	75	mg/kg		3
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5		GMP		6
05.1.3	cocoa-based spreads, including fillings		GMP		6
05.3	chewing gum	10000	mg/kg		6
06.2	flours and starches (including soybean powder)	300	mg/kg		3
08.1.2	fresh meat, poultry, and game, comminuted	1000	mg/kg	Note 94 ⁵⁹	6
08.2	processed meat, poultry, and game products in whole pieces or cuts		GMP	Note 16 ⁶⁰	6
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	1000	mg/kg	Note 78 ⁶¹	6
08.3.1.2	cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products		GMP	Note 16	6
08.3.1.3	fermented non-heat treated processed comminuted meat, poultry, and game products		GMP	Note 16	6
08.3.2	heat-treated processed comminuted meat, poultry, and game products		GMP	Note 16	6
08.3.3	frozen processed comminuted meat, poultry, and game products		GMP	Note 16	6
09.1.1	fresh fish		GMP	Note 50 ⁶²	6
09.1.2	fresh mollusks, crustaceans, and echinoderms		GMP	Note 16	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 95 ⁶³	6
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 16	6
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 16	6
09.2.4.1	cooked fish and fish products		GMP		6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms		GMP		6
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 16	6
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly		GMP	Note 16	6
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine		GMP	Note 16	6
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	50	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6
10.4	egg-based desserts (e.g., custard)		GMP		6
12.4	mustards		GMP		6

⁵⁸ **Note 3:** Surface treatment.

⁵⁹ **Note 94:** For use in loganiza (fresh, uncured sausage) only.

⁶⁰ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

⁶¹ **Note 78:** For use in tocino (fresh, cured sausage) only.

⁶² **Note 50:** For use in fish roe only.

⁶³ **Note 95:** For use in surimi and fish roe products only.

12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3			GMP	6
12.9.5	other protein products			GMP	6
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)			GMP	6
13.4	dietetic formulae for slimming purposes and weight reduction			GMP	6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6			GMP	6
13.6	food supplements			GMP	6
14.1.3.2	vegetable nectar			GMP	6
14.1.3.4	concentrates for vegetable nectar			GMP	6
14.2.2	cider and perry			GMP	6
14.2.3.2	sparkling and semi-sparkling grape wines			GMP	6
14.2.4	wines (other than grape)			GMP	6
14.2.6	distilled spirituous beverages containing more than 15% alcohol			GMP	6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)			GMP	6

RIBOFLAVINS (INS 101i, 101ii) (Colour)

Brazil supports the recommendation of discontinuing work on these provisions

01.4	cream (plain) and the like	300	mg/kg		3
01.6.3	whey cheese	300	mg/kg	Note 3 ⁶⁴	3
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	300	mg/kg		3
04.1.2.3	fruit in vinegar, oil, or brine	300	mg/kg		3
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	10	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	300	mg/kg		3
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	300	mg/kg		3
05.1.2	cocoa mixes (syrops)	1000	mg/kg		3
05.1.3	cocoa-based spreads, including fillings	1000	mg/kg		3
05.1.4	cocoa and chocolate products	1000	mg/kg		3
08.0	meat and meat products, including poultry and game	1000	mg/kg		6
09.2.4.1	cooked fish and fish products	300	mg/kg		3
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	300	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

06.4.2	dried pastas and noodles and like products	300	mg/kg		3
07.1	bread and ordinary bakery wares	300	mg/kg		3
14.1.3.2	vegetable nectar	300	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	300	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	300	mg/kg		3

This additive has a numerical ADI, therefore a numerical level of use should be established

09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms			GMP	Note 95 ⁶⁵	6
14.2.6	distilled spirituous beverages containing more than 15% alcohol			GMP		6

CASTOR OIL (INS 1503) (Anticaking Agent, Carrier Solvent, Glazing Agent, Release Agent)

Brazil supports the recommendation of discontinuing work on these provisions

⁶⁴ Note 3: Surface treatment.

⁶⁵ Note 95: For use in surimi and fish roe products only.

05.1	cocoa products and chocolate products including imitations and chocolate substitutes		GMP		6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	500	mg/kg		6
05.3	chewing gum	2100	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces		GMP		6
13.6	food supplements		GMP		6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	500	mg/kg		6

POLYSORBATES (INS 432, 433, 434, 435, 436) (Antifoaming Agent, Adjuvant, Emulsifier, Foaming Agent, Flour Treatment Agent, Stabilizer)

Brazil supports the recommendation of discontinuing work on these provisions

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	5000	mg/kg		6
01.3.2	beverage whiteners	5000	mg/kg		6
01.4	cream (plain) and the like	10000	mg/kg		3
01.4.2	sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	3000	mg/kg		6
01.5.2	milk and cream powder analogues	4000	mg/kg		6
01.6.1	unripened cheese	80	mg/kg	Note 38 ⁶⁶	6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	5000	mg/kg		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	10000	mg/kg		3
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	3000	mg/kg		6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	3000	mg/kg		6
05.1.2	cocoa mixes (syrups)	500	mg/kg		6
05.2.1	hard candy	10000	mg/kg		6
05.2.2	soft candy	1000	mg/kg		6
05.2.3	nougats and marzipans	1000	mg/kg		6
08.2	processed meat, poultry, and game products in whole pieces or cuts	10000	mg/kg		6
08.3	processed comminuted meat, poultry, and game products	10000	mg/kg		6
12.1.1	salt	10	mg/kg		6
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	10000	mg/kg		3
12.2.1	herbs and spices	2000	mg/kg		6
12.9.5	other protein products	4000	mg/kg	Note 15 ⁶⁷	6
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	10000	mg/kg		3
14.1.4.1	carbonated water-based flavoured drinks	500	mg/kg		6
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	500	mg/kg		6
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	45000	mg/kg	Note 102 ⁶⁸	6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	120	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	120	mg/kg		6

The proposed maximum level is too high. We suggest the level of 4000 mg/kg

02.0	fats and oils, and fat emulsions	10000	mg/kg		6
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The proposed maximum level is too high. We suggest the level of 1000 mg/kg

04.1.2.1 1	fruit fillings for pastries	5000	mg/kg		6
05.1.3	cocoa-based spreads, including fillings	4600	mg/kg		6

⁶⁶ **Note 38:** Level in creaming mixture.

⁶⁷ **Note 15:** Fat or oil basis.

⁶⁸ **Note 102:** For use as a surfactant or wetting agent for colours in the food.

05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	10000	mg/kg		3
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	7000	mg/kg		6
16.0	composite foods - foods that could not be placed in categories 01 - 15	2000	mg/kg		6

Additional information is necessary on the technological need and maximum level of use

04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	30	mg/kg	Notes 7 ⁶⁹ & 100 ⁷⁰	6
08.4	edible casings (e.g., sausage casings)	1500	mg/kg		6

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

05.1.4	cocoa and chocolate products	10000	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	5000	mg/kg		6
06.6	batters (e.g., for breading or batters for fish or poultry)	5000	mg/kg	Note 2 ⁷¹	6
07.1.1	breads and rolls	3000	mg/kg		6
10.4	egg-based desserts (e.g., custard)	5000	mg/kg		6
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	5000	mg/kg		6
12.6.3	mixes for sauces and gravies	5000	mg/kg		6

The proposed maximum level is too high. We suggest the level of 5000 mg/kg

05.3	chewing gum	20000	mg/kg		6
06.4.2	dried pastas and noodles and like products	10000	mg/kg		3
06.4.3	pre-cooked pastas and noodles and like products	10000	mg/kg		3

The proposed maximum level is too high. We suggest the level of 3000 mg/kg

07.1.2	crackers, excluding sweet crackers	5000	mg/kg	Note 11 ⁷²	6
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	10000	mg/kg	Note 11	6
07.1.4	bread-type products, including bread stuffing and bread crumbs	5000	mg/kg	Note 11	6
07.1.5	steamed breads and buns	5000	mg/kg	Note 11	6
07.1.6	mixes for breads and ordinary bakery wares	5000	mg/kg	Note 11	6
07.2	fine bakery wares (sweet, salty, savoury) and mixes	5000	mg/kg		6

The proposed maximum level is not enough to achieve the technological need. We suggest the level of 5000mg/kg

12.2.2	seasonings and condiments	4600	mg/kg		6
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	4600	mg/kg		6
12.6.4	clear sauces (e.g., fish sauce)	4600	mg/kg		6
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	2000	mg/kg		6
13.6	food supplements	790	mg/kg	Note 101 ⁷³	6

BENZOYL PEROXIDE, INS 928

This provisions should be endorsed.

01.6.2.1	ripened cheese, includes rind	20	mg/kg	Note Y ⁷⁴	6
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Brazil supports the recommendation of discontinuing work on this provision

01.8	whhey and whhey products, excluding whhey cheeses		GMP		6
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The proposed maximum level is too high. We suggest the level of 40mg/kg

06.2.1	flours	66	mg/kg		6
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⁶⁹ **Note 7:** Use level not in finished food.

⁷⁰ **Note 100:** For use as a dispersing agent in dill oil used in the final food.

⁷¹ **Note 2:** On dry ingredient, dry weight, dry mix or concentrate basis.

⁷² **Note 11:** Flour basis

⁷³ **Note 101:** Level based on the maximum recommended daily dose of 475 mg/dose, assuming one 600 mg tablet is consumed per day.

⁷⁴ **Note Y:** Used to bleach diary ingredients, on the weight of bleached milk.

ALLURA RED AC (INS 129)

The proposed maximum level is too high. We suggest the level of 50 mg/kg

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	mg/kg		6
01.6.4	processed cheese	200	mg/kg		6
16.0	composite foods - foods that could not be placed in categories 01 - 15	500	mg/kg		6

Brazil supports the recommendation of discontinuing work on these provisions

01.6.1	unripened cheese	200	mg/kg	Note 3 ⁷⁵	3
01.6.3	whey cheese	300	mg/kg	Note 3	3
01.6.5	cheese analogues	300	mg/kg	Note 3	3
02.1.3	lard, tallow, fish oil, and other animal fats	500	mg/kg		3
02.2.1.2	margarine and similar products	300	mg/kg		3
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg		6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		6
04.1.2.7	candied fruit	300	mg/kg		6
05.1.4	cocoa and chocolate products	300	mg/kg		6
06.2	Flours and starches (including soybean powder)	500	mg/kg		6
07.1.1	Breads and rolls	500	mg/kg		6
07.1.4	Bread-type products, including bread stuffing and bread crumbs	300	mg/kg		6
07.1.5	Steamed breads and buns	300	mg/kg		6
07.1.6	Mixes for bread and ordinary bakery wares	300	mg/kg		6
08.1.1	fresh meat, poultry, and game, whole pieces or cuts		GMP	Note 4 ⁷⁶	6
08.1.2	fresh meat, poultry, and game, comminuted	25	mg/kg		6
08.2	processed meat, poultry, and game products in whole pieces or cuts		GMP	Note 16 ⁷⁷	6
08.3.2	heat-treated processed comminuted meat, poultry, and game products	25	mg/kg		6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 95 ⁷⁸	6
09.2.4.1	cooked fish and fish products	500	mg/kg		6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 22 ⁷⁹	6
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg		6
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	500	mg/kg		6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6
10.1	fresh eggs	100	mg/kg	Note 4	3
10.4	egg-based desserts (e.g., custard)	300	mg/kg		6
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	300	mg/kg		6
12.2.2	seasonings and condiments	500	mg/kg		6
12.9.5	other protein products	100	mg/kg		6
14.2.1	beer and malt beverages	200	mg/kg		3
14.2.4	wines (other than grape)	200	mg/kg		6

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

01.6.2.2	rind of ripened cheese	100	mg/kg		6
05.1.3	cocoa-based spreads, including fillings	300	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	300	mg/kg		6
09.1.1	fresh fish	300	mg/kg	Note 50 ⁸⁰	6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		6
12.4	mustards	300	mg/kg		6

⁷⁵ **Note 3:** Surface treatment.

⁷⁶ **Note 4:** For decoration, stamping, marking or branding the product.

⁷⁷ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

⁷⁸ **Note 95:** For use in surimi and fish roe products only.

⁷⁹ **Note 22:** For use in smoked fish products only.

⁸⁰ **Note 50:** For use in fish roe only.

12.5	soups and broths	300	mg/kg		6
13.6	food supplements	300	mg/kg		6
14.2.2	cider and perry	200	mg/kg		6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	200	mg/kg		6
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		6

The proposed maximum level is too high. We suggest the level of 150 mg/kg

01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	300	mg/kg		6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	300	mg/kg		6
03.0	edible ices, including sherbet and sorbet	300	mg/kg		6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	300	mg/kg		6

This additive has a numerical ADI, therefore a numerical level of use should be established

02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions		GMP		6
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		GMP	Note X ⁸¹	6

The proposed maximum level is too high. We suggest the level of 100 mg/kg.

04.1.2.5	jams, jellies and marmelades	500	mg/kg	Only for cherry jam	6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	800	mg/kg	Except for coconut milk	6
14.1.4.1	carbonated water-based flavoured drinks	300	mg/kg		6
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	300	mg/kg		6
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	1572	mg/kg	Note 127	6

The proposed maximum level is too high. We suggest the level of 300 mg/kg.

04.1.2.11	fruit fillings for pastries	800	mg/kg		6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	348	mg/kg		6
05.3	chewing gum	467	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		6
12.6	saucers and like products	500	mg/kg		6

The proposed maximum level is too high. We suggest the level of 250 mg/kg.

06.3	breakfast cereals, including rolled oats	500	mg/kg		6
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The proposed maximum level is too high. We suggest the level of 300 mg/kg.

06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	300	mg/kg		6
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The proposed maximum level is too high. We suggest the level of 200 mg/kg.

07.1.2	Crackers, excluding sweet crackers	300	mg/kg		6
07.1.3	Other ordinary bakery products (e.g., bagels, pita, English muffins)	300	mg/kg		6
07.2.1	cakes, cookies and pies (e.g., fruit-filled or custard types)	2200	mg/kg		6
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	300	mg/kg		6
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)	300	mg/kg		6

Additional information is necessary on the technological need and maximum level of use.

This additive has a numerical ADI, therefore a numerical level of use should be established

08.4	edible casings (e.g., sausage casings)		GMP		6
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		6

⁸¹

Note X: Applied to outer shell of pistachio nuts only.

13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		6

CARAMEL COLOUR, CLASS III (INS 150c)

The proposed maximum level is too high. We suggest the level of 500mg/kg

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50000	mg/kg		3
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50000	mg/kg		3

These provisions should be endorsed.

01.3.2	beverage whiteners	1000	mg/kg		3
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	20000	mg/kg		3
03.0	edible ices, including sherbet and sorbet	30000	mg/kg		3
04.1.2	processed fruit	80000	mg/kg		3
04.2.2	processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	80000	mg/kg		3
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds		GMP	Note 76 ⁸²	6
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 category 12.10		GMP		6
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds		GMP		6
05.0	confectionery	50000	mg/kg		3
05.1.1	cocoa mixes (powders) and cocoa mass/cake		GMP		6
05.1.2	cocoa mixes (syrops)		GMP		6
05.1.4	cocoa and chocolate products		GMP		6
05.1.5	imitation chocolate, chocolate substitute products		GMP		6
06.3	breakfast cereals, including rolled oats	50000	mg/kg		3
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	50000	mg/kg		3
07.1.2	crackers, excluding sweet crackers	50000	mg/kg		3
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	50000	mg/kg		3
07.2	fine bakery wares (sweet, salty, savoury) and mixes	50000	mg/kg		3
9.3.3	Salmon substitutes, caviar, and other fish roe products	GMP 30000			
10.4	egg-based desserts (e.g., custard)	20000	mg/kg		3
11.1.2	powdered sugar, powdered dextrose	50000	mg/kg		3
12.2.2	Seasonings and condiments	GMP 10000			
14.2.6	Distilled spirituous beverages containing more than 15% alcohol	GMP 50000			
14.2.7	Aromatized alcoholic beverages (e.g. beer, wine, and spirituous cooler-type beverages, low alcoholic refreshers)	GMP 50000			
15.0	ready-to-eat savouries	10000	mg/kg		3

These provisions should be endorsed.

Additional information is necessary on the technological need and maximum level of use

01.4.3	clotted cream (plain)	5000	mg/kg		3
01.4.4	cream analogues	5000	mg/kg		3
01.5.2	milk and cream powder analogues	5000	mg/kg		3
01.6	cheese and analogues	50000	mg/kg		3

Brazil supports the recommendation of discontinuing work on these provisions

01.8	whey and whey products, excluding whey cheeses	50000	mg/kg		3
02.1	fats and oils essentially free from water	20000	mg/kg		3
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	20000	mg/kg		3
06.6	batters (e.g., for breading or batters for fish or poultry)	50000	mg/kg		3
06.7	pre-cooked or processed rice products, including rice cakes (Oriental type only)	50000	mg/kg		3

07.1.4	bread-type products, including bread stuffing and bread crumbs	50000	mg/kg		3
07.1.5	steamed breads and buns	50000	mg/kg		3
07.1.6	mixes for breads and ordinary bakery wares	50000	mg/kg		3
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
10.1	fresh eggs	20000	mg/kg	Note 4 ⁸³	3
10.2	egg products	20000	mg/kg		3
10.3	dried and/or heat coagulated egg products	20000	mg/kg		3
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	50000	mg/kg		3
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		3
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	100000	mg/kg		3
14.1.2.2	vegetable juice	50000	mg/kg		3
14.1.2.4	concentrates for vegetable juice	50000	mg/kg		3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	100000	mg/kg		3
14.2	alcoholic beverages, including alcohol-free and low-alcoholic counterparts	50000	mg/kg		3

Additional information is necessary on the technological need and maximum level of use

02.2.1.2	margarine and similar products	20000	mg/kg		3
02.2.1.3	blends of butter and margarine	20000	mg/kg		3
02.2.2	emulsions containing less than 80% fat	20000	mg/kg		3
08.0	meat and meat products, including poultry and game	200000	mg/kg	Note 16 ⁸⁴	3
09.1	fresh fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg	Note 16	3
09.1.1	fresh fish		GMP	Notes 3 & 50 ⁸⁵	6
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
12.3	vinegars	100000	mg/kg		3
12.9.3	semi-dehydrated bean curd	80000	mg/kg		3
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000	mg/kg		3
13.4	dietetic formulae for slimming purposes and weight reduction	20000	mg/kg		3
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	20000	mg/kg		3
13.6	food supplements	20000	mg/kg		3
14.1.3.2	vegetable nectar	50000	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	50000	mg/kg		3
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	50000	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	20000	mg/kg		3

The proposed maximum level is too high. We suggest the level of 1500mg/kg

06.4.2	dried pastas and noodles and like products	50000	mg/kg		3
06.4.3	pre-cooked pastas and noodles and like products	50000	mg/kg		3

This additive has a numerical ADI, therefore a numerical level of use should be established

09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 50	6
09.2.4.1	cooked fish and fish products		GMP	Note 50	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 50	6

The proposed maximum level is too high. We suggest the level of 10000mg/kg

12.4	mustards	100000	mg/kg		3
12.5	soups and broths	100000	mg/kg		3
12.6	saucers and like products	100000	mg/kg		3
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads	100000	mg/kg		3

⁸³ **Note 4:** For decoration, stamping, marking or branding the product.

⁸⁴ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

⁸⁵ **Note 50:** For use in fish roe only.

	excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3				
12.9.1	soybean protein products	100000	mg/kg		3
12.9.5	other protein products	100000	mg/kg		3
12.10	fermented soybean products	100000	mg/kg		3

CARAMEL COLOUR, CLASS IV (INS 150D)

The proposed maximum level is too high. We suggest the level of 500mg/kg

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50000	mg/kg		3
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50000	mg/kg		3

These provisions should be endorsed.

01.3.2	beverage whiteners	1000	mg/kg		3
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	20000	mg/kg		3
03.0	edible ices, including sherbet and sorbet	30000	mg/kg		3
04.1.2	processed fruit	80000	mg/kg		3
04.2.2	processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	80000	mg/kg		3
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds		GMP	Note 76 ⁸⁶	6
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 category 12.10		GMP		6
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds		GMP		6
05.0	confectionery	50000	mg/kg		3
05.1.1	cocoa mixes (powders) and cocoa mass/cake		GMP		6
05.1.2	cocoa mixes (syrops)		GMP		6
05.1.4	cocoa and chocolate products		GMP		6
05.1.5	imitation chocolate, chocolate substitute products		GMP		6
06.3	breakfast cereals, including rolled oats	50000	mg/kg		3
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	50000	mg/kg		3
07.1.2	crackers, excluding sweet crackers	50000	mg/kg		3
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	50000	mg/kg		3
07.2	fine bakery wares (sweet, salty, savoury) and mixes	50000	mg/kg		3
10.4	egg-based desserts (e.g., custard)	20000	mg/kg		3
11.1.2	powdered sugar, powdered dextrose	50000	mg/kg		3
13.4	dietetic formulae for slimming purposes and weight reduction	20000	mg/kg		3
15.0	ready-to-eat savouries	10000	mg/kg		3

These provisions should be endorsed.

Additional information is necessary on the technological need and maximum level of use.

01.4.3	clotted cream (plain)	5000	mg/kg		3
01.4.4	cream analogues	5000	mg/kg		3
01.5.2	milk and cream powder analogues	5000	mg/kg		3
01.6	cheese and analogues	50000	mg/kg		3
01.6.4.2	flavoured processed cheese, including containing fruit, vegetables, meat, etc.	100	mg/kg	Notes 5 ⁸⁷ & 72 ⁸⁸	6

This additive has a numerical ADI, therefore a numerical level of use should be established

01.6.4.1	plain processed cheese		GMP		6
09.1.1	fresh fish		GMP	Notes 3 & 50 ⁸⁹	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		GMP		6
09.2.4.1	cooked fish and fish products		GMP	Note 50	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 50	6

⁸⁶ **Note 76:** Use in potatoes only.

⁸⁷ **Note 5:** Used in raw materials for manufacture of the finished food.

⁸⁸ **Note 72:** Ready-to-eat basis.

⁸⁹ **Note 50:** For use in fish roe only.

14.2.5	mead		GMP	Note 50	6
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Brazil supports the recommendation of discontinuing work on these provisions

01.8	whey and whey products, excluding whey cheeses	50000	mg/kg		3
02.1	fats and oils essentially free from water	20000	mg/kg		3
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	20000	mg/kg		3
06.6	batters (e.g., for breading or batters for fish or poultry)	50000	mg/kg		3
06.7	pre-cooked or processed rice products, including rice cakes (Oriental type only)	50000	mg/kg		3
07.1.4	bread-type products, including bread stuffing and bread crumbs	50000	mg/kg		3
07.1.5	steamed breads and buns	50000	mg/kg		3
07.1.6	mixes for breads and ordinary bakery wares	50000	mg/kg		3
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
10.1	fresh eggs	20000	mg/kg	Note 4 ⁹⁰	3
10.2	egg products	20000	mg/kg		3
10.3	dried and/or heat coagulated egg products	20000	mg/kg		3
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	50000	mg/kg		3
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		3
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	100000	mg/kg		3
14.1.2.2	vegetable juice	50000	mg/kg		3
14.1.2.4	concentrates for vegetable juice	50000	mg/kg		3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	100000	mg/kg		3
14.2	alcoholic beverages, including alcohol-free and low-alcoholic counterparts	50000	mg/kg		3

Additional information is necessary on the technological need and maximum level of use.

02.2.1.2	margarine and similar products	20000	mg/kg		3
02.2.1.3	blends of butter and margarine	20000	mg/kg		3
02.2.2	emulsions containing less than 80% fat	20000	mg/kg		3
08.0	meat and meat products, including poultry and game	200000	mg/kg	Note 16 ⁹¹	3
09.1	fresh fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg	Note 16	3
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
12.3	vinegars	100000	mg/kg		3
12.9.3	semi-dehydrated bean curd	80000	mg/kg		3
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000	mg/kg		3
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	20000	mg/kg		3
13.6	food supplements	20000	mg/kg		3
14.1.3.2	vegetable nectar	50000	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	50000	mg/kg		3
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	50000	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	20000	mg/kg		3

The proposed maximum level is too high. We suggest the level of 1500 mg/kg

06.4.2	dried pastas and noodles and like products	50000	mg/kg		3
06.4.3	pre-cooked pastas and noodles and like products	50000	mg/kg		3

The proposed maximum level is too high. We suggest the level of 10000 mg/kg

12.4	mustards	100000	mg/kg		3
12.5	soups and broths	100000	mg/kg		3
12.6	sauces and like products	100000	mg/kg		3
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads	100000	mg/kg		3

⁹⁰ **Note 4:** For decoration, stamping, marking or branding the product.

⁹¹ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

	excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3				
12.9.1	soybean protein products	100000	mg/kg		3
12.9.5	other protein products	100000	mg/kg		3
12.10	fermented soybean products	100000	mg/kg		3

CAROTENOIDS (INS 160ai, 160aii, 160e, 160f) 160aii – caroteno vegetal

Verificar descrição para o 160aii na CL 34

The proposed maximum level is too high. We suggest the level of 50 mg/kg

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	150	mg/kg		6
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These provisions should be endorsed

01.3.2	beverage whiteners	1000	mg/kg		3
01.5.2	milk and cream powder analogues	1000	mg/kg		3
01.6.1	unripened cheese	35	mg/kg		6
01.6.2.1	ripened cheese, includes rind	600	mg/kg		6
01.6.2.2	rind of ripened cheese	1000	mg/kg		3
01.6.2.3	cheese powder (for reconstitution; e.g., for cheese sauces)	1000	mg/kg		3
01.6.4	processed cheese	200	mg/kg		6
01.6.6	whey protein cheese	1000	mg/kg		3
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	200	mg/kg		6
02.1	fats and oils essentially free from water	1000	mg/kg		6
02.2.1.1	butter and concentrated butter	100	mg/kg		6
02.2.1.2	margarine and similar products	1000	mg/kg		6
02.2.2	emulsions containing less than 80% fat	1000	mg/kg		6
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	1000	mg/kg		6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	150	mg/kg		6
03.0	edible ices, including sherbet and sorbet	200	mg/kg		6
04.1.2.3	fruit in vinegar, oil, or brine	1000	mg/kg		3
04.1.2.5	jams, jellies and marmelades	500	mg/kg		6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		6
04.1.2.7	candied fruit	200	mg/kg		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	500	mg/kg		6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	150	mg/kg		6
04.1.2.11	fruit fillings for pastries	10	mg/kg		6
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	1000	mg/kg		3
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg		6
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 category 12.10	1000	mg/kg		3
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	500	mg/kg		6
05.3	chewing gum	500	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		6
06.3	breakfast cereals, including rolled oats	200	mg/kg		6
06.4.3	pre-cooked pastas and noodles and like products	1000	mg/kg		3
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	150	mg/kg		6
06.6	batters (e.g., for breading or batters for fish or poultry)	500	mg/kg		6
07.1.2	crackers, excluding sweet crackers	1000	mg/kg		3
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	1000	mg/kg		3
07.1.4	bread-type products, including bread stuffing and bread crumbs	1000	mg/kg	Note 116 ⁹²	3
07.2	fine bakery wares (sweet, salty, savoury) and mixes	200	mg/kg		6

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Note 116: For use in doughs only.

08.3.1.2	cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products	20	mg/kg		6
08.3.1.3	fermented non-heat treated processed comminuted meat, poultry, and game products	20	mg/kg		6
08.3.2	heat-treated processed comminuted meat, poultry, and game products	20	mg/kg		6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 22 ⁹³	6
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg		6
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	500	mg/kg		6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6
10.2	egg products	1000	mg/kg		3
10.4	egg-based desserts (e.g., custard)	150	mg/kg		6
12.4	mustards	300	mg/kg		6
12.5	soups and broths	300	mg/kg		6
12.6	sauces and like products	500	mg/kg		6
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	1000	mg/kg		3
12.9.5	other protein products	100	mg/kg		6
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		6
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		6
13.6	food supplements	300	mg/kg		6
14.1.3.2	vegetable nectar	100	mg/kg		6
14.1.3.4	concentrates for vegetable nectar	100	mg/kg		6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	100	mg/kg		6
14.2.2	cider and perry	200	mg/kg		6
14.2.4	wines (other than grape)	200	mg/kg		6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	200	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	400	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	500	mg/kg		6

Brazil supports the recommendation of discontinuing work on these provisions

01.4	cream (plain) and the like	1000	mg/kg		3
01.6.3	whey cheese	1000	mg/kg	Note 3 ⁹⁴	3
01.6.5	cheese analogues	1000	mg/kg		3
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	1000	mg/kg		3
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg		6
05.1.1	cocoa mixes (powders) and cocoa mass/cake	300	mg/kg		6
05.1.2	cocoa mixes (syrops)	300	mg/kg		6
05.1.3	cocoa-based spreads, including fillings	300	mg/kg		6
05.1.4	cocoa and chocolate products	500	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	500	mg/kg		6
07.1.1	bread and rolls	35	mg/kg		6
07.1.5	steamed breads and buns	1000	mg/kg		3
08.1.1	fresh meat, poultry, and game, whole pieces or cuts	100	mg/kg	Note 3	6
08.1.2	fresh meat, poultry, and game, comminuted	100	mg/kg	Note 117 ⁹⁵	6
08.2	processed meat, poultry, and game products in whole pieces or cuts	100	mg/kg	Note 3	6

⁹³ **Note 22:** For use in smoked fish products only.

⁹⁴ **Note 3:** Surface treatment.

⁹⁵ **Note 117:** Except for use in loganiza (fresh, uncured sausage) at 1000 mg/kg.

08.3.3	frozen processed comminuted meat, poultry, and game products	100	mg/kg	Note 3	6
09.1.1	fresh fish	300	mg/kg		6
09.1.2	fresh mollusks, crustaceans, and echinoderms	100	mg/kg	Note 3	6
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		3
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 41 ⁹⁶	6
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 3	6
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 3	6
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		3
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	200	mg/kg	Note 3	6
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	200	mg/kg	Note 3	6
10.1	fresh eggs	1000	mg/kg	Note 4 ⁹⁷	3
11.1.2	powdered sugar, powdered dextrose	35	mg/kg		6
14.2.3.2	sparkling and semi-sparkling grape wines	1000	mg/kg		3
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		6

This additive has a numerical ADI, therefore a numerical level of use should be established

02.2.1.3	blends of butter and margarine		GMP		6
07.1.6	mixes for breads and ordinary bakery wares	1000	GMP		6

The proposed maximum level is too high. We suggest the level of 20mg/kg

08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	100	mg/kg	Note 118 ⁹⁸	6
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The proposed maximum level is not enough to achieve the technological need. We suggest the level of 5000mg/kg

08.4	edible casings (e.g., sausage casings)	100	mg/kg	Note 3	6
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The proposed maximum level is too high. We suggest the level of 200mg/kg

09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 95	6
09.2.4.1	cooked fish and fish products	500	mg/kg		6
12.2.2	seasonings and condiments	500	mg/kg		6

FAST GREEN FCF (INS 143)

The proposed maximum level is not enough to achieve the technological need. We suggest the level of 150mg/kg

02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	100	mg/kg		6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	100	mg/kg		6
10.4	egg-based desserts (e.g., custard)	100	mg/kg		6

These provisions should be endorsed.

There is a technological need for the functions

The proposed maximum level is justified to achieve the intended technological need

04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	100	mg/kg		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	100	mg/kg		6

Brazil supports the recommendation of discontinuing work on these provisions

04.1.2.7	candied fruit	100	mg/kg		6
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 category 12.10	300	mg/kg		3

⁹⁶ **Note 41:** Use in breading or batter coatings only.

⁹⁷ **Note 4:** For decoration, stamping, marking or branding the product.

⁹⁸ **Note 118:** Except for use in tocino (fresh, cured sausage) at 1000 mg/kg.

06.4.2	dried pastas and noodles and like products	100	mg/kg		6
06.4.3	pre-cooked pastas and noodles and like products	100	mg/kg		6
07.0	bakery wares	100	mg/kg		6
08.1	fresh meat, poultry, and game	1000	mg/kg	Notes 3 ⁹⁹ & 4 ¹⁰⁰	3
08.2	processed meat, poultry, and game products in whole pieces or cuts	1000	mg/kg	Notes 3 & 4	3
08.2	processed meat, poultry, and game products in whole pieces or cuts		GMP	Notes 3 & 4	8
08.4	edible casings (e.g., sausage casings)	1000	mg/kg	Notes 3 & 4	3
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg		6
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg		6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg		6
12.2.2	seasonings and condiments	100	mg/kg		6
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	100	mg/kg		6

The proposed maximum level is not enough to achieve the technological need. We suggest the level of 300mg/kg

04.1.2.11	fruit fillings for pastries	100	mg/kg		6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	100	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	100	mg/kg		6

The proposed maximum level is too high. We suggest the level of 50mg/kg

06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	100	mg/kg		6
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This additive has a numerical ADI, therefore a numerical level of use should be established

13.6	food supplements	300	GMP		6
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INDIGOTINE (INS 132)

The proposed maximum level is too high. We suggest the level of 100mg/kg

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	mg/kg		6
01.6.4	processed cheese	200	mg/kg		6
06.3	breakfast cereals, including rolled oats	300	mg/kg		6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 22 ¹⁰¹	6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	300	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	300	mg/kg		6

Brazil supports the recommendation of discontinuing work on these provisions

01.6.1	unripened cheese	200	mg/kg	Note 3 ¹⁰²	3
01.6.3	whey cheese	200	mg/kg	Note 3	3
01.6.5	cheese analogues	200	mg/kg	Note 3	3
02.1.3	lard, tallow, fish oil, and other animal fats	200	mg/kg		3
02.2.1.2	margarine and similar products	200	mg/kg		3
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	300	mg/kg		6
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg		6
04.1.2.5	jams, jellies and marmalades	500	mg/kg		6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		6
04.1.2.7	candied fruit	200	mg/kg		6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg		6

⁹⁹ **Note 3:** Surface treatment.

¹⁰⁰ **Note 4:** For decoration, stamping, marking or branding the product.

¹⁰¹ **Note 22:** For use in smoked fish products only.

¹⁰² **Note 3:** Surface treatment

04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg		6
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 category 12.10	500	mg/kg		3
05.1.3	cocoa-based spreads, including fillings	100	mg/kg		6
05.1.4	cocoa and chocolate products	450	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	450	mg/kg		6
07.0	bakery wares	300	mg/kg		6
08.1	Fresh meat, poultry and game		GMP	Note 4 ¹⁰³	6
08.2	Processed meat, poultry, and game products in whole pieces or cuts		GMP	Note 4	6
08.4	Edible casings (e.g., sausage casings)		GMP		6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 95 ¹⁰⁴	6
09.2.4.1	cooked fish and fish products	500	mg/kg		6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		6
10.1	fresh eggs	300	mg/kg	Note 4	3
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	300	mg/kg		6
11.6	table-top sweeteners, including those containing high-intensity sweeteners	300	mg/kg		6
12.2.1	herbs and spices	300	mg/kg		6
12.2.2	seasonings and condiments	500	mg/kg		6
12.9.5	other protein products	100	mg/kg		6
14.2.4	wines (other than grape)	200	mg/kg		6

These provisions should be endorsed:

01.6.2.2	rind of ripened cheese	100	mg/kg		6
04.1.2.11	fruit fillings for pastries	300	mg/kg		6
05.3	chewing gum	300	mg/kg		6
09.1.1	fresh fish	300	mg/kg	Note 50 ¹⁰⁵	6
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg		6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		6
12.4	mustards	300	mg/kg		6
12.6	sauces and like products	500	mg/kg		6
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		6
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		6
13.6	food supplements	300	mg/kg		6
14.2.2	cider and perry	200	mg/kg		6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		6
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		6

The proposed maximum level is too high. We suggest the level of 150 mg/kg.

01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	300	mg/kg		6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	300	mg/kg		6
03.0	edible ices, including sherbet and sorbet	300	mg/kg		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	500	mg/kg		6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	300	mg/kg		6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	300	mg/kg		6
10.4	egg-based desserts (e.g., custard)	300	mg/kg		6

The proposed maximum level is too high. We suggest the level of 300 mg/kg

¹⁰³ **Note 4:** For decoration, stamping, marking or branding the product.

¹⁰⁴ **Note 95:** For use in surimi and fish roe products only.

¹⁰⁵ **Note 50:** For use in fish roe only.

05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	450	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		6
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	500	mg/kg		6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6

The proposed maximum level is too high. We suggest the level of 50 mg/kg

12.5	soups and broths	300	mg/kg		6
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PONCEAU 4R (INS 124)

These provisions should be endorsed

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	150	mg/kg		6
01.6.2.2	rind of ripened cheese	100	mg/kg		6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	150	mg/kg		6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	150	mg/kg		6
03.0	edible ices, including sherbet and sorbet	150	mg/kg		6
04.1.2.4	canned or bottled (pasteurized) fruit	300	mg/kg		6
04.1.2.5	jams, jellies and marmelades	500	mg/kg		6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	150	mg/kg		6
04.1.2.11	fruit fillings for pastries	100	mg/kg		6
05.1.3	cocoa-based spreads, including fillings	100	mg/kg		6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	150	mg/kg		6
08.4	edible casings (e.g., sausage casings)	500	mg/kg	Note 16	6
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg		6
10.4	egg-based desserts (e.g., custard)	100	mg/kg		6
12.4	mustards	300	mg/kg		6
12.6	saucers and like products	500	mg/kg		6
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		6
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		6
13.6	food supplements	300	mg/kg		
14.2.2	cider and perry	200	mg/kg		6
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		6

Brazil supports the recommendation of discontinuing work on these provisions

01.6.1	unripened cheese	100	mg/kg	Note 3 ¹⁰⁶	3
01.6.3	whey cheese	100	mg/kg	Note 3	3
01.6.5	cheese analogues	100	mg/kg	Note 3	3
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		6
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	500	mg/kg	Note 16	6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg		6
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	100	mg/kg		6
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg		6

¹⁰⁶

Note 3: Surface treatment.

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 category 12.10	500	mg/kg		3
05.1.1	cocoa mixes (powders) and cocoa mass/cake	50	mg/kg		6
05.1.2	cocoa mixes (syrups)	50	mg/kg		6
05.1.4	cocoa and chocolate products	150	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	150	mg/kg		6
07.0	bakery wares	200	mg/kg		6
08.1	fresh meat, poultry, and game	500	mg/kg	Note 16	6
08.2	processed meat, poultry, and game products in whole pieces or cuts	30	mg/kg		6
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	250	mg/kg		6
08.3.1.2	cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products	200	mg/kg		6
08.3.1.3	fermented non-heat treated processed comminuted meat, poultry, and game products	30	mg/kg		6
08.3.2	heat-treated processed comminuted meat, poultry, and game products	200	mg/kg		6
08.3.3	frozen processed comminuted meat, poultry, and game products	200	mg/kg		6
09.1.1	fresh fish	300	mg/kg	Note 50 ¹⁰⁷	6
09.1.2	fresh mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6
09.2.4.1	cooked fish and fish products	500	mg/kg		6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		6
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	500	mg/kg	Note 16	6
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	500	mg/kg	Note 16	6
10.1	fresh eggs	500	mg/kg	Note 4 ¹⁰⁸	3
11.6	table-top sweeteners, including those containing high-intensity sweeteners	200	mg/kg		6
12.2.2	seasonings and condiments	500	mg/kg		6
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	200	mg/kg		6
12.9.5	other protein products	100	mg/kg		6
14.1.2.2	vegetable juice	300	mg/kg		3
14.2.4	wines (other than grape)	200	mg/kg		6

The proposed maximum level is too high. We suggest the level of 100mg/kg

01.6.4	processed cheese	200	mg/kg		6
04.1.1.2	surface-treated fresh fruit	500	mg/kg	Note 16 ¹⁰⁹	6
04.1.2.7	candied fruit	200	mg/kg		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	500	mg/kg	Except for coconut mild	6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	300	mg/kg		6
05.3	chewing gum	300	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	200	mg/kg		6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	200	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		6

The proposed maximum level is too high. We suggest the level of 50mg/kg

¹⁰⁷ **Note 50:** For use in fish roe only.

¹⁰⁸ **Note 4:** For decoration, stamping, marking or branding the product.

¹⁰⁹ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

06.3	breakfast cereals, including rolled oats	200	mg/kg		6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 22 ¹¹⁰	6
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	500	mg/kg		6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6
12.5	soups and broths	300	mg/kg		6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	100	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	200	mg/kg		6
16.0	composite foods - foods that could not be placed in categories 01 - 15	500	mg/kg		6

SUNSET YELLOW FCF, INS 110

The proposed maximum level is too high. We suggest the level of 50mg/kg

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	mg/kg		6
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg		6
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	500	mg/kg		6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6
12.5	soups and broths	300	mg/kg		6
16.0	composite foods - foods that could not be placed in categories 01 - 15	500	mg/kg		6

Brazil supports the recommendation of discontinuing work on these provisions

01.6.1	unripened cheese		GMP	Note 3 ¹¹¹	6
01.6.3	whey cheese		GMP	Note 3	6
01.6.5	cheese analogues		GMP	Note 3	6
02.1.3	lard, tallow, fish oil, and other animal fats		GMP		6
02.2.1.1	butter and concentrated butter	300	mg/kg		6
02.2.1.2	margarine and similar products		GMP		6
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	300	mg/kg		6
04.1.2.2	dried fruit	50	mg/kg		6
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg		6
04.1.2.5	jams, jellies and marmelades	500	mg/kg		6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		6
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	500	mg/kg	Note 16	6
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	300	mg/kg	Note 76 ¹¹²	6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg		6
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	100	mg/kg		6
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg		6
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 category 12.10	200	mg/kg		6

¹¹⁰ **Note 22:** For use in smoked fish products only.

¹¹¹ **Note 3:** Surface treatment.

¹¹² **Note 76:** Use in potatoes only.

05.1.1	cocoa mixes (powders) and cocoa mass/cake	50	mg/kg		6
05.1.2	cocoa mixes (syrops)	50	mg/kg		6
05.1.4	cocoa and chocolate products	400	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	400	mg/kg		6
06.4.2	dried pastas and noodles and like products	300	mg/kg		6
06.4.3	pre-cooked pastas and noodles and like products	300	mg/kg		6
07.0	bakery wares	300	mg/kg		6
08.1	fresh meat, poultry, and game	500	mg/kg	Note 16	6
08.2	processed meat, poultry, and game products in whole pieces or cuts	500	mg/kg	Note 16	6
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	500	mg/kg	Note 16	6
08.3.1.2	cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products	135	mg/kg		6
08.3.1.3	fermented non-heat treated processed comminuted meat, poultry, and game products	500	mg/kg	Note 16	6
08.3.2	heat-treated processed comminuted meat, poultry, and game products	500	mg/kg	Note 16	6
08.3.3	frozen processed comminuted meat, poultry, and game products	500	mg/kg	Note 16	6
08.4	edible casings (e.g., sausage casings)	500	mg/kg	Note 16	6
09.1.2	fresh mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		6
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6
09.2.4.1	cooked fish and fish products	500	mg/kg		6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		6
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 22 ¹¹³	6
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	500	mg/kg	Note 16	6
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	500	mg/kg	Note 16	6
10.1	fresh eggs		GMP	Note 4 ¹¹⁴	6
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	300	mg/kg		6
11.6	table-top sweeteners, including those containing high-intensity sweeteners	300	mg/kg		6
12.2.1	herbs and spices	300	mg/kg		6
12.2.2	seasonings and condiments	500	mg/kg		6
12.9.5	other protein products	200	mg/kg		6
14.1.2.2	vegetable juice		GMP		6
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	70	mg/kg		3
14.2.4	wines (other than grape)	200	mg/kg		6

These provisions should be endorsed

01.6.2.2	rind of ripened cheese	100	mg/kg		6
05.1.3	cocoa-based spreads, including fillings	100	mg/kg		6
09.1.1	fresh fish	300	mg/kg	Note 50 ¹¹⁵	6
12.4	mustards	300	mg/kg		6
12.6	sauces and like products	500	mg/kg		6
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		6
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		6
13.6	food supplements	300	mg/kg		6
14.2.2	cider and perry	200	mg/kg		6
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried	100	mg/kg		6

¹¹³ **Note 22:** For use in smoked fish products only.

¹¹⁴ **Note 4:** For decoration, stamping, marking or branding the product.

¹¹⁵ **Note 50:** For use in fish roe only.

	fruit)				
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The proposed maximum level is too high. We suggest the level of 150 mg/kg

01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	300	mg/kg		6
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The proposed maximum level is too high. We suggest the level of 100 mg/kg

01.6.4	processed cheese	200	mg/kg		6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	300	mg/kg		6
03.0	edible ices, including sherbet and sorbet	300	mg/kg		6
04.1.1.2	surface-treated fresh fruit	500	mg/kg	Note 16 ¹¹⁶	6
04.1.2.7	candied fruit	300	mg/kg		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	500	mg/kg		6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	300	mg/kg		6
04.1.2.11	fruit fillings for pastries	400	mg/kg		6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	400	mg/kg		6
05.3	chewing gum	300	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	300	mg/kg		6
10.4	egg-based desserts (e.g., custard)	300	mg/kg		6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		6
14.1.4.1	carbonated water-based flavoured drinks	300	mg/kg		6
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	300	mg/kg		6
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	391	mg/kg		6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		6

The proposed maximum level is too high. We suggest the level of 250 mg/kg

06.3	breakfast cereals, including rolled oats	350	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	550	mg/kg		3

General comments for sweeteners (acesulfame potassium, alitame, aspartame, cyclamic acid, neotame, saccharin, sucralose):

There were doubts about the maximum levels and functions sweeteners and flavour enhancer. We understood that flavour enhancer should be use less than sweeteners. Even for sweeteners some levels are not safe and could exceed the ADI.

CANADA:

1. Neotame, INS 961

Canada is giving consideration to the listing of the sweetener neotame at specified maximum levels of use in various food categories. This food additive was listed as one of the priority review additives in CL 2005/34-FAC. In order to harmonize Canadian proposed listings for neotame with the proposed Codex provisions, Canada has recommended to the GSFA Electronic Working Group (eWG) changes to the maximum levels of neotame in selected food categories. Attached is the listing of proposed provisions for this sweetener in Canada compared with those of Codex.¹¹⁷ Where Codex levels are lower, Canada would request the higher levels indicated.

2. Polyvinyl alcohol, INS 1203

Polyvinyl alcohol is not approved for use in Canada, nor have there been any requests or Food Additive Submissions to list it. Consequently, Canada has no information concerning the technological need for this food additive.

¹¹⁶ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

¹¹⁷ Specifications for neotame used in foods offered for sale in Canada will have to comply with those which will appear in the First Supplement to the Fifth Edition of the *Food Chemicals Codex*.

3. Aspartame-acesulfame salt, INS 962

The most recent specifications for this sweetener were published in Addendum 13 to the Compendium of Food Additive Specifications (FNP 52 Add.13). This combined molecule is purported to represent some technological advantages over aspartame alone in that it exhibits greater stability. Permission for use of this sweetener was granted in Canada in 1999 for use in the same food categories and within the limits outlined individually under the Canadian *Food and Drug Regulations* for aspartame and acesulfame potassium.

Levels of Neotame in Foods: Comparison of Codex (CL 2005/34-FAC) and Canadian Proposals

Food category	Canada, mg/kg	Codex, mg/kg
01.7. Dairy-based desserts	100	100
02.4 Fat-based desserts	100	100
03.0 Edible ices	100	100
04.1.2.5 Jams, jellies	70 ¹¹⁸	33
04.1.2.6 Fruit-based spreads	70	65
04.1.2.8 Fruit preparations	70	100
04.2.2.5 Vegetable, including mushroom and fungi and spreads	20	33
05.1.5 Imitation chocolate	100	100
05.2 Confectionery	100	1000
05.3 Chewing gum	320	1000
05.4 Decorations, toppings and sweet sauces	100	33
06.3 Breakfast cereals	160	80
07.2 Fine bakery wares (sweet, salty, savoury) and mixes	130	80
10.4 Egg based desserts	100	33
11.4 Other sugars and syrups (maple, toppings)	70	100
12.2.2 Seasonings and condiments	32	65
12.6.1 Emulsified sauces	20	65
12.6.2 Non-emulsified sauces	70	65
14.1.4 Water-based flavoured drinks	30	33
15.0 Ready-to-eat savouries	32	16

1. Carotenoids Lutein and Zeaxanthin

These two carotenoids are not explicitly approved for use in Canada. However, Canada has agreed to the use of lutein from *Tagetes* in foods offered for sale in Canada and considers this colour to be subsumed under the term “xanthophylls”. Therefore, under Canadian regulations, lutein is allowed for use in a number of foods, as follows:

- Category 1.6, Cheese and analogues
- Category 1.7, Ice milk and ice cream mix
- Category 2.2.1.2, Margarine and similar products
- Category 3.0, Edible ices, including sherbet and sorbet
- Category 4.1.2.5, Jams, jellies and marmalades
- Category 4.2.2.7, Fermented vegetables (pickles and relishes)
- Category 8.1.2, Fresh, uncured sausage (loganiza)
- Category 8.3.1.1, Fresh, cured sausage (tocino)
- Category 9.2.5, Smoked fish
- Category 9.3.1, Marinated fish and fish products
- Category 9.3.3, Salmon substitutes, caviar, and other fish roe products
- Category 10.2, Egg products
- Unstandardized foods

At present, under Canadian regulations, xanthophylls are allowed for use at a level consistent with “good manufacturing practice” (GMP).

2. Peroxyacid antimicrobial solutions containing 1-hydroxyethylidene-1,1-diphosphonic acid (HEDP)

A solution of these substances, also containing hydrogen peroxide (components of the mixed solution remain in equilibrium), can be applied in Canada as a sanitizing spray to the surfaces of meat carcasses (without a potable water rinse) and for the treatment of flume water for fresh fruits and vegetables. The concentration of peroxy acids in the solution for meat carcass treatment is up to 200 mg/kg and in flume water is 80 mg/kg.

¹¹⁸ Items highlighted in red indicate categories for which Canadian proposed levels are higher than Codex levels. Canada requests that the higher levels be considered for these categories in the GSFA.

Under usual conditions of use the chemicals of the solution are considered processing aids rather than food additives because they are functional during processing rather than in the final food. If, however, peroxy acid solutions were to be employed and were functional in use scenarios involving ready-to-eat foods sold to the consumer (e.g., meat cuts, fresh cut-up fruits and vegetables in salads, etc.), the chemicals in such solutions would be considered food additives

EUROPEAN COMMUNITY:

CARNAUBA WAX (INS 903)

The European Community supports the following provision

Food Cat No.	Food Category	Max	Level	EC Comment
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	200	mg/kg	support

The European Community supports discontinuing work on 05.1.4 (cocoa and chocolate products) at 10000 mg/kg as the adopted level of 500 mg/kg is sufficient for the purpose.

The European Community supports the following uses but at different maximum levels

Food Cat No.	Food Category	Max	Level	EC Comment
05.1.5	imitation chocolate, chocolate substitute products	10000	mg/kg	Too high 500 sufficient
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	10000	mg/kg	Too high 500 sufficient
13.6	Food supplements	500	mg/kg	Too high 200 sufficient
15.0	ready-to-eat savouries	2000	mg/kg	Too high 200 sufficient

BENZOATES (INS 210, 211, 212, 213)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to recommend that the 38th CCFAC discontinue work on specific provisions for the use of benzoates in the GSFA if no additional information is provided to the CCFAC.

The European Community does not agree with the increase of the use levels proposed for categories **04.1.2.5 jams, jellies and marmalades** and **12.5.1 soups and broths**. The European Community is of the opinion that the adopted level for category 04.1.2.5 is sufficient and the adopted level for category 12.5.1 is already higher than technologically needed (500 mg/kg in the EC). The European Community therefore agrees to discontinue work on all specific provisions proposed.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on

No comment

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comment

POLYDIMETHYLSILOXANE (INS 900A)

The European Community supports revoking the adopted provision for the use of polydimethylsiloxane in food category 04.2.2.1 and has no information to submit on the use in the categories 12.9.1.3 and 12.10.3.

PROPYLENE GLYCOL ESTERS OF FATTY ACIDS (INS 477)

The European Community has the following comments on these provisions

Food Cat No.	Food Category	Max	Level	EC Comment
02.2.1.3	Blends of butter and margarine	10000	mg/kg	In products for baking purposes only
02.4	Fat based desserts excluding dairy based dessert products of food category 01.7	40000	mg/kg	5000 generally whipping dessert toppings 30000

CALCIUM DISODIUM ETHYLENE DIAMINE TETRA-ACETATE & DISODIUM ETHYLENE DIAMINE TETRA-ACETATE (EDTAS), (INS 385 AND 386)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of EDTAs in the GSFA if no additional information is provided to the 38th CCFAC.

The European Community does not agree with the use of these additives in food categories 04.2.2.1 and 14.2.7 and therefore agrees that work on these specific provisions is discontinued.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on

The European Community questions the need for these additives in food category 04.2.2.1 where such products are preserved by freezing and also questions the technological need in products under food category 14.2.7.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No Comment

BUTYLATED HYDROXYANISOLE (BHA) (INS 320)**1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of BHA in the GSFA if no additional information is provided to the 38th CCFAC.**

The European Community has no new information to provide on the specific provisions and agrees to discontinue work on these provisions, with the exception of those listed under point 2.

2) If you support endorsement of these provisions for adoption at Step 8, for each of the food categories above, please comment on

From the specific provisions below, the EC permits the use of BHA in the following categories at the indicated level. For categories 02.2.1.2 and 02.2.2 the EC also restricts the use of BHA to uses for the professional manufacture of heat-treated foodstuffs only. Therefore we suggest the addition of a note to this end:

Food Cat No.	Food Category	Max	Level	Comments	EC comment
01.5.1	milk powder and cream powder (plain)	200	mg/kg	Notes 15 & 130	
05.3	chewing gum	750	mg/kg	Note 130	A level of 400 mg/kg is sufficient for the intended purpose
13.6	food supplements	400	mg/kg	Notes 15 & 130	
02.2.1.2	margarine and similar products	200	mg/kg	Notes 15 & 130 & X ¹¹⁹	
02.2.2	emulsions containing less than 80% fat	200	mg/kg	Notes 15 & 130 & X	

The intake studies carried out in the EC suggest that with the current limited uses and use levels ADI should not be exceeded for adults or children (Report from the Commission on Dietary Food Additive Intake in the European Union (COM (2001) 542 final): http://europa.eu.int/comm/food/food/chemicalsafety/additives/flav15_en.pdf

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comments at this stage.

BUTYLATED HYDROXYTOLUENE (BHT) (INS 321)**1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of BHT in the GSFA if no additional information is provided to the 38th CCFAC.**

The European Community has no new information to provide on the specific provisions proposed and agrees to discontinue work on these provisions, with the exception of those listed under point 2.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on:

From the specific provisions below, the EC permits the use of BHA in the following categories at the indicated level. For category 02.2.1.2 the EC also restricts the use of BHA to uses for the professional manufacture of heat-treated foodstuffs only. Therefore we suggest the addition of a note to this end:

¹¹⁹ For use for the professional manufacture of heat-treated foodstuffs only.

Food Cat No.	Food Category	Max	Level	Comments	EC comment
01.5.1	milk powder and cream powder (plain)	200	mg/kg	Notes 15 & 130	
02.1	fats and oils essentially free from water	200	mg/kg	Notes 15 & 130	
02.2.1.2	margarine and similar products	200	mg/kg	Notes 15 & 130 & X ¹²⁰	
05.3	chewing gum	750	mg/kg	Note 130	A level of 400 mg/kg is sufficient for the intended purpose
12.2	Herbs spices and seasonings and condiments	200	mg/kg	Notes 15 & 130	Restrict to category 12.2.2
13.6	food supplements	400	mg/kg	Notes 15 & 130	
15.0	Ready to eat savouries	200	Mg/kg	Notes 15 & 130	

The intake studies carried out in the EC suggest that with the current limited uses and use levels ADI should not be exceeded for adults. However, for children further examination has been recommended (actual intake with actual usage). (Report from the Commission on Dietary Food Additive Intake in the European Union (COM (2001) 542 final): http://europa.eu.int/comm/food/food/chemicalsafety/additives/flav15_en.pdf)

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comments at this stage.

TERTIARY BUTYLHYDROXYQUINONE (TBHQ) (INS 319)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on these provisions for the use of TBHQ in the GSFA.

The European Community agrees that the following provisions should be discontinued:

01.3.1	condensed milk (plain)	200	mg/kg	Notes 15 ¹²¹ & 130 ¹²²	3
01.3.1	condensed milk (plain)	100	mg/kg	Notes 15, 88 ¹²³ & 130	6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	200	mg/kg	Notes 15 & 130	6
02.0	fats and oils, and fat emulsions	200	mg/kg	Notes 15 & 130	6
03.0	edible ices, including sherbet and sorbet	200	mg/kg	Notes 15 & 130	6
04.1.2.2	dried fruit	200	mg/kg	Notes 15 & 130	6
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	200	mg/kg	Notes 15 & 130	6
05.1.4	cocoa and chocolate products	500	mg/kg	Notes 15 & 130	6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	200	mg/kg	Notes 15 & 130	6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	200	mg/kg	Notes 15 & 130	6
06.4.3	pre-cooked pastas and noodles and like products	200	mg/kg	Notes 15 & 130	3
07.1.1	breads and rolls	200	mg/kg	Notes 15 & 130	6
07.1.2	crackers, excluding sweet crackers	200	mg/kg	Notes 15 & 130	6
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	200	mg/kg	Notes 15 & 130	6
07.1.4	bread-type products, including bread stuffing and bread crumbs	200	mg/kg	Notes 15 & 130	6
08.2	processed meat, poultry, and game products in whole pieces or cuts	100	mg/kg	Notes 15 & 130	6
08.3	processed comminuted meat, poultry, and game products	100	mg/kg	Notes 15 & 130	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	1000	mg/kg	Notes 15 & 130	6
12.4	mustards	200	mg/kg	Notes 15 & 130	6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	1000	mg/kg	Notes 15 & 130	6
12.5	soups and broths	200	mg/kg	Notes 15 & 130	6

¹²⁰ For use for the professional manufacture of heat-treated foodstuffs only.

¹²¹ **Note 15:** Fat or oil basis.

¹²² **Note 130:** Singly or in combination: Butylated Hydroxyanisole (BHA, INS 320), Butylated Hydroxytoluene (BHT, INS 321), Tertiary Butylated Hydroquinone (TBHQ, INS 319), and Propyl Gallate (INS 310).

¹²³ **Note 88:** Carryover from the ingredient.

2) If you support endorsement of these provisions at Step 8, for each of the food categories above, please comment on

The European Community supports the following provision: **The use of TBHQ in category 05.3 chewing gum at a maximum level of 400 mg/kg**

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comments

DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL (DATEM) (INS 472E)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of Diacetyltartaric and Fatty Acid Esters of Glycerol in the GSFA if no additional information is provided to the 38th CCFAC.

The European Community is of the opinion that the technological need and or levels proposed for Diacetyltartaric and Fatty Acid Esters of Glycerol in the following categories seems unjustified and therefore agrees that such provisions are discontinued:

04.1.1.2	surface-treated fresh fruit	10000	mg/kg	Note 16 ¹²⁴	3
01.6.1	unripened cheese	10000	mg/kg		3
01.1.1.2	buttermilk (plain)	5000	mg/kg		3
01.5.1	milk powder and cream powder (plain)	10000	mg/kg		6
02.2	fat emulsions mainly of type water-in-oil	10000	mg/kg		6
04.1.2.12	cooked fruit	2500	mg/kg		3
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	10000	mg/kg	Note 16	3
06.4.2	dried pastas and noodles and like products	10000	mg/kg		6
13.1.1	infant formulae	5000	mg/kg		3
13.1.2	follow-up formulae	5000	mg/kg		3
06.2	flours and starches (including soybean powder)	5000	mg/kg		6
08.1.1	fresh meat, poultry, and game, whole pieces or cuts	10000	mg/kg	Note 16	3
08.1.2	fresh meat, poultry, and game, comminuted	10000	mg/kg		3
08.2.1	non-heat treated processed meat, poultry, and game products in whole pieces or cuts	10000	mg/kg		3
08.2.2	heat-treated processed meat, poultry, and game products in whole pieces or cuts	10000	mg/kg		3
08.2.3	frozen processed meat, poultry, and game products in whole pieces or cuts	10000	mg/kg	Note 16	3
08.3.1	non-heat treated processed comminuted meat, poultry, and game products	10000	mg/kg		3
08.3.2	heat-treated processed comminuted meat, poultry, and game products	10000	mg/kg		3
08.3.3	frozen processed comminuted meat, poultry, and game products	10000	mg/kg	Note 16	3
08.4	edible casings (e.g., sausage casings)	10000	mg/kg		3
09.1	fresh fish and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg	Note 16	3
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg		3
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg	Note 16	3
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg	Note 16	3
09.2.4	cooked and/or fried fish and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg		3
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg		3
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	10000	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	5000	mg/kg		3
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	1000	mg/kg		3
14.1.2.2	vegetable juice	5000	mg/kg		3
14.1.2.4	concentrates for vegetable juice	5000	mg/kg		3

¹²⁴

Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	5000	mg/kg		3
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2) If you support endorsement of these provisions for adoption at Step 8, for each of the food categories above, please comment on

Within the European Community this additive is permitted in the following food categories proposed at GMP and therefore the EC is not able to suggest particular maximum levels:

Diacetyltartaric and Fatty Acid Esters of Glycerol (INS 472e) (Emulsifier, Sequestrant, Stabilizer)					
Food Cat No.	Food Category	Max	Level	Comments	Step
01.4	cream (plain) and the like	5000	mg/kg	This should be restricted to sub category 01.4.4	6
02.1	fats and oils essentially free from water	10000	mg/kg		6
03.0	edible ices, including sherbet and sorbet	10000	mg/kg		3
03.0	edible ices, including sherbet and sorbet	1000	mg/kg		6
07.0	bakery wares	20000	mg/kg		3
07.0	bakery wares	10000	mg/kg		6
12.2.1	Herbs and spices	GMP	Mg/kg		

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No Comment

SULFITES (INS 220, 221, 222, 223, 224, 225, 227, 228, 539)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of sulfites in the GSFA if no additional information is provided to the 38th CCFAC.

The European Community does not have any additional information to provide on the specific provisions proposed.

2) If you support endorsement of these provisions for adoption at Step 8, for each of the food categories above, please comment on

The EC permits the use of sulphites in the following food categories, however subject to the restrictions mentioned under the column comments.

Food Cat No.	Food Category	Max	Level	Comments	EC comment
04.1.2.2	dried fruit	3000	mg/kg	Note 44	Proposed level too high and should be modified according to fruit e.g. as in the corresponding Codex commodity: · Dried apricots: 2000 mg/kg · Dried, grated coconut: 50 mg/kg · Raisins (only to bleached raisins) : 1500 mg/kg
04.1.2.3	fruit in vinegar, oil, or brine	350	mg/kg	Note 44	Proposed level high. 100 mg/kg sufficient
04.1.2.5	jams, jellies and marmelades	3000	mg/kg	Note 44	Proposed level too high. 100 mg/kg sufficient
04.1.2.7	candied fruit	350	mg/kg	Note 44	Proposed level high. 100 mg/kg sufficient
04.1.2.11	fruit fillings for pastries	350	mg/kg	Note 44	Proposed level high. 100 mg/kg sufficient
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	500	mg/kg	Notes 44 & 76 ¹²⁵	Proposed level high. 50 mg/kg should be sufficient and with a note specifying : "use for potatoes and white vegetables only"
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	750	mg/kg	Note 44	A note should restrict the "use in and white vegetables only". Commodity standards do not contain these uses, except in quick frozen French-fried potatoes at the level of 50 mg/kg

¹²⁵

Note 76: Use in potatoes only.

Food Cat No.	Food Category	Max	Level	Comments	EC comment
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	2500	mg/kg	Notes 44 & 105 ¹²⁶	Proposed level too high. 500 mg/kg should be sufficient
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	750	mg/kg	Note 44	Proposed level high. 100 mg/kg should be sufficient with the exception of Golden peppers in brine at 500 mg/kg
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	750	mg/kg	Note 44	Proposed level too high. 50 mg/kg should be sufficient as they undergo heat treatment.
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	750	mg/kg	Note 44	Proposed level high. 500 mg/kg should be sufficient
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	800	mg/kg	Note 44	Proposed level high. 500 mg/kg should be sufficient
06.2.2	starches	500	mg/kg	Note 44	Proposed level too high. 50 mg/kg should be sufficient
07.2	fine bakery wares (sweet, salty, savoury) and mixes	300	mg/kg	Note 44	Proposed level too high. 50 mg/kg should be sufficient. The EC permits the use only in dry biscuit.
08.1.2	fresh meat, poultry, and game, comminuted	450	mg/kg	Note 44	A Note should be added to read: "For use only in: - <i>Burger meat</i> with a minimum vegetable and/or cereal content of 4 % - <i>Breakfast sausages</i> - <i>Longaniza fresca</i> and <i>butifarra fresca</i>
08.3	processed comminuted meat, poultry, and game products	450 500	mg/kg	Note 44	A Note should be added to read: "For use only in: - <i>Burger meat</i> with a minimum vegetable and/or cereal content of 4 % - <i>Breakfast sausages</i> - <i>Longaniza fresca</i> and <i>butifarra fresca</i>
08.4	edible casings (e.g., sausage casings)	450 500	mg/kg	Note 44	A Note should be added to read: "For use only in: - <i>Breakfast sausages</i> - <i>Longaniza fresca</i> and <i>butifarra fresca</i>
09.1.2	fresh mollusks, crustaceans, and echinoderms	150	mg/kg	Note 44	
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg	Note 44	For use only in mollusks, crustaceans, and echinoderms
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	50	mg/kg	Note 44	
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Note 44	
11.1.3	soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar	20	mg/kg	Notes 44 & 111 ¹²⁷	The levels proposed in the note as carry over from the glucose syrup to sugar confectionery are very high. We propose the following note:" Note 111: Excluding dried glucose syrup and glucose syrup used in the manufacture of sugar confectionery at 50 mg/kg.

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Note 105: Except for use in dried gourd strips (KAMPYO) at 5000 mg/kg.

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Note 111: Excluding dried glucose syrup used in the manufacture of sugar confectionery at 150 mg/kg and glucose syrup used in the manufacture of sugar confectionery at 400 mg/kg.

Food Cat No.	Food Category	Max	Level	Comments	EC comment
11.1.4	lactose	20	mg/kg	Note 44	
11.2	brown sugar excluding products of food category 11.1.3	40	mg/kg	Note 44	
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	500	mg/kg	Note 44	The maximum level proposed is too high. 70 mg/kg should be sufficient
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	40	mg/kg	Note 44	
12.2.2	seasonings and condiments	200	mg/kg	Note 44	
12.3	vinegars	200	mg/kg	Note 44	
12.4	mustards	250	mg/kg	Notes 44 & 106 ¹²⁸	
12.9.5	other protein products	500	mg/kg	Note 44	The maximum level proposed is too high. 200 mg/kg should be sufficient.
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	350	mg/kg	Note 44	
14.2.1	beer and malt beverages	400	mg/kg	Note 44	The maximum level proposed is high. 50 mg/kg should be sufficient
14.2.2	cider and perry	350	mg/kg	Note 44	The maximum level proposed is too high. 200 mg/kg should be sufficient
14.2.3	grape wines	350	mg/kg	Notes 44 & 103 ¹²⁹	For the use of sulphites in wine, the EC would propose to distinguish between different types of wine for which the technological need is different (see annex that contains the regulation in the EC).
14.2.4	wines (other than grape)	350	mg/kg	Note 44	The maximum level proposed is high. 200 mg/kg should be sufficient
14.2.5	mead	350	mg/kg	Note 44	The maximum level proposed is too high. 200 mg/kg should be sufficient
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg	Note 44	The maximum level proposed is high. 200 mg/kg should be sufficient
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	50	mg/kg	Note 44	

2) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comment at this stage.

O2 limits in wine European Community Regulations

Still wines		
1) Red wine (REC n° 1493/1999 annex V A.) White wine and rosé wine (REC n° 1493/1999 annex VA.)	160 mg/l 210 mg/l	Residual sugar □ à 5g/l 210 mg/l 260 mg/l
2) Quality white wines psr REC n° 1493/1999 annex V A. point 2 b) REC n° 1622/2000 annex XII a)	300 mg/l	
3) Table wines REC n° 1622/2000 annexe XII a)	Total alcoholic strength by volume □ 15% vol and residual sugar □ 45g/l 300 mg/l	
4) Quality white wines psr REC n° 1493/1999 annex V A. point 2, d) REC n° 1622/2000 annex XII b)	400 mg/l	

¹²⁸

Note 106: Except for use in Dijon mustard at 500 mg/kg.

¹²⁹

Note 103: Except for use in special white wines at 400 mg/kg.

Liqueur wine		
REC n° 1493/1999 annex V J. point7 : Liqueur wine and quality liqueur wine psr	150 mg/l	Sugar content \leq 5 g/l 200 mg/l

Sparkling wine		
Sparkling wine (REC n° 1493/1999 annex V H. point11 d)	235 mg/l	
Quality sparkling wine (REC n° 1493/1999 annex V I. point5)	185 mg/l	
Quality sparkling wine psr (RCE n° 1493/1999 annex VI K. point7)	185 mg/l	

BRILLIANT BLUE FCF (INS 133)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of brilliant blue FCF in the GSFA if no additional information is provided to the 38th CCFAC.

The European Community has no new information to provide on the specific provisions proposed and agrees to discontinue work on these provisions, with the exception of those listed under point 2.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on

In relation to the specific provisions proposed the EC permits the use of Brilliant Blue FCF at the following food categories and maximum levels:

Food Cat No.	Food Category	Max	Level	Comments
01.6.4.2	Flavoured processed cheese,	100	mg/kg	
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg	
04.1.2.7	candied fruit	200	mg/kg	
07.2	fine bakery wares (sweet, salty, savoury) and mixes	200	mg/kg	
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg	
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 22 ¹³⁰
12.2.2	seasonings and condiments	500	mg/kg	
12.4	mustards	300	mg/kg	
12.5	soups and broths	50	mg/kg	
12.6	sauces and like products	500	mg/kg	
12.9.5	other protein products	100	mg/kg	

In addition the EC permits the use of Brilliant Blue FCF in processed mushy and garden peas (canned) at a max level of 20 mg/kg, therefore would support the use in category 04.2.2.4 with an appropriate footnote and at the lower level.

The European Scientific Committee on Food last evaluated Brilliant Blue FCF in 1983 when it established an ADI of 10 mg/kg b.w. The intake studies carried out in the EC suggest that with the current limited uses and use levels, the calculated intake by adults in tier 1 did not exceed this ADI, while the calculated intake by young children is reported by one member state as 38%. (Report from the Commission on Dietary Food Additive Intake in the European Union (COM (2001) 542 final): http://europa.eu.int/comm/food/food/chemicalsafety/additives/flav15_en.pdf)

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

The Codex standard for bouillons and consommés codex stan 117-1981, rev. 2-2001 permits the use of Brilliant Blue FCF at the level of 50 mg/kg. For this reason the European Community wishes to maintain, as mentioned above, the entry 12.5 soups and broths but at a maximum level of 50 mg/kg and not at the proposed level of 300 mg/kg.

CANTHAXANTHIN (INS 161G)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of canthaxanthin in the GSFA if no additional information is provided to the 38th CCFAC.

The European Scientific Committee on Food has allocated the same ADI to canthaxanthin (0.03 mg/kg b.w) as JECFA. The major concern the Committee has on the use of canthaxanthin is the formation of retinal crystalline deposit (Report of the Scientific Committee for Food. 43rd series). Due to this safety concern, the only permitted use in the EC is in traditional French sausage (Saucisse de Strasbourg) and therefore the European Community therefore supports discontinuation of the work on all specific provisions.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on

Not applicable

¹³⁰ Note 22: For use in smoked fish products only.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comment

CARMINES (INS 120)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of carmines in the GSFA if no additional information is provided to the 38th CCFAC.

The European Community agrees with 37th CCFAC's decision to discontinue work on the specific provisions with the exception of those mentioned under point 2.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on

The EC permits the use of carmines in the following food categories proposed and at the following maximum levels:

Food Cat No.	Food Category	Max	Level	Comments
05.3	chewing gum	300 4020	mg/kg	The proposed level of 1020 mg /kg is very high.
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16 ¹³¹ Though under discussion in the paper on glazes
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16 Though under discussion in the paper on glazes
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	100 4000	mg/kg	The proposed level of 1000 mg/kg is too high.
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg	

The intake studies carried out in the EC suggest that with the current limited uses and use levels, intake by adults and the whole population is reported in the range of 3-22% of ADI, while the calculated intake by young children is reported by one member state as 80%. (Report from the Commission on Dietary Food Additive Intake in the European Union (COM (2001) 542 final): http://europa.eu.int/comm/food/food/chemicalsafety/additives/flav15_en.pdf)

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No Comment

CAROTENES, VEGETABLE (INS 160AII)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of vegetable carotenes in the GSFA if no additional information is provided to the 38th CCFAC.

The European Community cannot provide information for the following or questions the need for these specific provisions and therefore can agree discontinuing work:

Food Cat No.	Food Category	Max	Level	Comments
01.4	cream (plain) and the like	1000	mg/kg	
01.6.3	whley cheese	1000	mg/kg	Note 3 ¹³²
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	4	mg/kg	
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	200	mg/kg	
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg	
05.1.3	cocoa-based spreads, including fillings	1000	mg/kg	
05.1.4	cocoa and chocolate products	1000	mg/kg	
05.1.4	cocoa and chocolate products	500	mg/kg	
05.1.5	imitation chocolate, chocolate substitute products	1000	mg/kg	
05.1.5	imitation chocolate, chocolate substitute products	500	mg/kg	
06.4.2	dried pastas and noodles and like products	1000	mg/kg	
06.4.3	pre-cooked pastas and noodles and like products	1000	mg/kg	
07.1.6	mixes for breads and ordinary bakery wares		GMP	
08.1.2	fresh meat, poultry, and game, comminuted	20	mg/kg	Note 117 ¹³³

¹³¹ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

¹³² **Note 3:** Surface treatment

¹³³ **Note 117:** Except for use in loganiza (fresh, uncured sausage) at 1000 mg/kg

Food Cat No.	Food Category	Max	Level	Comments
09.1.1	fresh fish		GMP	Note 50 ¹³⁴
12.10.3	fermented soybean paste (e.g., miso)		GMP	
13.1.3	formulae for special medical purposes for infants	30	mg/kg	Note 84 ¹³⁵
14.1.2.2	vegetable juice	2000	mg/kg	
14.1.2.4	concentrates for vegetable juice	2000	mg/kg	
16.0	composite foods - foods that could not be placed in categories 01 - 15	1000	mg/kg	

The European Community questions the need for the use of carotenes in category 16.0 composite foods. Justification should be provided for the proposed level and why the carry over wouldn't be sufficient.

The European Community cannot support at this stage the following provisions as discussions on this issue are ongoing within the discussion paper for food additive provisions in glazes for foods:

04.1.1.2	surface-treated fresh fruit		GMP	Note 16 ¹³⁶	
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		GMP	Note 16	
08.1.1	fresh meat, poultry, and game, whole pieces or cuts	5000	mg/kg	Note 16	
09.1.2	fresh mollusks, crustaceans, and echinoderms		GMP	Note 16	

2) If you support endorsement of these provisions, for each of the food categories above, please comment on

The EC permits the use of carotenes in the following categories at GMP level. The European Community cannot for this reason give comments on the proposed levels. However, we note that for food category 02.2.1.2 the use level of 25 mg/kg is consistent with the provision for beta-carotene in the Codex commodity standard for margarine (032-1989).

The European Community believes that the provision for category 9.2.4.1 is too wide and it is therefore appropriate to restrict it by the addition of Note 50.

Food Cat No.	Food Category	Max	Level	Comments	Step
02.2.1.2	margarine and similar products	1000	mg/kg		3
02.2.1.2	margarine and similar products	26	mg/kg		8
04.1.2.11	fruit fillings for pastries	4	mg/kg		6
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	1320	mg/kg		3
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 95 ¹³⁷	6
09.2.4.1	cooked fish and fish products	1000	mg/kg	Note 95	3
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	500	mg/kg		3
14.1.3.2	vegetable nectar	2000	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	1000	mg/kg		3
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	400	mg/kg		3
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	25	mg/kg		6
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	20000	mg/kg		3

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

The Codex Standards on Cocoa Butters (86-1981) and Chocolate (87-1981) do not include the use of colours. Therefore, the European Community supports the discontinuation of work on categories 5.1.3 and 5.1.4.

There are several Codex Standards on canned vegetables (e.g. tomatoes, carrots, sweet corn). Most of these contain no use of colours. Therefore, the European Community supports the discontinuation of work on category 04.2.2.4.

CHLOROPHYLLS, COPPER COMPLEXES (INS 141I & 141II)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of chlorophyll copper complexes in the GSFA if no additional information is provided to the 38th CCFAC.

The European Community agrees with this recommendation except from the provisions mentioned under point 2.

¹³⁴ **Note 50:** For use in fish roe only

¹³⁵ **Note 84:** For infants over 1 year of age only.

¹³⁶ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

¹³⁷ **Note 95:** For use in surimi and fish roe products only.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on:

The European Community recalls that for most of the specific provisions the request for information was mainly on the reporting basis of the maximum level i.e. as copper.

The European Community has no information in relation to levels expressed “as copper” as the EC permits the use of chlorophylls (copper complex) in the following proposed categories at GMP level:

dairy-based drinks (01.1.2), cheese (01.6.1, 01.6.2.2, 01.6.2.3, 01.6.4, 01.6.5, 01.6.6), desserts (01.7, 02.4, 04.1.2.9, 06.5, 10.4), edible ices (03.0), canned or bottled (pasteurised) fruit (04.1.2.4), jams, jellies and marmalades (04.1.2.5), fruit-based spreads (04.1.2.6), candied fruit (04.1.2.7), vegetables in vinegar, oil, brine or soy sauce (04.2.2.3), confectionery (5.2, 5.3, 5.4), breakfast cereals (06.3), fine bakery wares (07.2), frozen fish, fish fillets(09.2.1, surimi and fish roe as stated in Note 95), salmon substitutes (09.3.3), fresh eggs (10.1), seasonings and condiments (12.2.2), mustards (12.4), soups and broths (12.5.1, 12.5.2), sauces and like products (12.6), other protein products (12.9.5), dietetic foods (13.3, 13.4, 13.5), food supplements (13.6), vegetable nectars (14.1.3.2, 14.1.3.4), water-based flavoured drinks (14.1.4), cider and perry (14.2.2), wines (other than grape) (14.2.4), distilled spirituous beverages (14.2.6), snacks (15.1, 15.2)

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

The Codex Standards on Cocoa Butters (86-1981) and Chocolate (87-1981) do not include the use of colours. Therefore, the European Community supports the discontinuation of work on categories 05.1.2, 5.1.3 and 5.1.4.

The Codex Standards on Butter, Margarine and Named animal fats, contain proposals on the use of colours, however, not for chlorophylls. Therefore, the European Community supports the discontinuation of work on category 02.0.

ERYTHROSINE (INS 127)**1) Please indicate whether the WG should reaffirm the 37th CCFAC’s decision to discontinue work on specific provisions for the use of erythrosine in the GSFA if no additional information is provided to the 38th CCFAC.**

The European Community notes the low ADI which JECFA has established for this additive at 0.1 mg/kg bw/d. Within the EU this additive is only permitted in cocktail cherries and candied cherries and in Bigarreaux cherries and in cocktails. The European Community therefore agrees with the recommendation to discontinue work on these specific provisions.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on

No comments

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comments

GRAPE SKIN EXTRACT (INS 163II)**1) Please indicate whether the WG should reaffirm the 37th CCFAC’s decision to discontinue work on specific provisions for the use of grape skin extract in the GSFA if no additional information is provided to the 38th CCFAC.**

The European Community agrees discontinuing work on the specific provisions with the exception of those mentioned under point 2.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on:

The EC permits the use of grape skin extract in the following proposed categories:

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	
01.6.2.2	rind of ripened cheese	
01.6.5	cheese analogues	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	
03.0	edible ices, including sherbet and sorbet	
04.1.2.5	jams, jellies and marmelades	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	
04.1.2.7	candied fruit	
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	

04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	
04.1.2.11	fruit fillings for pastries	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	
05.1.5	imitation chocolate, chocolate substitute products	
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	
05.3	chewing gum	
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	
06.3	breakfast cereals, including rolled oats	
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	
08.4	edible casings (e.g., sausage casings)	
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	Note 22 ¹³⁸
09.3.3	salmon substitutes, caviar, and other fish roe products	
10.1	fresh eggs	Note 4 ¹³⁹
10.4	egg-based desserts (e.g., custard)	
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	
12.4	mustards	
12.5	soups and broths	
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	
12.6.3	mixes for sauces and gravies	
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	
12.9.5	other protein products	
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	
13.4	dietetic formulae for slimming purposes and weight reduction	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	
13.6	food supplements	
14.1.3.2	vegetable nectar	
14.1.3.4	concentrates for vegetable nectar	
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	
14.2.2	cider and perry	
14.2.4	wines (other than grape)	
14.2.6	distilled spirituous beverages containing more than 15% alcohol	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	

The European Scientific Committee for Food did not allocate an ADI to anthocyanins. Therefore the use of grape skin extract in the above categories is permitted in the EC at GMP level. The European Community is therefore not able at this stage to provide information in relation to the use levels.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comment at this stage.

IRON OXIDES (INS 172I, 172II, 172III)

1) Please indicate whether the WG should reaffirm the 37th CCFAC's decision to discontinue work on specific provisions for the use of iron oxides in the GSFA if no additional information is provided to the 38th CCFAC.

2) If you support endorsement of these provisions, for each of the food categories above, please comment on

The EC permits the use of iron oxides in the following proposed categories:

01.6.1	unripened cheese	
01.6.3	whey cheese	
01.6.5	cheese analogues	
05.3	chewing gum	
09.1.1	fresh fish	Note 50 ¹⁴⁰

¹³⁸ **Note 22:** For use in smoked fish products only.

¹³⁹ **Note 4:** For decoration, stamping, marking or branding the product.

09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Note 95 ¹⁴¹
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	
10.4	egg-based desserts (e.g., custard)	
12.4	mustards	
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	
12.9.5	other protein products	
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	
13.4	dietetic formulae for slimming purposes and weight reduction	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	
13.6	food supplements	
14.1.3.2	vegetable nectar	
14.1.3.4	concentrates for vegetable nectar	
14.2.2	cider and perry	
14.2.4	wines (other than grape)	
14.2.6	distilled spirituous beverages containing more than 15% alcohol	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	

The European Scientific Committee for Food in its latest evaluation in June 1975 allocated to iron oxides an ADI “not specified”. Hence the use of iron oxides in the above categories is permitted in the EC at GMP level. Therefore the European Community is not able at this stage to provide information in relation to the maximum use levels.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

The Codex Standard on Cocoa Butters (86-1981) does not include the use of colours. Therefore, the European Community supports the discontinuation of work on category 5.1.3.

There are several Codex Standards on canned vegetables (e.g tomatoes, carrots, sweet corn). Most of these contain no use of colours. Therefore, the European Community supports the discontinuation of work on category 04.2.2.4.

RIBOFLAVINS (INS 101I, 101II)

Request for Comment- Riboflavins (INS 101i, 101ii)

1) Please indicate whether the WG should reaffirm the 37th CCFAC’s decision to discontinue work on specific provisions for the use of riboflavins in the GSFA if no additional information is provided to the 38th CCFAC.

The European Community has no additional information to submit on the proposed specific provisions.

2) If you support endorsement of these provisions, for each of the food categories above, please comment:

The EC allows the use of riboflavins in the following of the proposed food categories at GMP level. The European Community has no information that the use in these food categories at the proposed level raises any safety concerns.

Riboflavins (INS 101i, 101ii) (Colour)					
Food Cat No.	Food Category	Max	Level	Comments	Step
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 95 ¹⁴²	6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	300	mg/kg		3

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comments at this stage.

CASTOR OIL

No Comments

POLYSORBATES (INS 432, 433, 434, 435, 436)

1) Please indicate whether the WG should reaffirm previous eWG’s recommendations on specific provisions for the use of polysorbates in the GSFA.

Polysorbates are proposed for a broad variety of foodstuffs at high use levels considering that the ADI assigned to polysorbates by JECFA is 25 mg/kg b.w . In order to avoid ADI concerns the suggested uses of polysorbates must be reviewed.

¹⁴⁰ **Note 50:** For use in fish roe only.

¹⁴¹ **Note 95:** For use in surimi and fish roe products only.

¹⁴² **Note 95:** For use in surimi and fish roe products only.

The technological need for polysorbates in the following categories seems unjustified:

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	5000	mg/kg
01.4	cream (plain) and the like	10000	mg/kg
01.4.2	sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	3000	mg/kg
01.6.1	unripened cheese	80	mg/kg
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	10000	mg/kg
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	30	mg/kg
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	3000	mg/kg
05.1.2	cocoa mixes (syrups)	500	mg/kg
05.1.3	cocoa-based spreads, including fillings	4600	mg/kg
05.1.4	cocoa and chocolate products	10000	mg/kg
05.1.5	imitation chocolate, chocolate substitute products	5000	mg/kg
06.4.2	dried pastas and noodles and like products	10000	mg/kg
06.4.3	pre-cooked pastas and noodles and like products	10000	mg/kg
06.6	batters (e.g., for breading or batters for fish or poultry)	5000	mg/kg
07.1.1	bread and rolls	3000	mg/kg
07.1.2	crackers, excluding sweet crackers	5000	mg/kg
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	10000	mg/kg
07.1.4	bread-type products, including bread stuffing and bread crumbs	5000	mg/kg
07.1.5	steamed breads and buns	5000	mg/kg
07.1.6	mixes for breads and ordinary bakery wares	5000	mg/kg
08.2	processed meat, poultry, and game products in whole pieces or cuts	10000	mg/kg
08.3	processed comminuted meat, poultry, and game products	10000	mg/kg
08.4	edible casings (e.g., sausage casings)	1500	mg/kg
12.1.1	salt	10	mg/kg
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	10000	mg/kg
12.2.1	herbs and spices	2000	mg/kg
12.2.2	seasonings and condiments	4600	mg/kg
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	4600	mg/kg
12.6.3	mixes for sauces and gravies	5000	mg/kg
12.6.4	clear sauces (e.g., fish sauce)	4600	mg/kg
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	2000	mg/kg
12.9.5	other protein products	4000	mg/kg
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	10000	mg/kg
14.1.4.1	carbonated water-based flavoured drinks	500	mg/kg
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	500	mg/kg
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	45000	mg/kg
14.2.6	distilled spirituous beverages containing more than 15% alcohol	120	mg/kg
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	120	mg/kg
16.0	composite foods - foods that could not be placed in categories 01 - 15	2000	mg/kg

2)

The following provisions are in line with those in which these additives are permitted within the European Union

01.3.2	beverage whiteners	5000	mg/kg
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	3000	mg/kg
05.2.2	soft candy	1000	mg/kg
05.2.3	nougats and marzipans	1000	mg/kg
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	5000	mg/kg
13.6	food supplements	790	mg/kg

For the following provisions the EC suggests different maximum levels or other notes limiting the use.

01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	5000	mg/kg	Suggested level 3000mg/kg
02.0	fats and oils, and fat emulsions	10000	mg/kg	In fat emulsions for baking purposes only
04.1.2.11	fruit fillings for pastries	5000	mg/kg	Suggested level 3000 mg/kg
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	10000	mg/kg	Suggested level 1000 mg/kg

05.2.1	hard candy	10000	mg/kg	Suggested level 1000 mg/kg
05.3	chewing gum	20000	mg/kg	Suggested level 5000 mg/kg
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	7000	mg/kg	Suggested level 3000 mg/kg
07.2	fine bakery wares (sweet, salty, savoury) and mixes	5000	mg/kg	Suggested level 3000 mg/kg
10.4	egg-based desserts (e.g., custard)	5000	mg/kg	Suggested level 3000 mg/kg

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No Comment

BENZOYL PEROXIDE, INS 928

The EC does not permit the use of Benzoyl Peroxide, INS 928 and therefore the European Community does not support any of the provisions listed.

ALLURA RED AC (INS 129)

a) Which food additive provisions you support for adoption at Step 5/8 or 8,

The European Community can support the following provisions and those under point c subject to the proposed revisions:

Food Cat No.	Food Category	Max	Level	Comments	Step
01.6.2.2	rind of ripened cheese	100	mg/kg		6
04.1.2.4	Canned or bottled (pasteurized) fruit	200	mg/kg		6
05.1.5	imitation chocolate, chocolate substitute products	300	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		6
08.4	edible casings (e.g., sausage casings)		GMP		6
09.1.1	fresh fish	300	mg/kg	Note 50 ¹⁴³	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 95 ¹⁴⁴	6
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		6
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg		6
10.1	fresh eggs	100	mg/kg	Note 4	3
11.4	Other sugars and syrups (e.g. xylose, maple syrup, sugar toppings)	300	Mg/kg		6
12.2.2	seasonings and condiments	500	mg/kg		6
12.4	mustards	300	mg/kg		6
12.6	saucers and like products	500	mg/kg		6
12.9.5	other protein products	100	mg/kg		6
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		6
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		6
13.6	food supplements	300	mg/kg		6
14.2.2	cider and perry	200	mg/kg		6
14.2.4	wines (other than grape)	200	mg/kg		6
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg		6
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		6
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	200	mg/kg		6
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		6

b) Which food additive provisions you support requesting additional information and the type of information needed,

The European Community does not support any of the remaining provisions if no new information is provided.

More specifically, the European Community cannot support at this stage the provisions for the categories: 08.1.1 (fresh meat, poultry, and game, whole pieces or cuts) and 08.2 (processed meat, poultry, and game products in whole pieces or cuts), as discussions on this issue is ongoing within the discussion paper for food additive provisions in glazes for foods.

The maximum level of 1572 mg/kg for category 14.1.4.3 concentrates (liquid or solid) for water-based flavoured drinks, seems incorrect.

¹⁴³ Note 50: For use in fish roe only.

¹⁴⁴ Note 95: For use in surimi and fish roe products only.

The European Community questions the need for the use of allura red AC in category 16.0 composite foods. Justification should be provided for the proposed level and why carry over would not be sufficient.

e) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.):

The European Community supports revision of the following provisions with regard to the maximum use levels. The proposed maximum levels are those permitted in the EC and we therefore believe they are sufficient for the intended purpose. For the provisions 08.1.2 and 08.3.2 the European Community suggests the addition of a Note.

Food Cat No.	Food Category	Max	Level	Comments (proposed max level)	Step
01.6.4	processed cheese	200	mg/kg	100 mg/kg	6
01.6.5	cheese analogues	300	mg/kg	Note 3 100 mg/kg	3
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	300	mg/kg	150 mg/kg	6
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	300	mg/kg	150 mg/kg	6
03.0	edible ices, including sherbet and sorbet	300	mg/kg	150 mg/kg	6
04.1.2.7	candied fruit	300	mg/kg	200 mg/kg	6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	800	mg/kg	500 mg/kg	6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	300	mg/kg	150 mg/kg	6
04.1.2.11	fruit fillings for pastries	800	mg/kg	500 mg/kg	6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	348	mg/kg	300 mg/kg	6
05.3	chewing gum	467	mg/kg	300 mg/kg	6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	300	mg/kg	150 mg/kg	6
07.2.1	cakes, cookies and pies (e.g., fruit-filled or custard types)	2200	mg/kg	200 mg/kg	6
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	300	mg/kg	200 mg/kg	6
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)	300	mg/kg	200 mg/kg	6
08.1.2	fresh meat, poultry, and game, comminuted	25	mg/kg	Note Z¹⁴⁵:	6
08.3.2	heat-treated processed comminuted meat, poultry, and game products	25	mg/kg	Note Z	6
09.2.4.1	cooked fish and fish products	500	mg/kg	100 mg/kg	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 22 ¹⁴⁶ 100 mg/kg	6
10.4	egg-based desserts (e.g., custard)	300	mg/kg	150 mg/kg	6
12.5	soups and broths	300	mg/kg	50 mg/kg	6
14.1.4.1	carbonated water-based flavoured drinks	300	mg/kg	100 mg/kg	6
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	300	mg/kg	100 mg/kg	6

d) Whether you support the previous recommendations of the Quality Control Working Group to discontinue work on specific provisions and to include the indicated amendments.

- The European Community agrees with the recommendation of the Quality Control Working Group to discontinue work on the provisions indicated in strikethrough.
- The European Community can support the recommendation for amendment on provision 08.4.
- The European Community does not support the recommendations for amendments on provisions 02.3, 04.2.1.2, 06.2, 06.3, 07.1.1, 07.1.2, 07.1.3, 07.1.4, 07.1.5, 07.1.6, 08.1.1, 08.2,

2) Please indicate the basis of your views by addressing the following:

The European Community recognises that this colour has been assessed for its safety by JECFA and that an ADI has been established, however in order to protect against such ADI being exceeded strongly supports the position that colours should only be included in the food categories and at the maximum levels in which the colours is justified.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

The Codex Standards on Margarine and Named animal fats, contain proposals on the use of colours, however, not for Allura Red AC. Therefore, the European Community supports the discontinuation or work on categories 02.1.3 lard, tallow, fish oil and other animal fats, and 02.2.1.2 margarine and similar products.

¹⁴⁵ Note Z: For use only in burger meat with a minimum vegetable and/or cereal content of 4%.

¹⁴⁶ Note 22: For use in smoked fish products only.

The Codex Standard on Cocoa Butters (86-1981) and Chocolate (87-1981) does not include the use of colours. Therefore, the European Community supports the discontinuation of work on categories 5.1.3 and 5.1.4.

The Codex Standard on Jam (fruit preserves) and jellies (79-1981) contains the use of several colours but not the use of Allura Red AC. Therefore the European Community supports discontinuation of work on category 04.1.2.5. Similarly most of the Codex Standards on canned vegetables (e.g tomatoes, carrots, sweet corn, mushrooms) contain no use of colours. The European Community therefore proposes discontinuation of work on categories 04.2.2.4 and 04.2.2.6.

The use of Allura Red AC in category 06.2 Flours and starches (including soybean powder) is not compatible with several Codex Standards on flours (e.g. wheat flour, whole maize (corn) meal, pearl millet flour, sorghum flour) which do not contain any use of colours.

CARAMEL COLOUR, CLASS III (INS 150C)

1) a) Which food additive provisions you support for adoption at Step 5/8 or 8,

The EC can support in general those provisions with a numerical use level which replace already adopted provisions with use level reported as GMP.

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50000	mg/kg		
01.3.2	beverage whiteners	1000	mg/kg		
01.4.3	clotted cream (plain)	5000	mg/kg		
01.4.4	cream analogues	5000	mg/kg		
01.5.2	milk and cream powder analogues	5000	mg/kg		
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50000	mg/kg		
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	20000	mg/kg		
03.0	edible ices, including sherbet and sorbet	30000	mg/kg		
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds		GMP		
05.1.5	imitation chocolate, chocolate substitute products		GMP		
06.3	breakfast cereals, including rolled oats	50000			
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	50000			
06.6	batters (e.g., for breading or batters for fish or poultry)	50000			
06.7	pre-cooked or processed rice products, including rice cakes (Oriental type only)	50000			
07.2	fine bakery wares (sweet, salty, savoury) and mixes	50000			
09.1.1	fresh fish		GMP	Notes 3 & 50 ¹⁴⁷	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 50	6
09.2.4.1	cooked fish and fish products		GMP	Note 50	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 50	6
10.1	fresh eggs	20000	mg/kg	Note 4 ¹⁴⁸	3
10.4	egg-based desserts (e.g., custard)	20000	mg/kg		3
11.1.2	powdered sugar, powdered dextrose	50000	mg/kg		3
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		3
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	100000	mg/kg		3
12.2.2	seasonings and condiments		GMP		Adopted
12.3	vinegars	100000	mg/kg		3
12.4	mustards	100000	mg/kg		3
12.5	soups and broths	100000	mg/kg		3
12.6	sauces and like products	100000	mg/kg		3
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	100000	mg/kg		3
12.9.1	soybean protein products	100000	mg/kg		3
12.9.3	semi-dehydrated bean curd	80000	mg/kg		3
12.9.5	other protein products	100000	mg/kg		3
12.10	fermented soybean products	100000	mg/kg		3
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000	mg/kg		3
13.4	dietetic formulae for slimming purposes and weight reduction	20000	mg/kg		3
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	20000	mg/kg		3

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Note 50: For use in fish roe only.

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Note 4: For decoration, stamping, marking or branding the product.

13.6	food supplements	20000	mg/kg		3
14.1.3.2	vegetable nectar	50000	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	50000	mg/kg		3
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	50000	mg/kg		3
15.0	ready-to-eat savouries	10000	mg/kg		3

b) Which food additive provisions you support requesting additional information the type of information needed:

01.6	cheese and analogues	50000	mg/kg		
01.8	whey and whey products, excluding whey cheeses	50000	mg/kg		
02.1	fats and oils essentially free from water	20000	mg/kg		
02.2.1.2	margarine and similar products	20000	mg/kg		
02.2.1.3	blends of butter and margarine	20000	mg/kg		
02.2.2	emulsions containing less than 80% fat	20000	mg/kg		
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	20000	mg/kg		
04.1.2	processed fruit	80000	mg/kg		
04.2.2	processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	80000	mg/kg		
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds		GMP		
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 category 12.10		GMP		
05.0	confectionery	50000	mg/kg		
05.1.1	cocoa mixes (powders) and cocoa mass/cake		GMP		
05.1.2	cocoa mixes (syrops)		GMP		
05.1.4	cocoa and chocolate products		GMP		
06.4.2	dried pastas and noodles and like products	50000	mg/kg		
06.4.3	pre-cooked pastas and noodles and like products	50000	mg/kg		
07.1.2	crackers, excluding sweet crackers	50000	mg/kg		
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	50000	mg/kg		
07.1.4	bread-type products, including bread stuffing and bread crumbs	50000	mg/kg		
07.1.5	steamed breads and buns	50000	mg/kg		
07.1.6	mixes for breads and ordinary bakery wares	50000	mg/kg		
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		
10.2	egg products	20000	mg/kg		3
10.3	dried and/or heat coagulated egg products	20000	mg/kg		3
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	50000	mg/kg		3
14.1.2.2	vegetable juice	50000	mg/kg		3
14.1.2.4	concentrates for vegetable juice	50000	mg/kg		3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	100000	mg/kg		3
14.2	alcoholic beverages, including alcohol-free and low-alcoholic counterparts	50000	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	20000	mg/kg		3

The European Community permits the use of caramel in the food categories 01.6.1, 01.6.2.2, 01.6.3, 01.6.4 and 01.6.5 as adopted but cannot support the provision for the broader category 01.6 cheese and analogues without additional information for the technological need.

The proposed provision for category 09.4 is much broader than the adopted one, because the Note 50 'for use in fish roe only' is deleted.

The European Community supports the provisions 14.2.1, 14.2.2, 14.2.3.3, 14.2.4, 14.2.5, 14.2.6 and 14.2.7 as adopted, but cannot support the proposed provision for the broader food category 14.2 alcoholic beverages, including alcohol-free and low-alcoholic counterparts which would include also the category 14.2.3 Grape wines.

The European Community questions the need for the use of caramel in category 16.0 composite foods. Justification should be provided for the proposed level and why the carry over wouldn't be sufficient.

The European Community cannot support at this stage the following provisions for use of caramel in the glaze for meat and fish, as discussions on this issue are ongoing within the discussion paper for food additive provisions in glazes for foods:

08.0	meat and meat products, including poultry and game	200000	mg/kg	Note 16 ¹⁴⁹	3
09.1	fresh fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg	Note 16	3

c) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.)

d) Whether you support the previous recommendations of the Quality Control Working Group to discontinue work on specific provisions.

The European Community can agree discontinuing work on the specific provisions indicated in strikethrough font.

2) Please indicate the basis of your views by addressing the following:

The European Community recognizes that this colour has been assessed for its safety by JECFA and that an ADI has been established, however in order to protect against such ADI being exceeded strongly supports the position that colours should only be included in the food categories and at the maximum levels in which the colour is justified.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

The Codex commodity standard for Whey powders (A-15-2003) does not provide for the use of caramel colour in these products. Therefore, the European Community does not support the proposed provision for category 01.8 whey and whey products, excluding whey cheeses. The Codex Standards Cocoa Powders (105-2001), Cocoa (Cacao) mass (141-2001) and Chocolate (87-1981) do not include the use of colours. Therefore, the European Community does not support the proposed provisions for categories 5.1.1 and 5.1.4.

CARAMEL COLOUR CLASS IV, (INS 150D)

1) Which food additive provisions you support for adoption at Step 5/8 or 8,

The European Community can generally support those provisions with a numerical use level which replace already adopted provisions with use level reported as GMP.

Food Cat No.	Food Category	Max Level		Comments	Step
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50000	mg/kg		3
01.3.2	beverage whiteners	1000	mg/kg		3
01.4.3	clotted cream (plain)	5000	mg/kg		3
01.4.4	cream analogues	5000	mg/kg		3
01.5.2	milk and cream powder analogues	5000	mg/kg		3
01.6.4.1	plain processed cheese		GMP		6
01.6.4.2	flavoured processed cheese, including containing fruit, vegetables, meat, etc.	100	mg/kg	Notes 5 ¹⁵⁰ & 72 ¹⁵¹	6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50000	mg/kg		3
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	20000	mg/kg		3
03.0	edible ices, including sherbet and sorbet	30000	mg/kg		3
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds		GMP		6
05.1.5	imitation chocolate, chocolate substitute products		GMP		6
06.3	breakfast cereals, including rolled oats	50000	mg/kg		3
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	50000	mg/kg		3
06.6	batters (e.g., for breading or batters for fish or poultry)	50000	mg/kg		3
06.7	pre-cooked or processed rice products, including rice cakes (Oriental type only)	50000	mg/kg		3
07.2	fine bakery wares (sweet, salty, savoury) and mixes	50000	mg/kg		3
09.1.1	fresh fish		GMP	Notes 3 & 50 ¹⁵²	6
09.2.1	frozen fish, fish fillets, and fish products, including mollusks,		GMP	Note 50	6

¹⁴⁹ **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

¹⁵⁰ **Note 5:** Used in raw materials for manufacture of the finished food.

¹⁵¹ **Note 72:** Ready-to-eat basis.

¹⁵² **Note 50:** For use in fish roe only.

Food Cat No.	Food Category	Max Level		Comments	Step
	crustaceans, and echinoderms				
09.2.4.1	cooked fish and fish products		GMP	Note 50	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 50	6
10.1	fresh eggs	20000	mg/kg	Note 4 ¹⁵³	3
10.4	egg-based desserts (e.g., custard)	20000	mg/kg		3
11.1.2	powdered sugar, powdered dextrose	50000	mg/kg		3
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		3
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	100000	mg/kg		3
12.3	vinegars	100000	mg/kg		3
12.4	mustards	100000	mg/kg		3
12.5	soups and broths	100000	mg/kg		3
12.6	sauces and like products	100000	mg/kg		3
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	100000	mg/kg		3
12.9.1	soybean protein products	100000	mg/kg		3
12.9.3	semi-dehydrated bean curd	80000	mg/kg		3
12.9.5	other protein products	100000	mg/kg		3
12.10	fermented soybean products	100000	mg/kg		3
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000	mg/kg		3
13.4	dietetic formulae for slimming purposes and weight reduction	20000	mg/kg		3
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	20000	mg/kg		3
13.6	food supplements	20000	mg/kg		3
14.1.3.2	vegetable nectar	50000	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	50000	mg/kg		3
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	50000	mg/kg		3
14.2.5	mead		GMP		6
15.0	ready-to-eat savouries	10000	mg/kg		3

Which food additive provisions you support requesting additional information the type of information needed,:

Food Cat No.	Food Category	Max Level		Comments	Step
01.6	cheese and analogues	50000	mg/kg		3
01.8	whey and whey products, excluding whey cheeses	50000	mg/kg		3
02.1	fats and oils essentially free from water	20000	mg/kg		3
02.2.1.2	margarine and similar products	20000	mg/kg		3
02.2.1.3	blends of butter and margarine	20000	mg/kg		3
02.2.2	emulsions containing less than 80% fat	20000	mg/kg		3
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	20000	mg/kg		3
04.1.2	processed fruit	80000	mg/kg		3
04.2.2	processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	80000	mg/kg		3
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds		GMP	Note 76 ¹⁵⁴	6
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 category 12.10		GMP		6
05.0	confectionery	50000	mg/kg		3
05.1.1	cocoa mixes (powders) and cocoa mass/cake		GMP		6
05.1.2	cocoa mixes (syrops)		GMP		6
05.1.4	cocoa and chocolate products		GMP		6
06.4.2	dried pastas and noodles and like products	50000	mg/kg		3
06.4.3	pre-cooked pastas and noodles and like products	50000	mg/kg		3
07.1.2	crackers, excluding sweet crackers	50000	mg/kg		3
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	50000	mg/kg		3

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Note 4: For decoration, stamping, marking or branding the product.

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Note 76: Use in potatoes only.

Food Cat No.	Food Category	Max Level		Comments	Step
07.1.4	bread-type products, including bread stuffing and bread crumbs	50000	mg/kg		3
07.1.5	steamed breads and buns	50000	mg/kg		3
07.1.6	mixes for breads and ordinary bakery wares	50000	mg/kg		3
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
10.2	egg products	20000	mg/kg		3
10.3	dried and/or heat coagulated egg products	20000	mg/kg		3
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	50000	mg/kg		3
14.1.2.2	vegetable juice	50000	mg/kg		3
14.1.2.4	concentrates for vegetable juice	50000	mg/kg		3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	100000	mg/kg		3
14.2	alcoholic beverages, including alcohol-free and low-alcoholic counterparts	50000	mg/kg		3
16.0	composite foods - foods that could not be placed in categories 01 - 15	20000	mg/kg		3

The European Community permits the use of caramel in the food categories 01.6.1, 01.6.2.2, 01.6.3, 01.6.4 and 01.6.5, but cannot support the provision for the broader category 01.6 cheese and analogues without additional information for the technological need.

The proposed provision for category 09.4 is much broader than the adopted one, because the Note 50 'for use in fish roe only' is deleted.

The European Community supports the provisions 14.2.1, 14.2.2, 14.2.3.3, 14.2.4, 14.2.5, 14.2.6 and 14.2.7, but cannot support the proposed provision for the broader food category 14.2 alcoholic beverages, including alcohol-free and low-alcoholic counterparts as this would extend the use also in category 14.2.3 Grape wines.

The European Community questions the need for the use of caramel in category 16.0 composite foods. Justification should be provided for the proposed level and why the carry over wouldn't be sufficient.

The European Community cannot support at this stage the following provisions for use of caramel in the glaze for meat and fish, as discussions on this issue are ongoing within the discussion paper for food additive provisions in glazes for foods:

08.0	meat and meat products, including poultry and game	200000	mg/kg	Note 16 ¹⁵⁵	3
09.1	fresh fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg	Note 16	3

c) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.), and

d) Whether you support the previous recommendations of the Quality Control Working Group to discontinue work on specific provisions and to include the indicated amendments.

The European Community can agree discontinuing work on the specific provisions indicated in strikethrough font.

2) Please indicate the basis of your views by addressing the following:

The European Community recognizes that this colour has been assessed for its safety by JECFA and that an ADI has been established, however in order to protect against such ADI being exceeded strongly supports the position that colours should only be included in the food categories and at the maximum levels in which the colour is justified.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

The Codex commodity standard for Whey powders (A-15-2003) does not provide for the use of caramel colour in these products. Therefore, the European Community does not support the proposed provision for category 01.8 whey and whey products, excluding whey cheeses.

The Codex Standards Cocoa Powders (105-2001), Cocoa (Cacao) mass (141-2001) and Chocolate (87-1981) do not include the use of colours. Therefore, the European Community does not support the proposed provisions for categories 5.1.1 and 5.1.4.

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Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

CAROTENOIDS (INS 160AI, 160AII, 160E, 160F)

See comments for carotenes for 160a (i) and (ii), and for sunset yellow for 160 e&f

FAST GREEN FCF (INS 143)**1) Which food additive provisions you support for adoption at Step 5/8 or 8,**

The EC does not permit the use of Fast Green FCF (INS 143). The European Community does not oppose to the use of this colour in the following categories, but is not in the position to provide recommendations on use levels:

Food Cat No.	Food Category	Max	Level	Comments	Step
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	100	mg/kg		6
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	100	mg/kg		6
04.1.2.7	candied fruit	100	mg/kg		6
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	100	mg/kg		6
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	100	mg/kg		6
04.1.2.11	fruit fillings for pastries	100	mg/kg		6
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	100	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	100	mg/kg		6
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	100	mg/kg		6
07.2	fine bakery wares (sweet, salty, savoury) and mixes	100	mg/kg		8
08.1	fresh meat, poultry, and game	1000	mg/kg	Notes 3 ¹⁵⁶ & 4 ¹⁵⁷	3
08.1	fresh meat, poultry, and game		GMP	Notes 3 & 4	8
08.2	processed meat, poultry, and game products in whole pieces or cuts	1000	mg/kg	Notes 3 & 4	3
08.2	processed meat, poultry, and game products in whole pieces or cuts		GMP	Notes 3 & 4	8
08.4	edible casings (e.g., sausage casings)	1000	mg/kg	Notes 3 & 4	3
08.4	edible casings (e.g., sausage casings)		GMP	Notes 3 & 4	8
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg		6
10.4	egg-based desserts (e.g., custard)	100	mg/kg		6
12.2.2	seasonings and condiments	100	mg/kg		6
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	100	mg/kg		6
13.6	food supplements		GMP		6

a) Which food additive provisions you support requesting additional information and the type of information needed,

The European Community does not support in general the use of colours in the following categories, pastas and noodles and bread and ordinary bakery wares, as they could mislead the consumer. Technological justification for these uses is therefore necessary.

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 category 12.10	300	mg/kg		3
06.4.2	dried pastas and noodles and like products	100	mg/kg		6
06.4.3	pre-cooked pastas and noodles and like products	100	mg/kg		6
07.0	bakery wares	100	mg/kg		6

b) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.).

The proposed uses of Fast Green FCF, INS 143 in the following categories is very broad. The European Community recommends these uses be restricted by the following notes:

¹⁵⁶ **Note 3:** Surface treatment.

¹⁵⁷ **Note 4:** For decoration, stamping, marking or branding the product.

Fast Green FCF, INS 143 (Colour)					
Food Cat No.	Food Category	Max	Level	Comments	Step
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 16 ¹⁵⁸ or 95 ¹⁵⁹	6
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 95	6

2) Please indicate the basis of your views:

The European Community recognizes that this colour has been assessed for its safety by JECFA and that an ADI has been established. However in order to protect against such ADI being exceeded strongly supports the position that colours should only be included in the food categories and at the maximum levels in which the colour is justified.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No recommendations at this stage.

INDIGOTINE (INS 132)

Request for Comment- Indigotine, (INS 132)

1) Which food additive provisions you support for adoption at Step 5/8 or 8,

The EC permits the use of – Indigotine in the following food categories and those under point c subject to the proposed revisions.

Indigotine, INS 132 (Colour)					
Food Cat No.	Food Category	Max	Level	Comments	
01.6.2.2	rind of ripened cheese	100	mg/kg		
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg		
04.1.2.7	candied fruit	200	mg/kg		
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	500	mg/kg		
04.1.2.11	fruit fillings for pastries	300	mg/kg		
05.3	chewing gum	300	mg/kg		
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		
08.4	Edible casings (e.g., sausage casings)		GMP		
09.1.1	fresh fish	300	mg/kg	Note 50 ¹⁶⁰	
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 95 ¹⁶¹	
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg		
10.1	fresh eggs	300	mg/kg	Note 4	
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		
12.2.2	seasonings and condiments	500	mg/kg		
12.4	mustards	300	mg/kg		
12.6	sauces and like products	500	mg/kg		
12.9.5	other protein products	100	mg/kg		
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		
13.6	food supplements	300	mg/kg		
14.2.2	cider and perry	200	mg/kg		
14.2.4	wines (other than grape)	200	mg/kg		
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		

¹⁵⁸ For use in glaze, coatings or decorations for fruit, vegetables, meat or fish

¹⁵⁹ For use in surimi and fish roe products only

¹⁶⁰ Note 50: For use in fish roe only.

¹⁶¹ Note 95: For use in surimi and fish roe products only.

a) Which food additive provisions you support requesting additional information and the type of information needed,

b) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use,):

Food Cat No.	Food Category	Max	Level	Comments	EC comments
01.6.4	processed cheese	200	mg/kg		Proposed level high. 100 mg/kg sufficient. For flavoured processed cheese only.
01.6.5	cheese analogues	200	mg/kg	Note 3	Proposed level high. 100 mg/kg sufficient
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	300	mg/kg		Proposed level high. 150 mg/kg sufficient
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	300	mg/kg		Proposed level high. 150 mg/kg sufficient
03.0	edible ices, including sherbet and sorbet	300	mg/kg		Proposed level high. 150 mg/kg sufficient
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	300	mg/kg		Proposed level high. 150 mg/kg sufficient
05.1.5	imitation chocolate, chocolate substitute products	450	mg/kg		Proposed level high. 300 mg/kg sufficient
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	450	mg/kg		Proposed level high. 300 mg/kg sufficient
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	300	mg/kg		Proposed level high. 150 mg/kg sufficient
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 22 ¹⁶²	Proposed level high. 100 mg/kg sufficient
10.4	egg-based desserts (e.g., custard)	300	mg/kg		Proposed level high. 150 mg/kg sufficient
12.5	soups and broths	300	mg/kg		Proposed level high. 50 mg/kg sufficient
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	300	mg/kg		Proposed level high. 100 mg/kg sufficient
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	300	mg/kg		Proposed level high. 200 mg/kg sufficient

The European Community cannot support the other provisions proposed if no information is provided on the technological need.

d) Whether you support the previous recommendations of the Quality Control Working Group to discontinue work on specific provisions and to include the indicated amendments.

- The European Community can agree with the recommendation to discontinue work on the specific provisions indicated in ~~strike through~~ font and the addition of the provision for category **08.4 Edible casings (e.g., sausage casings)**.
- The European Community **cannot agree** with the proposed provisions in bold for the following food categories:
 - 02.3 fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions,
 - 05.1.3 cocoa-based spreads, including fillings.
 - 8.1 Fresh meat, poultry and game and 08.2 Processed meat, poultry, and game products in whole pieces or cuts, as discussions on this issues are ongoing within the discussion paper for food additive provisions in glazes for foods.

2) Please indicate the basis of your views by addressing the following:

The European Community recognises that this colour has been evaluated by JECFA for its safety and that an ADI has been established. However, in order to protect against the ADI being exceeded the EC supports the position that colours should only be included in the food categories and at the max use levels in which the colours is justified.

¹⁶² **Note 22:** For use in smoked fish products only.

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No comments at this stage.

PONCEAU 4R, INS 124

1)

- a) The EC could support the following food additive provisions:
01.6.2.2, 01.6.5, 01.7, 02.4, 03.0, 04.1.2.5, 04.1.2.6, 04.1.2.7, 04.1.2.8, 04.1.2.9, 04.1.2.11, 05.1.5, 05.2, 05.3, 05.4, 06.5, 08.4, 09.1.1 (for use in fish roe only), 09.2.4.2, 09.3.3, 10.1, 10.4, 12.2.2, 12.4, 12.6, 12.9.5, 13.3, 13.4, 13.5, 13.6, 14.1.4, 14.2.2, 14.2.4, 14.2.6, 14.2.7, 15.1, 15.2.
- b) Generally the use of Ponceau 4R is proposed for too many products. Therefore the EC cannot support the following proposed provisions, if no information is provided on the technological need:
- The EC questions the use in food categories 04.2.2.3, 04.2.2.4, 04.2.2.5, 04.2.2.6, 04.2.2.7. Most of the Codex Standards on canned vegetables (e.g tomatoes, carrots, sweet corn, mushrooms) contain no use of colours.
 - Codex Standard on Cocoa Butters (86-1981) and Chocolate (87-1981) does not include the use of colours. Therefore, the European Community does not support the proposed provisions for categories 5.1.3 and 5.1.4, as well as 5.1.1 and 5.1.2.
 - The technological need for the use in food categories 07.0, 08.2, 08.3.1.3, 08.3.2, 08.3.3, 09.1.2, 09.2.1, 09.2.4.1, 9.4, 11.4, 11.6, 12.7, 14.1.2.2 should be justified and at the same time it should be demonstrated that the consumer is not misled.
 - The European Community cannot support at this stage the provisions for the following food categories, as discussions on this issue are ongoing within the discussion paper for food additive provisions in glazes for foods: 04.1.1.2, 04.2.1.2, 08.1, 09.1.2, 09.2.2, 09.2.3, 09.2.4.3, 09.3.1, 09.3.2.
 - Finally the need for the use of Ponceau 4R in category 16.0 composite foods is questioned. Justification should be provided as to why the carry over wouldn't be sufficient.
- c) The EC can support the following food additive provisions subject to the proposed revisions:
- 1.1.2 (not including chocolate milk)
 - 01.6.4 for **flavoured** processed cheese only, and at a level of **100 mg/kg** instead of 200 mg/kg.
 - 8.3.1.1 for use in Chorizo sausage and salchichon only, 08.3.1.2 for use for Sobrasada only.
 - 04.1.2.4 Within the EU the use of Ponceau 4R is only permitted for red fruits only and therefore a note should be added to this effect. A max level of **200 mg/kg** would be sufficient for the intended purpose.
 - 09.2.5 a max level of **100 mg/kg** (instead of 500 mg/kg) would be sufficient for this food category.
 - 09.3.4 a max level of **100 mg/kg** (instead of 500 mg/kg) would be sufficient for this food category.
 - 12.5 the proposed max level of 300 mg/kg is too high. A level of **50 mg/kg** would be sufficient for the intended purpose.

2) The European Community recognises that this colour has been assessed for its safety by JECFA and that an ADI has been established. However in order to protect against such ADI being exceeded strongly supports the position that colours should only be included in the food categories and at the maximum levels in which the colour is justified.

SUNSET YELLOW FCF, INS 110

- a) The EC could support the following food additive provisions:
01.1.2 (not including chocolate milk), 01.6.2.2, 04.1.2.8, 05.4, 08.4, 09.1.1 (for use in fish roe only), 09.2.4.2, 09.3.3, 10.1, 12.2.2, 12.4, 12.6, 12.9.5, 13.3, 13.4, 13.5, 13.6, 14.2.2, 14.2.4, 14.2.6, 14.2.7, 15.2.
- b) Generally the use of Sunset Yellow is proposed for too many products. Therefore the EC cannot support the following proposed provisions, if no information is provided on the technological need:
- The EC questions the use in food categories 04.2.2.3, 04.2.2.4, 04.2.2.5, 04.2.2.6, 04.2.2.7. Most of the Codex Standards on canned vegetables (e.g tomatoes, carrots, sweet corn, mushrooms) contain no use of colours.
 - The need for the use in food categories 04.2.2.2 (in potatoes only) and 04.2.2.3 is also questioned.

- Codex Standard on Cocoa Butters (86-1981) and Chocolate (87-1981) does not include the use of colours. Therefore, the European Community does not support the proposed provisions for categories 5.1.3 and 5.1.4, as well as 5.1.1 and 5.1.2.
- The technological need for the use in food categories 01.6.1, 02.1.3, 02.2.1.1, 02.2.1.2, 02.3, 04.1.2.2, 06.3, 06.4.2, 06.4.3, 07.0, 08.3.1.1, 08.3.1.3, 08.3.2, 08.3.3, 09.1.2, 09.2.1, 09.2.4.1, 9.4, 11.3, 11.4, 11.6, 12.2.1, 14.1.2.2, 14.1.5 should be justified and at the same time it should be demonstrated that the consumer is not misled.
- The European Community cannot support at this stage the provisions for the following food categories, as discussions on this issue are ongoing within the discussion paper for food additive provisions in glazes for foods: 04.1.1.2, 04.2.1.2, 08.1, 08.2, 08.3.1.3, 08.3.2, 08.3.3, 08.4, 09.1.2, 09.2.2, 09.2.3, 09.2.4.3, 09.3.1, 09.3.2.
- Finally the need for the use of Sunset Yellow FCF in category 16.0 composite foods is questioned. Justification should be provided as to why the carry over wouldn't be sufficient.

c) The EC can support the following food additive provisions subject to the proposed revisions:

- 01.6.4 for **flavoured** processed cheese only, and at a level of **100 mg/kg** instead of 200 mg/kg.
- 01.6.5 for cheese analogues a level of **100 mg/kg** instead of GMP.
- 01.7, 02.4, 04.1.2.9, 06.5, 10.4, (desserts) a max level of **150 mg/kg** (instead of 300 mg/kg) would be sufficient for these food categories.
- 03.0 edible ice: a max level of **150 mg/kg** (instead of 300 mg/kg) would be sufficient.
- 04.1.2.4 Within the EU the use of Sunset Yellow permitted for red fruits only and therefore a note should be added to this effect.
- 04.1.2.5 jams, jellies and marmalades and 04.1.2.6 (fruit based spreads) **100 mg/kg (individually or in combination)** would be sufficient (instead of the proposed level of 500 mg/kg).
- 04.1.2.7: a max level of **200 mg/kg** (instead of 300 mg/kg) would be sufficient.
- 04.1.2.11: max level of **150 mg/kg** (instead of 400 mg/kg) would be sufficient.
- For 05.1.5 (imitation chocolate) and 05.2 (confectionery) a max level of **300 mg/kg** (instead of 400 mg/kg) would be sufficient.
- 08.3.1.2 It should be specified that the provision should be “for use for Sobrasada only”.
- 09.2.5 a max level of **100 mg/kg** (instead of 500 mg/kg) would be sufficient for this food category.
- 09.3.4 a max level of **100 mg/kg** (instead of 500 mg/kg) would be sufficient for this food category.
- 12.5 the proposed max level of 300 mg/kg is too high. A level of **50 mg/kg** would be sufficient for the intended purpose.
- 14.1.4.1, 14.1.4.2, 14.1.4.3: a max level of **100 mg/kg** (instead of 300 mg/kg) would be sufficient for these food categories.
- 15.1 (snacks): a max level of **200 mg/kg** (instead of 550 mg/kg) would be sufficient for this food category.

2) The European Community recognises that this colour has been assessed for its safety by JECFA and that an ADI has been established. However in order to protect against such ADI being exceeded strongly supports the position that colours should only be included in the food categories and at the maximum levels in which the colour is justified.

ACESULFAME POTASSIUM, INS 950 (Flavour Enhancer, Sweetener)

1) Please indicate:

a) Which food additive provisions you support for adoption at Step 5/8 or 8;

12.4 mustards 350 mg/kg

12.6.2 non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy) 350 mg/kg

12.6.3 mixes for sauces and gravies 350 mg/kg

12.6.4 clear sauces (e.g., fish sauce) 350 mg/kg

13.3 dietetic foods intended for special medical purposes (excluding products of food category 13.1) 450 mg/kg

13.4 dietetic formulae for slimming purposes and weight reduction 450 mg/kg

14.2.2 cider and perry 350 mg/kg

15.3 snacks - fish based 350 mg/kg

b) Which food additive provisions you support requesting additional information the type of information needed; and

- 01.2 fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks) 500 mg/kg
- 01.3.2 beverage whiteners 2000 mg/kg
- 01.4 cream (plain) and the like 1000 mg/kg
- 01.5 milk powder and cream powder and powder analogues (plain) 3000 mg/kg
- 01.5.1 milk powder and cream powder (plain) GMP
- 01.6.1 unripened cheese 500 mg/kg
- 01.6.5 cheese analogues 350 mg/kg
- 02.3 fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions 1000 mg/kg
- 04.1.2.12 cooked fruit 500 mg/kg
- 04.1.2.1 frozen fruit 500 mg/kg
- 04.1.2.2 dried fruit 500 mg/kg
- 04.1.2.7 candied fruit 500 mg/kg
- 04.2.2.4 canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds 350 mg/kg
- 04.2.2.5 vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter) 2500 mg/kg
- 04.2.2.6 vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5 350 mg/kg
- 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 category 12.10 1000 mg/kg
- 05.1.1 cocoa mixes (powders) and cocoa mass/cake 2500 mg/kg
- 05.1.2 cocoa mixes (syrops) 500 mg/kg
- 06.1 whole, broken, or flaked grain, including rice 300 mg/kg
- 07.1 bread and ordinary bakery wares 1000 mg/kg
- 11.4 other sugars and syrups (e.g., xylose, maple syrup, sugar toppings) 1000 mg/kg
- 12.2 herbs, spices, seasoning, and condiments (e.g., seasoning for instant noodles) 2000 mg/kg
- 12.3 vinegars 2000 mg/kg
- 13.1.3 formulae for special medical purposes for infants 450 mg/kg
- 14.1.2.2 vegetable juice 600 mg/kg
- 14.1.2.4 concentrates for vegetable juice 3000 mg/kg Note 14
- 14.1.3.4 concentrates for vegetable nectar 2500 mg/kg Note 14
- 14.2.3 grape wines 500 mg/kg
- 14.2.4 wines (other than grape) 500 mg/kg
- 14.2.5 mead 500 mg/kg
- 14.2.6 distilled spirituous beverages containing more than 15% alcohol 350 mg/kg

- 14.1.5 coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa 600 mg/kg
- 16.0 composite foods - foods that could not be placed in categories 01 – 15 350 mg/kg

e) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.).

- 01.1.2 dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, wheybased drinks) 500 mg/kg. **The Level should be 350 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 01.7 dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt) 1000 mg/kg **The Level should be 350 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 02.4 fat-based desserts excluding dairy-based dessert products of food category 01.7 1000 mg/kg **The Level should be 350 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 03.0 edible ices, including sherbet and sorbet 800 mg/kg **The Level should be 350 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 04.1.2.3 fruit in vinegar, oil, or brine 200 mg/kg **(restricted to sweet sour preserves)**
- 04.1.2.4 canned or bottled (pasteurized) fruit 500 mg/kg **The level should be 350 mg/kg Energy reduced or with no added sugar**
- 04.1.2.5 jams, jellies and marmelades 1000 mg/kg **products should be energy reduced**
- 04.1.2.6 fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5 1000 mg/kg **Level should be 350 mg/kg energy reduced products only**
- 04.1.2.8 fruit preparations, including pulp, purees, fruit toppings and coconut milk 1000 mg/kg **Level should be 350 mg/kg energy reduced products only**
- 04.1.2.9 fruit-based desserts, including fruit-flavoured water-based desserts 1000 mg/kg **The Level should be 350 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 04.1.2.10 fermented fruit products 1000 mg/kg **Level should be 350 mg/kg energy reduced products only**
- 04.1.2.11 fruit fillings for pastries 1000 mg/kg **Level should be 350 mg/kg energy reduced products only**
- 04.2.2.3 vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce 1000 mg/kg **Level should be 200 mg/kg sweet sour preserves**
- 05.1.3 cocoa-based spreads, including fillings 2500 mg/kg **Level should be 1000 mg/kg Energy reduced or with no added sugar**
- 05.1.4 cocoa and chocolate products 2000 mg/kg **Should be 500 mg/kg and only in Energy reduced or with no added sugar products**
- 05.1.5 imitation chocolate, chocolate substitute products 2500 mg/kg **The Level should be 500 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 05.2.1 hard candy 3500 mg/kg **The Level should be 1000 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 05.2.2 soft candy 2500 mg/kg **The Level should be 1000 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 05.2.3 nougats and marzipans 2500 mg/kg **The Level should be 1000 mg/kg and restricted to products which are Energy reduced or with no added sugar**
- 05.3 chewing gum 5000 mg/kg **The level should be 800 mg/kg (chewing gums with added sugars) as flavour enhancer only and when used in combination with other sweeteners (950, 951, 957, 959) the levels should be reduced proportionally)**
- 05.4 decorations (e.g., for fine bakery wares), toppings (nonfruit) and sweet sauces 500 mg/kg **only products for special nutritional uses**
- 06.3 breakfast cereals, including rolled oats 1200 mg/kg **(with a fibre content of more than 15% and containing at least 20% Bran. Products should be Energy reduced or with no added sugar**
- 06.5 cereal and starch based desserts (e.g., rice pudding, tapioca pudding) 350 mg/kg **Products should be Energy reduced or with no added sugar**

- 07.2.1 cakes, cookies and pies (e.g., fruit-filled or custard types) 1000 mg/kg **Restricted to products for special nutritional uses only**
- 07.2.2 other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins) 2000 mg/kg **Level should be 1000 mg/kg Restricted to products for special nutritional uses only**
- 07.2.3 mixes for fine bakery wares (e.g., cakes, pancakes) 1000 mg/kg **Restricted to products for special nutritional uses only**
- 09.3 semi-preserved fish and fish products, including molluscs, crustaceans, and echinoderms 600 mg/kg **The level should be 200mg/kg**
- 09.4 fully preserved, including canned or fermented fish and fish products, including molluscs, crustaceans, and echinoderms 600 mg/kg **The level should be 200mg/kg**
- 10.4 egg-based desserts (e.g., custard) 350 mg/kg **products should be Energy reduced or with no added sugar**
- 11.6 table-top sweeteners, including those containing high intensity sweeteners 15000 mg/kg . **Although this additive has an ADI for such products a QS limitation is appropriate**
- 12.5 soups and broths 110 mg/kg **products should be energy reduced**
- 12.6.1 emulsified sauces (e.g., mayonnaise, salad dressing) 1000 mg/kg **Level should be 350 mg/kg**
- 12.7 salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3 1000 mg/kg **Products should be Energy reduced or with no added sugar (plus further restriction)**
- 13.5 dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1-13.4 and 13.6 1000 mg/kg **Level should be 450 mg/kg**
- 13.6 food supplements 2000 mg/kg **Level should be in liquid form 350 mg/l in solid form 500 mg/kg**
- 14.1.4 water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks 600 mg/kg **Products should be Energy reduced or with no added sugar**
- 14.2.7 aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers) 500 mg/kg **Level should be 350 mg/l**
- 14.2.1 beer and malt beverages 350 mg/kg **Only for the following products (alcohol free, or with alcohol not exceeding 1.2%), beers with minimum acidity 30 milliequivalents, brown beers of 'oud bruin' type, biere de table/tafelbier/table beer (original wort content less than 6%) except for ovbergariges einfachbier) and energy reduced beer**
- 15.1 snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes) 1000 mg/kg **Level should be 350 mg/kg and restricted to certain flavours only**
- 15.2 processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit) 1000 mg/kg **Level should be 350 mg/kg and restricted to certain flavours of coated nuts only**

2) Please indicate the basis of your views by addressing the following:

The European Community recognises that these sweeteners have been assessed for their safety by JECFA and that an ADI has been established, however in order to protect against such ADI's being exceeded strongly supports the position that the sweeteners should only be included in the food categories and at the maximum levels in which the sweetener is technically justified. In particular in the case of savoury vegetables and other savoury products the use of sweeteners is only necessary for certain flavours (e.g. sweet/sour). As a general rule sweeteners should be restricted to Energy reduced or with no added sugar products unless there are specific exemptions required. In line with the general principle on the use of all additives in infant foods the EU feels that sweeteners are not necessary in such products.

ALITAME (INS 956)

Within the EU alitame is not currently permitted for use as a sweetener and therefore the European Community are not able to suggest levels of use. However, when considering the low ADI which has been assigned by JECFA the levels and range of categories should be examined closely. As a general rule sweeteners should be restricted to Energy reduced or with no added sugar products unless there are specific exemptions required.

The following suggested uses require further justification

01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)	60	mg/kg		6
01.4	cream (plain) and the like	100	mg/kg		6
07.0	bakery wares	200	mg/kg		6

11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)		GMP		6
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	100	mg/kg		6

As described above the EC has no specific comments on the following, as this additive is not permitted within the EU, however specific restrictions should be included in line with other sweeteners in particular relating to Energy reduced or no added sugar products.

Alitame, INS 956 (Sweetener)					
Food Cat. No.	Food Category	Max.	Level	Comment	Step
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	100	mg/kg		6
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	100	mg/kg		6
03.0	edible ices, including sherbet and sorbet	100	mg/kg		6
04.1.2.5	jams, jellies and marmelades	100	mg/kg		6
05.0	Confectionery	300	mg/kg		6
11.6	table-top sweeteners, including those containing high-intensity sweeteners		GMP		6
12.5	soups and broths	40	mg/kg		6
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		6
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	40	mg/kg		6

ASPARTAME, INS 951

Request for Comment- Aspartame, (INS 951)

1) Please indicate:

a) Which food additive provisions you support for adoption at Step 5/8 or 8,

12.4	Mustards		350	mg/kg
12.6.3	mixes for sauces and gravies		350	mg/kg
12.6.4	clear sauces (e.g., fish sauce)		350	mg/kg
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)		1000	mg/kg
13.4	dietetic formulae for slimming purposes and weight reduction		800	mg/kg
14.2.2	cider and perry		600	mg/kg

b) Which food additive provisions you support requesting additional information the type of information needed,

The EC requests further information on the following:

With regard to the proposed use of 13.13 (formulae for special medical purposes for infants) The European Community does not support the use of sweeteners in foods intended for infants.

01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)		2000	mg/kg
01.3.2	beverage whiteners		6000	mg/kg
01.4.1	pasteurized cream (plain)		6000	mg/kg
01.4.2	sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)		6000	mg/kg
01.4.3	clotted cream (plain)		6000	mg/kg
01.4.4	cream analogues		1000	mg/kg
01.5.1	milk powder and cream powder (plain)		5000	mg/kg
01.5.2	milk and cream powder analogues		2000	mg/kg
01.6.1	unripened cheese		1000	mg/kg
01.6.5	cheese analogues		1000	mg/kg
3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions		1000	mg/kg
04.1.2.4	canned or bottled (pasteurized) fruit		1000	mg/kg
04.1.2.2	dried fruit		3000	mg/kg
04.1.2.4	canned or bottled (pasteurized) fruit		1000	mg/kg
04.1.2.7	candied fruit		2000	mg/kg
04.1.2.12	cooked fruit		2000	mg/kg
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds		1000	mg/kg
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds		1000	mg/kg

04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	3000	mg/kg
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 category 12.10	2500	mg/kg
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	1000	mg/kg
05.1.1	cocoa mixes (powders) and cocoa mass/cake	3000	mg/kg
05.1.2	cocoa mixes (syrops)	1000	mg/kg
07.1	bread and ordinary bakery wares	4000	mg/kg
08.2	processed meat, poultry, and game products in whole pieces or cuts	300	mg/kg
08.3	processed comminuted meat, poultry, and game products	300	mg/kg
10.2.3	dried and/or heat coagulated egg products	1000	mg/kg
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	3000	mg/kg
12.2.2	seasonings and condiments	2000	mg/kg
12.3	Vinegars		GMP
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	1000	mg/kg
13.1.3	formulae for special medical purposes for infants	800	mg/kg
14.1.2.4	concentrates for vegetable juice	2000	mg/kg
14.1.3.2	vegetable nectar	2000	mg/kg
14.1.3.4	concentrates for vegetable nectar	2000	mg/kg
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	5000	mg/kg
14.2.4	wines (other than grape)	700	mg/kg
14.2.5	Mead	700	mg/kg
14.2.6	distilled spirituous beverages containing more than 15% alcohol	700	mg/kg

c) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.), and

The EC supports the following subject to the comments in column below

Food Cat No.	Food Category	Max	Level	EC Comments
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	600	mg/kg	ENERGY REDUCED OR NO ADDED SUGAR
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	3000	mg/kg	Proposed level 1000 mg/kg ENERGY REDUCED OR NO ADDED SUGAR
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	3000	mg/kg	Proposed level 1000 mg/kg ENERGY REDUCED OR NO ADDED SUGAR
03.0	edible ices, including sherbet and sorbet	3000	mg/kg	Proposed level 1000 mg/kg ENERGY REDUCED OR NO ADDED SUGAR
04.1.2.3	fruit in vinegar, oil, or brine	300	mg/kg	Sweet sour preserves only
04.1.2.5	jams, jellies and marmalades	4000	mg/kg	Only energy reduced and 350 mg/kg
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	2000	mg/kg	Energy reduced 1000 mg/kg
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	3000	mg/kg	Energy reduced 1000 mg/kg
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	3000	mg/kg	1000 mg/kg Energy reduced or no added sugar
04.1.2.10	fermented fruit products	2000	mg/kg	1000 energy reduced
04.1.2.11	fruit fillings for pastries	3000	mg/kg	1000 energy reduced
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	2500	mg/kg	300 sweet sour preserves
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	1000	mg/kg	Energy reduced
05.1.5	imitation chocolate, chocolate substitute products	3000	mg/kg	Proposed level 2000 mg/kg ENERGY REDUCED OR NO ADDED SUGAR
05.2.1	hard candy	4000	mg/kg	1000 No added sugar
05.2.2	soft candy	3000	mg/kg	1000 No added sugar
05.2.3	nougats and marzipans	3000	mg/kg	1000 No added sugar
05.3	chewing gum	4000	mg/kg	Proposed level 5500 no added sugar
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	1000	mg/kg	ENERGY REDUCED OR NO ADDED SUGAR

Food Cat No.	Food Category	Max	Level	EC Comments
06.3	breakfast cereals, including rolled oats	5000	mg/kg	Proposed level 1000 mg/kg and only for breakfast cereals with a fibre content of more than 15% and containing at least 20% bran, energy reduced or with no added sugar
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	1000	mg/kg	Energy reduced or no added sugar
07.2	fine bakery wares (sweet, salty, savoury) and mixes	5000	mg/kg	1700 special nutritional purposes only
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg	Sweet sour preserves
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg	Sweet sour preserves
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms		GMP	Sweet sour preserves proposed level 300 mg/kg
10.4	egg-based desserts (e.g., custard)	1000	mg/kg	ENERGY REDUCED OR NO ADDED SUGAR
11.6	table-top sweeteners, including those containing high-intensity sweeteners	4000	mg/kg	Propose GMP level for such a use which is by its nature self limiting.
12.5	soups and broths	600	mg/kg	Energy reduced
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	2000	mg/kg	Proposed level 350 mg/kg
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	2000	mg/kg	Proposed level 350 mg/kg
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	2000	mg/kg	Proposed level 1000 mg/kg`
13.6	food supplements	5500	mg/kg	600 mg/kg for supplements in a liquid form / 2000 mg/kg for supplements in a solid form
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	4000	mg/kg	Proposed level 600 mg/l ENERGY REDUCED OR NO ADDED SUGAR
14.2.1	beer and malt beverages	600	mg/kg	Energy reduced beer Alcohol free beer of with an alcohol content not exceeding 1.2% vol. 'biere de table/tafelbier/table beer' (original wort content less than 6%) except for 'Obergariges Einfachbier', beers with a minimum acidity of 30 milli-equivalents expressed as NAOH, brown beers of the 'Oud Bruin' type
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	4000	mg/kg	Proposed level 600 mg/l
15.0	ready-to-eat savouries	500	mg/kg	Certain flavours only and coated nuts

3) Please provide recommendations to resolve any inconsistencies between the proposed uses in the GSFA and Codex commodity standards.

No Comment

CYCLAMATES (INS 952)

a) Which food additive provisions you support for adoption at Step 5/8 or 8,

11.6	table-top sweeteners, including those containing high-intensity sweeteners		GMP
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	250	mg/kg

b) Which food additive provisions you support requesting additional information and the type of information needed

01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)	250	mg/kg
04.1.2.7	candied fruit	500	mg/kg
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	250	mg/kg
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	500	mg/kg

12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	500	mg/kg
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	500	mg/kg
14.1.3.2	vegetable nectar	400	mg/kg
14.1.3.4	concentrates for vegetable nectar	400	mg/kg

c) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.), and

Food Cat No.	Food Category	Max	Level	Comments
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	400	mg/kg	Proposed level 250 mg/l ENERGY REDUCED OR WITH NO ADDED SUGAR
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	250	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	250	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
03.0	edible ices, including sherbet and sorbet	250	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
04.1.2.4	canned or bottled (pasteurized) fruit	1000	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
04.1.2.5	jams, jellies and marmelades	1000	mg/kg	Energy reduced
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	2000	mg/kg	Energy reduced
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	250	mg/kg	Energy reduced
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	250	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.1	cocoa products and chocolate products including imitations and chocolate substitutes	500	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2.1	hard candy	2500	mg/kg	Proposed level 500 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2.2	soft candy	500	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2.3	nougats and marzipans	500	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.3	chewing gum	3000	mg/kg	Proposed level 1500 no added sugar
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	250	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
07.2.1	cakes, cookies and pies (e.g., fruit-filled or custard types)	1600	mg/kg	For special nutritional purposes only
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	2000	mg/kg	Proposed level 1600 mg/kg For special nutritional purposes only
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)	1600	mg/kg	For special nutritional purposes only
10.4	egg-based desserts (e.g., custard)	250	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	1300	mg/kg	Proposed level 400 mg/kg
13.4	dietetic formulae for slimming purposes and weight reduction	1300	mg/kg	Proposed level 400 mg/kg
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	16000	mg/kg	Proposed level 400 mg/kg
13.6	food supplements	1250	mg/kg	Proposed level 400mg/kg (in liquid form) 500 mg/kg (in solid form)
14.1.4.1	carbonated water-based flavoured drinks	1500	mg/kg	Proposed level 250 mg/l ENERGY REDUCED OR WITH NO ADDED SUGAR
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	1500	mg/kg	Proposed level 250 mg/l ENERGY REDUCED OR WITH NO ADDED SUGAR

d) Whether you support the previous recommendations of the Quality Control Working Group to discontinue work on specific provisions and to include the indicated amendments.

01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)		GMP	Agree with discontinuing
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	100	mg/kg	Agree with discontinuing

NEOTAME (INS 961)

Within the EU neotame is not currently permitted for use as a sweetener and therefore the European Community are not able to suggest levels of use. However, when considering the low ADI which has been assigned by JECFA the levels and range of categories should be examined closely. As a general rule sweeteners should be restricted to Energy reduced or with no added sugar products unless there are specific exemptions required.

The EC is of the view that sweeteners are not necessary in foods for infants and therefore questions the proposal below:

13.1.3	formulae for special medical purposes for infants	25	mg/kg	3
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The following suggested uses require further justification

01.3.2	beverage whiteners		GMP	3
01.4.1	pasteurized cream (plain)		GMP	3
01.4.2	sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)		GMP	3
01.4.3	clotted cream (plain)		GMP	3
01.4.4	cream analogues	33	mg/kg	3
01.5.1	milk powder and cream powder (plain)		GMP	3
01.5.2	milk and cream powder analogues	65	mg/kg	3
01.6.1	unripened cheese	33	mg/kg	3
01.6.5	cheese analogues	33	mg/kg	3
04.1.2.7	candied fruit	65	mg/kg	3
07.1	bread and ordinary bakery wares	70	mg/kg	3
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	100	mg/kg	3
10.2.3	dried and/or heat coagulated egg products	33	mg/kg	3
14.1.2.2	vegetable juice	65	mg/kg	3
14.1.2.4	concentrates for vegetable juice	65	mg/kg	3
14.1.3.2	vegetable nectar	65	mg/kg	3
14.1.3.4	concentrates for vegetable nectar	65	mg/kg	3
14.2.6	distilled spirituous beverages containing more than 15% alcohol	23	mg/kg	3
15.0	ready-to-eat savouries	16	mg/kg	3

As described above the EC has no specific comments on the following as this additive is not permitted within the EU, however specific restrictions should be included in line with other sweeteners.

Neotame, INS 961 (Flavour Enhancer, Sweetener)					
Food Cat No.	Food Category	Max	Level	Comments	Step
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	20	mg/kg		3
01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)	65	mg/kg		3
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	100	mg/kg		3
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	10	mg/kg		3
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	100	mg/kg		3
03.0	edible ices, including sherbet and sorbet	100	mg/kg		3
04.1.2.1	frozen fruit	100	mg/kg		3
04.1.2.2	dried fruit	100	mg/kg		3
04.1.2.3	fruit in vinegar, oil, or brine	100	mg/kg		3
04.1.2.4	canned or bottled (pasteurized) fruit	33	mg/kg		3
04.1.2.5	jams, jellies and marmelades	33	mg/kg		3
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	65	mg/kg		3

Neotame, INS 961 (Flavour Enhancer, Sweetener)					
Food Cat No.	Food Category	Max	Level	Comments	Step
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	100	mg/kg		3
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	100	mg/kg		3
04.1.2.10	fermented fruit products	65	mg/kg		3
04.1.2.11	fruit fillings for pastries	100	mg/kg		3
04.1.2.12	cooked fruit	65	mg/kg		3
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	33	mg/kg		3
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	33	mg/kg		3
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	10	mg/kg		3
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	33	mg/kg		3
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	33	mg/kg		3
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	33	mg/kg		3
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 category 12.10	33	mg/kg		3
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	33	mg/kg		3
05.1.1	cocoa mixes (powders) and cocoa mass/cake	100	mg/kg		3
05.1.2	cocoa mixes (syrops)	33	mg/kg		3
05.1.3	cocoa-based spreads, including fillings	100	mg/kg		3
05.1.4	cocoa and chocolate products	80	mg/kg		3
05.1.5	imitation chocolate, chocolate substitute products	100	mg/kg		3
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	1000	mg/kg		3
05.3	chewing gum	1000	mg/kg		3
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	33	mg/kg		3
06.3	breakfast cereals, including rolled oats	80	mg/kg		3
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	33	mg/kg		3
07.2	fine bakery wares (sweet, salty, savoury) and mixes	80	mg/kg		3
08.2	processed meat, poultry, and game products in whole pieces or cuts	10	mg/kg		3
08.3	processed comminuted meat, poultry, and game products	10	mg/kg		3
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	10	mg/kg		3
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	10	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	10	mg/kg		3
10.4	egg-based desserts (e.g., custard)	33	mg/kg		3
11.6	table-top sweeteners, including those containing high-intensity sweeteners	12	mg/kg		3
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	65	mg/kg		3
12.3	vinegars	12	mg/kg		3
12.4	mustards	12	mg/kg		3
12.5	soups and broths	20	mg/kg		3
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	65	mg/kg		3
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	65	mg/kg		3
12.6.3	mixes for sauces and gravies	12	mg/kg		3
12.6.4	clear sauces (e.g., fish sauce)	12	mg/kg		3
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	33	mg/kg		3
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	33	mg/kg		3
13.4	dietetic formulae for slimming purposes and weight reduction	33	mg/kg		3

Neotame, INS 961 (Flavour Enhancer, Sweetener)					
Food Cat No.	Food Category	Max	Level	Comments	Step
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	65	mg/kg		3
13.6	food supplements	90	mg/kg		3
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	33	mg/kg		3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	50	mg/kg		3
14.2.1	beer and malt beverages	20	mg/kg		3
14.2.2	cider and perry	20	mg/kg		3
14.2.4	wines (other than grape)	23	mg/kg		3
14.2.5	mead	23	mg/kg		3
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	33	mg/kg		3

SACCHARIN (INS 954)**1) Please indicate:****a) Which food additive provisions you support for adoption at Step 5/8 or 8,**

11.6	table-top sweeteners, including those containing high-intensity sweeteners		GMP	Ok	6
12.4	Mustards	320	mg/kg	Ok	6
12.6.4	clear sauces (e.g., fish sauce)	160	mg/kg	Ok	6
14.2.2	cider and perry	80	mg/kg	Ok	6
14.2.7	Aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	80	mg/kg	Ok	6

b) Which food additive provisions you support requesting additional information and the type of information needed,

Saccharin, INS 954 (Flavour Enhancer, Sweetener)					
Food Cat No.	Food Category	Max	Level	Comments	Step
01.2.1	fermented milks (plain)	200	mg/kg	No	6
01.2.2	renneted milk (plain)		GMP	No	6
01.2.2	renneted milk (plain)	100	mg/kg	No	6
01.6.1	unripened cheese	100	mg/kg	No	6
04.1.2.7	candied fruit	5000	mg/kg	No	3
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	500	mg/kg	No	6
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	500	mg/kg	No	6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	500	mg/kg	No	6
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 category 12.10	500	mg/kg	No	6
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	500	mg/kg	No	6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		6
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	15	mg/kg	No	6
08.2.1.1	cured (including salted) non-heat treated processed meat, poultry, and game products in whole pieces or cuts	2000	mg/kg	No	6
08.2.2	heat-treated processed meat, poultry, and game products in whole pieces or cuts	500	mg/kg	No	6
08.3.2	heat-treated processed comminuted meat, poultry, and game products	500	mg/kg	No	6
09.2.4.1	cooked fish and fish products	500	mg/kg	No	6
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	1200	mg/kg	No	6
09.3.3	salmon substitutes, caviar, and other fish roe products	160	mg/kg	No	6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg	No	6
41.6	table-top sweeteners, including those containing high-intensity sweeteners	4545	mg/kg		6
12.3	Vinegars	300	mg/kg	No	6

Saccharin, INS 954 (Flavour Enhancer, Sweetener)					
Food Cat No.	Food Category	Max	Level	Comments	Step
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	200	mg/kg	No	6
12.9.1.3	other soybean products (including non-fermented soy sauce)	500	mg/kg	No	6
13.1.3	formulae for special medical purposes for infants	200	mg/kg	Sweeteners are not necessary in foods intended for infants	3
14.1.2.4	concentrates for vegetable juice	300	mg/kg	No	6
14.1.3.4	concentrates for vegetable nectar	300	mg/kg	No	6
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	200	mg/kg	No	6
16.0	composite foods - foods that could not be placed in categories 01 - 15	200	mg/kg	No	6

c) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.),

01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	400	mg/kg	Suggested level 80 mg/l ENERGY REDUCED OR WITH NO ADDED SUGAR
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	200	mg/kg	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	300	mg/kg	Suggested level 100 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	400	mg/kg	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	300	mg/kg	Suggested level 100 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
03.0	edible ices, including sherbet and sorbet	300	mg/kg	Suggested level 100 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
04.1.2.3	fruit in vinegar, oil, or brine	160	mg/kg	sweet sour only
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg	Energy reduced or with no added sugar
04.1.2.5	jams, jellies and marmelades	200	mg/kg	Energy reduced
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	200	mg/kg	Energy reduced
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	200	mg/kg	Energy reduced
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	100	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	2000	mg/kg	Suggested 160 mg/kg sweet sour only
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	500	mg/kg	Suggested 160 mg/kg sweet sour only
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	500	mg/kg	Suggested level 200 mg/kg energy reduced
05.1	cocoa products and chocolate products including imitations and chocolate substitutes	500	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2.1	hard candy	3000	mg/kg	Suggested level 500 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2.2	soft candy	500	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2.3	nougats and marzipans	500	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.3	chewing gum	3000	mg/kg	Suggested level 1200 mg/kg no added sugar
06.3	breakfast cereals, including rolled oats	100	mg/kg	only for breakfast cereals with a fibre content of more than 15% and containing at least 20% bran, energy reduced or with no added sugar
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	100	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR

07.2	fine bakery wares (sweet, salty, savoury) and mixes	2000	mg/kg	Suggested level 170 mg/kg Special nutritional uses only
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	160	mg/kg	Suggested level 160 mg/kg sweet sour preserves only
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	2000	mg/kg	Suggested level 160 mg/kg sweet sour preserves only
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	1200	mg/kg	Suggested level 160 mg/kg sweet sour preserves only
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	Suggested level 160 mg/kg sweet sour preserves only
10.4	egg-based desserts (e.g., custard)	100	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
12.5	soups and broths	110	mg/kg	Energy reduced
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	500	mg/kg	
12.6.1	Emulsified sauces (e.g., mayonnaise, salad dressing)	200	mg/kg	Suggested level 160 mg/kg
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	160	mg/kg	Suggested level 160 mg/kg
12.6.3	mixes for sauces and gravies	300	mg/kg	Suggested level 160 mg/kg
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	300	mg/kg	Suggested level 200 mg/kg
13.4	dietetic formulae for slimming purposes and weight reduction	300	mg/kg	
13.4	dietetic formulae for slimming purposes and weight reduction	400	mg/kg	Suggested level 240 mg/kg
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	500	mg/kg	Suggested level 200 mg/kg
13.6	food supplements	1200	mg/kg	Suggested level 80 mg/kg (liquid form) 500 mg/kg (solid form) 1200 mg/kg (syrup type or chewable)
14.1.4.1	Carbonated water-based flavoured drinks	500	mg/kg	Suggested level 80 mg/l ENERGY REDUCED OR WITH NO ADDED SUGAR
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	500	mg/kg	Suggested level 80 mg/l ENERGY REDUCED OR WITH NO ADDED SUGAR
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	2000	mg/kg	Suggested level 80 mg/l (as consumed) ENERGY REDUCED OR WITH NO ADDED SUGAR
14.2.1	beer and malt beverages	80	mg/kg	Only certain types
15.0	ready-to-eat savouries	100	mg/kg	Certain flavours only and coated nuts

SUCRALOSE, INS 955

a) Which food additive provisions you support for adoption at Step 5/8 or 8,

13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	400	mg/kg	ok	6
12.6.3	mixes for sauces and gravies	450	mg/kg	ok	6
12.6.4	clear sauces (e.g., fish sauce)	450	mg/kg	ok	6

b) Which food additive provisions you support requesting additional information and the type of information needed,

The EC feels that the use of sweeteners in foods intended for infants is not necessary

13.1.3	formulae for special medical purposes for infants	400	mg/kg		3
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01.1.1	Milk and buttermilk (plain)		GMP		6
01.2.1	fermented milks (plain)	400	mg/kg		3
01.2.1.1	Fermented milks (plain), not heat-treated after fermentation		GMP		6
01.2.1.2	fermented milks (plain), heat-treated after fermentation	250	mg/kg		6
01.2.2	Renneted milk (plain)		GMP		6
01.3.1	Condensed milk (plain)		GMP		6
01.3.2	beverage whiteners	580	mg/kg		3
01.4	cream (plain) and the like	580	mg/kg		3
01.5	Milk powder and cream powder and powder analogues (plain)		GMP		6
01.6	Cheese and analogues		GMP		6

01.8	Whey and whey products, excluding whey cheeses		GMP		6
02.3	Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions		GMP		6
04.1.2.1	frozen fruit	400	mg/kg		3
04.1.2.2	dried fruit	1500	mg/kg		3
04.1.2.7	candied fruit	800	mg/kg		6
05.1.1	cocoa mixes (powders) and cocoa mass/cake	1500	mg/kg		6
05.1.2	cocoa mixes (syrups)	1000	mg/kg		6
06.6	batters (e.g., for breading or batters for fish or poultry)	600	mg/kg		6
06.7	pre-cooked or processed rice products, including rice cakes (Oriental type only)	600	mg/kg		6
07.1	bread and ordinary bakery wares	750	mg/kg		6
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	1500	mg/kg		6
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	1500	mg/kg		6
14.1.2.2	vegetable juice	300	mg/kg		3
14.1.2.4	concentrates for vegetable juice	1500	mg/kg		3
14.1.3.2	vegetable nectar	300	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	1500	mg/kg		3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	300	mg/kg		3
14.2	alcoholic beverages, including alcohol-free and low-alcoholic counterparts	700	mg/kg	This category is too wide for the use of sweeteners	6
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	1250	mg/kg		6
12.2.1	herbs and spices	400	mg/kg		3
12.2.2	seasonings and condiments	700	mg/kg		6
12.3	vinegars		GMP		3
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	150	mg/kg		6
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	150	mg/kg		6
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	1000	mg/kg		6
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	150	mg/kg		6
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	1500	mg/kg		6
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 category 12.10	150	mg/kg		6
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	150	mg/kg		6
04.1.2.12	cooked fruit	150	mg/kg		6

c) Which food additive provisions you support revising (e.g., higher/lower maximum use level, addition/subtraction of a note clarifying conditions of use, etc.), and

Food Cat No.	Food Category	Max	Level	Comments
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	400	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	400	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
03.0	edible ices, including sherbet and sorbet	400	mg/kg	Suggested level 320 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
04.1.2.3	fruit in vinegar, oil, or brine	180	mg/kg	Sweet sour only
04.1.2.4	canned or bottled (pasteurized) fruit	450	mg/kg	Suggested level 400 mg/kg energy reduced or no added sugar
04.1.2.5	jams, jellies and marmelades	1000	mg/kg	Suggested level 400 mg/kg energy reduced
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	800	mg/kg	Suggested level 400 mg/kg energy reduced

Food Cat No.	Food Category	Max	Level	Comments
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	450	mg/kg	Suggested level 400 mg/kg energy reduced
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	1250	mg/kg	Suggested level 400 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
04.1.2.10	fermented fruit products	150	mg/kg	Sweet sour only
04.1.2.11	fruit fillings for pastries	400	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	450	mg/kg	Suggested level 400 mg/kg energy reduced
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	500	mg/kg	Suggested level 400 mg/kg energy reduced
05.1.3	cocoa-based spreads, including fillings	1500	mg/kg	Suggested level 400 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
05.1.4	cocoa and chocolate products	1500	mg/kg	Suggested level 800 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
05.1.5	imitation chocolate, chocolate substitute products	1500	mg/kg	Suggested level 800 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	2400	mg/kg	Suggested level 1000 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
05.3	chewing gum	5000	mg/kg	Suggested level 3000 mg/kg no added sugar
06.3	breakfast cereals, including rolled oats	1000	mg/kg	Proposed level 400 mg/kg and only for breakfast cereals with a fibre content of more than 15% and containing at least 20% bran, energy reduced or with no added sugar
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	1250	mg/kg	Suggested level 400 mg/kg ENERGY REDUCED OR WITH NO ADDED SUGAR
07.2.1	cakes, cookies and pies (e.g., fruit-filled or custard types)	750	mg/kg	Suggested level 700 mg/kg special nutritional uses only
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	800	mg/kg	Suggested level 700 mg/kg special nutritional uses only
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)	750	mg/kg	Suggested level 700 mg/kg special nutritional uses only
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	120	mg/kg	Sweet sour preserves only
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	450	mg/kg	Sweet sour preserves only Suggested level 120 mg/kg
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	450	mg/kg	Sweet sour preserves only Suggested level 120 mg/kg
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans and echinoderms	120	mg/kg	Sweet sour preserves only
10.4	egg-based desserts (e.g., custard)	400	mg/kg	ENERGY REDUCED OR WITH NO ADDED SUGAR
11.6	table-top sweeteners, including those containing high-intensity sweeteners	12000	mg/kg	Suggested level GMP
12.4	Mustards	400	mg/kg	Suggested level 140 mg/kg
12.5	soups and broths	1250	mg/kg	Suggested level 45 mg/l energy reduced
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	1250	mg/kg	Suggested level 450 mg/kg
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	1250	mg/kg	Suggested level 450 mg/kg
13.4	dietetic formulae for slimming purposes and weight reduction	1250	mg/kg	Suggested level 320 mg/kg
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	800	mg/kg	Suggested level 400 mg/kg
13.6	food supplements	2400	mg/kg	Suggested level 240 mg/l (liquid form) 800 mg/kg (solid form) 2400 mg/kg (syrup type or chewable form)
14.1.4.1	carbonated water-based flavoured drinks	600	mg/kg	Suggested level 300 mg/l ENERGY REDUCED OR WITH NO ADDED SUGAR
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	600	mg/kg	Suggested level 300 mg/l ENERGY REDUCED OR WITH NO ADDED SUGAR

Food Cat No.	Food Category	Max	Level	Comments
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	1500	mg/kg	Suggested level 300 mg/l (as consumed) ENERGY REDUCED OR WITH NO ADDED SUGAR
15.0	ready-to-eat savouries	1000	mg/kg	Level too high suggest 200. certain flavours only and coated nuts

POLYVINYL ALCOHOL (INS 1203)

The EC does not currently permit the use of PVA as a food additive, however the European Community recognises the technological need as a glazing agent on food supplements (13.6). The other proposed uses seem unjustified (01.7, 05.1.4, 06.3, 15.2).

Neotame and polyvinyl alcohol are not currently permitted food additives within the European Union and therefore the European Community has no information to submit at this time on either of these additives.

ASPARTAME-ACESULFAME SALT (INS 962)

The European Community wishes to propose the following categories for aspartame-acesulfame salt which is in line with European Community legislation for this additive and is based upon the levels permitted within the EU.

Maximum usable doses for the salt of aspartame-acesulfame are derived from the maximum usable doses for its constituent parts, aspartame (E951) and acesulfame-K (E950). The maximum usable doses for both aspartame (E951) and acesulfame-K (E950) should not to be exceeded by use of the salt of aspartame-acesulfame, either alone or in combination with E950 or E951.

Maximum levels are expressed either as (a) acesulfame-K equivalents or (b) aspartame equivalents.

Food Cat No.	Food Category	Max Level		Comments
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	350	mg/l (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	350	mg/kg (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	350	mg/kg (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
03.0	edible ices, including sherbet and sorbet	800	mg/kg (b)	ENERGY REDUCED OR WITH NO ADDED SUGAR
04.1.2.3	fruit in vinegar, oil, or brine	200	mg/kg (a)	Sweet sour only
04.1.2.4	canned or bottled (pasteurized) fruit	350	mg/kg (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
04.1.2.5	jams, jellies and marmalades	1000	mg/kg (b)	Energy reduced
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	350	mg/kg (a)	Energy reduced
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	350	mg/kg (a)	Energy reduced
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	350	mg/kg (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
04.1.2.11	fruit fillings for pastries	350	mg/kg (a)	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	200	mg/kg (a)	Sweet sour only
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	350	mg/kg (a)	Vegetable desserts ENERGY REDUCED OR WITH NO ADDED SUGAR
05.1.3	cocoa-based spreads, including fillings	1000	mg/kg (b)	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.1.4	cocoa and chocolate products	500	mg/kg (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.1.5	imitation chocolate, chocolate substitute products	500	mg/kg (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2.1	hard candy	500 1000 (starch based only) 2500 (breath freshening micro sweets)	mg/kg (a)	No added sugar ENERGY REDUCED OR WITH NO ADDED SUGAR No added sugar

05.2.2	soft candy	500 1000 (starch based only)	mg/kg (a)	No added sugar ENERGY REDUCED OR WITH NO ADDED SUGAR
05.2.3	nougats and marzipans	500 1000 (starch based only)	mg/kg (a)	No added sugar ENERGY REDUCED
05.3	chewing gum	2000	mg/kg (a)	No added sugar
06.3	breakfast cereals, including rolled oats	1000	mg/kg (b)	with a fibre content of more than 15 %, and containing at least 20 % bran ENERGY REDUCED OR WITH NO ADDED SUGAR
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	350	mg/kg (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
07.2	Fine bakery wares (sweet, salty, savoury) and mixes	1000	mg/kg (a)	for special nutritional uses only <i>Essoblaten</i>
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg (a)	
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg (a)	
10.4	egg-based desserts (e.g., custard)	350	mg/kg (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
11.6	table-top sweeteners, including those containing high-intensity sweeteners	GMP	mg/kg	
12.4	mustards	350	mg/kg (b)	
12.5	soups and broths	110	mg/kg (b)	Energy reduced
12.6	sauces and like products	350	mg/kg (b)	
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	1000	mg/kg (b)	ENERGY REDUCED OR WITH NO ADDED SUGAR
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	450	mg/kg (a)	
13.4	dietetic formulae for slimming purposes and weight reduction	450	mg/kg (a)	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	450	mg/kg (a)	
13.6	food supplements	350 (liquid form) 500 (solid form) 2000 (syrup type/ chewable form)	mg/kg (a)	
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	350	mg/l (a)	ENERGY REDUCED OR WITH NO ADDED SUGAR
14.2.1	beer and malt beverages	350 25	mg/l (a) mg/l (b)	Alcohol-free beer or with an alcohol content not exceeding 1,2 % vol. 'Bière de table/Tafelbier/Table beer' (original wort content less than 6 %) except for 'Oberjähriges Beers with a minimum acidity of 30 milli-equivalents expressed as NaOH. Brown beers of the 'oud bruin' type Energy-reduced beer
14.2.2	cider and perry	350	mg/l (a)	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	350	mg/l (a)	
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	500	mg/kg (b)	Certain sweet/sour flavours only
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	500	mg/kg (b)	
15.3	snacks - fish based	500	mg/kg (b)	Certain sweet/sour flavours only

Peroxyacid antimicrobial solutions are currently not allowed for use as a food additive in the EU nor as a processing aid for use on food of animal origin.

Zeaxanthin (INS 161h) is currently not permitted as a food additive within the European Union and therefore the European Community has no information to submit at this time on this additive.

Lutein (INS 161b) from *tagetes erecta* and other sources is a permitted food colour within the European Union. The authorisation of lutein as food colour is restricted. Lutein may be used singly or in combination with the following colours:

E 100 Curcumin
 E 102 Tartrazine
 E 104 Quinoline Yellow
 E 110 Sunset Yellow FCF Orange Yellow S
 E 120 Cochineal, Carminic acid, Carmines
 E 122 Azorubine, Carmoisine
 E 124 Ponceau 4R, Cochineal Red A
 E 129 Allura Red AC
 E 131 Patent Blue V
 E 132 Indigotine, Indigo carmine
 E 133 Brilliant Blue FCF
 E 142 Green S
 E 151 Brilliant Black BN, Black PN
 E 155 Brown HT
 E 160d Lycopene
 E 160e Beta-apo-8'-carotenal (C 30)
 E 160f Ethyl ester of Beta-apo-8'-carotenic acid (C 30)

in the foods specified in the table below up to the maximum levels specified in that table¹⁶³.

Food Cat No.	Food Category	Max	Level	Comments
01.1.2 and 14.1.4	Non-alcoholic flavoured drinks	100	mg/kg	With the exception of chocolate milk
01.6.2.2	rind of ripened cheese	GMP		
01.6.4	processed cheese	100	mg/kg	For flavoured processed cheese only.
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	150	mg/kg	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	150	mg/kg	
03.0	edible ices, including sherbet and sorbet	150	mg/kg	
04.1.2.5	Jams, jellies and marmelades	100	mg/kg	singly or in combination with the colours INS 104, 110, 120, 124, 142 and 160d only
04.1.2.7	candied fruit	200	mg/kg	
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	150	mg/kg	
04.1.2.11	fruit fillings for pastries	150	mg/kg	
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	300	mg/kg	
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg	
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	150	mg/kg	
07.2	Fine bakery wares	200	mg/kg	
08.4	Edible casings (e.g., sausage casings)		GMP	
09.1.1	fresh fish	300	mg/kg	Note 50 ¹⁶⁴

¹⁶³ There are further restrictions with regard to the maximum level for the colours E 110, E 122, E 124 and E 155 in certain foodstuffs, which do not affect the maximum level for lutein.

¹⁶⁴ **Note 50:** For use in fish roe only.

Food Cat No.	Food Category	Max	Level	Comments
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 95 ¹⁶⁵
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg	
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 22 ¹⁶⁶
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg	
10.4	egg-based desserts (e.g., custard)	150	mg/kg	
12.2.2	seasonings and condiments	500	mg/kg	
12.4	mustards	300	mg/kg	
12.5	soups and broths	50	mg/kg	
12.6	sauces and like products	500	mg/kg	With the exception of tomato-based sauces
12.9.5	other protein products	100	mg/kg	
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg	
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	100	mg/kg	
13.6	food supplements	300	mg/kg	
14.2.2	cider and perry	200	mg/kg	
14.2.4	wines (other than grape)	200	mg/kg	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg	
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	200	mg/kg	
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg	

IRAN:

In reply to your request for comments and information on Food Additive Provisions for Priority Additives in the GSFA (CL 34/2005-FAC), The Food Additives Codex Committee of Iran considered these provisions and commented as follows:

No.	Food Additives	Do not agree with use in ...
1	Benzoates	jams, jellies and marmalades
2	Brilliant Blue FCF	meat and meat products, cocoa and chocolate products, jams, jellies and marmalades
3	Canthaxanthin	Jams, jellies and marmalades
4	Carotenes, Vegetable	fresh meat, poultry and game, cocoa and chocolate products
5	Chlorophyll, Copper Complexes	meat, dairy, and oil products
6	Erythrosine	all kinds of food products
7	Allura Red AC	meat, dairy, and cereal products; jams, jellies, and marmalades
8	Caramel Color	fish products, tea, coffee, and cocoa products; jams, jellies, and marmalades
9	Carotenoids	fish and meat products, cocoa, jams, jellies, and marmalades
10	Fast Green FCF	meat, fish, dairy, and cereal products, seasonings and condiments
11	Indigotine	meat, fish, dairy, and cereal products, cocoa, jams, jellies, marmalades, and canned or bottled fruit, and seasonings and condiments, processed nuts including covered nuts and nut mixtures (with e.g., dried fruit)
12	Ponceau 4R	meat, fish, dairy, and cereal products; jams, jellies, marmalades, dried and canned fruit, cocoa, syrups, soups, broths, processed nuts
13	Sunset Yellow FCF	meat, fish, dairy, oil and cereal products; jams, jellies, marmalades, dried and canned fruit, cocoa, syrups, soups, broths, processed nuts, seasonings, condiments, coffee and tea products
14	Saccharin	all kinds of food products

¹⁶⁵ **Note 95:** For use in surimi and fish roe products only.

¹⁶⁶ **Note 22:** For use in smoked fish products only.

We kindly request to be sent any information regarding separation and determination of Synthetic Food Color in food products.

MALAYSIA:

FOOD ADDITIVES FOR FOOD CATEGORY 06.4.3 PRE-COOKED PASTA AND NOODLES AND LIKE PRODUCTS

The food additives BHA (INS 320), BHT (INS 321), TBHQ (INS 319) and propyl gallate (INS 310) used singly or in combination are carried over from the fats/oils used for frying the noodle. The proposed maximum level of 200 mg/kg is acceptable to function as antioxidants. Therefore, the inclusion of a note stating "Carry over from use of fats and oils" is satisfactory for these food additives.

Malaysia is of the view that Adipates (INS 355-357) is needed at maximum levels of 1000 mg/kg to meet the technological function as acidity regulator.

Malaysia would like to propose addition of the following food additives to the Food Additive Provisions for use in instant noodles as follows:

INS No.	Food Additive	Maximum level	ADI(mg/kg body weight)	Notes: Justification for use
501(i)	Potassium carbonate	GMP	Not Limited	An acid regulator that increases the firmness of the noodles. Combination of chlorides and carbonates increases the firmness of the noodle considerably. At a particular combination of chlorides and carbonates, cooked noodles exhibit greater reflectance. This ingredient helps to overcome the raw cereal taste of the noodles. It is a common ingredient for noodle production. With reference to GSFA, its addition in other products is at GMP.
400	Alginic Acid	GMP	Not Specified	A thickener that acts as a stabilizer and emulsifier. This ingredient also functions as thickening agent being a gum. It improves the eating quality of the noodle by working on the bite and texture of the cake. Usually used in Full Moisture Shelf Stable noodles. Its addition in category 06.4.1 and 06.4.2 is also at GMP.
412	Guar Gum	GMP	Not Specified	A thickener that has good water binding properties. It improves the processability and machinability. It provides greater resilience to the dough. Provides smooth and glossy surface to the cake and reduces its brittleness. Guar gum also acts as thickening agent. It improves the eating quality of the noodle by working on the bite and texture of the cake. Its addition in category 06.4.1 and 06.4.2 is also at GMP.
415	Xanthan Gum	GMP	Not Specified	A thickener that has high solubility. It acts as an effective stabilizer and emulsifying agent. It is also a thickening agent. Xanthan gum has good freeze-thaw stability.
452(i)	Sodium Polyphosphate	2200mg/kg	MTDI 70mg/kg bw (as P)	A water retention agent with the phosphates undergoes esterification reactions and cross linking between molecules of starches and proteins. It acts as a buffering agent and stabilizes pH. It functions as a wetting agent for carbonates and leads to better dispersion in the mix. Sodium polyphosphate promotes rehydration positively and tends to give bouncy texture with clean bite. A maximum level of 2200mg/kg is necessary to meet the technological function.
466	Sodium Carboxymethyl Cellulose	GMP	Not Specified	A stabilizer that acts as a texture modifier, stabilizing and emulsifying agent. It improves the water retaining capacity of the dough and improves the crump texture. It is more resistant to common oxidizing agents. It retards starch retro gradation and prevent staling to a certain extent. CMC improves mixing tolerances. It provides a smooth and glossy surface to the cake and reduces the cake brittleness.

Malaysia is of the view that sodium carbonate (INS 500i) has the same technological function for use as potassium carbonate and proposes GMP provision for use in noodle block. Sodium Carbonate is an acid regulator that increases the firmness of the noodles. Combination of chlorides and carbonates increases the firmness of the noodle considerably. At a particular combination of chlorides and carbonates, cooked noodles exhibit greater reflectance. This ingredient helps to overcome the raw cereal taste of the noodles. It is a common ingredient for noodle production and has been evaluated by JECFA as ADI 'Not Limited'.

Sodium carbonate is listed in Table 3 of the Codex GSFA, '*Additives Permitted for Use in Foods in General, unless otherwise Specified, In Accordance with GMP*'. Furthermore, the use of sodium carbonate at GMP provision has already been allowed in other food categories, for example in food categories *05.0 Confectionery, 06.3 Breakfast cereals, including rolled oats and 07.0 Bakery wares*.

Malaysia supports the other food additive listed in the Food Additive Provisions as in Appendix 1, Draft Standard for Instant Noodles circulated in CL-2005/29-CPL. Malaysia also supports the inclusion of food additives and their proposed levels for food category *06.4.3 Pre-cooked pasta and noodles and like products* in CL 34/2005-FAC including Carmines (INS 120), Canthaxanthin (INS 161g), Carotenes (INS 160aii), Chlorophylls (INS 141i and 141ii), Caramel Colour Class III (INS 150c), Caramel Colour Class IV (INS 150d), Carotenoids (INS 160ai, 160aii, 160e, 160f), Fast Green FCF (INS 143), Acesulfame Potassium (INS 950) and Sulfites (INS 220, 221, 222, 223, 224, 225, 227, 228, 539) for use as colour in seasoned noodles, and Polysorbates (INS 432, 433, 434, 435, 436).

Malaysia is of the view that food additive provisions agreed by CCCPL be submitted to the 38th Session of the CCFAC for endorsement and as basic reference material for CCFAC to complete food additive provisions for food category *06.4.3 Pre-cooked pasta and noodles and like products* and for adoption by the 29th Session of the Codex Alimentarius Commission.

Malaysia is also of the view that the Draft Standard for Instant Noodles should simultaneously be endorsed by the CCCPL for adoption by the 29th Session of the Codex Alimentarius Commission.

1. Polydimethylsiloxane (INS 900A)

Malaysia notes that the use of polydimethylsiloxane in *food category 2.1 Fats and Oils essentially free from water* had been provided for at Step 3 in the Report of the Electronic Working Group in document CX/FAC 05/37/9. The eWG could not reach consensus on the draft provisions for polydimethylsiloxane in some food categories which had included the *food category 2.1-Fats and Oils essentially free from water*. The 37th Session of the CCFAC had requested for information on the use of polydimethylsiloxane in the food categories concerned based on Recommendation 3 of the eWG with the understanding that if no information is received by the 38th Session of the CCFAC to justify for their uses, the listings of polydimethylsiloxane in these food categories will be deleted.

We had submitted our written comments to the 37th CCFAC (in CRD 21). Malaysia had proposed that the entry for the food category *2.1 Fats and Oils essentially free from water* at maximum level 10 mg/kg to be retained as this food additive is commonly used as an anti-foaming agent in oils and fats in industrial frying and in batch frying. However, Malaysia is concerned that the provision for the use of polydimethylsiloxane in this food category does not appear in CL 34/2005-FAC and possibly been inadvertently missed out.

Malaysia therefore would like to propose that the entry for polydimethylsiloxane in the food category *2.1 Fats and Oils essentially free from water* at maximum level 10 mg/kg to be re-inserted, as that the provision for this food additive in this food category has not been discontinued at the last 37th Session of the CCFAC.

The proposed maximum level of 10 mg/kg is sufficient for it to achieve the intended technological function as an anti-foaming agent in oils and fats.

Polydimethylsiloxane is safe to be used at a maximum level of 10 mg/kg in view that this food additive, is allowed to be used in other foods such as in *milk powder and cream powder* (food category 01.5.1) at maximum level 10 mg/kg as anti-caking agent, in *jams, jellies and marmalades* (food category 04.1.2.5) at maximum level 30 mg/kg and in *fruit-based desserts* (food category 04.1.2.9) at maximum level 110 mg/kg.

2. Propylene Glycol Esters of Fatty Acids (INS 477)

Malaysia would like to propose that the entry for the food category *02.2.1.3 blends of butter and margarine* at maximum level of 10,000 mg/kg currently at Step 3 to be retained and supports the endorsement of the provision for propylene glycol esters of fatty acids for adoption at Step 8 by the 38th CCFAC in the food category *2.4 fat-based desserts excluding dairy-based dessert products of food category 01.7* at maximum level of 40,000 mg/kg currently at Step 6.

This food additive is needed in the above food categories to function as an emulsifier and stabilizer. For the *food category 02.2.1.3 blends of butter and margarine*, the proposed maximum level of 10,000 mg/kg of polypropylene glycerol esters of fatty acids is sufficient to achieve this technological function. However, Malaysia supports the maximum level of 40,000 mg/kg for the *food category 2.4 fat-based desserts excluding dairy-based dessert products of food category 01.7*, as this higher level is needed and justified to achieve this technological function.

The use of propylene glycol esters of fatty acids at a maximum level of 10,000 mg/kg has already been allowed in other food categories, for example in food categories *04.1.2.8 Fruit preparations, including pulp, purees, fruit toppings and coconut milk, 04.1.2.9 Fruit-based desserts, including fruit flavoured water based desserts, 04.1.2.11 Fruit fillings for pastries, 05.4 Decorations (e.g. for fine bakery wares), toppings (non-fruits) and sweet sauces, 06.5 Cereal and starch based desserts (e.g. rice puddings, tapioca puddings and category 10.4 Egg-based desserts (e.g. custards).*

This food additive is therefore safe for use at a maximum level of 10,000 mg/kg in view that it is already been used in other food categories as mentioned above.

3. Butylated Hydroxyanisole (BHA) (INS 320)

Malaysia supports the endorsement of the provision for adoption at Step 8 by the 38th CCFAC for BHA in the food category *02.0 fats and oils and fat emulsions* at maximum level of 200 mg/kg currently at Step 6 of the Codex Step procedure. This food additive is commonly used as an antioxidant to prohibit lipid oxidation in fats and oils and fats emulsions.

In addition, Malaysia would also like to endorse the provision for adoption at Step 8 for BHA in the food category *02.1 Fats and Oils essentially free from water* currently at Step 6. The use of this food additive in this food category had been included in the document CX/FAC 05/ 37/9. The eWG could not reach consensus on the draft provisions for BHA in some food categories which had included the food category *2.1 Fats and Oils essentially free from water*. The 37th Session of the CCFAC had requested for information on the use of BHA in the food categories concerned based on Recommendation 4 of the eWG with the understanding that if no information is received by the 38th Session of the CCFAC to justify for their uses, the draft provisions will be deleted.

Malaysia had submitted our written comments to the 37th CCFAC (in CRD 21). Malaysia had proposed that the entry for the food category *2.1 Fats and Oils essentially free from water* at maximum level 200 mg/kg to be retained as this food additive is commonly used as an antioxidant to prohibit lipid oxidation in fats and oils. However, Malaysia notes that the provision for use of BHA in this food category does not appear in CL 34/2005-FAC has possibly been inadvertently missed out.

Malaysia therefore, strongly proposes that the provision for BHA in the food category *02.1 Fats and Oils essentially free from water* to be reinserted and the provision of this food additive to be endorsed for adoption at Step 8 by the 38th CCFAC in view that the provision for this food additive in this food category has not been discontinued at the last 37th Session of the CCFAC. Malaysia would also like to reiterate that the 38th CCFAC endorses the adoption at Step 8 for BHA in the *food category 02.0 fats and oils and fat emulsions* at maximum level of 200 mg/kg currently at Step 6.

The proposed maximum level of 200 mg/kg in these food categories is justified for it to achieve the intended technological function as an antioxidant to prohibit lipid oxidation in fats and oils and in fats emulsions.

BHA is safe to be used in view that this food additive is allowed for use in other food categories, for example in food categories *02.2.1.2 margarine and similar products* at maximum level 200 mg/kg, *02.2.2 emulsions containing less than 80% fat* at maximum level of 200 mg/kg, *02.3 fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions* at maximum level 200 mg/kg and *02.4 fat-based desserts excluding dairy-based dessert products of food category 01.7* at maximum level 200 mg/kg. The provisions for the use of this food additive in these food categories were adopted by the last 28th Session of the CAC in July 2005.

4. Butylated Hydroxytoluene (BHT) (INS 321)

Malaysia supports the endorsement of the provision for adoption at Step 8 for BHT in the food categories *02.1 fats and oils essentially free from water* and *02.2.1.2 margarine and similar products* currently at Step 6 of the Codex Step procedure. This food additive is commonly used as an antioxidant to prohibit lipid oxidation in fats and oils and in fats emulsions.

Malaysia is of the view that the proposed maximum level of 200 mg/kg for BHT in food category *02.1 fats and oils essentially free from water* is justified for it to achieve the intended technological function as an antioxidant in oils and fats to prohibit lipid oxidation. However, for the food category *02.2.1.2 margarine and similar products*, Malaysia is of the view that the maximum level of 200 mg/kg is sufficient for this additive to achieve its intended technological function. Malaysia therefore supports for the maximum level of 200 mg/kg BHT in the food category *02.2.1.2 margarine and similar products* instead of the proposed maximum level of 500 mg/kg.

BHT is safe to be used in view that this food additive is allowed for use in other food categories, for example in food categories *02.2.2 emulsions containing less than 80% fat* at maximum level of 200 mg/kg, *02.3 fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions* at maximum level 200 mg/kg and *02.4 fat-based desserts excluding dairy-based dessert products of food category 01.7* at maximum level 200 mg/kg. The provisions for the use of this food additive in these food categories were adopted by the last 28th Session of the CAC in July 2005.

5. Tertiary Butylhydroxyquinone (TBHQ) (INS 319)

Malaysia supports the endorsement of the provision for adoption at Step 8 by the 38th CCFAC for TBHQ in the food category *02.0 fats and oils and fat emulsions* at maximum level of 200 mg/kg currently at Step 6 of the Codex Step procedure. This food additive is commonly used as an antioxidant to prohibit lipid oxidation in fats and oils and in fats emulsions.

The proposed maximum level of 200 mg/kg in this food category is justified for it to achieve the intended technological function as an antioxidant to prohibit lipid oxidation in fats and oils and in fats emulsions.

TBHQ is safe to be used in view that this food additive is allowed for use in other food categories, for example in food categories 02.1 *fats and oils essentially free from water* at maximum level 200 mg/kg, 02.2.1.2 *margarine and similar products* at maximum level 200 mg/kg, 02.2.1.3 *blends of butter and margarine* at maximum level 200 mg/kg, 02.2.2 *emulsions containing less than 80% fat* at maximum level of 200 mg/kg, 02.3 *fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions* at maximum level 200 mg/kg and 02.4 *fat-based desserts excluding dairy-based dessert products of food category 01.7* at maximum level 200 mg/kg. The provisions for the use of this food additive in these food categories were adopted by the last 28th Session of the CAC in July 2005.

6. Diacetyltartaric and Fatty Acid Esters of Glycerol (DATEM) (INS 472E)

Malaysia supports the endorsement of the provision for adoption at Step 8 by the 38th CCFAC for Diacetyltartaric and Fatty Acid Esters of Glycerol (DATEM) in food categories 02.1 *fats and oils essentially free from water* and 02.2 *fat emulsions mainly of type water-in-oil* both at maximum level of 10,000 mg/kg currently at Step 6 of the Codex Step procedure. This food additive is commonly used as a stabilizer and emulsifier for these food categories.

The proposed maximum level of 10,000 mg/kg in these food categories is justified for it to achieve the intended technological function as a stabilizer and emulsifier in fats and oils and in fats emulsions.

DATEM is safe to be used in view that this food additive is allowed for use in other food categories, for example in food categories 02.2.1.2 *margarine and similar products* at maximum level 10,000 mg/kg, 02.2.1.3 *blends of butter and margarine* at maximum level 10,000 mg/kg, 02.2.2 *emulsions containing less than 80% fat* at maximum level of 10,000 mg/kg, 02.3 *fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions* at maximum level 10,000 mg/kg and 02.4 *fat-based desserts excluding dairy-based dessert products of food category 01.7* at maximum level 5,000 mg/kg. The provisions for the use of this food additive in these food categories were adopted by the last 28th Session of the CAC in July 2005.

7. Sulphites (INS 220, 221, 222, 223, 224, 225, 227, 228, 539)

Malaysia would like to maintain the entry for the food category 02.3 *fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions* at maximum level of 50 mg/kg currently at Step 3 of the Codex Step procedure as this food additive is necessary in this food category to function as a preservative.

The proposed maximum level of 50 mg/kg for this food category is justified for this food additive to achieve the intended technological function as a preservative in fats emulsions.

Sulphites is considered safe to be used in view that this food additive is allowed to be used in other food categories, for example in food categories 11.1.5 *plantation or mill white sugar* at maximum level 70 mg/kg, 14.1.2.1 *fruit juice* at maximum level 50 mg/kg, 14.1.2.3 *concentrate of fruit juice* at maximum level 50 mg/kg, 14.1.3.1 *fruit nectar* at maximum level 50 mg/kg and 14.1.3.3 *concentrates for fruit juice* at maximum level 50 mg/kg. The provisions for the use of this food additive in these food categories were adopted by the last 28th Session of the CAC in July 2005.

8. Carotenes Vegetables (INS 160aii)

Malaysia is of the view that the maximum level of 26 mg/kg for carotenes vegetable in the food category 02.2.1.2 *margarine and similar products* which was adopted by the last 28th CAC is insufficient to achieve the desired colour of the product during shelf life due to low stability of the naturally-occurring carotenes in the product. Naturally-occurring carotenes are much more unstable in relation to isomerization and oxidation resulting in its loss during preparation, processing and storage.

At the last 37th CCFAC, Malaysia had submitted our written comments (in CRD 21) to support for the endorsement by the CCFAC at Step 8 from Step 6 the provisions for GMP in the following food categories 02.1 *fats and oils essentially free from water* 02.2.1.2 *margarine and similar products*, 02.2.2 *emulsions containing less than 80% fat* 02.3 *fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions* and 02.4 *fat-based desserts excluding dairy-based dessert products of food category 01.7*. However, Malaysia notes that the above provisions in those food categories mentioned had been discontinued by the last 37th Session of the CCFAC.

Malaysia would like to reiterate that we are strongly of the view that CCFAC agree to GMP provision for carotenes vegetables as a colouring substance as carotenes vegetables is a natural product, and should therefore be safe for use for this intended technological function. A quantitative level is unrealistic for the above food categories as carotenes vegetables is naturally-occurring.

Petición de Información sobre el neotamo (SIN 961), el alcohol polivinílico (SIN 1203) y la sal de aspartame-acesulfame (SIN 962)

MEXICO:

In Mexico the use of neotame is permitted based on an assessment of the information on toxicology, safety and general technology.

The use of aspartame-acesulfame salt is also permitted under the same specifications of the JECFA.

In the case of polyvinyl alcohol (INS 1203), Mexico possesses NO information concerning its technological function as a food additive or any other information of a toxicological nature, and in general there is only scarce information to be found in toxicological journals. There is evidence, however, of residues of vinyl acetate in it as a result of its manufacture, so that we in any case suggest a revision of the specifications for commercial products, as well as for its uses.

SRI LANKA:**Need for Determination of MRL of Sulphite as SO₂ in Cinnamon**

National Codex Committee of Sri Lanka wishes to make the following comments with regards to item No.12.2.2 in respect of food additive - Sulfites (INS 220, 221, 222, 223,224, 225, 227, 228, 539) in response to CL 34/2005 - FAC of July 2005 (CX 4/30.2) - Appendix II.

Sri Lanka is one of the largest producers of authentic cinnamon (*Cinnamomum Zeylanicum* or otherwise known as Ceylon Cinnamon) exported to a number of countries including EU countries. On account of an European Parliament and Council Directive No.95/2/EC of 20 February 1995 Cinnamon exported to EU countries are being rejected in the absence of a product specific maximum residue limit set by the CAC as in the case of ginger, mustards etc.

The attached document provides the background information including the technical need for use of Sulphur Dioxide in processing cinnamon.

Sri Lanka would greatly appreciate if this matter is looked into **on a priority basis** as the cinnamon industry in Sri Lanka is adversely affected and a Product Specific Maximum Residue Level of 500 mg/kg is set for cinnamon.

Introduction:

The 37th Session of the Codex Committee on Food Additives and Contaminants (CCFAC) held in the Hague, Netherlands in April 2005 agreed to request comments from the Member Governments on the food additive provisions contained in Appendix IX of ALINORM/05/28/12 by justifying their uses.

It was further agreed that the comments, if any, be submitted by the Member Countries by the 38th Session of the CCFAC, i.e. by 01st December 2005.

The Government of Sri Lanka is pleased to submit the following comments and arguments on the use of food additive **Sulphur Dioxide (SO₂) in Food Category 12.2.1 (Herbs and Spices)** for favourable consideration of the Members of the CCFAC.

Background

Since November 2004, Sri Lanka has encountered problems with a number of consignments of 'Ceylon Cinnamon' exported to the European Union on the grounds that consignments contained Sulphur Dioxide (SO₂). The EC Authorities have cited, that this action was taken under a Technical Regulation relating to import of foodstuffs to the European Union (the EU) contained in **European Parliament and Council Directive No. 95/2/EC** of 20th February 1995 and its subsequent amendments.

In this regard Sri Lanka has communicated in detail its concerns and appealed to the SPS committee in the WTO in October 2005 wherein it has demonstrated the adverse impact of this ruling on the Cinnamon Industry of Sri Lanka.

The cinnamon Industry of Sri Lanka represents the third largest export agricultural crop (*Ceylon Tea being number one*) and provides employment to over 350,000 persons in over 70,000 cinnamon grower families. Sri Lanka exports approximately 9.0% of it's total produce of cinnamon to the EU countries.

The EU directive referred to above which covers food additives, identifies only those additives which satisfy the requirements stated therein, and Appendix II –Part B of the regulation deals with Sulphur Dioxide (SO₂) and Sulphite substances, and lists different sources of SO₂ (E220- E228) that have been permitted, indicating the maximum tolerable levels expressed in parts per million (ppm).

The Chemical Evaluation of Food Additives undertaken by JECFA in 1998, has accepted that SO₂ in acceptable quantities as food additives does not produce any adverse effect on human health. In addition to the EC, CODEX too has recognized the use of SO₂ and sulphites to be used in food as food additives, and this is described in Codex General Standards for Food Additives (GSFA), ALINORM 01/124 Appendix 4, page 144 and Food Category 12.2, which refers to all Herbs & Spices (12.2.1) and Seasoning & Condiments (12.2.2) and identifies a maximum residual value for SO₂ as 500 ppm.

Appendix II – Part B of the EC Directive No. 95/2/EC referred to above has listed food products, where levels up to 2,000 ppm of residual SO₂ had been permitted in certain food items, such as prunes – 2,000 ppm., apples & pears – 600 ppm., ginger – 150 ppm. and mustard 500 ppm.

As is seen, these are products that are consumed in very much larger quantities than cinnamon (with *the total world export of Cinnamomum zeylanicum – Ceylon Cinnamon is approximately 15,000 MT / annum*), but have been approved for very much higher levels of residual sulphur. However, regrettably neither the CODEX nor the EU identifies cinnamon as a food product, whereas Ginger – a spice (*with world trade in year 2002 being at – 210,000 MT based on WTO /UNCTAD Report Jan 2004*) has been listed in the EU document and with all Spices & Herbs, including Seasoning & Condiments in general being identified in the CODEX GSFA.

It is Sri Lanka's request that this anomaly due to omission be corrected and to permit the entry of exports of cinnamon to the EU at a residual SO₂ content as indicated in the CODEX GSFA referred to above wherein a level of 500 ppm has been identified for All Herbs & Spices.

The Technological Justification:

The General Guidelines of CAC on identifying of food additives and their respective technological functions recognise that a single food additive, such as SO₂ can be used for a range of technological functions in food items. According to the list of Codex Advisory Specifications for Food Additives, SO₂ has been adopted in 1999 as a permissible food additive. SO₂ may function as either a preservative¹⁶⁷ or an antioxidant¹⁶⁸ in foods or as an anti-browning (bleaching) agent.

The SO₂ is currently used for the bleaching and also as a preservative in many foods, and in the case of cinnamon, it functions as a preservative and an antibrowning (bleaching) agent.

Fumigation of cinnamon quills are carried out in a specially prepared fumigation chambers usually made of cement and brick walls. Top of the chamber an exhaust line with a chimney is built in, inside the chamber, using hard wood such as Jack or Coconut rafters, racks are built longitudinally approximately 4 feet height from the cement floor. Underneath the racks on the floor a rectangular pit is made with the depth of approximately 8 inches for placing sulphur to be burnt.

The amount of sulphur needed for a batch depends on the quantity of cinnamon placed in the fumigation chamber. As a guide approximately **one kg** of powdered sulphur is used for **one MT** of cinnamon. Once sulphur is lit in the pit it is partially closed with a wooden sheet. This prevents deposit of any sulphur on cinnamon which sublimates without burning. Sulphur dioxide fumes penetrate through quills and effectively fumigate cinnamon. Sulphur burn for about two hours and chamber is kept closed until the following morning for complete fumigation and colour fixation.

Bails are placed horizontally or some times vertically on the racks in loosened form, spread over each other and covered with jute hazing blankets before the lighting of sulphur. Usually fumigation starts late in the evening and chamber windows are closed. Fumes are allowed to remain overnight. On the following morning fumes are removed via exhaust line with the aid of exhausting fans for about thirty minutes.

Cinnamon quills removed from the chamber and loosened for final grading. They are hand picked and graded depending on diameter, length and appearance. If necessary part of the quill is cut or removed depending on diameter and kept aside as quillings. During this period most of the residue sulphur dioxide trapped in the quill escape from the quills.

After the fumigation it will take at least one week to prepare the final bail. The bails numbered graded, weighted and dated are ready for exports. During this whole period cinnamon quill is open to environment and any residue sulphur dioxide within the quill may escape leaving minimum residue sulphur level in the quills.

The Need for the Use of SO₂ as an additive:

The cinnamon industry of Sri Lanka has been a traditional industry spanning centuries. The variety of cinnamon that is grown is indigenous to Sri Lanka and is known as *Cinnamomum zeylanicum* - commonly referred to as 'sweet cinnamon' or 'true cinnamon' (*Cinnamomum verum*). Of the total quantity of cinnamon produced, over 75% is being exported as raw cinnamon (approximately 11,300 MT), which accounts for an almost 85% of the world demand for 'true' cinnamon.

Among many steps involved during the processing of cinnamon, fumigation is one of the important and critical steps. In addition to common aspects of fumigation such as avoiding insect damage and destruction of microbes; it helps in the fixation of characteristic yellow colour of Ceylon cinnamon. Cassia bark, a substitutable product, could be easily distinguished from the Ceylon cinnamon which possesses this unique yellow colour.

¹⁶⁷ This is defined as a function, which prolongs the self-life of food by protecting against deterioration caused by micro organisms.

¹⁶⁸ This is defined as a function, which prolongs the self-life of food by protecting against deterioration caused by oxidation, such as fat rancidity and colour changes.

Cinnamon quill is not a product manufactured with single piece of bark line in cassia. It is a bunch of carefully peeled inner bark of matured shoots of cinnamon tree, which are placed on one another in a telescopic manner until it reaches standard length of the quill (1050mm). As this whole process is carried out when the peels are fresh, (usually done under a shade), they are prone to microbial and bacterial contamination during the curing and also for insect attacks particularly at tropical and humid climatic conditions prevailing in the island.

Curing cannot be neglected as it is the key step for development of valuable major and minor chemical compounds responsible for aroma and flavour in true cinnamon including cinnamic aldehyde. Fumigation keeps the hygienic quality by preventing microbial contamination and insect attacks, it is, therefore, absolutely necessary to carry out fumigation.

The cinnamon industry has traditional practices in cinnamon peeling and fumigation, and the use of SO₂ has been known to the industry for scores of years. SO₂ is being used to achieve two main objectives, viz. bleaching and for its biocidal activity, which is to remove pests and insects and to prevent fungus formation etc). **Even today**, the CODEX ALINORM 01/124 describes the use of SO₂ for the very same purpose as has been used traditionally in the Sri Lankan cinnamon industry for more than 500 years. SO₂ fumigation, as described above, is very effective and is simple to use.

The practice of burning Sulphur remotely, allowing the vapours to impinge usually over night for 8-12 hours on the bundled quills and keeping them in a closed chamber has been quite effective from the producers point of view. This process bleaches the cinnamon to the desired level and eliminates or destroys insects present, if any, thereby preventing the growth of fungus and bacteria as well.

The application of sulphur dioxide for fumigation purposes has been proved acceptable to the buyers and importers across the world for many generations, as this acceptable method for fumigation assured them a natural product with good hygienic qualities and a better colour.

Proposed Maximum Residual Level:

It has been reported that the sulphur compounds formed are unstable and they breakdown with time especially when exposed to the atmosphere. This decay in the level of sulphur has been observed in practical fumigation at plantation/trader level, and the rate of decay is to be established. It is known that the **residual sulphur content drops substantially** from the time of fumigation to the time of shipment which is an approximately 60 days.

This decay being time dependant, a freshly fumigated consignment would have excessive sulphur & hence would require 'storage' for a period of time prior to its shipment. This would require keeping the stock in 'storage' after fumigation till such time as the level drops.

Sri Lanka envisages that at this juncture that the industry would be comfortable in meeting the requirements of 500 ppm, which is proposed in GSFA for 12.2 (All Herbs and Spices) food category, without having to 'store' the product for extended lengths of time, thus risking the possibility of colour development / fungal growth and insect infestation

Sri Lanka has, at this juncture, therefore decided to request for a **maximum level of 500 ppm** of sulphur measured as SO₂, as consignments rejected have had levels of sulphur far below this amount as reported by the importing EU countries. Sri Lanka's request for this value was arrived at considering the levels of Sulphur proposed by the CCFAC under the Amendments to the Codex GSFA (page 144 of ALINORM 01/12A, Appendix IV).

The level 500 ppm is proposed by Sri Lanka considering the fact that the cinnamon industry is confident that the producers would be able to achieve an actual level of SO₂ content, which is very much below this proposed level, through the development of a "controlled method of fumigation" at national level.

Current work:

Establishment of a "Controlled Fumigation Method" at National Level:

The process of fumigation, currently carried out essentially by 'practice' and 'experience' is to be converted to a "measurable" entity, thus enabling the operator to design his process based on predetermined parameters, i.e., to have a controllable and scientifically designed process.

In this regard, the Industrial Technology Institute (ITI), a State Research Organization and the Department of Export Agriculture (DEA) together are in the process of developing a sustainable method of fumigation which could be applied at 'plantation / trader level' where fumigation is carried out at over 100 centres. This would be designed to make use of the least quantity of sulphur for the least duration of time to achieve the desired results.

Certification

It is proposed that every consignment of cinnamon prior to leaving the country be certified by an established or internationally recognized certifying body for its residual sulphur content. In this regard, four (4) testing and certifying organizations with international acceptance have been identified to issue certificates of conformance. Sampling and testing are to be conducted in accordance with guidelines / test methods established by ISO 5522 based on AOAC Test Methods and in line with Codex requirements.

USA:

This responds to CL 2005/50-FAC (October 2005) which requests information on (1) the use of Luthein from *T. erecta* L. (INS 161b) and zeaxanthin-synthetic (INS 161h) as colors for inclusion in the Codex General Standard for Food Additives (GSFA) and (2) how Peroxyacid antimicrobial solutions containing 1-hydroxyethylidene-1-1-phosphonic acid (HEDP) are used in order to decide whether they are processing aids or food additives; the foods on which these solutions are used; and whether the uses are followed by a potable water rinse (ALINORM 05/28/12, para. 42 and Appendix IV). The United States of America appreciates the opportunity to provide comments for consideration at the 38th session of the Codex Committee on Food Additives and Contaminants.

Luthein from *T. erecta* L. (INS 161b) and Zeaxanthin-synthetic (INS 161h)

Neither lutein from *T. erecta* L (INS 161b) nor zeaxanthin-synthetic (INS 161h) is approved in the United States for use as a color in foods.

Peroxyacid antimicrobial solutions containing HEDP

Peroxyacid antimicrobial solutions containing HEDP mixed with hydrogen peroxide, acetic and octanoic acids, and their peroxy derivatives are appropriate for use in the United States as antimicrobial agents on meat (carcasses, parts, trim, and organs) and poultry (Carcasses, parts, and organs), according to good manufacturing practices with specified maximum limits for the peroxyacids and hydrogen peroxide; for poultry applications, HEDP may also be included in the applied solutions at the specified maximum limit. Additionally, these peroxyacid antimicrobial solutions are approved for use, with maximum limits on their components, on fruits and vegetables that are not raw agricultural commodities. These authorizations do not require that applications of the antimicrobial solution is to be followed by a potable water rinse.

The 63rd Joint FAO/WHO Expert Committee on Food Additives (JECFA, 2004; WHO TRS 928) reviewed the safety of these peroxyacid antimicrobial solutions for use on fresh meat and poultry and in the wash water for fresh and processed fruits and vegetables.

JECFA noted that, after application of the solutions to process waters, the components of these solutions (or their breakdown products) are largely eliminated by drainage and further washing and trimming of products.

Codex has defined a *Processing aid* as “any substance or material, not including apparatus or utensils, and not consumed as a food ingredient by itself, intentionally used in the processing of raw material, foods or its ingredients, to fulfill a certain technological purpose during treatment or processing and which may result in the non-intentional but unavoidable presence of residues or derivatives in the final products.”(Codex Procedural Manual)

The uses that the United States and JECFA have considered are consistent with Codex definitions of a processing aid. Therefore, we recommend that CCFAC conclude that peroxyacid antimicrobial solutions are used as processing aids.

VENEZUELA:

Place in the text	Additives	Comment
Page 19-20 Food Cat. N°	Brilliant Blue FCF (INS 133) (Colour) 01.6.1 Unripened cheese 01.6.3 Whey cheese 01.6.4 Processed cheese 04.1.1.2 Fresh fruit 04.1.2.4 Canned or bottled fruit 04.1.2.5 Jams, jellies, marmelades 04.1.2.8 Fruit preparations, including pulp, purees 04.2.2.3 ; 2.6 and 2.7 Vegetables 07.1 Bread and ordinary bakery wares	1. The use of this artificial colour in these products is not permitted
Page 21-23 Food Cat. N°	Canthaxanthin (INS 161 g) (Colour) 08.1.1. Fresh meat 08.1.2 Fresh meat comminuted 08.3.1.1 Cured meat, poultry and game products 09.2.1 Frozen fish, fish fillet and fish products 09.2.4.1 Cooked fish and fish products 09.2.5 Smoked fish and fish products 09.3.3 Salmon substitutes 09.4 Canned fish and fish products	1. The use of this artificial colour in these products is not permitted 2. Its use is not permitted in the marked meat and meat products listed in the document
Page 23-24 Food Cat. N°	Carmines (INS 120) (Colour) 09.2.1 Frozen fish, fish fillet and fish products 09.2.2. Fish, fish fillets 09.2.4.3 Fried fish and fish products	1. The use of this natural colour in these products is not permitted 2. Its use is not permitted in the marked meat and meat products listed in the document

Place in the text	Additives	Comment
Page 25-26 Food Cat. N°	Carotenes, natural extracts (vegetables) (INS 160aii) 08.1.1. Fresh meat 08.1.2 Fresh meat comminuted 09.1.1 Fresh fish 09.1.2 Fresh molluscs, crustaceans and echinoderms 09.2.1 Frozen fish, fish fillet and fish products 09.2.4.1 Cooked fish and fish products	1. The use of this natural colour in these products is not permitted 2. Its use is not permitted in the marked meat and meat products listed in the document
Page 26-29 Food Cat. N°	Chlorophylls, copper complexes 04.1.2.5 Jams, jellies, marmelades 09.2.4.1 Cooked fish and fish products 09.2.4.3 Fried fish and fish products 09.2.5 Smoked fish and fish products 09.3.1 Fish and fish products, marinated 09.3.2 Fish and fish products in brine 09.3.3 Salmon substitutes 09.3.4 Semi preserved fish and fish products 09.4 Preserved fish and fish products	1. The use of this natural colour in these products is not permitted 2. Its use is not permitted in the marked meat and meat products listed in the document
Page 29	Erythrosin (INS 127)	In Venezuela the use of erythrosine is restricted due to the high content of iodine, therefore it is only permitted for cherries and chewing gum
Page 31-34 Food Cat. N°	Grape Skin Extract (INS 163). 08.1.1. Fresh meat 08.1.2 Fresh meat comminuted 0.8.2 Meat, poultry and game products 08.3.1.1 Cured meat, poultry and game products 8.3.1.2 Non-heat treated meat, poultry and game products 08.3.1.3 Fermented non-heat treated meat, poultry and game products 08.3.3 Frozen processed meat, poultry and game products 09.2.2 Frozen battered fish, fish fillets and fish products 09.2.3 Frozen minced and creamed fish products, including molluscs, crustaceans and echinoderms 09.2.4.1 Cooked fish and fish products 09.2.5 Smoked fish and fish products 09.2.4.3 Fried fish and fish products 09.2.5 Smoked fish and fish products 09.3.1 Fish and fish products, marinated 09.3.2 Fish and fish products in brine 09.3.3 Salmon substitutes 09.3.4 Semi preserved fish and fish products 09.4 Preserved fish and fish products	1. The use of this natural colour in these products is not permitted 2. Its use is not permitted in the marked meat and meat products listed in the document
Page 35-36 Food Cat. N°	Iron oxides (INS 172) (Colour)	1. In Venezuela the use of this additive as a colour is no permitted
Page 37-38 Food Cat. N°	Riboflavins (INS 101)	1. Its use is not permitted in the marked meat and meat products listed in the document 2. The use of natural and/or artificial colour in natural whipped cream or milk cream is permitted in flavoured creams in quantities not exceeding 300 mg/Kg in the end product
Page 41 Food Cat. N°	Benzoil peroxide (INS 928)	Our legislation only permits the use of this food additive as bleaching agent or as a bread enhancer
Page 42-45 Food Cat.	Allura red (INS 129) (Colour) 01.6.1 Unripened cheese	1. The use of this artificial colour in these products is not permitted

Place in the text	Additives	Comment
N°	01.6.2.2 Rind of ripened cheese 01.6.3 Whey cheese 01.6.4 Processed cheese 01.6.5 Cheese analogues 01.7 Dairy-based desserts (yoghurt) 04.1.2.4 Canned or bottled fruit 04.1.2.5 Jams, jellies, marmelades 04.1.2.8 Fruit preparations, including pulps and purees 04.2.1.2;2.3 ; 2.4 and 2.6 vegetables, pulps and preparations 07.1 Bread and ordinary bakery wares 08.1.1. Fresh meat 08.1.2 Fresh meat comminuted 0.8.2 Meat, poultry and game products 8.3..2 Heat-treated processed meat, poultry and game products 09.2.1 Frozen fish, fish fillet and fish products 09.2.4.1 Cooked fish and fish products 09.2.5 Smoked fish and fish products 09.3.3 Salmon substitutes 09.3.4 Semi preserved fish and fish products 09.4 Fully preserved fish and fish products, including canned or fermented	2. Its use is not permitted in the marked meat and meat products listed in the document
Page 46-56 Food Cat. N°	Caramel colour Class III and Class IV (INS 150c, 150 d) 01.6 Cheese and analogues 01.6.1 Unripened cheese 01.6.2.2 Rind or ripened cheese 01.6.3 Whey cheese 01.6.4 Processed cheese 01.6.5 Cheese analogues 01.7 Dairy-basd desserts (yoghurt) 04.1.2.4 Canned or bottled fruit 04.1.2.5 Jams, jellies, marmelades 04.1.2.8 Fruit preparations, including pulps and purees 04.2.1.2; 2.3; 2.4 and 2.6 Vegetables, pulps and preparations 07.1 Bread abd ordinary bakety wares 08.1.1. Fresh meat 08.1.2 Fresh meat comminuted 0.8.2 Meat, poultry and game products 8.3.1.2 Non-heat treated meat, poultry and game products 09.2.1 Frozen fish, fish fillet and fish products 09.2.4.1 Cooked fish and fish products 09.2.5 Smoked fish and fish products 09.3.3 Salmon substitutes 09.3.4 Semi preserved fish and fish products 09.4 Fully preserved fish and fish products, including canned or fermented 12.3 Vinegars	1. The use of natural and/or artificial colour in natural whipped crean or milk cream is permitted in flavoured creams in quantities not exceeding 300 mg/Kg in the end product 2.- The use of this natural colour in coffee is not permitted 3.- The use of this natural colour in these products is not permitted
Page 56-60 Food Cat. N°	Carotenoids (Colour) 04.1.2.3 Fruit in vinegar, or brine 04.1.2.4 Canned or bottled fruit 04.1.2.5 Jams, jellies, marmelades 08.1.1. Fresh meat 08.1.2 Fresh meat, comminuted 0.8.2 Meat, poultry and game products	1.-The use of natural and/or artificial colours in natural whipped cream or mil cream is permitted in flavoured creams not exceeding 300 mg/Kg in the end product 2.- Its use is not permitted in the marked meat and meat and meat products listed in the document 3.- The use of this natural colour is these products

Place in the text	Additives	Comment
	8.3..2 Heat-treated processed meat, poultry and game products 09.2.1 Frozen fish, fish fillet and fish products 09.2.4.1 Cooked fish and fish products 09.2.5 Smoked fish and fish products 09.3.3 Salmon substitutes 09.3.4 Semi-preserved fish and fish products 09.4 Fully preserved fish and fish products, including canned or fermented	is not permitted.
Page 61 Food Cat. N°	Fast Green FCF (INS 143) (Colour)	Its use as a colour is not permitted
Page 75 Food Cat. N°	Alitame (INS 956) (Sweetener)	Its use as a sweetener is not permitted
Page 91 Food Cat. N°	Polyvinyl alcohol (INS 1203)	Its use as a glazing agent and stabilizer is not permitted

Note – The Justification of the indicated maximum levels in order to meet the technological need of the different additives that are permitted in Venezuela, must comply with the recommendations of the JECFA and the CCFAC.