

codex alimentarius commission



FOOD AND AGRICULTURE
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DISCUSSION PAPER ON FOOD ADDITIVE PROVISIONS IN GLAZES FOR FOODS

(prepared by Canada with the assistance of the EC)

Introduction

1. The 37th Session (2005) of the Codex Committee on Food Additives and Contaminants (CCFAC) agreed to the recommendation of its *ad hoc* Working Group on the Codex General Standard for Food Additives (GSFA), to draft a discussion paper proposing options to address in an uniform and consistent manner the food additive provisions in glazes for foods (ALINORM 05/28/12, para.67, second bullet). The Committee accepted the offer of Canada, with the assistance of the EC, to prepare the Discussion Paper.¹ In the preparation of this draft Discussion Paper, Canada has taken the liberty of enlarging the scope beyond “glazes” only and has included any surface-applied food preparation including coatings, marking inks and decorating preparations, all of which involve the same issue as glazes, described below in paragraphs 2 and 3.

Background

2. Currently the GSFA and its working documents, contain numerous provisions (at various steps of the Procedure) for maximum levels of use of food additives bearing accompanying Notes 3, 4 or 16. Note 3 applies to additives used for surface treatment, Note 4 restricts the use of an additive for decoration, stamping, marking or branding the product, and Note 16 informs readers that a use of a given food additive is foreseen in “glazes, coatings or decorations for fruit, vegetables, meat or fish”. Other Notes also refer to coating or glaze applications (e.g. Note 41, “Use in breading or batter coatings only” and Note 53, “For use in coatings only”).

3. The Food Category System (FCS) of the GSFA currently accommodates some glazes and coatings marketed as such. For instance, Food Category 04.1.2.8 (Fruit preparations, including pulp, purees, fruit toppings and coconut milk) includes fruit-based glazes. Food Category 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit), and sweet sauces) includes sweet (non-fruit) glazes that may be used on confectionery, fine bakery wares, meat or fish. Food Category 06.6 (Batters (e.g. for breading or batters for fish or poultry)) includes cereal-based batters and breading to be used on poultry and fish. Food Category 12.6.2 (Non-emulsified sauces) includes products, such as barbecue sauce that may be used as glazes for fish or meat. These glazes, toppings, sauces or batters are food products which may be sold to the consumer as such, to be used in the preparation of the food at home (e.g., to prepare glazed ham, breaded fish).

¹ Insofar as the United States of America is the lead country in drafting the GSFA, its representatives were invited to comment on the feasibility of the options mentioned later on in this paper. Their assistance in this regard is gratefully acknowledged.

4. However, there are also marketed food products that contain a glaze or coating as a part of the marketed food. Such glazes or coatings may be a part of the food in itself (e.g., sliced honey glazed turkey, glazed ham, frozen battered fish fillets, refrigerated teriyaki glazed salmon steaks), or could be mixtures of compounded food additives with specific technological functions (e.g., wax coatings used on some raw fruits and vegetables, ink-marking formulations for stamped shell eggs and meat carcasses, or decorative colour formulations for hard-boiled shell eggs). Coatings may or may not be removed prior to consumption. In the case of marking stamps or egg shell decorations, however, it is likely that the additives used in the ink or decoration additives will be discarded and not ingested, due to peeling (e.g., egg shells) or trimming (e.g., meat carcasses). In these latter cases, residues of the additives involved are low or non-existent and little or no ingestion of them occurs.

5. Since the FCS is constructed considering similarity in the type of food and the manner in which the food is consumed, glazes or coatings that are part of the marketed food and are consumed as part of that food, are accommodated by including them in the food category that contains the food to which the glaze or coating was applied. The indication that the additive is used in a glaze or coating that is then applied to a food (e.g. meat, eggs, fish, fruits, vegetables) is achieved through the use of an appropriate Note. Thus, the Notes are an integral and important component of the GSFA Tables, and must be considered in order to understand correctly the reported provisions.

6. Despite the use of Notes, providing for the use of food additives used in external glazes, coatings, decorations, or marking inks on fruits, vegetables, eggs, meat or fish products on account of their being used in an external glaze, decoration, coating or marking ink may be confusing to the user of the GSFA. In addition, because of expansion of the reported use of a food additive from a broad food category to its sub-categories, according to procedures established to elaborate the GSFA (see, e.g., CX/FAC 97/7), some provisions for use of an additive in a surface treatment, glaze or coating in a food category may be unintended.

7. In view of the above, Canada has prepared the first draft of this discussion paper which is being circulated for comments. Some options for CCFAC to consider at its 38th Session to address a more transparent approach for listing additives used in glazes, coatings, marking inks, and surface decorations are proposed in the following section.

Proposed Options

Option No. 1

8. No change is introduced into the existing FCS. Food additive provisions would continue to be allocated on the current basis.

Option No. 2

9. A new food category to accommodate glazes, coatings, decorations or marking inks is introduced into the FCS. The newly-created category would be essentially restricted to the “non-food”² types of preparations consisting mainly of food additives.

This new category 17.0, entitled “Surface-applied food preparations,” could be subdivided as follows:

- 17.1 Glazes and coatings (e.g. for fruit and vegetables)
- 17.2 Marking inks (e.g., for meat carcasses and shell eggs)

² The term “food-type” glazes and coatings is used throughout this paper to denote glazes and coatings that contain ingredients and food additives (e.g., maple syrup glazes for hams, lemon-based sweetened glazes for bakery products, savory sauces and marinades, sugar-based cake decorations) which are applied externally to a food for taste, flavouring and characterizing purposes. The term “non-food type” glazes and coatings is used to denote those substances that are used for protection (e.g., wax coatings for fruit and vegetables), identification (e.g., marking inks for meat and shell eggs), and decoration (e.g., colored hard-boiled shell eggs). These substances do not affect the organoleptic characteristics of the food to which they are applied. Despite this distinction, however, it should be recognized that both “food” and “non-food” types of surface-applied preparations are arguably “foods” in the broadest sense.

17.3 Decorating preparations (e.g., for shell eggs).

10. The following descriptor for category 17.0 is proposed:

“Includes glazes, coatings, various surface layers, compounds, preparations or single substances, including inks for marking, stamping or decorating that are applied to different foods, such as fruit, vegetables, meat, and fish. These preparations are used to protect or identify a food, or to decorate a portion of a food that is not consumed (e.g., shell of an egg). Such preparations may be formulated with various waxes, emulsifiers, colours, texture and binding agents, and other food additives, as well as food ingredients (i.e., edible surface layers applied onto different foods). Excludes surface-applied preparations that are sold as foods themselves or that are a part of a marketed food and contribute to the organoleptic or other characteristic properties of the marketed food (e.g., glazed ham). These latter, “food-type” glazes, decorations or sauces are accommodated under categories 1 to 16.”

11. The following descriptors are proposed for the sub-categories:

17.1 Glazes and Coatings: Formulations consisting of various food additives and ingredients that are applied to the surface of a food for protections (e.g. wax-based coating for fruit or vegetables). Excludes formulations applied for organoleptic or other characteristic purposes (e.g., glazes for meat, where the formulated glazed meat can be sold to the consumer as such for the preparation of foods like glazed hams or frozen breaded fish fillets).

17.2 Marking Inks: Formulations that contain colour additives used to stamp or mark food products for identification purposes (e.g., grade stamping of meat carcasses or shell eggs).

17.3 Decoration Preparations: Formulations applied to food for aesthetic reasons but which are not consumed (e.g., dyes applied to shells of hard-boiled eggs).

12. Various “food-type” glazes, coatings, batters and other decorations which may, but not necessarily, be sold separately as foods themselves and which are used for sweetening, battering, breading or seasoning the food to which they are applied would be handled within existing categories of the FCS. The appropriate category is determined by the foods upon which the given surface-applied preparation is layered. Examples of such glazes are barbecue or teriyaki sauces for use on (or used on) meat; maple or honey syrup glazes for use on (or used on) hams or turkeys, and breading or batter mixtures for use on (or used on) poultry or fish.

13. It should be noted that if this Option is implemented, the title of food Category 16.0 would need to be amended to include the newly-created Category 17.0 as follows

16.0 – Composite foods – foods that could not be placed in categories 01 to 15 and 17.

Option No 3

14. A new sub-category 12.11 entitled “Surface-applied food preparations” would be added to Category 12.0 to accommodate “non-food” types of coatings or glazes, including marking and decorating inks. Category 12.0 (Salts, spices, soups, sauces, salads, protein products, including soybean protein products and fermented soybean products) already includes some foods that are similar to “food-type” glazes (e.g., condiments, seasonings, sauces). Further sub-categories would be included as follows:

12.11.1 Glazes and coatings (e.g., for fruit and vegetables)

12.11.2 Marking inks (e.g., for meat carcasses and shell eggs)

12.11.3 Decorations (e.g., for shell eggs)

15. The descriptor proposed for category 17.0 in Option No. 2 also applies to the proposed category 12.11 in Option No. 3, except that the last sentence would be: “ These latter “food-type” glazes, decorations or sauces are accommodated under other food categories of the GSFA.” Similarly, the descriptors for the sub-categories proposed in Option No. 2 would apply to those in Option No. 3. Thus, to summarize, the main difference between Option Nos. 2 and 3 is that Option No. 2 adds a new main category (17.0) to the FCS, whereas Option No. 3 adds the same information as a sub-category (12.11) under the existing category 12.0.

Option No. 4

16. New food categories that accommodate both “food” and “non-food” type glazes and coatings would be added as individual sub-categories under existing food categories. For example, under category 08.0 (Meat and meat products, including poultry and game), appropriate sub-categories that include the relevant surface-applied preparations would be added under 08.2 (Processed meat, poultry and game products in whole pieces or in cuts) and Category 08.3 (Processed comminuted meat, poultry and game products) as follows:

- 08.2.4 Glazes, coatings, and marking inks for processed meat, poultry and game products in whole pieces or cuts
 - 08.2.4.1 Glazes and coatings for processed meat, poultry and game products in whole pieces or cuts
 - 08.2.4.2 Marking inks for processed meat, poultry and game products in whole pieces or cuts
- 08.3.4 Glazes, coatings, and marking inks for processed comminuted meat, poultry and game products
 - 08.3.4.1 Glazes and coatings for processed comminuted meat, poultry and game products
 - 08.3.4.2 Marking inks for processed comminuted meat, poultry and game products.

In a similar manner, sub-categories could be established under other appropriate food categories of the GSFA (e.g., fish products, shell eggs). Further input from CCFAC could help to define those sub-categories.

Option No. 5

17. Components of meat- and egg-marking inks and egg (shell)-decorating preparations are removed from the GSFA insofar as they arguably do not fit the Codex definition of a food additive and leave little or no residue in food that is consumed.

Discussion / Analysis of Options**Option No. 1**

18. The current FCS already accommodates some glazes and coatings within existing food categories. When the glaze, coating or marking ink is part of the food, it is included with the appropriate commodity to ensure adequate consideration in the intake of the additive used in the external glaze as well as in the food itself. It should be noted that intake is not considered if the external layer is discarded (e.g., shell of hard-boiled egg).

19. This option would not require changes to the FCS or the GSFA and would keep the number of Notes to a minimum. Any current provisions in the GSFA that appear to be in error regarding the technological need of an additive in a surface treatment, glaze or coating applied to a food and whether or not the class of food itself is actually glazed or coated, could be discussed as a matter of course by the CCFAC.

20. Adoption of this Option could continue to lead, at first sight, to erroneous interpretation of the provisions in the GSFA. Using a food additive on a food is not the same as using it in a food formulation. Surface portions of food may not necessarily be ingested or may lose their components because of time-related or technological losses (e.g., due to the volatility of components of the formulation, washing, peeling, heat treatments). Listing provisions of food additives used in glazes, coatings or marking inks in the food category for a particular food (e.g., meat or fish) instead of in a food category for surface-applied preparations may convey a perception that the additive may be used in that food itself, especially if the Notes are not appropriately consulted. Also, calculation of the intake of a particular food additive under this presentation can be overestimated, particularly if surface portions are not consumed.

Option No. 2

21. The difference between the products covered under the proposed food category 17.0 (Surface-applied food preparations) and those covered under other current food categories is that the products in this new category are not consumed as “food” *per se*. Rather, these constitute edible surface layers applied onto different foods (e.g. fruit and vegetables, meat, fish, eggs) for a technological purpose (e.g., protection, decoration, marking) as opposed to organoleptic or other characteristic purposes. These coatings or glazes are not necessarily marketed as such, but are usually manufactured for further use in food processing.

22. This Option may not reduce the need for Notes because, although this separate food category would provide a separate location within the GSFA for surface-applied food preparations, the Committee might wish to set levels of additives used in such preparations in final food products upon which the preparations are applied. On the other hand, if no ingestion occurs (which is likely in the case of a meat or an egg marking inks) then establishment of a level in the final food would be superfluous and no Note would be necessary.

23. This Option would require that “non-food” type glazes and coatings covered under existing food categories (e.g., 10.1 Fresh eggs) be moved from the current food category to the appropriate sub-category of the new category 17.0 or that existing food categories (e.g., 04.1.1.2, Surface-treated fresh fruits, 04.2.1.2, Surface-treated fresh vegetables) be deleted as these categories would now be covered by the new sub-category 17.1. These changes would require revision of the adopted and draft provisions in the relevant food categories in the GSFA. It would also require revision of the descriptors of the relevant food categories currently in the FCS. These revisions would likely slow the progress of the development of the GSFA, by requiring CCFAC to re-evaluate some provisions on which decisions have already been made.

24. All “food-type” surface-applied preparations, whether marketed as a part of the food upon which they are applied, or as foods themselves would be accommodated under the appropriate existing food categories, with the use of Notes, if necessary.

25. It should be noted that some Codex commodity standards permit the use of additives in the food and in the coating component of the food within the same standard (e.g., CX/STAN 166-1989, Rev.1-1995, Codex Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter). Under Option No. 2, this would complicate the interpretation of the Codex commodity standard within the GSFA, as a user may not be aware that additives used in a single standardized product appear in two different food categories in the GSFA. Currently, the additives limited to use in the breading or batter appear under food category 09.2.2, with an appropriate Note.

Option No. 3

26. This Option is similar to Option No. 2 and therefore the discussion provided above applies. The only difference is that this Option would create a new sub-category 12.11 within the current category 12.0, instead of creating a new category 17.0. Under this Option, sub-category 12.11 would accommodate only “non-food” *per se* type surface-applied preparations, as does category 17.0 in Option No. 2.

Option No. 4

27. Option No. 4 would add several new sub-categories for glazes, coatings, decorations or marking inks within the current FCS. All types of glazes, whether “food” type (sold as such or as a part of food) or “non-food” type, would be accommodated within appropriate existing or new sub-categories of the FCS. If this Option was chosen, CCFAC would need to agree on the food categories that are affected and propose appropriate new sub-categories and descriptors.

28. The disadvantage of this Option is that, within any one food category, there would be separate sub-categories covering the food itself (e.g., hams in 08.2.2), “food-type” glazes (e.g., sweetened glazes for hams (sold as such or as a component of a glazed ham) in 08.2.4.1) and “non-food” type glazes (e.g., meat-marking or decorating preparations in 08.2.4.2). This would lead to a systematic unevenness in the way foods are accommodated in the FCS (e.g., hams are potentially now in 3 different categories). This can add to confusion in interpretation of the GSFA.

29. This Option would require significant and extensive changes to the FCS and the GSFA (draft and adopted provisions) that would cause delays in their elaboration.

30. It is difficult to predict whether any of the proposed Options Nos. 2, 3 or 4 would, if implemented, result in a reduction of the number of Notes. Although introduction of separate food categories for surface-applied preparations would provide specific locations for listing surface-applied food preparations, under the same broad food category as the food to which they are applied, CCFAC may wish to list the levels of additives used in such preparations in the final food products to which the preparation is applied. Therefore, the desired effect of reducing the use of Notes in the GSFA may not be achieved.

Option No. 5

31. This Option would reduce both number of provisions and Notes in the GSFA, particularly those related to colours. Components of meat-/egg-marking inks and egg-shell decorating preparations do not fulfil a technological function in the food but rather are used for identification/dating/traceability/exterior decoration. Because there are little or no residues of these components in food, there is virtually no ingestion and little need to recognize their use in the standard. A policy statement could be inserted into relevant standards that only colours and other adjuncts that appear in the GSFA may be used in meat-/egg-marking inks and other such preparations.

Feasibility of Options

32. The current FCS does not uniformly accommodate glazes, coatings, decorations or marking inks and the food additives used in these surface preparations. These products are used for different reasons (organoleptic, protection, decoration, identification) and are marketed differently (i.e., sold as such or sold as part of a food to which the surface preparation is applied). Some may be ingested (e.g., sweetened glazes, some fruit and vegetable coatings) and others may not (e.g., meat- and egg-marking inks and shell of eggs decorations).

33. Option No. 1 (no change) is conceivable and constitutes the path of least work for the Committee. It would require no change to the FCS or the GSFA. This Option is consistent with the principles used to construct the GSFA as it would minimize the use of Notes that are already in place. However, it does not address the potential misinterpretation of the provisions of the GSFA if the Notes are not appropriately consulted.

34. Options No. 2 or No 3 (creation of a new category No 17.0 “Surface-applied food preparations” or addition of a new sub-category 12.11 of “Surface-applied food preparations” to category 12.0), both with further sub-categories of “Glazes and coatings”, “Decorations” and “Marking inks”, are conceivable. They would require creation of new categories which do not parallel other food categories that represent food *per se*. Explanatory Notes are likely to be required to list the use of the additives in the food upon which the glaze, coating, decoration or marking ink is applied. This is in contrast to the current approach in the GSFA in which the use of an additive in the surface applied preparation is indicated by a Note to the food category that includes the food on which the surface preparation is applied. These Options would also require revision of the FCS and reassignment of the affected draft and adopted food additive provisions of the GSFA.

35. Under Option Nos. 2 and 3, “food-type” glazes, coatings, marking inks, and decorations would be accommodated within the existing sixteen food categories, with Notes as appropriate. Examples of such sub-categories already exist.

36. Option No. 4 (insertion of several new sub-categories into the FCS) is the most labour-intensive of the Options, as it would require extensive revision of the FCS and a major revision of the affected draft and adopted food additive provisions in the GSFA. There would be several new sub-categories placed in the food categories that include the foods upon which the surface preparations are applied, irrespective of whether they are “food” or “non-food” type. Under this Option food additives used in the same food may be listed in several food categories, depending on whether the food has a surface applied preparation or not, and whether this preparation is of “food” or “non-food” type. This Option may, therefore, complicate rather than simplify the reporting of information for a provision in the GSFA.

37. Option Nos 2, 3, and 4 would require different degrees of revision of the FCS and the GSFA. Therefore, an evaluation of consequent labour vs benefits to users of the GSFA would be useful. Changes may be difficult to implement, while benefits to users may not be significant.

38. Option No. 5 is feasible on condition that CCFAC member states agree with the premises upon which this option is based.

Summary, Recommendation and Further Consequences of Potential Adoption of Options

39. The purpose of the proposal is to consider new approaches to accommodating glazes, coatings and other surface-applied food preparations in the FCS of the GSFA.

40. Glazes, coatings, and marking, stamping or decorating inks are heterogeneous groups of products. Some products, particularly glazes and coatings, are foods *per se*, and others are not. Some of the products may be sold directly to the consumer and others may be a part of foods offered for sale. The latter type of surface-applied preparations can be either consumed with a food or discarded before its consumption.

41. The FCS currently accommodates some glazes and coatings that may be marketed as such within appropriate categories. For surface-applied preparations which are a part of a marketed food an appropriate Note indicates that a given additive is used in a glaze or coating that is then applied to a food.

42. Any modification of FCS should more accurately reflect the use of food additives upon the surfaces of a food, as opposed to the use of an additive in a food formulation. The changes should improve the comprehensiveness of the FCS and should better reflect actual use of a food additive in various surface applications. It should also result in more accurate information provided to a consumer and avoid some potential misinterpretations during international trade of foodstuffs.

43. Several options are proposed for consideration. Options Nos. 2, 3, 4 and 5 would result in varying degrees of revision of the current FCS. Options Nos. 2 and 3 advocate introduction of a new category in order to accommodate provisions for food additives used in “non-food” type surface applied products (e.g., glazes for surface-coated fruits and vegetables, decorated (painted) shells of eggs, and stamped meat (e.g., carcasses) and poultry products (e.g., shells of eggs). The new category could either be a main category in itself (Option No. 2) or a sub-category under an existing category (Option No. 3). These new categories would contain further sub-categories.

44. Glazes or coatings of the “food” type (e.g., sauces, decorative foods such as cake decorations or marinades) are accommodated under the existing FCS. Entries already existing in the FCS reflect this reasoning (e.g., 05.4, Confectionery Decorations (e.g., for fine bakery wares), toppings and sweet sauces), 06.6, Batters (for breading or batters for fish or poultry)).

45. As a consequence of the introduction of the new category, existing provisions for food additives in Tables 1 and 2 would be modified. Those provisions bearing Notes 3, 4, 16, 41, and 53 would be re-evaluated and, for those determined as “non-food” type surface applied preparations, would be moved to the appropriate sub-category under the new category “Surface-applied food preparations”. Those determined as “food” type surface applied preparations would remain in the GSFA as currently.

46. Option No. 4 would add several new sub-categories for all types of surface applied preparations. These sub-categories would be created for foods on which the glaze is applied, regardless of the nature of the glaze (i.e., “food” type or “non-food” type).

47. As a consequence, existing provisions for food additives in the GSFA would need to be revised. Those provisions bearing Notes 3, 4, 16, 41, and 53 would be re-evaluated and reassigned to the appropriate new sub-category. As noted above, there is the potential for multiple listings for the use of an additive in a single food, depending in whether that food contains a surface applied preparation and depending on the type of preparation.

48. In view of the above CCFAC may consider the usefulness of proposed Options, particularly Option No. 2 or No. 3 versus Option No.1. As the above discussion suggests, Option No. 4 seems even more laborious than Option Nos 2 or 3. Option No. 5 may seem to provide a drastic “surgery” solution and requires a common agreement for such move.

49. Each of the proposed Option requires a careful reflection with regard to need for change within existing GSFA, usefulness, feasibility, work involved and expected benefits. A priori it seems that Option Nos 2 or 5 or a combination of the two would be preferred. However, the recommended Option will result from evaluation of above factors and a common agreement for a change.

50. A draft Project Document, assuming that either Option No 2, No 3, No 4 or No 5 is adopted by the Committee, is attached as Appendix I to this Discussion Paper.

Appendix I**Project Document****Proposal for New Work on the revision of the Food Category System of the Codex General Standard for Food Additives (GSFA), CAC/Stan. 192-1995, Rev. 5(2004)-Annex B****1. The purposes and the scope of the standard**

The purpose of this work is to consider introduction of a new category of “Surface-applied food preparations” and its associated sub-categories, “Glazes and coatings”, “Marking inks” and “Decorations” into the Food Category System (FCS) of the Codex General Standard for Food Additives (GSFA), Codex Standard 192-1995 (Rev.5-2004)-Annex B. The list of food categories is an essential component of the GSFA. Provisions for food additives are established as a function of their use in different food categories. Adequate specificity of food categories is essential for an appropriate interpretation of the Standard.

2. Relevance and Timeliness

Proposed changes will contribute significantly to the improvement of clarity, transparency, and accuracy of the GSFA. A gap in the existing list of food categories was identified, and this proposal intends to introduce a new category. This would complete the revision of the FCS.

If the proposal to create a new food category is adopted by the CCFAC at its 38th Session and is subsequently accepted as New Work by the Codex Alimentarius Commission in 2006, work could begin to revise:

- the existing Tables of food additive provisions in the GSFA
- the existing FCS (including descriptors of the food categories).

Modification of the FCS (including the descriptors of the food categories) and of Tables 1 and 2 of the GSFA would probably require a minimum period of one to three years duration for circulation, comments and final agreement. Therefore, a realistic estimate of the complete revision would be a minimum two years. The time frame for a final adoption of the proposed change should not exceed three to four years.

3. The main aspects to be covered

As a result of the decision of the 37th CCFAC to address food additive provisions in glazes for foods (ALINORM 05/28/12, para. 67, second bullet) the existing list of food categories could be enlarged and the current Annex B of the GSFA will be revised. Consequently, Tables 1 and 2 of the GSFA (CAC/Stan. 192-1995, Rev. 5(2004)) will be modified in order to accommodate the proposed changes.

4. Assessment against Criteria for the establishment of work priorities

The proposal will contribute to:

- a) Consumer protection from the point of view of health and fraudulent practices, and
- b) Diversification of national legislation and alleviation of apparent resultant or potential impediments to international trade.

It is expected that the proposed modifications will improve the transparency of the FCS, and will better reflect actual food additive use in various food surface applications.

It is also expected that more accurate information will be provided to a consumer which may avoid some potential misinterpretations during international trade of foodstuffs.

5. Relevance to Codex strategic objectives

The present proposal is consistent with the Strategic Vision statement of the Strategic Framework 2003-2007.

6. Information on the relation between the proposal and other existing Codex documents

The proposal is related to the content of the GSFA. Consequently, the Food Additive Sections of the Codex Commodity Standards would also be affected by the proposed modification.

7. Identification of any requirement for and availability of expert scientific advice

It is expected that the proposal would not require particular advice from expert scientific bodies.

8. Identification of any need for technical input to the standard from external bodies

The proposal is justified by technological needs and practice and, therefore, Codex Commodity Committees or professional food industry organizations may be consulted for technological justification and actual industrial practices.

9. The proposed time-line for completion of the new work, including the start day, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission

Assuming that the Commission approves this proposal in 2006, the work could begin with the 39th CCFAC in 2007, the proposed year for adoption at Step 5 could be envisaged 2008 and the adoption at Step 8 in 2009. This timing, however, would be valid on condition that CCFAC agrees on the usefulness of this new work and that estimation of engaged work versus expected benefits would favour benefits.