codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 9 (a) **CX/FAC 06/38/14**
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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

PROPOSED DRAFT REVISION OF THE CODEX CLASS NAMES AND INTERNATIONAL NUMBERING SYSTEM (CAC/GL 36-1989)

Comments at Step 3 in response to CL 2005/32-FAC by Brazil, Canada, European Community, Guinea Bissau, Mexico, United States ,Venezuela, EFEMA, ELC, IDF, IFAC, ISA and ITF

BRAZIL

Functional Classes	Definition	Sub-classes	BRAZIL COMMENTS
5 Antioxidant	A food additive, which Prolongs the shelf-life of foods by protecting against deterioration caused by oxidation, ~~such as fat rancidity and colour changes~~	Antioxidant synergist, antibrowning agent	Brazil proposes delete the example in order to be equal to the other functional classes´s definitions (which do not have examples).
12 Emulsifier	A food additive, which forms or maintains a uniform mixture of two or more immiscible phases ~~such as oil and water in a food~~	Plasticizer, dispersing agent, surface active agent, crystallization inhibitor, density adjustment (flavouring oils in beverages), suspension agent, clouding agent	Brazil proposes delete the example in order to be equal to the other functional classes´s definitions (which do not have examples).
13 Emulsifying salt	A food additive, which rearranges cheese proteins in the manufacture of processed cheese, in order to prevent fat separation	Melding salt	Isn´t MELTING?
21 Packaging gas	A food additive gas, which is introduced into a container before, during or after filling with food		For consistence with other functional classes the purpose of the substance should be included

CANADA

Canada is pleased to offer the following comments to the definitions as proposed in the Table in Section 2 of this document, *"Table of Functional Classes, Definitions and Technological Functions"(N07-2005), at Step 3.*

- Canada does not see a need for both of the terms, "Acid" (Functional Class 1) and "Acidity Regulator" (Functional Class 2) and suggests only the latter is really needed. An "Acidity Regulator" could be an acid or a base. Canada also suggests that the term "**water-correcting agent**" be added to the list of sub-classes employed under "Acidity Regulator" (Functional Class 2). If this is accepted, the sub-classes now under the "Acid" Functional Class could be added to the "Acidity Regulator" sub-classes.
- Add the term "**flour maturing agent**" to the sub-classes of "Flour treatment agent" (Functional Class 16) such that the list of sub-classes will now read: "flour-bleaching agent, flour improver, **flour maturing agent,** dough conditioner, dough strengthening agent."
- Regarding Functional Class 22 ("Preservatives"), perhaps the term "sanitizing agent" could be added to the list of sub-classes. Currently, such agents are considered to be processing aids. However, if the Committee decides to consider as food additives peracetic acid (see CL 2005-50 FAC, October 2005) and other similar agents (e.g. those based on chlorine) or fumigating substances, then a functional class descriptor will have to be added to accommodate them. Consequently, the list of sub-classes would now read: "antimicrobial preservative, antimycotic agent, bacteriophage control agent, **sanitizing agent**, antibrowning agent, fungistatic agent, antimould and antirope agent, antimicrobial synergist."

EUROPEAN COMMUNITY

The European Community and its Member States wish to propose the following initial comments on this circular letter. These comments relate to the English version of the circular letter. However, it is noted that the Spanish version contains a number of errors that have arisen during translation.

A revised definition of carrier is proposed as follows as these provides more description of the functionality: 'A food additive used to dissolve, dilute, disperse or otherwise physically modify a food additive, flavouring or nutrient without altering its function (and without exerting any technological effect itself) in order to facilitate its handling, application or use' As an alternative the text in parentheses could be replaced by the additional paragraph as follows 'The technological effect of the carrier food additive is solely on the food additive, flavouring or nutrient with which it used.'

A revised definition of flour treatment agent is proposed as follows: 'A food additive, which is added to flour **or dough** to improve its baking quality or colour'.

A revised definition of raising agent is proposed as follows: 'A food additive or a combination of food additives, which liberate gas and thereby increase the volume of a dough **or batter'**.

A revised definition of stabiliser is proposed as follows: A food additive, which makes it possible to maintain a uniform dispersion of two or more immiscible substances in a food. **Also a food additive which increases the binding capacity of the food, including the formation of cross links between proteins enabling the binding of food pieces into reconstituted food.**

GUINEA BISSAU

In response to your letter, Ref CS 4/30.2, concerning the request for observer status during stage 3 of the pilot project to revise the "Category nomenclature and the International numbering system for food additives" (CA/GL 36-1989),

The Guinea-Bissau National Codex Alimentarius Commission is honored and pleased to append here the document dealing with the revision carried out

FOOD ADDITIVES

13. **Emulsifying salts**: substances added during cheese production to obtain an homogenous distribution of fats and other components. Subcategory: Homogenizing agents to achieve a homogenous distribution of fats and other components. .

14 **Firming agents:** substances that firm up fruit and other horticultural products. They may be used to interact with the gelling agents during the production process either to firm up the fruit and other horticultural products or to reinforce a gel.

1.8 **Gelling agents:** substances that give texture to food products by forming a gel. Subcategory: texturising agents that texturize food products by causing substances to coalesce.

21. **Packaging gases**: Gases other than air, introduced into food containers before, during and after the packaging process. **Packaging agents** are substances introduced into the container during air-packed packaging processes;

23. **Propellant gases:** gases other than air used to expel food products from their container. **Expulsive agents** are those that can expel food products from their packaging.

24. **Chemical leavening agents**: substances or combinations of substances that give off gases and increase the volume of dough. .

25. **Sequestrant:** substances complexes with metallic ions that could contribute to the deterioration of food products by increasing the rate of oxidation. **Reducing agents** limit the formation of metallic ions by speeding up the oxidation process.

MEXICO

Functional class	**Definition**	**Subclasses**	**Comments from México**
1. Acids	Food additives which increase the acidity of a food and/or give it an acidic taste	acidificant acidulant	In Mexico, both terms are used indiscriminately
2. Acid regulators	Food additives which modify or control the changes in pH of a food ~~alter or control the alkalinity~~ of a food	acids, alkalis, bases, regulating solutions, regulating agents, pH-regulating agents	We consider that for the technological function of these substances it is more precise to refer to the pH
3. Antiagglutinant agents	Food additives which reduce the tendency of the particles of a food to adhere to each other	antiadherent agents, drying agents, ~~powders for powdering~~ powdering agents	The translation is superfluous. We therefore suggest keeping the literal translation
4. Antifoaming agents	Food additives which prevent or reduce the formation of foam	foam eliminators	
5. Antioxidants	Food additives which prolong the shelf life of foods in storage, protecting them from deterioration caused by oxidation, such as the ~~rankness~~ rancidness of fat and changes in colour	synergics of antioxidants, sequestrant agents, antigreying agents	In Mexico, “shelf life” conceptually corresponds with “vida de anaquel”, which encompasses practically the entire period until its expiration, regardless of whether it is in storage or on display. Rancidness is the correct technical term and we are of the opinion that antigreying agents also belong to this functional class and must therefore be included.
6. Decolourants	Food additives used for decolouring a food. Decolourants contain no pigments	bleaching agents	

Functional class	Definition	Subclasses	Comments from México
7. Bulking agents	Food additives which increase the volume of a food without significantly contributing to its available energetic value	filling agent	
8. Gasifiers	Food additives used for introducing carbon dioxide into a food		
9. ~~Inert substances~~ Carriers or carrying agents	Food additives which are used together with another additive, a nutrient or a ~~aromatizer~~ flavourings to facilitate its introduction or transmission or to maintain its integrity. The technological effect of the inert substances is solely the effect of the additive, nutrient or aromatizer together with which they are used.	Inert dissolvents, nutrient carrying inert substances, diluents of other food additives, encapsulating agents.	In accordance with the definition we believe that the functional class must be carriers or vehicles since these define the technological function of these substances in the context of additives better. We believe that flavouring must be used in accordance with the definitions outlined in the document CX/FAC 06/38/12 since in Spanish aromatizer is associated primarily with the sensation perceived by the olfactory system; the term flavour encompasses the interaction taste/smell better.
10. ~~Colours~~ Colorants	Food additives which give or restore colour to a food	~~Decoration~~ colouring pigments, surface colorants	The term in Spanish for these additives is colorants. We do not think it fitting to use the term “decoration” since it can give rise to confusion regarding the function of colorants
11. Colour-retention agents	Food additives which stabilize, preserve or intensify the colour of a food	colour fixers, colour stabilizers, colour enhancers	
12.Emulsionants Emulsifiers	Food additives which make it possible to form or maintain a homogenous mixture of two or more immiscible liquids, such as oil and water, in a food.	plastifiers, dispersing agents, tenso-active agents, crystallization inhibiters, density correctors for aromatizing oils in beverages, stabilizers of a suspension, clouding agents	In México, both terms are used indiscriminately
13. Emulsifying salts	Food additives which are used in the manufacture of processed cheese to rearrange the proteins of the same in order to prevent the fat from separating	fusing agents, fusing salts	In view of the fact that its application is specific according to the definition, we think that the technical and commercial term used in Spanish should be considered.

Functional class	Definition	Subclasses	Comments from México
14. Firming h~~ardening~~ agents or firming agents	Food additives which make or maintain the tissues of fruit or vegetables firm or ~~crisp~~ crunchy or act together with gelling agents for producing or maintaining a gel		In accordance with the definition, we think that the functional class should describe the technological function of these substances as precisely as possible. In the literature, the term "crunchy" (« crujiente ») best describes this effect, although these two terms are used indiscriminately.
15. ~~Aroma enhancers~~ Flavour enhancers	Food additives which enhance the flavour and/or smell which a food has	~~aroma~~ flavour modifiers, synergetic flavourings	The term strengtheners defines the function of these substances better. We think that flavour and flavouring should be used in accordance with the definitions outlined in the document CX/FAC 06/38/12, since in Spanish aroma / aromatizers solely describes the sensation perceived by the olfactory system; the term flavour encompasses the interaction taste/smell better.
16. Flour treatment agents	Food additives which are added to flour to improve the cooking or the colour of the flour	flour bleaching agents, flour improvers, dough conditioners, dough reinforcers	
17. Foaming agents	Food additives which make it possible to form or maintain a uniform dispersion of a gaseous phase in a liquid or solid food	whipping agents, aerating agents	
18. Gellifying agents	Food additives which give texture to a food by means of the forming of a gel		
19. Glazing agents	Food additives which, when applied to the outside surface of a food, gives it a glossy look or ~~coat~~ cover this with a protective layer	sealing agents, ~~coating~~ covering agents, finishing sealing agents, glazing agents, film-forming agents	Covering and coating are the most suitable terms to describe the effect of these substances on the food.
20. Humectants	Food additives which prevent the desiccation of foods, counteracting the effect of a low humidity content in the atmosphere	humidity retention agents, humectants	

Functional class	Definition	Subclasses	Comments from México
21. Packing or bottling gases	Food additives ~~gases~~ in a gaseous state, introduced in a jar, tin or bottle before, during or after it has been filled with a food ~~or thereafter~~		
22. ~~Conserving substances~~ Preservatives	Food additives which prolong the shelf life ~~in storage~~ of foods protecting them from deterioration caused by micro-organisms	antimicrobial preservatives, antimycotic agents, bacteriophages controlling agents, antigreying agents, fungistatic agents, mildew and filamentous fungi, antimicrobial synergists	"shelf life" conceptually corresponds with "vida de anaquel", which encompasses practically the entire period until its expiration, regardless of whether it is in storage or on display.
23. ~~Propellants~~ Propellents	Food additive gases which expel a food from a receptacle		The appropriate term is propellents.
24. Rising agents	Food additives or combinations of food additives which free or help the formation of gas ~~and, in this way~~, increase the volume of the dough		We think that not all substances in this class necessarily "free" gas, there are some (e.g. the yeast of beer) which help its formation and freeing.
25. Sequestrants	Additives which control the availability of a cation		
26. Stabilizers	Food additives which make it possible to maintain a uniform dispersion of two or more immiscible substances in a food	foam stabilizers, colloidal stabilizers, ~~emulsions~~ emulsion stabilizers	
27. Sweeteners	Food additives (other than sugar) which give a food a sweet taste	intense sweeteners, massive sweeteners	We believe that the greatest clarity is required as far as the functional class, the definition and the subclasses are concerned. In Mexico, the term "azúcar" (« sugar ») is not solely used for saccharine. In other words, it encompasses various materials and is used in literature to designate simple sugars in general (fructose, glucose, saccharose, lactose, etc.) so that the definition should be widened. Likewise, sugars are also known as "sweeteners" o "natural sweeteners", and we therefore suggest making a clear distinction between the organic synthetic sweeteners, the artificial sweeteners, and the natural sweeteners other

Functional class	Definition	Subclasses	Comments from México
			than sugars. It is not clear either to what the term "masive" refers, since in Spanish the meaning of that word is not a technical one and does not describe a technological effect either. These comments could be integrated in the table with the help of footnotes.
28. Thickeners	Food additives which increase the viscosity of a food	Supporting agents, agglutinants, texturizing agents	

UNITED STATES

This responds to CL 2005/32-FAC (July 2005) which requests comments at Step 3 on the modified Section II "Table of Functional Classes, Definitions and Technological Functions" of the Codex *Class Names and International Numbering System for Food Additives* (CAC/GL 36-1989). The United States of America appreciates the opportunity to provide the following comments for consideration at the forthcoming 38th Session of the Codex Committee on Food Additives and Contaminants (CCFAC).

Comments on proposed draft revision of CAC/GL 36-1989, Rev. 6, 2001

1. The United States generally supports the revised list of functional classes, definitions, and sub-classes included in CL 2005/32-FAC. However, we have suggestions on nine functional classes for further consideration by CCFAC:

Carrier

We suggest that the definition be changed as follows: "A food additive used with another food additive, ~~a~~ nutrient or ~~a~~ flavouring agent to facilitate the introduction or delivery of the other food additive**, nutrient or flavouring agent** or to maintain its integrity. The technological effect of the carrier food additive is solely on the food additive, nutrient or flavouring agent with which it is used."

Glazing Agent

We suggest that hyphens be added to the sub-classes "surface finishing agent" and "film forming agent." We therefore propose that the sub-class listing read: "Sealing agent, coating agent, surface-finishing agent, polishing agent, film-forming agent."

Humectant

We suggest that a hyphen be added to the sub-class "moisture retention agent." We therefore propose that the sub-class listing read: "Moisture-retention agent, wetting agent."

Packaging gas

It is our understanding that gases used in food manufacturing are used for one of the following intended technical effects: 1) filling the head space in food packaging with an inert substance to prolong shelf-life; 2) aeration, whipping, or foaming of the food; and 3) providing a propellant to expel a food from packaging. Upon further consideration, we do not believe that inert gases which act by displacing air in a food container should be considered food additives. Based on the following points:

- The Codex General Standard for the Labeling of Prepackaged Foods (CX-STAN 1-1985 (Rev. 1-1991)) does not require that inert gases (e.g., nitrogen, argon) which act by displacing air must be included in the list of ingredients on food labeling.
- The inert gas itself has no active functional effect on the food.

We conclude that the functional class for "Packaging gas" is not necessary, and should be removed from the proposed table of functional classes. If this is done, the following substances would no longer have a listed functional effect, and could be considered for deletion from the INS list: argon, helium, oxygen and hydrogen. Removal of these gases from the INS list would not mean a total removal from the Codex system, as they are currently listed in the Inventory of Processing Aids (IPA-CAC/MISC 3).

Preservatives

We recommend that the Functional Class Name "Preservatives" be changed to the singular form "Preservative" in order to bring the naming of this Functional Class in line with the other Functional Classes.

We suggest that the spelling of the sub-class "antimyotic agent" be corrected to "antimycotic agent."

We note that "antibrowning agent" is included as a sub-class of both "Antioxidant" and "Preservative." Although JECFA lists "antibrowning agent" as a sub-class of "Preservative," JECFA considers seven additives, all of which are sulfites (e.g., potassium sulfite, sodium sulfite), to be "antibrowning agents." Sulfites are traditionally used to prevent browning of fresh cut fruit and vegetables. The discoloration of these foods is caused by enzymatic browning. Thus, we believe that JECFA intended the sub-class "antibrowning agent" to refer to the prevention of enzymatic browning. The current definiton for "Preservative" states that it protects against deterioration caused by microorganisms. This definition excludes enzymatic browning observed in fresh cut fruits and vegetables. Therefore, we recommend that the sub-class "anti-browning agent" be excluded under the current definition for "Preservative," and removed from the sub-class listing for "Preservative." The sub-class "antibrowning agent" should be retained under the functional class "Antioxidant."

Propellant

We propose that the definition be changed as follows: "A food additive ~~gas~~ that **is introduced as a gas into a container under pressure for the purpose of expelling** ~~expels a~~ food from ~~a~~ **the** container."

Raising agent

We propose that the definition be changed as follows: "A food additive or a combination of food additives that liberate**s a** gas and thereby increase**s** the volume of ~~a~~ dough."

Sequestrant

We propose that the definition be changed as follows: "A food additive that ~~controls the availability of a cation~~ **prolongs the shelf-life of foods by reducing the potential for undesirable metal ion-catalyzed reactions**."

Sweetener

We are concerned that the term "non-sugar" used in the definition is too vague. Non-sugar could mean "other than sucrose" specifically, or it could exclude sugars as a class (e.g., sucrose, fructose). For the sake of clarity, we propose that the term "non-sugar" be replaced with "other than a mono- or disaccharide sugar." Thus the definition would read: "A food additive (other than a mono- or disaccharide sugar) that imparts a sweet taste to food."

2. As an aid to CCFAC in implementing the revision of the INS, as agreed to in the project document (ALINORM 05/28/12, Appendix XIV, para. 3) the United States has prepared a draft update of Section 3 of CAC/GL 36-1989, Rev. 6, 2001) (see Annex) based on the revised list provided in CL 2005/32-FAC, and including modifications noted below:

- The attached INS list has been updated to include additives identified at the 34th CCFAC (ALINORM 03/12, Appendix VII), 35th CCFAC (ALINORM 03/12A, Appendix VII), 36th CCFAC (ALINORM 04/27/12, Appendix XII), and 37th CCFAC (ALINORM 05/28/12, Appendix XIII).
- Functional effects attributed to an additive by JECFA have been added in cases where the JECFA functional effect matches a functional class or sub-class from the revised INS list of Functional Classes.

Additional Comments

3. The United States would like to propose changes to the INS listings for Starch Acetate and Tocopherols for consideration by CCFAC.

Starch Acetate

The United States proposes a change to the additive names and INS numbers currently associated with "Starch Acetate" so as to remove an inconsistency between the INS list (CAC/GL 36-1989, Rev. 6, 2001), and the entry in the current JECFA specifications (adopted as Codex specifications) for starch acetate listed in the monograph for Modified Starches (FAO Compendium of Food Additive Specifications, FNP 52/addendum 9). Starch acetate is listed in the specifications with INS 1420 and further described by "esterification with acetic anhydride or vinyl acetate)." In the INS list, however, the term "starch acetate" encompasses two additives: 1) INS 1420 "Starch Acetate esterified with acetic anhydride; and 2) INS 1421 "Starch Acetate esterified with vinyl acetate." In order to address this inconsistency, we propose that the additives listed under INS 1420 and 1421 in the INS list be combined under a single entry: INS 1420 Starch Acetate. The more specific additive names previously used in the INS list could be included as synonyms for "starch acetate."

We believe that the approach described above is the most efficient way to address this inconsistency. It would be easier for CCFAC to recommend amending the INS list than for JECFA to modify the complex specifications monographs, which would then need to come again before CCFAC for endorsement and recommendation for adoption by the Commission. For consistency, this approach should also be applied to the General Standard for Food Additives (GSFA). Table 3 of the GSFA lists starch acetate as "INS 1420 Starch Acetate." However, in Tables 1 and 2 of the GSFA, both INS 1420 and INS 1421 are listed under the group heading "Starch Acetate." Removal of INS 1421 from the group heading would bring the INS list, the Codex-adopted-JECFA specifications, and the GSFA into alignment.

If the modifications to the INS list that we have suggested regarding starch acetate are implemented, there may be consequential effects to the following commodity standards which include starch acetate in their list of food additives:

Codex Standard Number	Codex Standard Title	INS Numbers Listed in Codex Standard
A-09-1976 Rev. 1-2003	Cream and prepared creams	1420
221-2001	Unripened cheese, including fresh cheese	1420 & 1421
018-1981	Canned sweet corn	"Starch acetate" (no INS listed)
055-1981	Canned mushrooms	"Starch acetate" (no INS listed)
116-1981	Canned carrots	"Starch acetate" (no INS listed)
056-1981	Canned asparagus	"Starch acetate" (no INS listed)
058-1981	Canned green peas	"Starch acetate" (no INS listed)
016-1981	Canned green beans and wax beans	"Starch acetate" (no INS listed)
166-1985 Rev. 1-1995	Quick frozen fish sticks (fish fingers), fish portions and fish fillets - breaded and in batter	1420 & 1421
094-1981 Rev. 1-1995	Canned sardines and sardine-type products	1420 & 1421
070-1981 Rev. 1-1995	Canned tuna and bonito	1420 & 1421
119-1981 Rev. 1-1995	Canned finfish	1420 & 1421
ALINORM 06/29/26 Apx. II (27CCNFSDU) for adoption [074-1981 (4th Amendment 1997)]	Processed cereal-based foods for infants and children	1420

Tocopherols

There are several inconsistencies in the INS numbers associated with tocopherols in the INS list (CAC/GL 36-1989, Rev. 6, 2001) and the JECFA specification monographs (http://apps3.fao.org/jecfa/additive_specs/foodad-q.jsp). The following table presents the tocopherol names and associated INS numbers currently found in these listings.

INS Number	INS List	JECFA Specification Monograph
INS 306	Mixed Tocopherols Concentrate	No reference
INS 307	Alpha-tocopherol	d-alpha-Tocopherol concentrate (55th JECFA, 2000)
INS 307a	No listing	d-alpha-Tocopherol, concentrate (30th JECFA, 1986)
INS 307b	No listing	Tocopherol concentrate, mixed (30th JECFA, 1986)
INS 307c	No listing	dl-alpha Tocopherol (30th JECFA, 1986)

First, the INS numbers 307a and 307, respectively, referenced in the 1986 and 2000 JECFA specifications clearly refer to the same substance, "d-alpha-tocopherol concentrate".

Second, we have concluded that INS 306 ("mixed tocopherols concentrate") in the INS list and INS 307b ("tocopherols concentrate, mixed") used in the 1986 JECFA monograph refer to the same material. This conclusion is based on the following: 1) The assay for "tocopherols concentrate, mixed" evaluated by JECFA in 1986 is the same as in the specifications for "tocopherols concentrate, mixed" published in 1972 in the second edition of the Food Chemicals Codex (FCC); and 2) Chronologically, the 1972 FCC listing for "tocopherols concentrate, mixed" likely corresponds to "mixed tocopherols concentrate," which was evaluated by JECFA in 1973 (WHO Technical Report Series no. 539). However, we were unable to obtain a copy of the 1973 JECFA specifications to confirm this.

In order to address these duplicate INS numbers, we propose the following:

1. In the INS list, delete INS number 306, rename INS number 307 to "Tocopherols" so that it becomes a "parent" listing for tocopherols, and add the sublistings INS 307a (d-alpha-tocopherol concentrate), 307b (tocopherol concentrate, mixed), and 307c (dl-alpha-tocopherol). We believe that the existence of INS no. 306 for "mixed tocopherols concentrate" might have easily been overlooked when attempting to consolidate the tocopherol INS numbers under 307 in the INS list.
2. In the GSFA, modify the group additive listing for "Tocopherols" by removing INS 306, and adding INS 307a, 307b, and 307c.

If the modifications to the INS list that we have suggested regarding tocopherols are implemented, there may be consequential effects to the following commodity standards which include tocopherols in their list of food additives:

Codex Standard Number	Codex Standard Title	INS Numbers Listed in Codex Standard
019-1981 Rev. 3-2003	General standard for edible oils not covered by individual standards	306, 307, 308 (synthetic gamma-tocopherol), 309 (synthetic delta-tocopherol)
A-02-1973 Rev. 1-1999	Milkfat products	306, 307
033-1981 Rev. 2-2003	Olive oil, virgin and refined, and refined olive pomace oil, olive oils and olive pomace oils	Alpha-tocopherol (no INS given)

Codex Standard Number	Codex Standard Title	INS Numbers Listed in Codex Standard
210-1999 Rev. 2-2003 (Amended 2005)	Named vegetable oils	306, 307, 308 (synthetic gamma-tocopherol), 309 (synthetic delta-tocopherol)
211-1999	Named animal fats	306, 307, 308 (synthetic gamma-tocopherol), 309 (synthetic delta-tocopherol)
032-1981 Rev. 1-1989	Margarine	"Natural and synthetic tocopherols" (no INS given)
135-1981	Minarine	"Natural and synthetic tocopherols" (no INS given)
087-2003	Chocolate and chocolate products	307
117-1981 Rev. 2-2001	Bouillon and consommes	306, 307
072-1981 (4th Amendment 1997)	Infant formula	306
156-1987 (Amended 1989)	Follow-up formula	Mixed tocopherol concentrate, alpha tocopherol (no INS given)
073-1981	Canned baby foods	Mixed tocopherol concentrate, alpha tocopherol (no INS given)
ALINORM 06/29/26 Apx. II (27CCNFSDU) for adoption [074-1981 (4th Amendment 1997)]	Processed cereal-based foods for infants and children	306, 307

Annex to US Comment

Bold text indicates a proposed addition, ~~strikethrough~~ text indicates a proposed deletion, **bold double underlined** text indicates a technical function taken from JECFA.

Section 3

INS Number	Food Additive Name	Technical functions
100	Curcumins	colour
100(i)	Curcumin	colour
100(ii)	Turmeric	colour
101	Riboflavins	colour
101(i)	Riboflavin	colour
101(ii)	Riboflavin 5'- phosphate, sodium	colour
102	Tartrazine	colour
103	Alkanet	colour
104	Quinoline yellow	colour
107	Yellow 2G	colour
110	Sunset yellow FCF	colour
120	Carmines	colour
121	Citrus red 2	colour
122	Azorubine	colour
123	Amaranth	colour
124	Ponceau 4R	colour
125	Ponceau SX	colour
127	Erythrosine	colour
128	Red 2G	colour
129	Allura red AC	colour
130	Manascorubin	colour
131	Patent blue V	colour
132	Indigotine	colour
133	Brilliant blue FCF	colour
140	Chlorophyll	colour
141	Copper chlorophylls	colour
141(i)	Chlorophyll copper complex	colour
141(ii)	Chlorophyll copper complex, sodium and potassium Salts	colour
142	Green S	colour

INS Number	Food Additive Name	Technical functions
143	Fast green FCF	colour
150a	Caramel I - plain	colour
150b	Caramel II - caustic sulphite process	colour
150c	Caramel III - ammonia process	colour
150d	Caramel IV - ammonia sulphite process	colour
151	Brilliant black PN	colour
152	Carbon black(hydrocarbon)	colour
153	Vegetable carbon	colour
154	Brown FK	colour
155	Brown HT	colour
160a	Carotenes	colour
160a(i)	Beta-carotene (synthetic)	colour
160a(ii)	Natural extracts, **beta-carotene (*Blakeslea trispora*)**	colour
160b	Annatto extracts	colour
160c	Paprika oleoresins	colour
160d	Lycopene	colour
160e	Beta-apo-carotenal	colour
160f	Beta-apo-8'-carotenic acid, methyl or ethyl ester	colour
161a	Flavoxanthin	colour
161b	Lutein	colour
161c	Kryptoxanthin	colour
161d	Rubixanthin	colour
161e	Violoxanthin	colour
161f	Rhodoxanthin	colour
161g	Canthaxanthin	colour
161h	**Zeaxanthin (synthetic)**	**colour**
162	Beet red	colour
163	Anthocyanins	colour
163(i)	Anthocyanins	colour
163(ii)	Grape skin extract	colour
163(iii)	Blackcurrant extract	colour
163(iv)	**Purple corn colour**	**colour**
163 (v)	**Red cabbage colour**	**colour**
164	Gardenia yellow	colour
165	**Gardenia blue**	**colour**
166	Sandalwood	colour
170	Calcium carbonates	surface colourant, anticaking agent, stabilizer
170(i)	Calcium carbonate	anticaking agent, **surface colourant, stabilizer**
170(ii)	Calcium hydrogen carbonate	anticaking agent, **surface colourant, stabilizer**
171	Titanium dioxide	colour
172	Iron oxides	colour
172(i)	Iron oxide, black	colour
172(ii)	Iron oxide, red	colour
172 (iii)	Iron oxide, yellow	colour
173	Aluminium	colour
174	Silver	colour
175	Gold	colour
180	Lithol rubine BK	colour
181	Tannins, food grade	colour, emulsifier, stabilizer, thickener
182	Orchil	colour
200	Sorbic acid	preservative
201	Sodium sorbate	preservative
202	Potassium sorbate	preservative
203	Calcium sorbate	preservative
209	Heptyl p-hydroxybenzoate	preservative
210	Benzoic acid	preservative
211	Sodium benzoate	preservative
212	Potassium benzoate	preservative
213	Calcium benzoate	preservative
214	Ethyl p-hydroxybenzoate	preservative
215	Sodium ethyl p-hydroxybenzoate	preservative
216	Propyl p-hydroxybenzoate	preservative
217	Sodium propyl p-hydroxybenzoate	preservative
218	Methyl p-hydroxybenzoate	preservative
219	Sodium methyl p-hydroxybenzoate	preservative
220	Sulphur dioxide	preservative, antioxidant
221	Sodium sulphite	preservative, antioxidant
222	Sodium hydrogen sulphite	preservative, antioxidant
223	Sodium metabisulphite	preservative, bleaching agent, antioxidant
224	Potassium metabisulphite	preservative, antioxidant

INS Number	Food Additive Name	Technical functions
225	Potassium sulphite	preservative, antioxidant
226	Calcium sulphite	preservative, antioxidant
227	Calcium hydrogen sulphite	preservative, antioxidant, **firming agent**
228	Potassium bisulphite	preservative, antioxidant
230	Diphenyl	preservative
231	Ortho-phenylphenol	preservative
232	Sodium o-phenylphenol	preservative
233	Thiabendazole	preservative
234	Nisin	preservative
235	Pimaricin (natamycin)	preservative
236	Formic acid	preservative
237	Sodium formate	preservative
238	Calcium formate	preservative
239	Hexamethylene tetramine	preservative
240	Formaldehyde	preservative
241	Gum guaicum	preservative
242	Dimethyl dicarbonate	preservative
249	Potassium nitrite	preservative, colour fixative
250	Sodium nitrite	preservative, colour fixative
251	Sodium nitrate	preservative, colour fixative
252	Potassium nitrate	preservative, colour fixative
260	Acetic acid, glacial	preservative, acidity regulator, **acidifier**
261	Potassium acetates	preservative, acidity regulator
261(i)	Potassium acetate	preservative, acidity regulator
261(ii)	Potassium diacetate	preservative, acidity regulator
262	Sodium acetates	preservative, acidity regulator
262(i)	Sodium acetate	preservative, acidity regulator
262(ii)	Sodium diacetate	preservative, acidity regulator
263	Calcium acetate	preservative, stabilizer
264	Ammonium acetate	acidity regulator
265	Dehydroacetic acid	preservative
266	Sodium dehydroacetate	preservative
270	Lactic acid (L-, D- and Dl-)	acidity regulator
280	Propionic acid	preservative
281	Sodium propionate	preservative
282	Calcium propionate	preservative
283	Potassium propionate	preservative
290	Carbon dioxide	carbonating agent, ~~packing gas~~, **packaging gas, propellant, preservative**
296	Malic acid (D-,L-)	acidity regulator
297	Fumaric acid	acidity regulator
300	Ascorbic acid (L-)	antioxidant
301	Sodium ascorbate	antioxidant
302	Calcium ascorbate	antioxidant
303	Potassium ascorbate	antioxidant
304	Ascorbyl palmitate	antioxidant
305	Ascorbyl stearate	antioxidant
306	Mixed tocopherols concentrate	antioxidant
307	Alpha-tocopherol	antioxidant
308	Synthetic gamma-tocopherols	antioxidant
309	Synthetic delta-tocopherol	antioxidant
310	Propyl gallate	antioxidant
311	Octyl gallate	antioxidant
312	Dodecyl gallate	antioxidant
313	Ethyl gallate	antioxidant
314	Guaiac resin	antioxidant
315	Isoascorbic acid	antioxidant
316	Sodium isoascorbate	antioxidant
317	Potassium isoascorbate	antioxidant
318	Calcium isoascorbate	antioxidant
319	Tertiary butytylhydroxyquinone	antioxidant
320	Butylated hydroxyanisole	antioxidant
321	Butylated hydroxytoluene	antioxidant
322	Lecithins	antioxidant, emulsifier
323	Anoxomer	antioxidant
324	Ethoxyquin	antioxidant
325	Sodium lactate	antioxidant synergist, humectant, bulking agent, **bodying agent**
326	Potassium lactate	antioxidant synergist, acidity regulator
327	Calcium lactate	acidity regulator, flour treatment agent
328	Ammonium lactate	acidity regulator, flour treatment agent
329	Magnesium lactate (D-,L-)	acidity regulator, flour treatment agent
330	Citric acid	acidity regulator, antioxidant, sequestrant

INS Number	Food Additive Name	Technical functions
331	Sodium citrates	acidity regulator, sequestrant, emulsifier, stabilizer
331(i)	Sodium dihydrogen citrate	acidity regulator, sequestrant, emulsifier, stabilizer
331(ii)	Disodium monohydrogen citrate	acidity regulator, sequestrant, emulsifier, stabilizer
331(iii)	Trisodium citrate	acidity regulator, sequestrant, emulsifier, stabilizer
332	Potassium citrates	acidity regulator, sequestrant, stabilizer
332(i)	Potassium dihydrogen citrate	acidity regulator, sequestrant, stabilizer
332(ii)	Tripotassium citrate	acidity regulator, sequestrant, stabilizer
333	Calcium citrates	acidity regulator, firming agent, sequestrant
334	Tartaric acid (L (+)-)	acidity regulator, sequestrant, antioxidant synergist, **acid, emulsifier**
335	Sodium tartrates	stabilizer, sequestrant
335(i)	Monosodium tartrate	stabilizer, sequestrant
335(ii)	Disodium tartrate	stabilizer, sequestrant
336	Potassium tartrates	stabilizer, sequestrant
336(i)	Monopotassium tartrate	stabilizer, sequestrant
336(ii)	Dipotassium tartrate	stabilizer, sequestrant
337	Potassium sodium tartrate	stabilizer, sequestrant
338	Orthophosphoric acid	acidity regulator, antioxidant synergist, **sequestrant**
339	Sodium phosphates	acidity regulator, sequestrant, emulsifier, ~~texturizer~~, stabilizer, ~~water~~ **moisture** retention agent, **texturizing agent**
339(i)	Monosodium orthophosphate	acidity regulator, sequestrant, emulsifier, ~~texturizer~~, stabilizer, ~~water~~ **moisture** retention agent, **texturizing agent**
339(ii)	Disodium orthophosphate	acidity regulator, sequestrant, emulsifier, ~~texturizer~~, stabilizer, ~~water~~ **moisture** retention agent, **texturizing agent**
339(iii)	Trisodium orthophosphate	acidity regulator, sequestrant, emulsifier, ~~texturizer~~, stabilizer, ~~water~~ **moisture** retention agent, **texturizing agent**
340	Potassium phosphates	acidity regulator, sequestrant, emulsifier, ~~texturizer~~, stabilizer, ~~water~~ **moisture** retention agent, **texturizing agent**
340(i)	Monopotassium orthophosphate	acidity regulator, sequestrant, emulsifier, ~~texturizer~~, stabilizer, ~~water~~ **moisture** retention agent, **texturizing agent**
340(ii)	Dipotassium orthophosphate	acidity regulator, sequestrant, emulsifier, ~~texturizer~~, stabilizer, ~~water~~ **moisture** retention agent, **texturizing agent**
340(iii)	Tripotassium orthophosphate	acidity regulator, sequestrant, emulsifier, ~~texturizer~~, stabilizer, ~~water~~ **moisture** retention agent, **texturizing agent**
341	Calcium phosphates	acidity regulator, flour treatment agent, firming agent, ~~texturizer~~, raising agent, anticaking agent, ~~water~~ **moisture** retention agent, **texturizing agent**
341(i)	Monocalcium orthophosphate	acidity regulator, flour treatment agent, firming agent, ~~texturizer~~, raising agent, anticaking agent, ~~water~~ **moisture** retention agent, **texturizing agent, sequestrant**
341(ii)	Dicalcium orthophosphate	acidity regulator, flour treatment agent, firming agent, ~~texturizer~~, raising agent, anticaking agent, ~~water~~ **moisture** retention agent, **texturizing agent**
341(iii)	Tricalcium orthophosphate	acidity regulator, flour treatment agent, firming agent, ~~texturizer~~, raising agent, anticaking agent, ~~water~~ **moisture** retention agent, **texturizing agent**
342	Ammonium phosphates	acidity regulator, flour treatment agent
342(i)	Monoammonium orthophosphate	acidity regulator, flour treatment agent
342(ii)	Diammonium orthophosphate	acidity regulator, flour treatment agent
343	Magnesium phosphates	acidity regulator, anticaking agent
343(i)	Monomagnesium orthophosphate	acidity regulator, anticaking agent
343(ii)	Dimagnesium orthophosphate	acidity regulator, anticaking agent
343(iii)	Trimagnesium orthophosphate	acidity regulator, anticaking agent
344	Lecithin citrate	preservative
345	Magnesium citrate	acidity regulator
349	Ammonium malate	acidity regulator
350	Sodium malates	acidity regulator, humectant
350(i)	Sodium hydrogen malate	acidity regulator, humectant
350 (ii)	Sodium malate	acidity regulator, humectant
351	Potassium malates	acidity regulator
351(i)	Potassium hydrogen malate	acidity regulator
351(ii)	Potassium malate	acidity regulator
352	Calcium malates	acidity regulator
352 (i)	Calcium hydrogen malate	acidity regulator
352(ii)	Calcium malate	acidity regulator
353	Metatartaric acid	acidity regulator
354	Calcium tartrate	acidity regulator
355	Adipic acid	acidity regulator
356	Sodium adipates	acidity regulator
357	Potassium adipates	acidity regulator
359	Ammonium adipates	acidity regulator
363	Succinic acid	acidity regulator
364(i)	Monosodium succinate	acidity regulator, flavour enhancer
364(ii)	Disodium succinate	acidity regulator, flavour enhancer
365	Sodium fumarates	acidity regulator
366	Potassium fumarates	acidity regulator
367	Calcium fumarates	acidity regulator

INS Number	Food Additive Name	Technical functions
368	Ammonium fumarate	acidity regulator
370	1, 4 - Heptonolactone	acidity regulator, sequestrant
375	Nicotinic acid	colour retention agent
380	Ammonium citrates	acidity regulator
381	Ferric ammonium citrate	anticaking agent
383	Calcium glycerophosphate	thickener, gelling agent, stabilizer
384	Isopropyl citrates	antioxidant, preservative, sequestrant
385	Calcium disodium ethylene-diamine-tetra-acetate	antioxidant, preservative, sequestrant
386	Disodium ethylene-diamine-tetra- acetate	antioxidant, preservative, sequestrant
387	Oxystearin	antioxidant, sequestrant, **defoaming agent**
388	Thiodipropionic acid	antioxidant
389	Dilauryl thiodipropionate	antioxidant
390	Distearyl thiodipropionate	antioxidant
391	Phytic acid	antioxidant
399	Calcium lactobionate	stabilizer
400	Alginic acid	thickener, stabilizer, **gelling agent, emulsifier**
401	Sodium alginate	thickener, stabilizer, gelling agent, **emulsifier**
402	Potassium alginate	thickener, stabilizer, **gelling agent, emulsifier**
403	Ammonium alginate	thickener, stabilizer, **gelling agent, emulsifier**
404	Calcium alginate	thickener, stabilizer, gelling agent, antifoaming agent
405	Propylene glycol alginate	thickener, emulsifier, **stabilizer**
406	Agar	thickener, gelling agent, stabilizer, **emulsifier**
407	Carrageenan and its Na, K, NH4 salts (includes furcellaran)	thickener, gelling agent, stabilizer, **emulsifier**
407a	Processed Euchema seaweed (PES)	thickener, stabilizer, **gelling agent, emulsifier**
408	Bakers yeast glycan	thickener, gelling agent, stabilizer
409	Arabinogalactan	thickener, gelling agent, stabilizer
410	Carob bean gum	thickener, stabilizer, **emulsifier**
411	Oat gum	thickener, stabilizer
412	Guar gum	thickener, stabilizer, **emulsifier**
413	Tragacanth gum	thickener, stabilizer
414	Gum arabic (acacia gum)	thickener, stabilizer, **emulsifier**
415	Xanthan gum	thickener, stabilizer, **emulsifier, foaming agent**
416	Karaya gum	thickener, stabilizer, **emulsifier**
417	Tara gum	thickener, stabilizer
418	Gellan gum	thickener, stabilizer, gelling agent
419	Gum ghatti	thickener, stabilizer, emulsifier
420	Sorbitol and sorbitol syrup	sweetener, humectant, sequestrant, ~~texturizer~~, emulsifier, **texturizing agent, stabilizer, bulking agent**
421	Mannitol	sweetener, anticaking agent, **humectant, stabilizer, bulking agent**
422	Glycerol	humectant, bodying agent
424	Curdlan	thickener, stabilizer, **firming agent, gelling agent**
425	Konjac flour	thickener, **gelling agent, emulsifier, stabilizer**
426	**Soybean hemicellulose**	**emulsifier, thickener, stabilizer, anticaking agent**
429	Peptones	emulsifier
430	Polyoxyethylene (8) stearate	emulsifier
431	Polyoxyethylene (40) stearate	emulsifier
432	Polyoxyethylene (20) sorbitan monolaurate	emulsifier, dispersing agent
433	Polyoxyethylene (20) sorbitan monooleate	emulsifier, dispersing agent
434	Polyoxyethylene (20) sorbitan monopalmitate	emulsifier, dispersing agent
435	Polyoxyethylene (20) sorbitan monostearate	emulsifier, dispersing agent
436	Polyoxyethylene (20) sorbitan tristearate	emulsifier, dispersing agent
440	Pectins	thickener, stabilizer, gelling agent, emulsifier
441	Superglycerinated hydrogenated rapeseed oil	emulsifier
442	Ammonium salts of phosphatidic acid	emulsifier
443	Brominated vegetable oil	emulsifier, stabilizer
444	Sucrose acetate isobutyrate	emulsifier, stabilizer
445	Glycerol esters of wood rosin	emulsifier, stabilizer
446	Succistearin	emulsifier
450	Diphosphates	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
450(i)	Disodium diphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
450(ii)	Trisodium diphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
450(iii)	Tetrasodium diphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent

INS Number	Food Additive Name	Technical functions
450(iv)	Dipotassium diphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
450(v)	Tetrapotassium diphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
450(vi)	Dicalcium diphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
450(vii)	Calcium dihydrogen diphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
450(viii)	Dimagnesium diphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
451	Triphosphates	sequestrant, acidity regulator, ~~texturizer~~, **texturizing agent**
451(i)	Pentasodium triphosphate	sequestrant, acidity regulator, ~~texturizer~~, **texturizing agent**
451(ii)	Pentapotassium triphosphate	sequestrant, acidity regulator, ~~texturizer~~, **texturizing agent**
452	Polyphosphates	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
452(i)	Sodium polyphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
452(ii)	Potassium polyphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
452(iii)	Sodium calcium polyphosphate	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
452(iv)	Calcium polyphosphates	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
452(v)	Ammonium polyphosphates	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
452(vi)	**Sodium potassium tripolyphosphate**	emulsifier, stabilizer, acidity regulator, raising agent, sequestrant, ~~water~~ **moisture** retention agent
457	**alpha-Cyclodextrin**	stabilizer, binder
458	gamma Cyclodextrin	stabilizer, binder
459	beta-cyclodextrin	stabilizer, binder
460	Cellulose	emulsifier, anticaking agent, ~~texturizer~~, dispersing agent, **texturizing agent**
460(i)	Microcrystalline cellulose	emulsifier, anticaking agent, ~~texturizer~~, dispersing agent, **texturizing agent**
460(ii)	Powdered cellulose	emulsifier, anticaking agent, ~~texturizer~~, dispersing agent, **texturizing agent**
461	Methyl cellulose	thickener, emulsifier, stabilizer
462	Ethyl cellulose	binder, filler
463	Hydroxypropyl cellulose	thickener, emulsifier, stabilizer
464	Hydroxypropyl methyl cellulose	thickener, emulsifier, stabilizer
465	Methyl ethyl cellulose	thickener, emulsifier, stabilizer, antifoaming agent, **foaming agent**
466	Sodium carboxymethyl cellulose	thickener, emulsifier, stabilizer
467	Ethyl hydroxyethyl cellulose	thickener, emulsifier, stabilizer
468	~~Croscaramellose~~ **Cross-linked sodium carboxymethyl cellulose (cross-linked cellulose gum)**	stabilizer, binder
469	Sodium carboxymethyl cellulose, enzymatically hydrolysed	thickener, stabilizer
470	Salts of fatty acids (with base Al, Ca, Na, Mg, K and NH4)	emulsifier, stabilizer, anticaking agent
471	Mono- and di-glycerides of fatty acids	emulsifier, stabilizer
472a	Acetic and fatty acid esters of glycerol	emulsifier, stabilizer, sequestrant
472b	Lactic and fatty acid esters of glycerol	emulsifier, stabilizer, sequestrant
472c	Citric and fatty acid esters of glycerol	emulsifier, stabilizer, sequestrant, **dough conditioner, antioxidant**
472d	Tartaric acid esters of mono- and di-glycerides of fatty acids	emulsifier, stabilizer, sequestrant
472e	Diacetyltartaric and fatty acid esters of glycerol	emulsifier, stabilizer, sequestrant
~~472f~~	~~Mixed tartaric, acetic and fatty acid esters of glycerol~~	~~emulsifier, stabilizer, sequestrant~~
472g	Succinylated monoglycerides	emulsifier, stabilizer, sequestrant, **dough conditioner**
473	Sucrose esters of fatty acids	emulsifier
474	Sucroglycerides	emulsifier
475	Polyglycerol esters of fatty acids	emulsifier
476	Polyglycerol esters of interesterified ricinoleic acid	emulsifier
477	Propylene glycol esters of fatty acids	emulsifier
478	Lactylated fatty acid esters of glycerol and propylene glycerol	emulsifier
479	Thermally oxidized soya bean oil with mono- and di-glycerides of fatty adids	emulsifier
480	Dioctyl sodium sulphosuccinate	emulsifier, wetting agent
481	Sodium lactylates	emulsifier, stabilizer
481(i)	Sodium stearoyl lactylate	emulsifier, stabilizer
481(ii)	Sodium oleyl lactylate	emulsifier, stabilizer
482	Calcium lactylates	emulsifier, stabilizer

INS Number	Food Additive Name	Technical functions
482(i)	Calcium stearoyl lactylate	emulsifier, stabilizer
482(ii)	Calcium oleyl lactylate	emulsifier, stabilizer
483	Stearyl tartrate	flour treatment agent
484	Stearyl citrate	emulsifier, sequestrant
485	Sodium stearoyl fumarate	emulsifier
486	Calcium stearoyl fumarate	emulsifier
487	Sodium laurylsulphate	emulsifier
488	Ethoxylated mono - and di - glycerides	emulsifier
489	Methyl glucoside- coconut oil ester	emulsifier
491	Sorbitan monostearate	emulsifier
492	Sorbitan tristearate	emulsifier
493	Sorbitan monolaurate	emulsifier, **stabilizer**
494	Sorbitan monooleate	emulsifier, **stabilizer**
495	Sorbitan monopalmitate	emulsifier
496	Sorbitan trioleate	stabilizer, emulsifier
500	Sodium carbonates	acidity regulator, raising agent, anticaking agent
500(i)	Sodium carbonate	acidity regulator, raising agent, anticaking agent
500(ii)	Sodium hydrogen carbonate	acidity regulator, raising agent, anticaking agent
500(iii)	Sodium sesquicarbonate	acidity regulator, raising agent, anticaking agent
501	Potassium carbonates	acidity regulator, stabilizer
501(i)	Potassium carbonate	acidity regulator, stabilizer
501(ii)	Potassium hydrogen carbonate	acidity regulator, stabilizer
503	Ammonium carbonates	acidity regulator, raising agent
503(i)	Ammonium carbonate	acidity regulator, raising agent
503(ii)	Ammonium hydrogen carbonate	acidity regulator, raising agent
504	Magnesium carbonates	acidity regulator, anticaking agent, colour retention agent,
504(i)	Magnesium carbonate	acidity regulator, anticaking agent, colour retention agent
504(ii)	Magnesium hydrogen carbonate	acidity regulator, anticaking agent, colour retention agent, **carrier**
505	Ferrous carbonate	acidity regulator
507	Hydrochloric acid	acidity regulator, **acid**
508	Potassium chloride	gelling agent
509	Calcium chloride	firming agent
510	Ammonium chloride	flour treatment agent
511	Magnesium chloride	firming agent, **colour retention agent**
512	Stannous chloride	antioxidant, colour retention agent
513	Sulphuric acid	acidity regulator, **acid**
514	Sodium sulphates	acidity regulator
515	Potassium sulphates	acidity regulator
516	Calcium sulphate	flour treatment agent, sequestrant, firming agent
517	Ammonium sulphate	flour treatment agent, stabilizer
518	Magnesium sulphate	firming agent
519	Cupric sulphate	colour fixative, preservative
520	Aluminium sulphate	firming agent
521	Aluminium sodium sulphate	firming agent, **buffering agent**
522	Aluminium potassium sulphate	acidity regulator, stabilizer
523	Aluminium ammonium sulphate	stabilizer, firming agent
524	Sodium hydroxide	acidity regulator
525	Potassium hydroxide	acidity regulator
526	Calcium hydroxide	acidity regulator, firming agent
527	Ammonium hydroxide	acidity regulator
528	Magnesium hydroxide	acidity regulator, colour retention agent
529	Calcium oxide	acidity regulator, colour retention agent, **dough conditioner**
530	Magnesium oxide	anticaking agent
535	Sodium ferrocyanide	anticaking agent
536	Potassium ferrocyanide	anticaking agent
537	Ferrous hexacyanomanganate	anticaking agent
538	Calcium ferrocyanide	anticaking agent
539	Sodium thiosulphate	antioxidant, sequestrant, **antibrowning agent**
541	Sodium aluminium phosphate	acidity regulator, emulsifier
541(i)	Sodium aluminium phosphate-acidic	acidity regulator, emulsifier, **raising agent**
541(ii)	Sodium aluminium phosphate-basic	acidity regulator, emulsifier
542	Bone phosphate (essentially calcium phosphate, tribasic)	emulsifier, anticaking agent, ~~water~~ **moisture** retention agent
550	Sodium silicates	anticaking agent
550(i)	Sodium silicate	anticaking agent
550(ii)	Sodium metasilicate	anticaking agent
551	Silicon dioxide, amorphous	anticaking agent
552	Calcium silicate	anticaking agent
553	Magnesium silicates	anticaking agent, ~~dusting powder~~
553(i)	Magnesium silicate	anticaking agent, dusting powder
553(ii)	Magnesium trisilicate	anticaking agent, ~~dusting powder~~
553(iii)	Talc	anticaking agent, ~~dusting powder~~, **texturizing agent**

INS Number	Food Additive Name	Technical functions
554	Sodium aluminosilicate	anticaking agent
555	Potassium aluminium silicate	anticaking agent
556	Calcium aluminium silicate	anticaking agent
557	Zinc silicate	anticaking agent
558	Bentonite	anticaking agent
559	Aluminium silicate	anticaking agent
560	Potassium silicate	anticaking agent
570	Fatty acids	foam stabilizer, glazing agent, antifoaming agent
574	Gluconic acid (D-)	acidity regulator, raising agent
575	Glucono delta-lactone	acidity regulator, raising agent, **sequestrant**
576	Sodium gluconate	sequestrant
577	Potassium gluconate	sequestrant, **acidity regulator**
578	Calcium gluconate	acidity regulator, firming agent, **sequestrant**
579	Ferrous gluconate	colour retention agent
580	Magnesium gluconate	acidity regulator, firming agent
585	Ferrous lactate	colour retention agent
586	4-Hexylresorcinol	colour retention agent, antioxidant
620	Glutamic acid (L (+)-)	flavour enhancer
621	Monosodium glutamate	flavour enhancer
622	Monopotassium glutamate	flavour enhancer
623	Calcium glutamate	flavour enhancer
624	Monoammonium glutamate	flavour enhancer
625	Magnesium glutamate	flavour enhancer
626	Guanylic acid	flavour enhancer
627	Disodium 5'-guanylate	flavour enhancer
628	Dipotassium 5'-guanylate	flavour enhancer
629	Calcium 5'-guanylate	flavour enhancer
630	Inosinic acid	flavour enhancer
631	Disodium 5'-inosinate	flavour enhancer
632	Potassium Inosinate	flavour enhancer
633	Calcium 5'-inosinate	flavour enhancer
634	Calcium 5'-ribonucleotides	flavour enhancer
635	Disodium5'-ribonucleotides	flavour enhancer
636	Maltol	flavour enhancer
637	Ethyl maltol	flavour enhancer
638	Sodium L-Aspartate	flavour enhancer
639	DL-Alanine	flavour enhancer
640	Glycine	flavour enhancer
641	L-Leucine	flavour enhancer
642	Lysine hydrochloride	flavour enhancer
650	**Zinc acetate**	**flavour enhancer**
900a	Polydimethylsiloxane	antifoaming agent, anticaking agent, emulsifier
900b	Methylphenylpolysiloxane	antifoaming agent
901	Beeswax, white and yellow	glazing agent, ~~release agent~~
902	Candelilla wax	glazing agent
903	Carnauba wax	glazing agent, **bulking agent, acidity regulator, carrier**
904	Shellac	glazing agent
~~905a~~	~~Mineral oil, food grade~~	~~glazing agent, release agent, sealing agent~~
905b	Petrolatum (petroleum jelly)	glazing agent, ~~release agent~~, sealing agent, **antifoaming agent**
905c	Petroleum wax	glazing agent, ~~release agent~~, sealing agent
905c (i)	Microcrystalline wax	glazing agent
905c (ii)	Paraffin wax	glazing agent
905d	**Mineral oil, high viscosity**	**glazing agent, ~~release agent~~, sealing agent**
905e	**Mineral oil, medium and low viscosity (Class I)**	**glazing agent, ~~release agent~~, sealing agent**
905f	**Mineral oil, medium and low viscosity (Class II)**	**glazing agent, ~~release agent~~, sealing agent**
905g	**Mineral oil, medium and low viscosity (Class III)**	**glazing agent, ~~release agent~~, sealing agent**
906	Benzoin gum	glazing agent
907	Hydrogenated poly-1-decene	glazing agent
908	Rice bran wax	glazing agent
909	Spermaceti wax	glazing agent
910	Wax esters	glazing agent
911	Methyl esters of fatty acids	glazing agent
913	Lanolin	glazing agent
915	Glycerol-, methyl-, or penta- erithrytol esters of colophane	glazing agent
916	Calcium iodate	flour treatment agent
917	Potassium iodate	flour treatment agent
918	Nitrogen oxides	flour treatment agent
919	Nitrosyl chloride	flour treatment agent

INS Number	Food Additive Name	Technical functions
920	L-Cysteine and its hydrochlorides- sodium and potassium salts	flour treatment agent
921	L-Cystine and its hydrochlorides- sodium and potassium salts	flour treatment agent
922	Potassium persulphate	flour treatment agent
923	Ammonium persulphate	flour treatment agent
924a	Potassium bromate	flour treatment agent
924b	Calcium bromate	flour treatment agent
925	Chlorine	flour treatment agent, **bleaching agent**
926	Chlorine dioxide	flour treatment agent
927a	Azodicarbonamide	flour treatment agent
927b	Carbamide (urea)	flour treatment agent
928	Benzoyl peroxide	flour treatment agent, preservative
929	Acetone peroxide	flour treatment agent
930	Calcium peroxide	flour treatment agent
938	Argon	~~packing gas~~, packaging gas
939	Helium	~~packing gas~~, packaging gas
940	Dichlorodifluoromethane	propellant, ~~liquid freezant~~
941	Nitrogen	~~packing gas~~, ~~freezant~~, **propellant, packaging gas**
942	Nitrous oxide	propellant, **antioxidant, foaming agent**
943a	Butane	propellant
943b	Isobutane	propellant
944	Propane	propellant
945	Chloropentafluoroethane	propellant
946	Octafluorocyclobutane	propellant
948	Oxygen	~~packing gas~~, **packaging gas**
949	**Hydrogen**	**~~Packing gas~~, packaging gas**
950	Acesulfame potassium	sweetener, flavour enhancer
951	Aspartame	sweetener, flavour enhancer
952	Cyclamic acid (and Na, K, Ca Salts)	sweetener
953	Isomalt (isomaltitol)	sweetener, anticaking agent, bulking agent, glazing agent
954	Saccharin (and Na, K, Ca salts)	sweetener
955	Sucralose (trichlorogalactosucrose)	sweetener
956	Alitame	sweetener
957	Thaumatin	sweetener, flavour enhancer
958	Glycyrrhizin	sweetener, flavour enhancer
959	Neohesperidine dihydrochalcone	sweetener
960	~~Stevioside~~ **Steviol glycosides**	sweetener
961	**Neotame**	**sweetener, flavour enhancer, ~~sweetening agent~~**
962	**Aspartame-acesulfame-salt**	**sweetener**
963	**D-Tagatose**	**sweetener**
964	Polyglycitol syrup	sweetener
965	Maltitol and maltitol Syrup	sweetener, stabilizer, emulsifier, **humectant, bulking agent**
966	Lactitol	sweetener, ~~texturizer~~, **texturizing agent**
967	Xylitol	sweetener, humectant, stabilizer, emulsifier, thickener
968	Erythritol	sweetener, flavour enhancer, humectant
999	Quillaia extracts	foaming agent, **emulsifier**
1000	Cholic acid	emulsifier
1001	Choline salts and esters	emulsifier
1001(i)	Choline acetate	emulsifier
1001(ii)	Choline carbonate	emulsifier
1001(iii)	Choline chloride	emulsifier
1001(iv)	Choline citrate	emulsifier
1001(v)	Choline tartrate	emulsifier
1001(vi)	Choline lactate	emulsifier
1100	Amylases	flour treatment agent
1101	Proteases	flour treatment agent, stabilizer, ~~tenderizer~~, flavour enhancer
1101(i)	Protease	flour treatment agent, stabilizer, ~~tenderizer~~, flavour enhancer
1101(ii)	Papain	flour treatment agent, stabilizer, ~~tenderizer~~, flavour enhancer
1101(iii)	Bromelain	flour treatment agent, stabilizer, ~~tenderizer~~, flavour enhancer
1101(iv)	Ficin	flour treatment agent, stabilizer, ~~tenderizer~~, flavour enhancer
1102	Glucose oxidase	antioxidant
1103	Invertases	stabilizer
1104	Lipases	flavour enhancer
1105	Lysozyme	preservative
1200	Polydextroses A and N	bulking agent, stabilizer, thickener, humectant, ~~texturizer~~, **texturizing agent**
1201	Polyvinylpyrrolidone	bodying agent, stabilizer, ~~clarifying agent~~, dispersing agent
1202	Polyvinylpolypyrrolidone	colour stabilizer, colloidal stabilizer
1203	**Polyvinyl alcohol**	**~~coating, binder~~, sealing agent, surface-finishing agent**
1204	**Pullulan**	**glazing agent, film forming agent**
1503	Castor oil	~~release agent~~, **carrier solvent**
1505	Triethyl citrate	foam stabilizer, **carrier solvent, sequestrant**

INS Number	Food Additive Name	Technical functions
1518	Triacetin	humectant
1520	Propylene glycol	humectant, wetting agent, dispersing agent, **glazing agent**
1521	Polyethylene glycol	antifoaming agent

Section 3

SUPPLEMENTARY LIST - MODIFIED STARCHES

INS	Food Additive Name	Technical Functions
1400	Dextrins, roasted starch white and yellow	stabilizer, thickener, ~~binder~~
1401	Acid-treated starch	stabilizer, thickener, ~~binder~~
1402	Alkaline treated starch	stabilizer, thickener, ~~binder~~
1403	Bleached starch	stabilizer, thickener, ~~binder~~
1404	Oxidized starch	stabilizer, thickener, ~~binder~~, **emulsifier**
1405	Starches, enzyme-treated	thickener
1410	Monostarch phosphate	stabilizer, thickener, ~~binder~~
1411	Distarch glycerol	stabilizer, thickener, ~~binder~~, **emulsifier**
1412	Distarch phosphate esterified with sodium trimetaphosphate; esterified	stabilizer, thickener, ~~binder~~
1413	Phosphated distarch phosphate	stabilizer, thickener, ~~binder~~
1414	Acetylated distarch phosphate	emulsifier, thickener
1420	Starch acetate esterified with acetic anhydride	stabilizer, thickener
1421	Starch acetate esterified with vinyl acetate	stabilizer, thickener
1422	Acetylated distarch adipate	stabilizer, thickener, ~~binder~~
1423	Acetylated distarch glycerol	stabilizer, thickener, **emulsifier**
1440	Hydroxypropyl starch	emulsifier, thickener, ~~binder~~
1442	Hydroxypropyl distarch phosphate	stabilizer, thickener
1443	Hydroxypropyl distarch glycerol	stabilizer, thickener
1450	Starch sodium octenyl succinate	stabilizer, thickener, ~~binder~~, emulsifier
1451	**Acetylated oxidized starch**	**Stabilizer , thickener, ~~binder,~~ emulsifier**

VENEZUELA

PLACE IN TEXT	WHERE IT READS:	IT SHOULD READ:
Page 3 Definitions	**2.** Food additives which **alter or** control the acidity or alkalinity of a food.	**2.** Food Additives which control the acidity or alkalinity of a food.
Page 3 Definitions	**9.** Food additives which are used together with another additive, nutrient o an **flavour** to facilitate its introduction or transmission or to maintain its integrity. The technological effect of the inert substances is solely that of the additive, nutrient flavour together with which they are used.	**9.** Food additives which are used together with another additive or a nutrient to facilitate its introduction or transmission or to maintain its integrity. **Note: the flavours must not be separated from the additives since the flavours are included in the additives.** The technological effect of the inert substances is solely that of the additive, nutrient flavour together with which they are used.
Page 4 Functional Classes	**13.** Emulsifying Salts (Sales Emulsionante)	**13.** Emulsifying Salts (Sales Emulsionantes)
Page 4 Definitions	**14.** Food Additives which **make** or keep the tissues of fruit or vegetables firm or crispy or act together with gelling agents for producing or maintaining a gel.	**14.** Food Additives which keep the tissues of fruit or vegetables firm or crispy or act together with gelling agents for producing or maintaining a gel.
Page 4 Subclasses	**16.** flour bleaching agents flour improvers, dough conditioners, dough reinforcers.	**16.** flour bleaching agents, flour improvers, dough conditioners, dough reinforcers.
Page 4 Definitions	**21.** Food Additives, gases, introduced in a jar, can or bottle during filling with a food or after filling.	**21.** Food Additives in the form of gases which are introduced in a jar, can or bottle during filling with a food or after filling.

Page 5 Definitions	**23.** Food Additives gases which expel a food from a receptacle.	**23.** Food additives in the form of gases which allow the expelling of a food from a receptacle.
Page 5 Definitions	**28**. Food additives which augment the viscosity of a food.	**28**. Food additives which increase the viscosity of a food.

Note: (1) Venezuela requests an explanation as to why? in the documents on food additives there is the tendency to separate the terms additives and flavours.

EFEMA

I am writing to you on behalf of EFEMA, the European Food Emulsifiers Manufacturers Association, in relation to the above mentioned document. EFEMA has Non-Governmental Observer Status with Codex Alimentarius and would like to submit the following comments to document CAC/GL 36-1989 on the Proposed Draft Revision of the Codex Class Names and International Numbering System; more particularly, functional class 12 "Emulsifier":

Definition of Emulsifier, functional class 12

The current proposed definition of "Emulsifier", as outlined in section 2 "Table of Functional Classes, Definitions and Technological Functions" (N07-2005), is: *"A food additive, which forms or maintains a uniform mixture of two or more immiscible phases such as oil and water in a food."*

EFEMA would suggest adding the following text (in bold) to further clarify the current proposed definition:

"A food additive, which forms or maintains a uniform mixture of two or more immiscible phases such as oil and water in a food ***and shows a range of specific functional interactions with food components."***

Sub-classes:

EFEMA welcomes the list of sub-classes proposed in the draft revision but would suggest the following modifications and additions (in bold) to extend the scope of the sub-classes and further clarify the proposed sub-classes:

"Fat *plasticizer, dispersing agent, surface active agent, crystallization inhibitor/****modifier,*** *density adjustment (flavouring in oils in beverages), suspension agent, clouding agent,* ***aerating agent, antistaling agent, starch complexing agent, dough strengthener, foaming agent, wetting agent, solubilizer, viscosity modifier , stabilizer****"*

ELC

The ELC (Federation of European Food Additives, Food Enzymes and Food Cultures Industries) would like to make the following comments surrounding the above-mentioned document:

- **We agree that as a matter of principle, all the definitions start with the wording *"food additive, which…"*** because it helps clarifying the status of ingredients that are not additives but which however are able to show some of the functionalities referred to in the document.
- **We support the addition of the sub-classes "*bulk sweetener*" to the list of sub-classes provided under Functional Class 27 "*sweetener*".** Actually, bulk sweetener represents a well-defined class of additives, namely the polyols, that should be rightfully included in this sub-class. We also would draw your attention on the French translation "édulcorant de lest" : in our opinion, "édulcorant de charge" would be a more accurate wording.
- As regards the proposed definition for carrier, we would remind the reservation of the delegations of Switzerland and United States and of some observers at the 2005 CCFAC session, i.e. that the food additive class for "carrier" was not appropriate and needed further elaboration (Alinorm 05/28/12 – Para 93). **We would suggest in particular to check the consequences of the introduction of this category on labelling.**

IDF

Introduction

The Codex Working Group led by the United Kingdom is proposing the expansion of the list of functional classes of food additives in the General Standard for Food Additives (GSFA), with modification of identified subclasses and definitions. New classes proposed include “carriers” and “packaging gases,” both of which would require addition of food additives to the GSFA. In many IDF countries, food additives in these categories are regarded as processing aids and have generally not been labeled in the ingredient statement, which would be required if they were added to the GSFA. In addition, the subclasses and definitions are not always clear or consistent.

IDF Position

Below are listed the changes that would improve the table of food additive class names, subclasses and definitions. The actual Working Group proposal for functional classes of food additive, their sub-classes and definitions can be found below these IDF recommended positions.

1. Class "#1, Acid" and class "#2, Acidity Regulators" should be merged since their definition has no real distinction between the two. Also "acid" is a sub-category of Acidity Regulator and "acidifier" is a subcategory of Acid. There is no substantive difference between the two, further supporting our recommendation to merge these two functional classes.

2. The column titled, “Sub-classes” is not accurate and is confusing. A better term might be "Description," "Functional effect" or some other synonym.

3. The definition for functional class "#3, Anticaking Agent," should have the word "particles" replaced with "parts."

4. The functional class #5 Antioxidant" should be removed as a functional class and added under "22 Preservatives" as a "Sub-class." In most countries, antioxidants are classified as "preservatives" and their function is to preserve the food characteristics. We also believe that the use of the term "shelf life" in the definition of antioxidants is not appropriate. (See #11 below for additional explanations on this point.)

5. The new functional class, "#9 Carrier" is unnecessary since carriers are usually present in very small amounts in an ingredient and the final food. Carriers are not intended to have any affect in the final food other than to deliver the ingredient(s). As an example, lactose and vegetable oils are widely used as carriers, but are not considered food additives. The function of these products fits much better as a processing aid. Processing aids are not included in the GSFA.

6. The name of functional class "#10, Colour" should be changed to "Colouring agent" since some food additives can decolorize food, not colour it. Also, definition of "#10 Colour" should be modified to "A food additive that adds, restores or alters colour in food by the addition of pigment."

7. The definition for "#12 Emulsifier" needs correction by replacing "mixture" by "emulsion" and the word "immiscible" should be deleted in order to remove redundant language and improve technical accuracy.

8. The "Sub-classes" for "#13 Emulsifying Salts" needs correction of a typing error, the correct spelling is "Melting Salt."

9. The definition of "#26 Stabilizer" should have the same modifications of its definition by removal of the word “immiscible." The purpose of stabilizers is to assist in maintaining a certain texture or mixture within a food regardless of whether the substances are "immiscible" or not. The definition of "immiscible" is to be "incapable of mixing or attaining homogeneity" and this may not describe completely all possible substances that might need to be stabilized.

10. The new functional class "#21Packaging Gas" is unnecessary and should be deleted since these gases are added to modify the atmosphere of the headspace in the container, do not affect the characterizing aspects of the food product (composition, texture, colour, taste, etc.) and therefore are not food additives. Another approach would be to leave the new functional class, "21 Packaging Gas," but change the definition to read, "A gas which is introduced into the food before, during or after the filling of the food and is present in the food or package after closure of the package."
11. The functional class definition for "22 Preservatives" uses the term, "shelf life" as part of the definition, but this term is not defined and has a multitude of meanings throughout the world. To remove any confusion, we recommend the definition be modified to "A food additive active against specific micro-organisms and/or unwanted chemical deterioration in order to extend the time that a food maintains its desirable characteristics." As a consequence of this new definition, those food additives that act specifically against chemical deterioration need to be identified by new subclass names, i.e. "anti-oxidants".
12. The functional class definition for "27 Sweetener" is acceptable and "sugar" needs to be excluded since this is an ingredient.

IFAC

The International Food Additives Council (IFAC), an association representing companies who produce high quality substances used worldwide as food additives, holds official Non Governmental Organization (NGO) status before Codex Alimentarius and is an active participant in the Codex Committee on Food Additives and Contaminants (CCFAC).

IFAC supports the 37th CCFAC proposed draft revision in the Codex Class Name document to change the functional class formerly called “artificial sweetener” to “sweetener,” and defined as “a food additive (non-sugar), which imparts a sweet taste to a food. ” IFAC also supports retention of the two sub-classes “intense sweetener” and “bulk sweetener.”

The reasons for the proposed change in the class name are sound. The term “sweetener” more accurately describes this class. The term “artificial” does not describe a “function” of the products that would fall under this category and has little value. The function provided by these food additives is to provide sweetness.

IFAC therefore commends the Committee for proposing a much more accurate name for this functional class and supports the functional class name, “sweetener.”

ISA

I am writing to you on behalf of the International Sweeteners Association (ISA), representing manufacturers and industrial users of intense sweeteners, in relation to the above mentioned document. ISA has Non-Governmental Observer Status with Codex Alimentarius and would like to submit the following comments to document CAC/GL 36-1989 on the Proposed Draft Revision of the Codex Class Names and International Numbering System; more particularly, functional class 27 “Sweetener”:

Definition of “Sweetener”, functional class 27

The current proposed definition of “Sweetener”, as outlined in section 2 “Table of Functional Classes, Definitions and Technological Functions” (N07-2005), is: *“A food additive (non-sugar), which imparts a sweet taste to a food.”*

ISA would propose a slight but significant modification to this definition of “Sweetener”, withdrawing the reference to “non-sugar”, as follows:

“A food additive, which imparts a sweet taste to a food”

The proposal makes it clear that it only includes food additives while any reference to sugar (in some countries only used for sucrose, in others for all sweet carbohydrates) could be misinterpreted.

Sub-classes

ISA welcomes the listing of two clearly distinct sub-classes, namely "intense sweetener" and "bulk sweetener". ISA believes that the term "intense sweetener", based on physiological properties or sensory characteristics is the adequate sub-class description for substances with a high sweetening power that do not provide or hardly provide any calories. We also support the inclusion of the sub-class term "bulk sweetener", as this term represents a well-defined class of additives, such as polyols, which rightfully belong to this sub-class.

Food Category System

Relating to the definition of "Sweetener" as a functional class of additives, ISA would like to point out the inconsistency with the Food Category Systems of the General Standard, as adopted by the Codex Alimentarius Commission in 2004 (ALINORM 14/27/12, Appendix V), where food category 11.0 is referred to as *"Sweeteners, including honey"*.

To remain coherent, ISA would argue that the descriptor for food category 11.0 be modified to:

"Sweetening agents, including honey"

We would argue that the term "sweetening agent" covers all types of substances imparting sweet taste, including sugars and sweeteners.

ITF

The Institute of Food Technologists (IFT) is pleased to have this opportunity to provide comments on CL 2005/32-FAC, *Request for Comments at Step 3 on Proposed Draft Revision of the Codex Class Names and International Numbering System (CAC/GL 36-1989)*, which will be considered at the Thirty-Eighth Session of the Codex Committee on Food Additives (CCFAC), 24-28 April 2006.

IFT is an international scientific and educational society, and a registered non-government organization of the Codex Alimentarius, with 22,000 members working throughout the food science and technology profession. IFT's mission is to advance the science and technology of food through the exchange of knowledge.

IFT commends the Working Group on its efforts to harmonize the terms used by JECFA and Codex and prepare the draft *Table of Functional Classes, Definitions and Technological Functions*. IFT has comments on two of the additions, "carrier" and "packaging gas," in the proposed table and that are not included in the current table in CAC/GL 36-1989.

- Carrier: The definition in the table states, "the technological effect of the carrier is solely on the food additive, nutrient, or flavouring agent with which it is used." If the substance does not have a technological effect on the final food product, it should not be considered a food additive, and thus should not be included on this list.
- Packaging Gas: IFT does not believe there is a need for this new functional class. This functional class could be interpreted to include inert gases that are used to fill the headspace in some food products, which is not a food additive use. The *Table of Functional Classes* already lists "*foaming agent*" and "*propellant*" as functional classes for gases that are actually used as food additives.