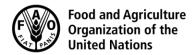
#### CODEX ALIMENTARIUS COMMISSION





Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 4.7

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX ALIMENTARIUS COMMISSION

Forty-sixth Session

### COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 53RD CODEX COMMITTEE ON FOOD ADDITIVES<sup>1</sup>

#### **BACKGROUND**

- 1. This document compiles the comments on the draft standards submitted at Step 8 or Step 5/8 of the Procedure. The comments are as shown in Appendices I, II, III and IV.
- 2. OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

#### **EXPLANATORY NOTES ON APPENDICES I, II, III and IV**

- 3. The comments received are presented in a table format, with two columns as follows:
  - First column Presents the comments with the rationale.
  - Second column Presents the provider of the comments (name of member or observer)

 $<sup>^1</sup>$  This document compiles comments submitted through OCS, or via email by the time this document was issued, in reply to CL 2023/41/OCS-FA, CL 2023/42/OCS-FA, CL 2023/43/OCS-FA and CL 2023/44/OCS-FA

Appendix I

### COMMENTS IN REPLY TO CL 2023/41/OCS-FA - REQUEST FOR COMMENTS ON: i) DRAFT AND PROPOSED DRAFT FOOD-ADDITIVE PROVISIONS OF THE GSFA AND REVISIONS (...)

Comments of Canada, Chile, Costa Rica, Cuba, Egypt, El Salvador, Iraq, Kenya, Peru, Senegal, Uganda and Food Industry Asia

#### COMMENT MEMBER / OBSERVER Canada supports that the proposed revisions and amendments identified in CL Canada 2023/41/OCS-FA be adopted but would like to make the following comments to ensure accuracy and consistency, as there appears to have been a number of transcriptional errors introduced between the report of the eWG of Alignment (CX/FA 23/53/6) and the report of the physical working group (CRD 3) for matters that we do not believe were agreed to during the physical working group: A listing for the BENZOATES in FC 02.2.2 is missing from page 3, where an XS253 note is required. The provision is accurately listed for the Table 2 entry (see page 14) The addition of Note 359 to Diacetyltartaric and fatty esters of glycerol (INS 472e) in FC 02.2.2 (see page 5) and to Stearoyl lactylates (INS 481(i) and 482(i)) in FC 02.2.2 (page 11) may inadvertently impact non-standardized foods in that Food Category, if there is not a 1:1 parity with the associated Commodity Standards Note C290 is missing from the PHOSPHATES provision in FC 01.5.1 (page 7 and page 12 of CL; See pages 72, 74, 125 and 126 of CX/FA 23/53/6) Note C290: For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): bone phosphate (INS 542), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)) and trimagnesium phosphate (INS 343(iii)), as anticaking agents only, singly or in combination at 4,400 mg/kg. A listing for the RIBOFLAVINS in FC 02.2.2 is missing from page 9 (Table 1 entry) and page 15 (Table 2 entry), where an XS253 note is required. The provision is accurately listed for the Table 2 entry (see page 14) An XS262 Note is missing for RIBOFLAVINS in FC 01.6.1 (page 9) due to Alignment of CXS 262-2006, see page 109 of CX/FA 23/53/6 Regarding proposed note D262 (page 11 and page 18), Canada notes that talc (INS 553(iii)) is not currently permitted in products conforming to CXS 262-2006. Canada wonders whether a decision was made to permit talc in those products conforming to CXS 262 and to include it under the same combination provisions as for calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and silicon dioxide, amorphous (INS 551), as is currently indicated in the proposed note D262. If such a decision was not made, then talc (INS 553(iii)) may need to be removed from note D262 as a result of alignment. See page 48 of CX/FX 23/53/6 (specifically Chair's response to para. 65), talc was to be removed from the Note. A listing for the Tartrates in FC 01.6.1 is missing from the Table 1 entries on page 11, where an XS262 note is required. The provision is accurately listed for the Table 2 entry (see page 13) Bone phosphate (INS 542) is erroneously listed twice in Note C207 on page 15 • There is an extra space, bracket and comma ")," in Note D290 prior to the "talc" listing on page 16. The Table 3 entry for Carob bean gum on page 19 should have the following "(see functional class table and footnote)" in column five after the CXS 253-2006 entry. Carob bean gum is a Stabilizer/Thickener which are limited to certain products in CXS 253 via the functional class Table. This Note

is correct and is what was discussed in the eWG, see page 153 of CX/FA 23/53/6.

- The Table 3 entry for both Sodium dihydrogen citrate and sodium hydroxide on page 23 should NOT have "(see functional class table and footnote)" in column five after the CXS 253-2006 entry. These additives function as acidity regulators and do not require reference to the functional class table since they are permitted in all products conforming to CXS 253-2006. The absence of the Note is correct and is what was discussed in the eWG, see page 155 of CX/FA 23/53/6.
- The Table 3 entry for Sodium sesquicarbonate on page 23 should have the following "(see functional class table and footnote)" in column five after the CXS 253-2006 entry. However, the CXS 253 entry in Table 3 for Sodium sesquicarbonate should be held until such time as the INS WG determines whether stabilizer/thickener is an appropriate technological function for this additive, see para. 41 and para. 130 of REP23/FA for further information.
- The Table 3 entry for Pectins on page 21, and for potassium acetate, potassium carbonate, potassium dihydrogen citrate and processed euchema seaweed (PES) on page 22 should have the following "(for use in cheese mass only)" in column five after the CXS 262-2006 entry, NOT "(as an anticaking agent only, see functional class table in CXS 262-2006) which should be removed as it is incorrect, these additives are not listed as anticaking agent in CXS 262-2006. The former Note is correct and is what was discussed in the eWG, see page 157 of CX/FA 23/53/6.
- The Maximum Use level of 1000 mg/kg for Sucrose Esters is under the wrong column heading on page 60
- The text proposed for food category 04.1.2.6 in the Section 2 of the Annex to Table 3 (page 61) should be specific to "Certain acidity regulators" in Table 3, rather than a general reference to Table 3 food additives. This is because no other Table 3 additives other than certain acidity regulators are permitted in CXS 160. The condition in Section 2 of the Annex to Table 3 would then read "Only certain Table 3 acidity regulators (as indicated in Table 3) are acceptable for use in foods conforming to this Standard" rather than "Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to this Standard". The change is consistent with the text used for Section 2 of the Annex to Table 3 for FC 12.6.2 on page 61 (i.e., the functional classes within allowed Table 3 additives are identified).
- It would appear that Food Category 13.1.1 should also be listed for each of pectins (page 69, page 70 and page 77) and xanthan gum (page 76 and page 78), noting that CXS 72-1981 permits each of pectins and xanthum gum in "liquid hydrolysed protein infant formula". This product also falls under infant formula (FC 13.1.1) as described in CXS 192-1995, where the final sentence of FC 13.1.1 indicates "Products, other than those under food category 13.1.3, may be, hydrolyzed protein and/or amino acid-based, or milk-based."
- The Maximum Use Level for tocopherols in FC 13.3 should be 30 mg/kg (as correctly identified on page 76) NOT 50 mg/kg as currently listed on page 82.
- Note D72 (page 82) requires a correction to correctly reference the CXS title in the Note "...Standard for Infant Formula and Formulas for Special Medical Dietary Purposes Intended for Infants (CXS 72-1981)."

Chile está de acuerdo con las propuestas finales de la CCFA53 para enviar a aprobación a la CAC 46, por lo tanto, apoya todas las solicitudes desde la i hasta la xii de la carta circular 41.

Chile pone especial énfasis en la solicitud xii donde se solicita la inclusión de las disposiciones para aditivos alimentarios en la categoría 14.2.3. La CCFA53 acordó remitir a la CAC para su adopción en el trámite 5/8 y 8, en su 46.º período de sesiones, las disposiciones sobre aditivos alimentarios que figuran en la CA 14.2.3 junto con la nota revisada "La dosis máxima del aditivo en los vinos de uva establecida como buenas prácticas de fabricación debe impedir: i) la modificación de las características naturales y esenciales del vino, y ii) un

Chile

cambio sustancial en la composición del vino. Algunos miembros del Codex	
especifican además que el uso debe ser coherente con el Código de prácticas enológicas de la Organización Internacional de la Vid y el Vino (OIV)". Este tema que fue presentado por Chile como autor y Unión Europea y Estados Unidos como co-autores fue finalmente aprobado por todos los países asistentes sin oposición alguna, y dadas todas las explicaciones durante la reunión plenaria, se apoyó la nota propuesta, destacando que se trataba de una solución excepcional para una situación compleja, recordando que el tema de aditivos en vinos venía detenido desde la reunión CCFA49. Por todos los antecedentes expuestos en el REP23/FA, Chile espera la aprobación de la CAC46 a la solicitud enviada desde la CCFA53 sobre el tema de aditivos en vinos, para la aprobación en trámite 5/8 y 8 de los aditivos en cuestión.	Ocata Disc
Costa Rica considera que el texto está listo para su adopción.	Costa Rica
Cuba apoya lo descrito en la carta circular CL 2023/4/OCS-FA sobre el ANTEPROYECTOS Y PROYECTOS DE DISPOSICIONES SOBRE ADITIVOS ALIMENTARIOS Y OTRAS DISPOSICIONES.	Cuba
Egypt appreciates the work which made in the document & agrees on it	Egypt
El Salvador está de acuerdo con incorporar a las disposiciones de SIN 954 que figuran en cuadros I y II de la NGGA, la nota siguiente: "para la sacarina y sus sales de Ca, KI, Na, expresadas como Sacarina Na" como se aprobó en CCFA53 (párrafo 92 REP23/FA). El Salvador está de acuerdo con incorporar a las disposiciones de SIN 951 para la Categoría de Alimentos 14.1.5 que figuran en cuadros I y II de la NGGA, la nota 191 que indica: Si se utiliza en combinación con la sal de aspartamo y acesulfamo (SIN 962), la dosis máxima de uso combinada, expresada como aspartamo, no será superior a esta dosis, como se indica en REP23/FA Apéndice VI, de acuerdo al consenso del CCFA53 (párrafo 117 REP23/FA).El Salvador considera que la disposición de SIN 331 (iii) con las notas 438, 227 y AA en la Categoría de Alimentos No. 01.1.1 está lista para su adopción final por parte de CAC46, en virtud del consenso alcanzado en CCFA53, como se indica en el párrafo 171 de REP23/FA	El Salvador
Agree	Iraq
Kenya supports the adoption of these provisions except for the adoption of Trisodium Citrate INS 331 (iii) on FC 01.1.1 (Fluid milk plain). As previously submitted during CAC43 and in several sessions of CCFA Kenya does not find the use of Trisodium Citrate technically justifiable in UHT milk consistent with	Kenya
the preamble of CXS 192. Recalling the discussions of CAC43, most member countries objected to the adoption of these additives in plain milk as no convincing technical justification for its use. In the technical discussion during CCFA53, Kenya expressed her reservations about the decision CCFA raised (REP23/FA Para 170). We also find the conclusion of REP23/FA Para 172 restricting as it limits further discussions during the CAC46 thus negating the principle of consensus that has been cardinal in Codex. We therefore present our Strong Objection to its adoption at step 8.	
countries objected to the adoption of these additives in plain milk as no convincing technical justification for its use. In the technical discussion during CCFA53, Kenya expressed her reservations about the decision CCFA raised (REP23/FA Para 170). We also find the conclusion of REP23/FA Para 172 restricting as it limits further discussions during the CAC46 thus negating the principle of consensus that has been cardinal in Codex. We therefore present our Strong Objection to its adoption at step 8.  Perú apoya las disposiciones para adopción sobre:ii) revisión de los descriptores en las categorías de alimentos (CA) 12.2.1 y 12.2.2; iii) inclusión de mono y diglicéridos de ácidos grasos (SIN 471) en la CA 02.1.2; v) revisión de las notas 488 y 502; vi) eliminación de la nota 301 de la disposición para BENZOATOS en la CA 14.1.4; vii) inclusión de riboflavina de Ashbya gossypii (SIN 101(iv)) en el encabezamiento de grupo RIBOFLAVINAS en los cuadros I y II de la NGAA; viii) inclusión de las disposiciones para riboflavina, sintética (SIN 101(i)), riboflavina 5'-fosfato sódico (SIN 101(ii)), riboflavina de Bacillus subtilis (SIN 101(iii)), riboflavina de Ashbya gossypii (SIN 101(iv)) en el Cuadro III; x) revisiones de las disposiciones adoptadas para edulcorantes en diferentes CA.	Peru
countries objected to the adoption of these additives in plain milk as no convincing technical justification for its use. In the technical discussion during CCFA53, Kenya expressed her reservations about the decision CCFA raised (REP23/FA Para 170). We also find the conclusion of REP23/FA Para 172 restricting as it limits further discussions during the CAC46 thus negating the principle of consensus that has been cardinal in Codex. We therefore present our Strong Objection to its adoption at step 8.  Perú apoya las disposiciones para adopción sobre:ii) revisión de los descriptores en las categorías de alimentos (CA) 12.2.1 y 12.2.2; iii) inclusión de mono y diglicéridos de ácidos grasos (SIN 471) en la CA 02.1.2; v) revisión de las notas 488 y 502; vi) eliminación de la nota 301 de la disposición para BENZOATOS en la CA 14.1.4; vii) inclusión de riboflavina de Ashbya gossypii (SIN 101(iv)) en el encabezamiento de grupo RIBOFLAVINAS en los cuadros I y II de la NGAA; viii) inclusión de las disposiciones para riboflavina, sintética (SIN 101(ii)), riboflavina 5'-fosfato sódico (SIN 101(ii)), riboflavina de Bacillus subtilis (SIN 101(iii)), riboflavina de Ashbya gossypii (SIN 101(iv)) en el Cuadro III; x) revisiones de las disposiciones adoptadas para edulcorantes en	Peru

Position: le Sénégal émet des réserves sur l'adoption du texte :

Justificatif: L'utilisation de cet additif dans cette catégorie d'aliments n'est pas technologiquement justifiée et peut induire le consommateur en erreur (référence à la section 3.2 du préambule de la NGAA)

-Part A: provisions related to agenda item 2

Uganda agrees with the maximum limits and attached notes on the food additives

provisions under Codex Committee on Fats and Oils.

-Part B: provisions related to agenda item 3a

Uganda agrees on the set ML and the removal of Note 301 from the provision for Benzoates (INS 210-213) in food category 14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks. Uganda notes that the issues was extensively considered by JECFA evaluation and accepted by CCFA53.

-Part C: provisions related to agenda item 4b

For the food additives provisions for milk and milk products, Uganda does not use preservatives in the milk powders, creams, butter and noted only used in some cheeses. The meeting therefore agreed with the proposed MLs and attached notes.

-Proposed amendments to table 1, 2 and 3 of the GSFA relating to processed fruits and vegetables (CCPFV)

Uganda agrees with the maximum limits and attached notes on the food additives provisions.

-Proposed amendments to table 1, 2 and 3 of the GSFA relating to alignment of CCNFSDU standards

Uganda agrees with the maximum limits and attached notes on the food additives provisions for adoption to the next step.

-Proposed amendments to the GSFA for alignment of CXS 325R-2017 – Regional standard for unrefined shea butter, and CXS 40R-1981 – Regional standard for Chanterelles

Uganda accepts the adoption of the maximum limits and relevant notes for the food additives provisions under the regional standards.

-Part D: provisions related to agenda item 5a

Uganda accepts the revisions to Food Additive Provisions, Draft and Proposed Draft Food Additive Provisions for colors under in different food categories for adoption at Step 8 and 5/8

-Part E: provisions related to agenda item 5b

Uganda accepts the Food Additive Provisions, their relevant notes and MLs for carotenes and beta carotenes used in different food categories for adoption at Step 8 and 5/8

-E.3- Provisions from CX/FA 23/53/8 Appendix 4, Topic A

Uganda agrees to the MLs and notes attached to the use of the Aspartameacesulfame salt as used in various food categories noting acceptance from JECFA toxicological studies and guidance given to the CCFA.

-Part G: provisions related to agenda item 9

Uganda did not support the use of trisodium citrate in fluid milk despite the Maximum limit set as GMP and relevant notes attached to it, this is because its use alters the nature of the product, masking poor quality, misleads consumers and potential misuse by the food industry.

Uganda

Codex region (CCLA), other options can be discovered to solve the issue within the CCLAC region without use of the food additive in the fluid milk produced by other regions that do not have the sedimentation challenge. The proposed set limit and relevant notes on trisodium citrate in the revised GSFA text can be considered to milks within CCLAC only.  Uganda therefore, agrees that the draft provision should be not proceed at step 8 for adoption until the subject is given the necessary consideration by all the Codex members and observers in various Codex regions in order to facilitate fair trade in safe and quality milks.  Further, Uganda's milk does not have a problem of milk sedimentation, therefore, does not support the use of trisodium citrate as a food additive in prevention of sedimentation, coagulation and gelation, which is a common phenomenon that occurs during prolonged storage of UHT fluid milk.  FIA supports the CCFA53 recommendations for adoption by CAC45.	Food Industry Asia
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Appendix II

### COMMENTS IN REPLY TO CL 2023/42/OCS-FA - REQUEST FOR COMMENTS ON PROPOSED REVISED FOOD ADDITIVE SECTIONS OF VARIOUS CODEX COMMODITY STANDARDS

Comments of Canada, Chile, Costa Rica, Cuba, Egypt, Iraq, Kenya, Peru and Uganda

COMMENT	MEMBER / OBSERVER
Canada supports that the proposed revised food additive sections of various	Canada
Codex commodity standards as indicated in CL 2023/42/OCS-FA be adopted	
but would like to make the following comment to ensure consistency in	
amendments between the various Milk and Milk Product Standards.	
The functional class table for CXS 207-1999 (page 2), CXS 281-1971 (page	
11), CXS 282-1971 (page 12), CXS 290-1995 (page 13) of the CL has had	
new text added "X The use of additives belonging to the class is	
technologically justified." and the following text identified as requiring removal	
"- The use of additives belonging to the class is not technologically justified.".	
However, the functional class table for CXS 253-2006 (page 3) and CXS 262-	
2006 (page 8) has had both sentences added below the respective functional	
class tables as new text. In this regard, if the intention is to keep both	
sentences or only to keep the former of the two sentences, then that approach	
should be applied consistently to all Milk and Milk Product standards containing	
a functional class table.	
Chile está de acuerdo que la CAC46 adopte las disposiciones sobre aditivos	Chile
alimentarios convenidas en las recomendaciones expuestas en el REP23/FA y	
enumeradas en los apéndices V del mismo reporte.	
Costa Rica considera que el texto está listo para su adopción.	Costa Rica
Cuba apoya lo descrito en el documentos sobre las ENMIENDAS	Cuba
PROPUESTAS A LAS DISPOSICIONES SOBRE ADITIVOS ALIMENTARIOS	Gubu
DE LAS NORMAS PARA PRODUCTOS en respuesta al CL 2023/42/OCS-FA	
Egypt appreciates the work which made in the document & agrees on it	Egypt
Yes to adoption.	Iraq
Kenya supports the adoption of proposed revised food additive sections of	Kenya
various Codex commodity standards as the proposed amendments of	Reliya
alignments are consistent with the requirements of the procedural manual.	
	Peru
Perú no presentará respuesta a la Carta Circular CL2023/42/OCS-FA.	
-Proposed amendments to the food additive provisions of the standard for milk	Uganda
powders and cream powder (CXS 207-1999)	
Uganda supports amendment of the previous text and adoption of revised text	
on the food additives provisions to next step given the technological	
justifications for their use in the food product categories.	
Dranged amendments to the food additive provisions of the codey standard	
-Proposed amendments to the food additive provisions of the codex standard for dairy fat spreads (CXS 253-2006)	
Uganda accepts the adoption of the food additives provisions as amended to	
be considered in the product standard.	
be considered in the product standard.	
-Proposed amendments to the food additive provisions of the codex standard	
for mozzarella (CXS 262-2006)	
Uganda agrees to adopt the amended text on the food additives used in the	
mozzarella cheese.	
mozzarona onococ.	
-Proposed amendments to the food additive provisions of the codex standard	
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-Proposed amendments to the food additive provisions of the codex standard for evaporated milks (CXS 281-1971) Uganda notes acceptance to adoption of the amendment on the food additives	

-Proposed amendments to the food additive provisions of the codex standard for sweetened condensed milks (CXS 282-1971)

Uganda supports amendment made in insertion of new text and deletion of the previous text on the food additives provisions as used in the product standard for sweetened condensed milks.

-Proposed amendments to the food additive provisions of the codex standard for edible casein products (CXS 290-1995)

Uganda accepts the adoption of the amended text on the food additives provision in the edible casein product standard.

-Proposed amendments to the food additive provisions of the codex standard for dairy permeate powders (CXS 331-2017)

Uganda supports the proposed amendment in section 4 of the Standard for Dairy Permeate Powders, accepts to remove the requirement 'shall' and use a recommendation 'should' to cross reference to the guidelines on substances as used as processing aids (CXG 75:2010).

-Proposed amendments to the food additive provisions of the standard for mango chutney (CXS 160-1987)

Uganda agrees to the amendment of the food additives provision in the mango chutney.

-Proposed amendments to the food additive provisions of the standard for gochujang (CXS 294-2009)

Uganda does not produce nor trade in food category (gochujang) thus has a reservation on the amendment on the food additive provisions.

-Proposed amendments to the food additive provisions of the standard for chili sauce (CXS 306-2011)

Uganda agrees to the amendment of the food additives provision in the chili sauce.

Uganda also accepts to remove the requirement 'shall' and use a recommendation 'should' to cross-reference to the Guidelines for the Use of Flavourings (CXG 66-2008).

-Proposed amendments to the food additive provisions of the standard for infant formula and formulas for special medical purposes intended for infants (CXS 72-1981)

Uganda supports the amendment made on the food additives provisions as is. Uganda also accepts the deletion of the text cross-referring to carbon dioxide and nitrogen as packing media. Uganda supports a form of packaging that safe guard the product safety and quality without limiting the technological advancement and industry innovation while applying the package.

-Proposed amendments to the food additive provisions of the standard for canned baby foods (CXS 73-1981)

Uganda accepts the amendments of the food additive provisions for canned baby food as is.

- -Proposed amendments to the food additive provisions of the standard for processed cereal based foods for infants and young children (CXS 74-1981) Uganda accepts amendments of the food additive provisions for processed cereal based foods for infants and young children as is.
- -Proposed amendments to the food additive provisions of the draft follow-up formula standard (from appendix II REP23/NFSDU)

Uganda accepts proposed amendments of the food additive provisions for follow-up formula standard as is in both sections A and B.
Uganda raises a need for justification on the difference in MLs for vanillin and ethyl vanillin in canned baby foods and section B: drink for young children with added nutrients in follow-up formula standard as proposed for 70mg/kg and 50mg/kg respectively.

- -Proposed amendments to the food additive provisions of the standard for formula foods in weight control diets (CXS 181-1991) Uganda accepts the amended text as proposed.
- -Proposed amendments to the food additive provisions of the standard for formula for use in very low energy diets for weight reduction (CXS 203-1995) Uganda accepts the amended text as is.
- -Proposed amendments to the food additive provisions of the guidelines for ready to use therapeutic foods (CXG 92-2022)
  Uganda agrees to amended text on the food additives provision as is.

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Appendix III

### COMMENTS IN REPLY TO CL 2023/43/OCS-FA - REQUEST FOR COMMENTS AT STEP 5/8 ON THE PROPOSED DRAFT SPECIFICATIONS FOR THE IDENTITY AND PURITY OF FOOD ADDITIVES

Comments of Canada, Chile, Costa Rica, Cuba, Egypt, Iraq, Kenya, Peru and Uganda

COMMENT	MEMBER / OBSERVER
Canada supports the proposed draft specifications and has no further	Canada
comments	
Chile apoya y agradece el trabajo realizado por JECFA, y está de acuerdo con	Chile
la propuesta final de la CCFA53 de remitir a la CAC con miras a su adopción	
en el trámite 5/8 en su 46.º período de sesiones.	
Costa Rica considera que el texto está listo para su adopción	Costa Rica
Cuba apoya lo descrito en el documento de ANTEPROYECTO DE	Cuba
ESPECIFICACIONES DE IDENTIDAD Y PUREZA DE ADITIVOS	
ALIMENTARIOS en respuesta ala carta circular CL 2023/43/OCS-FA	
Egypt appreciates the work which made in the document & agrees on it	Egypt
Agree	Iraq
Kenya supports the adoption of proposed draft Specifications for the Identity and	Kenya
Purity of Food Additives at step 5/8.	
Perú apoya el anteproyecto de especificaciones de identidad y pureza de	Peru
aditivos alimentarios	
SUSTENTO: las especificaciones de identidad y pureza del anteproyecto	
están basadas en la Monografía 27 y Monografía 30 del Comité Mixto	
FAO/OMS de Expertos en Aditivos Alimentarios JECFA que es un comité	
científico internacional de expertos administrado conjuntamente por la	
Organización de las Naciones Unidas para la Alimentación y la Agricultura	
(FAO) y la Organización Mundial de la Salud (OMS).	
Uganda supports the proposed specifications for identity and purity from the	Uganda
92nd and 95th JECFA evaluation for adoption at step 5/8. Uganda notes that	
the listed food additives and flavourings have adequate evaluation by JECFA	
and as in the monographs.	

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**Appendix IV** 

# COMMENTS IN REPLY TO CL 2023/44/OCS-FA - REQUEST FOR COMMENTS AT STEP 5/8 ON THE PROPOSED DRAFT REVISION TO THE CLASS NAMES AND THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CXG 36-1989)

Comments of Canada, Chile, Costa Rica, Cuba, Egypt, Iraq, Kenya, Peru and Uganda

COMMENT	MEMBER / OBSERVER
nil comments – Canada does not use the INS	Canada
Chile apoya la solicitud de la CCFA53 de enviar los anteproyectos de cambios	Chile
al SIN a la CAC con miras a su adopción en el trámite 5/8 en su 46.º período	
de sesiones (Apéndice X del REP23/FA).	
Costa Rica considera que e texto está listo para su adopción.	Costa Rica
Cuba agradece la oportunidad de expresar sus comentarios sobre la carta	Cuba
circular CI 2023/44/OCS-FA el Anteproyecto sobre el Anteproyecto de revisión	
de nombres genéricos y sistema internacional de numeración de aditivos	
alimentarios y apoya lo que se describe en este documento.	
Egypt appreciates the work which made in the document & agrees on it.	Egypt
Agree	Iraq
Kenya supports the adoption of Class Names and the International Numbering	Kenya
System for Food Additives (CXG 36-1989) at step 5/8	
Perú apoya las disposiciones para adopción sobre:ii) revisión de los	Peru
descriptores en las categorías de alimentos (CA) 12.2.1 y 12.2.2; iii) inclusión	
de mono y diglicéridos de ácidos grasos (SIN 471) en la CA 02.1.2; v) revisión	
de las notas 488 y 502; vi) eliminación de la nota 301 de la disposición para	
BENZOATOS en la CA 14.1.4; vii) inclusión de riboflavina de Ashbya gossypii	
(SIN 101(iv)) en el encabezamiento de grupo RIBOFLAVINAS en los cuadros I	
y II de la NGAA; viii) inclusión de las disposiciones para riboflavina, sintética	
(SIN 101(i)), riboflavina 5'-fosfato sódico (SIN 101(ii)), riboflavina de Bacillus	
subtilis (SIN 101(iii)), riboflavina de Ashbya gossypii (SIN 101(iv)) en el Cuadro	
III; x) revisiones de las disposiciones adoptadas para edulcorantes en	
diferentes CA.	
Uganda adopts progression to step 5/8 of the proposed revision on the class	Uganda
name and international system for food additives.	