

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 8

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**CODEX COMMITTEE ON FOOD ADDITIVES**  
**Forty-eighth Session**  
**Xi'an, China, 14-18 March 2016**  
**DISCUSSION PAPER ON SECONDARY FOOD ADDITIVES**

Comments of China, Egypt, Ghana, India, Indonesia, Russian Federation, Senegal, Thailand and African Union

## CHINA

China basically supports **Recommendation 2, Option C**: Development of separate Guidelines for the use of secondary additives following the approach of CAC/GL 66-2008.

China believes separate guidelines for the use of secondary additives is a pragmatic and efficient approach to recognize and legitimize the use of secondary additives. All issues related to secondary additives (e.g. scope, conditions of use, relevant functional classes, etc.) could be addressed. Also establishment of separate Guidelines for the use of secondary additives would not require much CCFA resources, and have a low impact on the GSFA.

## EGYPT

we support the development of Guidelines, separate from the GSFA, to address the use of secondary additives (Option C). A Guideline would serve well to provide certainty and clarity about the use of these substances without changes to the GSFA. This solution would avoid additional work within the GSFA which would be positive at a time when there is already a multitude of other priority issues and an extensive backlog of provisions awaiting for adoption. Also does not support proposals to address the use of secondary additives within the GSFA through the use of notes (Option B).

## GHANA

Ghana supports the recommendation for CCFA to adopt option B: to address the use of secondary additives by use of notes within the current GSFA food category system for Food categories listed in Section 4.3 (i.e., 13.1 - Infant formulae, follow-up formulae, and formulae for special medical purposes for infants and 13.2 - Complementary foods for infants and young children)

**Rationale:** Whilst CCFA continues to discuss issues related to secondary food additives, Ghana shares the opinion that infants and young children have peculiar vulnerabilities as such, the health of this sub-population should be safeguarded.

The use of notes for food categories 13.1 and 13.2 is a prudent risk management measure which can contribute to protecting infants and young children from dietary exposure to food additives which could present adverse health effects.

## INDIA

**Recommendation 1-** Recommendation 1 is acceptable.

**Recommendation 2-** India supports Option A as it would address the issue of use of secondary food additives in a more objective manner as compared to the Option C.

## INDONESIA

Indonesia agrees with recommendation 2 opsi A. Indonesia considers that establishment of a new category in the GSFA food category system will be easier to address the use of secondary food additives.

**RUSSIAN FEDERATION**

RU supports necessity of endorsement of Option A (Recommendation 2) which recommends to establish a new category - "Preparations" in the GSFA.

Only in case of establishing a new food category in GSFA – «Preparations» could be possible: 1. regulate the listing and the maximum level of use of food additives in complex food additives, enzymes, flavorings and food ingredients; 2. correctly implement the labeling of food products. Currently, these issues are constantly having problems.

However, the definition of the term "Preparations" should be given.

**SENEGAL****Problème:**

(I) Section 4 du préambule NGAA couvre de manière appropriée tous les aspects de la définition de travail des additifs alimentaires secondaires approuvée par CCFA47.

(li) Si tous les aspects ne sont pas abordés quel serait l'impact de la définition sur la NGAA?

**Position:** Section 4.3 du préambule de la NGAA ne couvre pas de manière appropriée tous les aspects de la définition adoptée d'additifs secondaires tel que décrit ci-dessous, par rapport aux catégories d'aliments 13.1 et 13.2 et donc la définition adoptée devrait être révisée.

"Additif alimentaire secondaire désigne tout additif alimentaire qui: (i) est utilisé dans les préparations d'additifs alimentaires, des enzymes, des arômes, des nutriments ou des substances ayant un effet physiologique qui sont formulés en particulier pour un usage commercial; (li) exerce une fonction technologique dans les préparations (par exemple pour faciliter leur stockage, la standardisation, la dispersion, la dilution ou la dissolution); et (iii) n'a pas de fonction technologique dans la denrée alimentaire dans laquelle ces préparations ont une fonction. Le terme ne comprend pas les auxiliaires technologiques qui ne disposent pas de fonction technologique dans la préparation ou la nourriture dont les préparatifs ont une fonction. "

**Justification:** les additifs alimentaires secondaires sont inacceptables dans les aliments appartenant aux catégories d'aliments 13.1 et 13.2

**THAILAND**

Thailand would like to thank European Union for great work and leading the electronic Working Group (eWG) on secondary food additives.

We are of the view that Section 4 of the preamble to the GSFA partially covers the using of secondary food additives since it would require secondary food additives to be permitted in raw materials or ingredients or final food. There are food additive provisions for use in raw materials (e.g. milk, cream, flours, fruit and vegetable), ingredients (e.g. salt, sugar and spices) and final food according to the GSFA but there is no food additive provision or guideline for use in additives, enzymes and flavourings preparation. Therefore, we support a development of criteria for the use of secondary food additives in order to clarify which additives or functional classes are justified for the use in preparation.

Option A and C in CX/FA 16/48/17 are likely to be an effective approach to handle the use of food additives in preparation. However, further discussion and consideration on how to address the use of secondary food additives on the basis of these two options and its consequential outcome are needed. Hence, we support recommendation 2 in CX/FA 16/48/17.

**AFRICAN UNION****Issue:**

(i) Weather Section 4 in the GSFA preamble appropriately covers all the aspects of the working definition of secondary food additives as endorsed by CCFA47.

(ii) If all aspects are not addressed what would be the impact of the definition on the GSFA?

**Position:** AU notes that, Section 4.3 of the preamble of GSFA does not appropriately cover all aspects of the adopted definition of secondary additives as outlined below, with respect to food categories 13.1 and 13.2 and therefore the adopted definition should be revised.

“Secondary food additive means any food additive that: (i) is used in preparations of food additives, enzymes, flavourings, nutrients or substances with physiological effect that are formulated particularly for commercial use; (ii) exerts a technological function in those preparations (e.g. to facilitate their storage, standardisation, dispersion, dilution or dissolution); and (iii) does not have a technological function in the food in which those preparations have a function. The term does not include processing aids which do not have any technological function in the preparations or in the food in which the preparations have a function.”

**Rationale:** Secondary food additives are unacceptable in foods belonging to food categories 13.1 and 13.2