

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

**Forty-eighth Session**

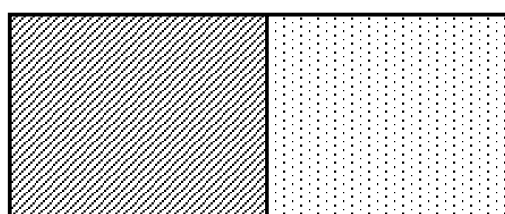
**Xi'an, China, 14-18 March 2016**

#### ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS AND RELEVANT PROVISIONS OF THE GSFA

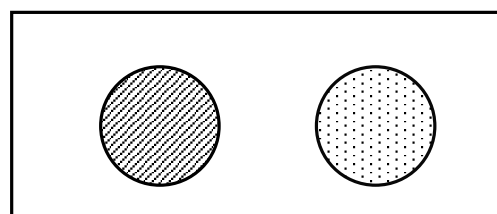
Comments of Japan

#### General comments





1. For checking the compliance of food items with the Codex General Standard for Food Additives (CODEX STAN 192-1995) (GSFA) and/or Codex commodity standards with regards to the use of food additives, it is of extreme importance that provisions in the GSFA and food additive provisions originally included in Codex commodity standards shall be consistent. The GSFA itself states that it “should be the single authoritative reference point for food additives.” For ensuring the consistency of the provisions in the GSFA and food additive provisions in Codex commodity standards, in addition to the consistency of numerical values for maximum levels, it is necessary for the CCFA to clarify the coverage of individual food categories; i.e., whether a food category in the GSFA covers only the related existing Codex commodity standard(s) (case 1 below) or the related existing Codex commodity standards and other related non-standardized commodities (Case 2 below). Depending on which one applies to the food categories in the GSFA, there would be a need for different notes to be attached to the provisions for individual food categories in GSFA.

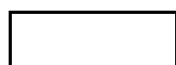


Case 1



Case 2

  or   : commodity standard(s); and

 : related food category of the GSFA

2. To ensure the “Alignment” efficiently and to avoid going back and forth in the alignment work, Japan proposes that the CCFA should first ensure which of the above two cases applies to individual food categories in the GSFA before starting alignment of the food additive provisions of commodity standards and relevant provisions of the GSFA.

#### Specific comments

1. Food category 05.1.1

(1) The food category system of the GSFA states:

“c) The food category system takes into consideration the carry-over principle. By doing so, the food category system does not need to specifically mention compound foodstuffs (e.g. prepared meals, such as

pizza, because they may contain, pro rata, all the additives endorsed for use in their components), unless the compound foodstuff needs an additive that is not endorsed for use in any of its components.”

(underline by Japan)

The scope of the Codex standard for cocoa powders (cocoas) and dry mixtures of cocoa and sugars (CODEX STAN 105-1981) states:

“This standard applies to cocoa powders (cocoas) and dry mixtures of cocoa and sugars intended for direct consumption”

On the other hand, food category 05.1.1 of the GSFA covers products not only for direct consumption but also for further processing.

(2) If cocoa dust (fines) is not consumed as such by humans, the food category descriptor of food category 05.1.1 of the GSFA should be amended as follows:

“Includes a variety of products that are used in the manufacture of other chocolate products or in the preparation of cocoa-based beverages. ...

**Examples include:** drinking chocolate powder; breakfast cocoa; ~~cocoa dust (fines)~~, nibs, mass, press cake; chocolate liquor; cocoa mixes (powders for preparing the hot beverage); cocoa-sugar mixture; and dry mixes for sugar-cocoa confectionery. Finished cocoa beverages and chocolate milk are included in category 01.1.2, and most finished chocolate products are included in category 05.1.4.”

(Text to be removed is indicated in ~~strike through~~ by Japan)

## 2. Food category 05.1.4

The report of the 19<sup>th</sup> Session of Codex Committee on Cocoa Products and Chocolate ALINORM 03/14) states in para.33:

“The Committee agreed that the term "Cocoa Butter Confectionery" was not currently used in practice and agreed to delete it from the description and labelling sections. It was understood that this term could be used if needed for other products not defined in this standard.”

Based on the above decision of the CCCPC, the “cocoa butter confectionery” is the products not defined in the Codex Standard for Chocolate and Chocolate products (CODEX STAN 87-1981). If food category 05.1.4 of the GSFA is supposed to cover only the product standardized in Codex, to make this food category to be consistent with the commodity standard, examples for the cocoa butter confectionery should be amended by deleting the cocoa butter confectionery as follows:

**Examples include:** bonbons, ~~cocoa butter confectionery (composed of cocoa butter, milk solids and sugar)~~, white chocolate, ...”

(Text to be removed is indicated in ~~strike through~~ by Japan)

However, if the food category covers not only food products standardized by Codex but also other foods, there is no need to amend the examples.