



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-eighth Session

Xi'an, China, 14-18 March 2016

PROPOSED DRAFT REVISION OF SECTION 4.1C AND 5.1C OF THE GENERAL STANDARD FOR THE LABELLING OF FOOD ADDITIVES WHEN SOLD AS SUCH (CODEX STAN 107-1981)

Comments at Step 3 of Costa Rica, Ecuador, Nicaragua and United States of America

COSTA RICA

Costa Rica supports the wording of Annex 1 for Sections 4.1c and 5.1c of the *General Standard for the Labelling of Food Additives when sold as such* (CODEX STAN 107-1981). This text was prepared by the electronic work group, with the participation of Costa Rica.

ECUADOR

Ecuador supports the proposal raised by the electronic working group, since it guarantees the rights of the final consumers of the food additives they are having access to.

NICARAGUA

(i) General comments

In the document prepared in English the term **flavouring** includes properties of taste and smell, however when translated into Spanish the term "flavouring" (aroma) is understood as a property relating only to the smell (see: **CAC/GL 66-2008**), it is recommended to clarify the meaning of this term.

(ii) Specific comments

First phrase

Nicaragua agrees to maintain the current wording, as recommended by the electronic working group, because it reflects the current commercial practice.

Second phrase

Drafting proposal:

"The generic expression "~~flavour~~" or "flavouring" may be used, together with a true indication of the organoleptic properties (e. g. "apple flavour") and/or the origin or source of the product".

Rationale:

The term flavour is the result of incorporating a flavouring, therefore we propose to delete the word flavour in the second sentence, to be consistent with what is established in the guidelines for the use of flavouring agents.

Third phrase

Drafting proposal:

"When the origin or source of the product is identified, the generic expression may be qualified by the words "natural", ~~in the case of natural flavourings, as defined in [CAC/GL 66-2008](#)~~, **Error! Hyperlink reference not valid.**[CAC/GL 66-2008](#), **Error! Hyperlink reference not valid.**

Rationale:

- We propose to delete the phrases above marked in order to avoid redundancy or confusion when interpreting the text.

- With the aim of avoiding inconsistencies, it is proposed to use the word "synthetic" instead of "artificial" to refer to the flavouring substances obtained by chemical synthesis, taking as reference what is set out in the *Guidelines for the use of flavouring agents* (CAC/GL 66-2008).

Fourth phrase

We agree with the recommendation of the eWG.

UNITED STATES OF AMERICA

Recommendation 1

The United States supports maintaining the current wording of the first sentence in Sections 4.1(c) and 5.1(c).

Recommendation 2

The United States supports the revision of the current wording of the second sentence in Sections 4.1(c) and 5.1(c). Taking into account our comments on Recommendation 3, below, the United States is of the view that the term "flavour" should be removed from the revised second sentence, as follows:

"The generic expression ~~"flavour"~~ or "flavouring" may be used, together with an indication of the organoleptic properties (e.g. "apple flavouring") and/or the origin or source of the product."

Recommendation 3

The United States supports the revision of the current wording of the third sentence in Sections 4.1(c) and 5.1(c), as presented in Recommendation 3. As a consequence, the term "flavour" should be removed from the second sentence in Sections 4.1(c) and 5.1(c).

Recommendation 4

The United States supports the deletion of the current fourth sentence in Sections 4.1(c) and 5.1(c). However, the United States is of the view that, although herbs and spices are food, they may be used in flavour and food additive preparations. As such, the labelling of herbs and spices should be included, specifically or generally as food ingredients, in an appropriate sub-section of Sections 4.1 and 5.1 (see Recommendation 5).

Recommendation 5

The United States supports the inclusion of a new sub-section in Sections 4.1 and 5.1 to allow for the general listing of food ingredients to include, but not be limited to, herbs and spices. The United States also supports the proposal for CCFA to consult with the Codex Committee on Food Labelling (CCFL) as to whether it is appropriate to include text regarding the labelling of allergens in CODEX STAN 107-1981.

Finally, the United States supports the proposed text for the new sub-section, as presented in Recommendation 5. However, depending upon the outcome of the discussion with CCFL regarding the appropriateness of including text regarding the labelling of allergens, the proposed text ". . . except for those ingredients that are identified in Section 4.2.1.4 of the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) as foods or ingredients that are known to cause hypersensitivity." may need to be revised or deleted.

Annex 1: Proposed Draft Revision of Sections 4.1(c) and 5.1(c) of the *General Standard for the Labelling of Food Additives When Sold as Such* (CODEX STAN 107-1981)

The text in Annex 1 represents the revision of Sections 4.1(c) and 5.1(c) as per Recommendations 1 to 5, above. The United States supports the revision of Sections 4.1(c) and 5.1(c) as presented in Annex 1, noting that the proposed inclusion of the text regarding the labelling of allergens in the last sentence may need to be revised or deleted (see Recommendation 5).