CODEX ALIMENTARIUS COMMISSION

E

Food and Agriculture Organization of the United Nations

World Health Organization

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

Agenda Item 5(a) **CX/FA 17/49/7**
December 2016

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-ninth Session

Macao SAR, China, 20-24 March 2017

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): CCFA48 OUTSTANDING PROVISIONS; PROVISIONS FOR BENZOATES IN FC 14.1.4; PROVISIONS IN FC 5.0 AND 5.1; PROVISIONS ASSOCIATED WITH NOTE 22; PROVISIONS IN FC 01.1, 01.1.1, 01.1.3 AND 01.1.4 (REPORT OF THE EWG ON THE GSFA)

Prepared by the United States of America with the assistance of Australia, Brazil, Canada, China, Costa Rica, European Union, India, Indonesia, Iran, Japan, Malaysia, New Zealand, Norway, Russian Federation, Singapore, Spain, Thailand, Calorie Control Council (CCC), Collagen Casings Trade Association (CCTA), European Food Emulsifier Manufacturers Association (EFEMA) Federation of European Specialty Food Ingredients Industries (ELC), International Association of Color Manufacturers (IACM), International Council of Beverages Associations (ICBA), International Chewing Gum Association (ICGA), International Dairy Federation (IDF), and International Food Additives Council (IFAC)

Introduction

1. CCFA48 agreed to establish an EWG to provide recommendations to CCFA49 on the following topics:[1]

(i) Request information and justification on the proposed food additives provisions held at the current session;

(ii) Request information on use levels and technical justification for the use of benzoates in food category 14.1.4;

(iii) Request information on the use of food additives in food categories 5.0 and 5.1 and related sub-categories;

(iv) Request information on the use of food additives associated with Note 22 in non-standardized food as defined in Section 1 of the *Standard for Smoked Fish, Smoke-flavoured Fish and Smoke-dried Fish* (CODEX STAN 311-2015);

(v) Consider the appropriateness of the food additive provisions (adopted and in the Step process) in the renamed food categories 01.1, 01.1.1, 01.1.3 and 01.1.4

Working Documents

2. The working documents for the report of the EWG on the General Standard for Food Additives are presented as appendices to this document. The appendices provide background on the topic under discussion and request comment from the EWG.

- For reasons of efficiency, topics i and the draft and proposed draft provisions that pertain to topic iii are combined into Appendix 1.

- Proposals to revise adopted provisions that pertain to topic iii are presented in a separate appendix (Appendix 2).

- Separate appendices are presented for topic ii (Appendix 3), topic iv (Appendix 4), and topic v (Appendix 5).

[1] REP 16/FA, para. 101.

Appendix 1: Request for information and justification on draft and proposed draft food additive provisions: A) in FC 01.2 through 08.4 held at the CCFA48; and B) in food categories 5.0 and 5.1 and related subcategories

1. Among several topics, CCFA48 requested the EWG on the GSFA to CCFA49:[1]

- Request information and justification on the proposed food additive provisions held at the current session;

- Request information on the use of food additives in food categories 5.0 and 5.1 and related sub-categories

Background:

2. CCFA46 agreed that the EWG on the GSFA to CCFA47 should prepare proposals for the remaining draft and proposed draft provisions for food additives in food categories 01.2 through 08.4, with the exception of provisions in food categories that were currently under consideration by the EWG on alignment, or provisions for food additives with "colour" or "sweetener" function.[2]

3. CCFA47 was unable to discuss the proposals of the EWG on the GSFA on this topic (CX/FA 15/47/9) due to time constraints, and therefore agreed that these proposals would be considered by the physical Working Group (PWG) on the GSFA to CCFA48.[3] The PWG on the GSFA to CCFA48 considered these proposals (CX/FA 16/48/7) and reached consensus recommendations for a large number of provisions.[4] The PWG on the GSFA to CCFA48 also recommend that CCFA48 circulate for comment requests for information on provisions for which the PWG was unable to reach consensus.[5] CCFA48 agreed to these recommendations.[6] CCFA48 also noted that draft and proposed draft provisions for food additives in certain subcategories of food category 05.0 had not been included in CX/FA 15/47/9 or CX/FA 16/48/7 due to the fact that those food categories had been under consideration by the EWG on Alignment to CCFA47.[7] Therefore CCFA48 agreed to request information on the use of food additives in food categories 5.0 and its related subcategories.[8]

Working Document:

4. The EWG issued two circulars for comment. This current document presents proposals for the remaining draft and proposed draft provisions in Tables 1 and 2 of the GSFA in food categories (FCs) 01.2 through 08.4. However, within FCs 01.2 through 08.4 this circular does not include draft and proposed draft provisions for:

- food additives with "colour" or "sweetener" function;

- adipates (INS 355, 359), nitrates (INS 251, 252), and nitrites (INS 249, 250), each of which are the subject of different Agenda Items for CCFA49 and therefore are not appropriate subjects for the EWG on the GSFA.[9];

- which the CCFA48 requested guidance from other Codex Committees[10]; and

- Table 3 additives.[11]

5. Part 1 of the current document presents recommendations for each provision (adopt, adopt with revision, discontinue, discontinue and move to subcategories as appropriate, request information). These proposals are based upon a consensus approach taking into account alignment with corresponding Codex commodity standards and comments by members of the EWG. These recommendations are based on the "weight of evidence"; that is, comments containing justifications were given more weight than comments with no supporting justification.

---

[1] REP 16/FA, para. 101.

[2] REP 14/FA, para. 103.

[3] REP 15/FA, paras 75 and 117.

[4] 48 CCFA CRD2, Recommendations 1 and 2.

[5] 48 CCFA CRD2, Recommendation 3.

[6] REP 15/FA, paras 57, 58, 101, and Appendix XI.

[7] REP 15/FA, para. 43.

[8] REP 15/FA, para. 101.

[9] REP 16/FA paras 59, 60-63, and 102.

[10] REP 16/FA, para 65.

[11] Draft or proposed draft provisions in Tables 1 and 2 for Table 3 additives were not included in CX/FA 15/47/9 or CX/FA 16/48/7.

Conventions

6. Part 1 of the current document presents the provisions under discussion in the format of the food categories listed in Table 2 of the GSFA. Information on corresponding Codex commodity standards and the use of food additives in those commodity standards is provided for each food category. Information on the decision of the PWG to CCFA45 or CCFA46 as to the horizontal justification of the use of emulsifiers, stabilizers, and thickeners, or of acidity regulators, for food categories which appear in the Annex to Table 3, is provided. The document also presents a compilation of comments provided by EWG members to the first circular as well as relevant information from CCFA48.

7. The following conventions were used to prepare the working document:

- When the proposal is that a food additive provision be moved from a parent food category to a subcategory, the original provision in the parent food category will be indicated with ~~strikethrough~~ font and the new provision in the subcategory will be in **bolded** font with no Step indicated in the "Step/Adopted" column.

Appendix 1, Part 1: Draft and Proposed Draft Provisions in Tables 1 and 2 of the GSFA in food categories 01.2 through 08.4, with exceptions listed in paragraph 4

Food Category No. 01.2 (Fermented and renneted milk products (plain) excluding food category 01.1.2 (dairy based drinks)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: None, 243-2003 corresponds to subcategories 01.2.1.1 & 01.2.1.2;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~PROPYLENE GLYCOL ALGINATE~~	~~405~~	~~10000~~		~~4~~	~~Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener~~	**CX/FA 16/48/7** : Move to subcategories 01.2.1.1 & 01.2.1.2 - allowed in CODEX STAN 243-2003 in both subcategories but with restrictions **EU, India, Iran:** Support the proposal. **RF:** No technological justification for using this FA in this FC. Use could mislead consumers	Move to subcategories 01.2.1.1 & 01.2.1.2 - allowed in CODEX STAN 243-2003 in both subcategories but with restrictions
~~TOCOPHEROLS~~	~~307a, b, c~~	~~200~~		~~7~~	Antioxidant	**CX/FA 16/48/7:** Discontinue in parent category. Move to FC 01.2.2 **EU, India:** Supports the proposal **RF:** No technological justification for using this FA in this FC. Use could mislead consumers	Move to FC 0.1.2.2 - Discontinue in parent category; move to FC 01.2.2

Food Category No. 01.2.1 (Fermented milks (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: None, 243-2003 corresponds to subcategories 01.2.1.1 & 01.2.1.2;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~TARTRATES~~	~~334, 335(ii), 337~~	~~GMP~~	~~45~~	~~7~~	~~All: Acidity regulator , Sequesterant INS 334:Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer~~	**CX/FA 16/48/7:** Discontinue – adopt in subcategories. **Note:** a provision for tartrates in FC 01.2.1.2 was adopted by CCFA48 **EU, India, Iran, RF:** Support proposal **USA:** Consistent with revision of F.C 01.1 (Milk and dairy-based drinks) and its sub-categories,	Consistent with revision of F.C 01.1 (Milk and dairy-based drinks) and its sub-categories, move to new

						move to new F.C. 01.1.2 – "Other fluid milks (plain)"	F.C. 01.1.2 – "Other fluid milks (plain)"

Food Category No. 01.2.1.1 (Fermented milks (plain), not heat-treated after fermentation)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators not horizontally justified, ES&T justified with notes 234[12] and 235[13].

Corresponding commodity standards: 243-2003: allows various additives in various foods;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**10000**			**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**CX/FA 16/48/7:** Discontinue in FC 01.2**;** Move to subcategories 01.2.1.1 & 01.2.1.2 - allowed in CODEX STAN 243-2003 in both subcategories but with restrictions adopt at GMP with Note 235 and 234. Aligns with CODEX STAN 243-2003 **EU, RF:** Supports Notes 234/235 Need info on actual use level; GMP not appropriate; ML too high **India:** Supports proposal as it aligns with Codex STAN 243 – 2003	Discuss further - adoption at GMP with notes 234 and 235 would align with CS 243
TARTRATES	**334, 335 (ii), 337**	**GMP**	**45**		**All: Acidity regulator , Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Discontinue in F.C. 01.2; Adopt here with Note 45 "as tartaric acid," and new Note "for use in non-fermented acidified milks only". **Brazil:** GMP not appropriate for FA with numerical ADI **EU. RF:** Does not support proposal; CODEX STAN does not allow acidity regulators in non-heat-treated plain fermented milk. This category refers to fermented products and seems to be fully covered by products of CS 243-2003. The impact of fermentation is much more complex and cannot be substituted simply by addition of organic acids. Stabilizers: "Use is restricted to reconstitution and recombination and if permitted by national legislation in the country of sale to the final consumer." Acidity regulators, colours, emulsifiers, packaging gases and preservatives listed in Table 3 of GSFA are acceptable for use in fermented milk products categories *as specified in the table above* (2,000	Consistent with revision of F.C 01.1 (Milk and dairy-based drinks) and Its sub-categories, move to new F.C. 01.1.2 – "Other fluid milks

[12] **Note 234:** For use as a stabilizer or thickener only.

[13] **Note 235:** For use in reconstituted and recombined products only.

						mg/kg as tartaric acid). In FC 01.2.1.2 TARTRATES 334; 335(ii); 337 5/8 2000 mg/kg 45 & 230 **India:** Supports proposal as FA's use in non-fermented acidified milks is technologically justified. **USA:** Consistent with revision of F.C 01.1 (Milk and dairy-based drinks) and Its sub-categories, move to new F.C. 01.1.2 – "Other fluid milks (plain)"	

Food Category No. 01.2.1.2 (Fermented milks (plain), heat-treated after fermentation)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators not horizontally justified, ES&T are horizontally justified

Corresponding commodity standards: 243-2003: allows table 3 packaging gases in foods corresponding to this food category

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	405	5000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	**CX/FA 16/48/7:** Discontinue in FC 01.2. Move to subcategories 01.2.1.1 & 01.2.1.2 - allowed in CODEX STAN 243-2003 in both subcategories but with restrictions. Adopt at GMP with Note 234 "For use as a stabilizer or thickener only". Aligns with CODEX STAN 243-2003 **EU:** need lower ML. GMP not appropriate. At 5,000 ppm 20 kg child reaches ADI ((JECFA ADI 70 mg/kg bw/d) by drinking 280 ml; For children in the EU the mean consumption of fermented milk products is 70-235ml and P95 consumers 142-580ml. INS 405 not permitted in this food in EU but allowed in beer, malt beverages, cider and perry at 100 ppm or in flavoured drinks at 300 ppm. **India:** Supports proposal, as it aligns with CODEX STAN 243. **RF:** does not agree with proposal. INS 405 could be used only as Carrier for FA. Not used in this FC in RF and Customs Union; ML = 5000 is too high	Discontinue in FC 01.2. Adopt in FC 01.2.1.2 at GMP with Note 234: aligns with CODEX STAN 243-2003

Food Category No. 01.2.2 (Renneted milk (plain))

Corresponding commodity standards: None

Additive	INS	Max Level	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal

		(mg/kg)					
PROPYLENE GLYCOL ALGINATE	**405**	**10000**			**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**CX/FA 16/48/7:** Do not move from FC 01.2 – no information provided on use **EU:** Discontinue if no information provided; GMP not appropriate; need lower ML. At 10,000 20 kg child reaches ADI (70 mg/kg bw/d) at 140 ml. INS 405 not permitted in this food in EU, but allowed in beer, malt beverages, cider and perry at 100 ppm or in flavoured drinks at 300 ppm. **RF**: proposed ML excessive; discontinue	Do not move from FC 01.2 – no information provided on use
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7:** Move from FC 01.2 to FC 01.2.2 - not allowed in CODEX STAN 243-2003 **EU:** Supports proposal. Use of antioxidants not recognized in CS 243-2003 covering similar products to renneted milk. No info on use **India:** Use of antioxidant in this category doesn't seem technologically justified. **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg. No technological justification	Move from FC 01.2 to 01.2.2

Food Category No. 01.3 (Condensed milk and analogues (plain)

Corresponding commodity standards: None, multiple standards correspond to subcategories

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~TOCOPHEROLS~~	~~307a, b, c~~	~~200~~		~~7~~	~~Antioxidant~~	**CX/FA 16/48/7:** Consider use in subcategories – not allowed in standards corresponding to FC 01.3.1 **EU, India, RF:** Supports proposal, as additive may not be required in all subcategories.	Consider use in subcategories

Food Category No. 01.3.1 (Condensed milk (plain)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 281-1971, 282-1971: list specific firming agents, ES&T, and acidity regulators

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7:** Do not move from FC 01.3 – not allowed in standards corresponding to FC 01.3.1	Adopt with note "For use in Khoya

						EU: does not support adoption; antioxidants not permitted in corresponding standards. It has to be clarified whether Khoya falls under this category and why antioxidants are needed **India:** Supports proposal. Use of antioxidant is technologically justified only in condensed milk (plain, unsweetened) that are subject to UHT or sterilization treatments and product like Khoya may be adopted with a suitable footnote to this effect. **Indonesia:** proposes ML of 300 mg/kg and does not agree with the note "For use in Khoya only" because tocopherols is used in sweetened condensed milk **RF:** Does not support adoption. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg.	only" (**khoya** is a dairy product used in South Asian cuisine of India, Nepal, Bangladesh and Pakistan. It is made of either dried whole milk or milk thickened by heating. It is lower in moisture than typical fresh cheeses] FC is for condensed milk plain.

Food Category No. 01.3.2 (Beverage whiteners)

Corresponding commodity standards: 250-2006, 252-2006: lists specific ES&Ts and acidity regulators

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7:** Adopt as listed with new Note excluding products conforming to CODEX STAN 250-2006 and CODEX STAN 252-2006. **India:** Use of antioxidant technologically justified in relatively high fat plain (unsweetened) variants. Support proposed exclusion of products covered in codex STAN 250 and 252.Supports proposal **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg. **ELC**: This FC, per its definition, includes vegetable fat-water emulsions, and includes powdered forms. Vegetable fats can be high in poly-unsaturated fats, and emulsions and all the more powder forms are known for their large surface area which critically exposes fatty acids to air/oxygen and makes them prone to oxidation and rancidity which can result in unacceptable smell/taste of the product. For this reason antioxidative protection is needed. The required use level of 200 ppm is confirmed.	Adopt as listed with new Note excluding products conforming to CODEX STAN 250-2006 and CODEX STAN 252-2006.

Food Category No. 01.4 (Cream (plain) and the like)

Corresponding commodity standards: 288-1976 corresponds to subcategories 01.4.1 - 01.4.3

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~NISIN~~	~~234~~	~~12.5~~	~~233~~	~~3~~	~~Preservative~~	**CX/FA 16/48/7:** Move to subcategory 01.4.4. Preservatives not allowed in CODEX STAN 288-1976 **EU:** Supports move to 01.4.4. Need for additives in plain cream very limited; economically and technically feasible to produce products without preservatives **IFAC:** Does not support move to 01.4.4. Codex Stan 288-1976 is out of date and should be updated. Request that CCFA solicit feedback on whether other CCFA members believe the standard needs to be updated. Disallowing a technically justified additive in this food category simply because of an outdated standard is not acceptable. We appreciate that some EWG members believe the need for additives in plain creams is limited, but following is the technical justification. **See IFAC comments document for tech. justification FC 01.4.1 and 01.4.2.** **India:** Supports move to subcat. **Indonesia**: supports moving to FC 01.4.4 **Iran:** Agrees with move to subcat. 01.4.4 due to pasteurization **RF:** Discontinue in this FC and 01.4.4 due to antibiotic resistance	Discuss further
~~TOCOPHEROLS~~	~~307a, b, c~~	~~200~~		~~7~~	~~Antioxidant~~	**CX/FA 16/48/7** Move to subcategory 01.4.4 - CODEX STAN 288-1976 does not allow antioxidants. **CCFA48:** Requests information on technological justification in parent or subcategories **EU, India:** Supports proposal **RF:** Supports move to 01.4.4. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg **ELC**: This FC, per its definition, includes vegetable fat-water emulsions, and includes powdered forms. Vegetable fats can be high in poly-unsaturated fats, and emulsions and all the more powder forms are known for their large surface area which critically exposes fatty acids to air/oxygen and makes them prone to oxidation and rancidity which can result in unacceptable smell/taste of the product. For this reason antioxidative protection is needed. The required use level of 200 ppm is confirmed.	Discuss further.

Food Category No. 01.4.1 (Pasteurized cream (plain))

Corresponding commodity standards: 288-1976: lists specific ES&T and acidity regulators, also packing gases and propellants in whipped cream and cream packed under pressure (which becomes whipped cream when removed from the container)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
NISIN	**234**	**12.5**	**233**		**Preservative**	**CX/FA 16/48/7:** Move to subcategory 01.4.4. Preservatives not allowed in CODEX STAN 288-1976 **EU:** Suggest discontinue; Preservatives are not technologically justified (pasteurization should provide a sufficient protection to this products) and not listed in CS 288-1976 **ELC:** Adopt in 1.4.1 and amend CS 288-1976 – ELC understand nisin currently used in products in international trade conforming to this standard. Products in this food category are heat labile and typically only pasteurized. Spores of thermophilic bacteria commonly found in milk (e.g. Bacillus cereus, Bacillus spp.) generally survive pasteurization. Disruptions in cold chain can lead to microbial outgrowth resulting in product spoilage and food wastage. Studies show nisin inhibits thermophilic bacterial spore outgrowth and thereby helps to extend product shelf life and to ensure food safety. **IFAC:** Does not support proposal. Codex Stan 288-1976 is out of date and should be updated. Request that CCFA solicit feedback on whether other CCFA members believe the standard needs to be updated. Disallowing a technically justified additive in this food category simply because of an outdated standard is not acceptable. We appreciate that some EWG members believe the need for additives in plain creams is limited, but following is the technical justification. **See IFAC comments document for tech. justification in FC 01.4.1 and 01.4.2.** **India:** Supports proposal **Iran:** not technologically justified due to pasteurization **NZ:** Supports the use of Nisin in “fresh thickened cream”. It is not clear which food category this falls under. It could be FC 01.4.1 or 01.4.2. Technological justification is as an antimicrobial preservative in fresh thickened cream. NZ continues to make the same points made at the first round of the EWG. The technological function is as a preservative in ‘fresh thickened cream”. These are not Cream analogues. They are pasteurised cream products. The spoilage of cream is	Discuss further. Define what “fresh thickened cream” is

						generally similar to that of liquid milk product, but because of the difference in purchasing patterns, cream is often required to have a longer shelf life than milk. The request to CCFA is for 'thickened cream products" only, and not for all cream. The commodity standard is considered out of date, and as the CCMMP is not active, new provisions are not under consideration. The GSFA is considered the single reference point at which updated provision can be included. **RF:** Discontinue due to antibiotic resistance	
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7:** Discontinue. **Note: Antioxidants not allowed in CS 288-1976** **EU:** Suggest discontinue; antioxidants not technologically justified – milk/pasteurized cream as a balanced foodstuff does not require further protection against oxidation; antioxidants not listed in CS 288-1976 **India:** Use of antioxidant in creams is not technologically justified, as cream has natural antioxidants from milk and the fat is not in free form. Fat in cream is present as fat globules with a membrane. Supports proposal **RF:** Discontinue. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Do not move from FC 01.4

Food Category No. 01.4.2 (Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T are horizontally justified

Corresponding commodity standards: 288-1976: lists specific ES&T and acidity regulators, also packing gases and propellants in whipped cream and cream packed under pressure (which becomes whipped cream when removed from the container);

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
NISIN	**234**	**12.5**	**233**		**Preservative**	**CX/FA 16/48/7: Note:** Preservatives not allowed in CODEX STAN 288-1976. Request information on use, technological justification in this FC **EU:** Suggest discontinue; Preservatives are not technologically justified (pasteurization, sterilization or UHT should provide a sufficient protection to these products) and not listed in CS 288-1976 **ELC, IFAC:** Adopt in 1.4.2 and amend CS 288-1976 – IFAC understands nisin currently used in products in international trade conforming to this standard. Products in this food category are heat labile and typically only pasteurized. Spores of thermophilic bacteria commonly found in milk (e.g. Bacillus cereus, Bacillus spp.) generally survive	Discuss further. Define what "fresh thickened cream" is

						pasteurization. Disruptions in cold chain can lead to microbial outgrowth resulting in product spoilage and food wastage. Studies show nisin inhibits thermophilic bacterial spore outgrowth and thereby helps to extend product shelf life and to ensure food safety. **India:** Supports proposal **Iran:** not technologically justified due to pasteurization **NZ:** Supports the use of Nisin in "fresh thickened cream". It is not clear which food category this falls under. It could be FC 01.4.1 or 01.4.2. Technological justification is as an antimicrobial preservative in fresh thickened cream. See Nisin comment in FC 01.4.1 above **RF:** Suggests discontinuation due to antibiotic resistance	
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7:** Discontinue. **Note Antioxidants not allowed in CS 288-1976** **EU, India, RF:** Suggest discontinue **India:** Use of antioxidant in creams is not technologically justified, as cream has natural antioxidants from milk and the fat is not in free form. Fat in cream is present as fat globules with a membrane. **Indonesia:** proposes to discontinue **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg Suggests discontinuation **ELC**: This FC includes in its definition cream "*being whipped*" and includes products that are subject to harsh heat treatment (UHT, sterilization, ultra-pasteurization) and products packed under pressure. Fatty acids with unsaturated structure present in these products are prone to oxidation which is fostered by heat (sterilization, UHT) and by enlarging surface area (whipping process). For this reason antioxidative protection may be required. In addition, in the EU the use of tocopherols is permitted for FC 1.4. Permissions in the EU are based on a sound technical justification, among others. The required use level of 200 ppm is confirmed.	Discuss further

Food Category No. 01.4.3 (Clotted cream (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 288-1976: lists specific ES&T and acidity regulators, also packing gases and propellants in whipped cream and cream packed under pressure (which becomes whipped cream when removed from the container);

Note: There is already an adopted provision for Nisin in the FC at 10 mg/kg with no Note.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7:** Discontinue. **EU, India, Indonesia, RF:** Support discontinuation **India:** Use of antioxidant in creams is not technologically justified, as cream has natural antioxidants from milk and the fat is not in free form. Fat in cream is present as fat globules with a membrane. **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Do not move from FC 01.4

Food Category No. 01.4.4 (Cream analogues)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
NISIN	**234**	**12.5**	**233**		**Preservative**	**CX/FA 16/48/7:** Adopt as listed, no corresponding commodity standard **ELC**: Supports adoption. The technical justification is similar to FC 1.4.1. Nisin is used in this food category because they are temperature sensitive and typically only pasteurized. The spores of thermophilic bacteria commonly found in milk (e.g. Bacillus cereus, Bacillus spp.) generally survive pasteurization. Outgrowth can occur when there are disruptions in the cold chain. Studies show that nisin inhibits spore outgrowth of these bacteria and thereby helps to extend product shelf life and to ensure food safety. **EU:** Discontinue. No preservatives permitted in this FC – microbiological safety guaranteed by heat treatment and GHP. **India:** Use of preservative function in creams is not technologically justified, as these products can be heat treated to achieve preservation. **Iran:** pasteurization **RF:** Suggests discontinuation due to antibiotic resistance **NZ:** the request for nisin is not related to this product category	Discuss further
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7:** Adopt as listed **India:** Supports adoption as listed. Antioxidant function in	Discuss further

						cream analogues may be necessary, as the vegetable fat in water emulsion will often not have any natural antioxidant present. **Indonesia:** proposes to discontinue **Japan:** Supports proposal. Tocopherols are used in cream analogues containing vegetable oil to prevent oxidation.**ELC**: Support adoption. Vegetable fats can be high in poly-unsaturated fats, and emulsions and all the more powder forms are known for their large surface area which critically exposes fatty acids to air/oxygen and makes them prone to oxidation and rancidity which can result in unacceptable smell/taste of the product. For this reason antioxidative protection is needed. Cream analogues include emulsions and powdered forms and whipped cream (toppings), structures of large surface area that foster fat oxidation and justify use of an antioxidant. In addition, in the EU the use of tocopherols is permitted for FC 1.4. Permissions in the EU are based on a sound technical justification, among others. The required use level of 200 ppm is confirmed. **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	

Food Category No. 01.5 (Milk powder and cream powder and powder analogues (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 207-1999, 290-1995 correspond to FC 01.5.1; 251-2006 corresponds to FC 01.5.2

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~POLYGLYCEROL ESTERS OF FATTY ACIDS~~	~~475~~	~~10000~~		~~7~~	~~Emulsifier~~	**CX/FA 16/48/7:** Move to FC 01.5.2, not allowed in CODEX STANs 207-1999, 290-1995. **Note:** provisions for INS 475 & 476 adopted in FC 01.5.2 by CCFA48 **EU:** supports proposal. CODEX STANs only allow INS 322 (Lecithin) & 471 (Mono- and diglycerides of fatty acids) **India:** Supports proposal. Use of emulsifiers technologically justified in this FC, including all subcategories. However to minimize use of FA in products and to align with commodity standards, these specific additives may not be allowed. **Iran:** Supports the recommendation **CX/FA 16/48/7 USA**: INS 476 allowed in the USA in	Discontinue. Not allowed in standards corresponding to FC 01.5.1 and already adopted in FC 01.5.2
~~POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID~~	~~476~~	~~10000~~		~~7~~	~~Emulsifier~~		

						cream (FC 01.5.1), and dairy analogues (FC 01.5.2), at 10,000 mg/kg as emulsifier **RF:** Supports discontinuation	
TOCOPHEROLS	**307a, b, c**	**5000**			**Antioxidant**	**CCFA48:** Requests information on technological justification in parent and subcategory **ELC**: Milk and cream naturally contain milk fat and milk fat contains sufficient quantities of fatty acids prone to oxidation. These products are per definition of this FC (milk powder and cream powder) in a powdered form. Powdered form means large surface area and much air exposure, conditions that favour strongly fat oxidation which results in rancidity and off flavor/taste of the product. Tocopherol is an effective, fat soluble antioxidant that can help prevent and delay fat oxidation. 1000 ppm maximum should be sufficient. **EU: discontinue**, not allowed in corresponding commodity standards of subcategories **India:** Use of antioxidants is technologically justified in this FC including all subcategories. However to minimize use of FA in products and to align with commodity standards, these specific additives may not be allowed. **Indonesia**: use this additives in flavoured milk powder with ML of 500 mg/kg **RF:** Suggests discontinuation	Adopt at 1000

Food Category No. 01.5.1 (Milk powder and cream powder (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 207-1999: lists specific firming agents, acidity regulators, anticaking agents, antioxidants, emulsifiers, and stabilizers; 290-1995: lists specific bulking agents, acidity regulators, anticaking agents, and emulsifiers

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TOCOPHEROLS	307a, b, c	5000		7	Antioxidant	**CX/FA 16/48/7:** Discontinue, not allowed in corresponding commodity standards **CCFA48:** Requests information on technological justification **Brazil, EU:** supports discontinue **India:** Use of antioxidants technologically justified in this food category including all subcategories. However to minimize use of FA in products and to align with commodity standards, these specific additives may not be allowed. **RF:** Supports discontinuation. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Adopt at 1000

						ELC: Milk and cream naturally contain milk fat and milk fat contain sufficient quantities of fatty acids prone to oxidation. These products are per definition of this FC (milk powder and cream powder) in a powdered form. Powdered form means large surface area and much air exposure, conditions that favour strongly fat oxidation which results in rancidity and off flavor/taste of the product. Tocopherol is an effective, fat soluble antioxidant that can help prevent and delay fat oxidation. 1000 ppm maximum should be sufficient. **Indonesia:** proposes to discontinue Allowed in the parent category	

Food Category No. 01.5.2 (Milk and cream powder analogues)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 251-2006: lists specific stabilizers, acidity regulators, emulsifiers, anticaking agents, and antioxidants.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TOCOPHEROLS	307a, b, c	5000		7	Antioxidant	**CX/FA 16/48/7:** Discontinue, not allowed in corresponding commodity standards **CCFA48:** Requests information on technological justification **EU:** supports discontinue **India:** Use of antioxidants technologically justified in this food category including all subcategories. However to minimize use of FA in products and to align with commodity standards, these specific additives may not be allowed. **RF:** Supports discontinuation. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Discontinue

Food Category No. 01.6 (Cheese and analogues)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Subcategories 01.6.3 and 01.6.6 are in the Annex to Table 3

Corresponding commodity standards: None; Multiple commodity standards correspond to subcategories

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7: Indonesia:** proposes moving provisions for these additives from subcategories to parent category 01.6 as used in all subcategories. **CCFA48:** Requests information on technological justification in parent and subcategories	Do not move from subcategories, discuss use in each subcategory

						Note: adopted provision in 01.6.5 **EU:** Supports discussion in subcategories - Further info needed on technological justification ; **Only CXS_275-1973** Cream Cheese authorises use of antioxidants (INS 307 b/c) **India, Japan, Malaysia:** supports proposal **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	

Food Category No. 01.6.1 (Unripened cheese)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: All list specific acidity regulators, preservatives, and stabilizers; 283-1987 (General standard for cheese): for unripended cheeses refers to CODEX STAN 221-2001; 221-2001 (Group standard for unripened cheese) specific thickeners, colours, foaming agents, anticaking agents; 262-2006 (Mozzarella) specific colours, anticaking agents; 273-1698 (Cottage cheese); 275-1973 (Cream cheese) specific thickeners, emulsifiers, antioxidants, colours, foaming agents

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
DIOCTYL SODIUM SULFOSUCCINATE	480	5000	20[14]	7	Emulsifier, Humectant	**CX/FA 16/48/7**: Discontinue **Brazil:** At this level, 1.2g is enough to reach the ADI for adults (ADI of 0-25 mg/kg bw) and 0,3g for children. If adopted, suggest decreasing ML. **EU:** supports proposal to limit to Neufchâtel cheese; need technological justification – seems to be a secondary additive use. **India:** emulsifier and humectants are not technologically justified in this food category. **USA**: allowed in the USA in cream cheese and Neufchatel cheese at 5,000 mg/kg of stabilizer (note 20) **RF:** This FA not used in the FC in Russian Federation and Customs Union. Discontinue	Discontinue
TOCOPHEROLS	307a, b, c	200		7	Antioxidant	**CX/FA 16/48/7:** Adopt as listed with new note "Only for use in products conforming to the Standard for Cream Cheese (CODEX STAN 275-1973)" 275-1973 only lists 307 b and c **EU:** Supports proposal; 275-1973 only lists INS 307 b, c **Indonesia:** Supports adoption with new note **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses.	Adopt as listed with new note "Only for use in products conforming to the Standard for Cream Cheese (CODEX STAN 275-1973)" 275-

[14] Note 20: Singly or in combination with other stabilizers, thickeners and/or gums.

							1973 only lists 307 b and c

Food Category No. 01.6.2 (Ripened cheese)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: Multiple standards correspond to FC 01.6.2.1

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
~~TOCOPHEROLS~~	~~307a, b, c~~	~~200~~	-	~~7~~	~~Antioxidant~~	**CX/FA 16/48/7:** Discontinue. Move to subcategory 01.6.2.3. Not listed in corresponding commodity standards **EU:** Supports discontinue & move to 01.6.2.3. Not listed in Commodity Standards. Unaware of tech. need in ripened cheese **India:** Proposal acceptable as these additives may not be required in all subcategories. Supports proposal **RF:** Supports proposal	Discontinue. Move to subcategory 01.6.2.3. Not listed in corresponding commodity standards

Food Category No. 01.6.2.1 (Ripened cheese, includes rind)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 283-1987 (General standard for cheese): Refers to STAN 208-199 for cheeses in brine, lists specific additives that can be used in all other ripened cheeses; 208-1999 (Group standard for cheeses in brine): INS 270 & 575; Specific standards 263 through 272, 274, 276, 277: lists specific additives, most do not allow additives on the rind; 288: does not list food additives

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7: Indonesia:** proposes moving from FC 01.6.2 to parent FC 01.6. **Note:** adopted provision in 01.6.5 **EU:** supports discontinue & move to 01.6.2.3. Not listed in corresponding commodity standards 283-1987 does not list antioxidants; 208-1999 only Acidity regulators (INS 270, 575) **India:** Supports proposal. Moving to parent category is not acceptable, as it may not be required in all subcategories. Consider use in specific subcategories. **RF:** Supports proposal. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Do not move to this subcategory, only Move to subcategory 01.6.2.3. Antioxidants not listed in 283-1987.

Food Category No. 01.6.2.2 (Rind of ripened cheese)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 283-1987 (General standard for cheese): Refers to STAN 208-199 for cheeses in brine, lists specific additives that can be used in all other ripened cheeses; 208-1999 (Group standard for cheeses in brine): INS 270 & 575; Specific standards 263 through 272, 274, 276, 277: lists specific additives; 288: does not list food additives.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7: Indonesia:** proposes moving from FC 01.6.2 to parent FC 01.6. **Note:** adopted provision in 01.6.5 **EU:** supports discontinue & move to 01.6.2.3. Not listed in corresponding commodity standards 283-1987 does not list antioxidants; 208-1999 only Acidity regulators (INS 270, 575) **India:** Supports proposal. Moving to parent category is not acceptable, as it may not be required in all subcategories. Consider use in specific subcategories. **RF:** Supports proposal. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Do not move to this subcategory, only Move to subcategory 01.6.2.3. Antioxidants not listed in 283-1987.

Food Category No. 01.6.2.3 (Cheese powder (for reconstitution; e.g. for cheese sauces))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7**: Move from 01.6.2. Adopt here at 300 mg/kg - comments indicate use at that level by some members **ELC, India, Japan:** supports proposal **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Move from 01.6.2. Adopt here at 300 mg/kg - comments indicate use at that level by some members

Food Category No. 01.6.3 (Whey cheese)

Corresponding commodity standards: 284-1971: refers to FC 01.6.3 and 01.6.6.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal

TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**CX/FA 16/48/7**: Do not include in FC 01.6, or in FC 01.6.3 **EU:** Supports proposal; discontinue **India:** support proposal **RF:** Supports proposal. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Do not include in FC 01.6 or 01.6.3

Food Category No. 01.6.4 (Processed cheese)

Corresponding commodity standards: None.

General Note: The CCFA48 did not discuss provisions in this Food Category due to ongoing work by the Codex Committee on Milk and Milk Products on a draft Standard for Processed Cheese.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal
DIOCTYL SODIUM SULFOSUCCINATE	480	5000	20	7	Emulsifier, Humectant	**CX/FA 16/48/7**: additives in additives use **Note:** REP 16/FA, para. 138: address secondary additive use with notes. **EU:** supports expressing ML in final food to consider exposure (very low ADI). **India:** support proposal **Japan:** CAC39 (2016) agreed to continue discussing draft Standard for Processed Cheese next CAC (2017) due to time constraint. It should be taken into consideration when considering draft food additive provisions under FC01.6.4. **Malaysia:** Agrees; supports proposal **USA**: allowed in the USA in spreads at 5,000 mg/kg of stabilizer (note 20) – additive in additive use **RF:** discontinue	Adopt – expression of ML on stabilizer basis appears to address exposure concern
NISIN	234	12.5	233	6	Preservative	**CX/FA 16/48/7**: Adopt **EU:** Accepts **ELC, IFAC:** Supports adoption. Currently used in FC 01.6.4 products in international trade. Studies show that nisin @ 2.5-6.25 mg/kg can help control *Clostridial* spore outgrowth and spoilage in various processed emmental and cheddar cheeses and @ 2.5-12.5 mg/kg can reduce *Bacillus spp.* spores counts in pasteurized processed cheese. Nisin (@12.5- 250 mg/kg) also used to control *Clostridia botulinum growth* in pasteurized processed cheese spreads.(Use at 250 mg/kg is country specific and for lower sodium and higher moisture processed cheese spreads.) **IFAC** notes that several member states have supported this provision, and the only opposition	Adopt

						appears to be based on antimicrobial concerns, which are not relevant here per JECFA. **India, Indonesia, Japan, Malaysia :** support adoption **Iran**: supports adoption due to pasteurization **Japan:** used in processed cheese as preservative. Maximum use level is 6.25 mg/kg **Malaysia:** Supports adoption **CX/FA 16/48/7 USA**: allowed in the USA in pasteurized processed cheese spreads with and without fruits, etc at 250 mg/kg as a preservative **RF:** Does not support due to antibiotic resistance concerns	
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10000		7	Emulsifier	**CX/FA 16/48/7**: Adopt - Comments indicate use by some members **EU:** Technological need? In what kind of cheese it is used to prevent separation of oil? Only for cheese intended for further processing? ML is high; 20 kg child meets ADI by consuming 50g. 35th JECFA established ADI 0-25 mg/kg bw in 1989 **India:** technologically justified in processed cheese. Supports adoption. **Japan**: used to prevent separation of oil in processed cheese for further processing. Maximum use level is 5,000 mg/kg. **RF:** Does not support; no tech. justification.	Adopt at 5,000
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	476	5000		7	Emulsifier	**CX/FA 16/48/7**: Adopt - Comments indicate use by some members **EU:** Technological need? ML is high; 20 kg child meets ADI by consuming 30g. 17th JECFA established ADI 0-7.5 mg/kg bw in 1989 **RF:** Does not support; no technological justification. **India:** technologically justified in processed cheese. support proposal	Adopt
PROPYLENE GLYCOL ALGINATE	405	9000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	**CX/FA 16/48/7**: Adopt - Comments indicate use by some members **EU:** Technological need? ML is high. 41st JECFA established ADI 0.70 mg/kg bw in 1993. **India:** support proposal **USA**: allowed in USA at 9,000 mg/kg **RF:** does not support adoption; No technological justification.	Adopt
SUCROSE ESTERS OF FATTY ACIDS	473	10000		7	Emulsifier, Stabilizer	**CX/FA 16/48/7**: Adopt - Comments indicate use by some members **EU:** Technological need? ADI 0-30 mg/kg bw for this FA with sucroglycerides, sucrose oligoesters type I and type II and sucrose monoesters of lauric, palmitic or stearic acid	Adopt at 2,100 mg/kg with corrected note 348 (see Japan

						established at 73rd JECFA (2010). Only for cheese intended for further processing. Singly or in combination INS 473 and 473a? At ML 10.000 a 20kg-child exceeds ADI by eating 60g of cheese **India:** support proposal **Japan:** proposes adding note 348 "Singly or in combination: ~~sorbitan~~ **sucrose** esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS473a) and sucroglycerides (INS 474)." since INS 473 share the ADI with INS 473a and 474. Japan also proposes to revise Note 348 to correct name of INS 473 as described above. **Malaysia:** Supports proposal **RF:** does not support adoption; No technological justification.	comment re. INS 473) Also adopt provision for INS 474 in this FC with note 348
SUCROSE OLIGOESTERS, TYPE I AND TYPE II	473a	1500		4	Emulsifier, Stabilizer	**CX/FA 16/48/7**: Adopt - Comments indicate use by some members **EU:** Technological need? Group ADI of 0-30 mg/kg bw for this FA with sucrose esters of fatty acids, sucroglycerides, sucrose oligoesters type II and sucrose monoesters of lauric, palmitic or stearic acid was established at the 73rd JECFA (2010). Only for cheese intended for further processing. Singly or in combination INS 473 and 473a? **India:** support proposal **Japan:** proposes adding note 348 "Singly or in combination: ~~sorbitan~~ **sucrose** esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS473a) and sucroglycerides (INS 474)." since INS 473a share the ADI with INS 473 and 474. **Malaysia:** Supports proposal **RF:** Does not support; no tech. justification.	Adopt at 2,100 mg/kg with corrected note 348 (see Japan comment re. INS 473) Also adopt provision for INS 474 in this FC with note 348
TARTRATES	334, 335(ii), 337	34900	45	7	All: Acidity regulator , Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**CX/FA 16/48/7**: Adopt - Comments indicate use by some members **EU, RF:** Need more info on technological justification. At ML 34,900 child ≤ 20 kg reaches ADI @ 17 g processed cheese. **India:** Use of this food additive function is technologically justified in processed cheese. May be adopted as proposed. **RF:** Discontinue; no tech. justification.	Request further information on actual use levels and tech. justification
TOCOPHEROLS	307a, b, c	200		7	Antioxidant	**CX/FA 16/48/7**: Adopt - Comments indicate use by some members	Adopt

						EU: Need more info on technological justification **India:** Supports proposal. Use of this food additive function is technologically justified in processed cheese. **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	

Food Category No. 01.6.4.1 (Plain processed cheese)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; included for information purposes only

Food Category No. 01.6.4.2 (Flavoured processed cheese, including containing fruit, vegetables, meat, etc.)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; included for information purposes only

Food Category No. 01.6.5 (Cheese analogues)

Corresponding commodity standards: None

Note: There is an adopted provision for the use of tocopherols (INS 307a, b, c) in this FC.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	334, 335(ii), 337	GMP	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**CX/FA 16/48/7:** Adopt **EU:** Technological need? **India**: Supports proposal. Use of these food additives function is technologically justified in processed cheese. **RF:** Suggest discontinue; no tech. justification; established ADI. Should not be used with ML=GMP	Request information on actual use level

Food Category No. 01.6.6 (Whey protein cheese)

Corresponding commodity standards: 284-1971: refers to FC 01.6.3 and 01.6.6.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TOCOPHEROLS	**307a,**	**200**			**Antioxidant**	**CX/FA 16/48/7:** Do not include in FC 01.6, or in FC 01.6.3	Discuss further

	b, c					**EU:** supports proposal. Need more info on technological justification **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg **ELC**: These products by definition can contain various types of fats (and thus fatty acids, from saturated to poly-unsaturated) and also may exist in powdered form. Depending on the composition, this may require antioxidative protection against oxidation, and thus justify tocpherol use. In the EU, this product category corresponds to FC 1.7.6 in the European food additive regulation. We note that in the EU, tocopherols are permitted for this FC. Permissions in the EU are based on a sound technical justification, among others. 200 ppm is an appropriate use level	

Food Category No. 01.7 (Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt))

Corresponding commodity standards: 243-2003: allows various additives in various foods;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	1520	25000		7	Emulsifier, Glazing Agent, Humectant	**CX/FA 16/48/7** Adopt with new note NXS 243: "Excluding products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003)" **CCFA48:** Requests information on actual use level **EU, RF**: not permitted in CS 243-2003; technological need? ML 25,000 excessive. Child ≤20 reaches ADI (0.25 mg/kg bw) by eating 20 g dairy-based dessert (RF: ML should not exceed 3000 if used as carrier in secondary FA). **India:** Use is technologically justified in dairy based desserts. Adoption with proposed exclusion of products conforming to codex STAN 243 is acceptable. **CX/FA 16/48/7 USA**: allowed in the USA at 25,000 mg/kg	Requests information on actual use level

Food Category No. 01.8 (Whey and whey products, excluding whey cheeses)

Corresponding commodity standards: 289-1995 corresponds to subcategory 01.8.2.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; included for information purposes only

Food Category No. 02.1.2 (Vegetable oils and fats)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: 019-1981, 210-1999: allows specific antioxidants, antioxidant synergists, and anti-foaming agent; 033-1981: does not allow food additives (except tocopherols);

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; CCFA48 requested information from the Codex Committee on Fats and Oils on the remaining draft provisions (REP 16/FA para 65)

Food Category No. 02.1.3 (Lard, tallow, fish oil, and other animal fats)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: 019-198: allows specific antioxidants, antioxidant synergists, and anti-foaming agent; 211-1999: allows specific antioxidants, antioxidant synergists;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; CCFA48 requested information from the Codex Committee on Fats and Oils on the remaining draft provisions (REP 16/FA para 65)

Food Category No. 04.1.1.2 (Surface treated fresh fruit)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators not horizontally justified - ES&T on hold until additives in additives discussion

Corresponding commodity standards: 143-1985: allows only glycerol and sorbitol (INS 420) at GMP (Standard does not address coatings);

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal
GLYCEROL	422	GMP	16	7	Humectant, Thickener	**CX/FA 16/48/7:** Hold until additive in additive discussion **Note:** REP 16/FA, para. 138: address secondary additive use with notes. **EU:** Reflecting CCFA 48 decision, technological justification for use of secondary additives should be provided **RF:** agrees to hold. Use of these FA in this FC could mislead consumers.	Request information on use
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	1000		7	Emulsifier		Request information on use
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	476	1000		7	Emulsifier		Request information on use
PROPYLENE GLYCOL ALGINATE	405	10000		4	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer,	**CX/FA 16/48/7:** Hold until additive in additive discussion **Note:** REP 16/FA, para. 138: address secondary additive use with notes. **EU:** Reflecting CCFA 48 decision, technological justification for use of secondary additives should be provided **USA**: Used in USA in coatings on fresh citrus fruits at GMP **RF:** Hold. No technological justification. Child ≤ 20 kg would reach the ADI (0-70 mg/kg bw) with only 140 g/kg food.	Request information on actual use level

					Thickener		
SORBITAN ESTERS OF FATTY ACIDS	491 - 495	5000	16	4	Emulsifier, (Stabilizer - INS 492, 493 and 494 only)	**CX/FA 16/48/7:** Hold until additive in additive discussion **Note:** REP 16/FA, para. 138: address secondary additive use with notes. **EU:** Reflecting CCFA 48 decision, technological justification for use of secondary additives should be provided **RF:** does not agree with proposal. Hold for additive in additive discussion. Use of FA in this FC could mislead consumers. These FA are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be reduced in diet. Need technological justification for use of FA in this FC in high concentrations. Consider intake of fatty acids from all FA uses.	Request information on use
SUCROSE ESTERS OF FATTY ACIDS	473	1000		4	Emulsifier, Stabilizer	**CX/FA 16/48/7:** Hold until additive in additive discussion **Note:** REP 16/FA, para. 138: address secondary additive use with notes. **EU:** Reflecting CCFA 48 decision, technological justification for use of secondary additives should be provided **USA**: used at GMP as emulsifier, stabilizer in protective coatings **RF:** does not agree with proposal. Hold for additive in additive discussion. Use of FA in this FC could mislead consumers. These FA are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be reduced in diet. Need technological justification for use of FA in this FC in high concentrations. Consider intake of fatty acids from all FA uses.	Request information on actual use level

Food Category No. 04.1.2 (Processed fruit)

Corresponding commodity standards: None. Multiple standards apply to subcategories, several of which do not allow food additives;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; CCFA48 requested information from the Codex Committee on Processed Fruits and Vegetables on the request by Indonesia to move the draft provision for tocopherols (INS 307a, b, c) from FC 04.1.2.2 to parent FC 04.1.2 (REP 16/FA para 65)

Food Category No. 04.1.2.1 (Frozen fruit)

Corresponding commodity standards: 52-1981, 69-1981, 75-1981, 76-1981, 103-1981: either no food additives permitted or allow ascorbic and citric acid

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; included for information purposes only

Food Category No. 04.1.2.2 (Dried fruit)

Corresponding commodity standards: 67-1981, 130-1981: allows sorbic acid, sulphur dioxide, mineral oil (67-1981 only); 177-1991: allows antioxidants and preservatives in GSFA FC 04.1.2.2.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; CCFA48 requested information from the Codex Committee on Processed Fruits and Vegetables on the draft provisions for tocopherols (INS 307a, b, c) and tartrates (INS 334, 335(ii), 337) (REP 16/FA para 65)

Food Category No. 04.1.2.3 (Fruit in vinegar, oil, or brine)

Corresponding commodity standards: 260-2007: refers to Table 2, FC 04.1.2.3 for use of antioxidants, acidity regulators, antifoaming agents, colours, firming agents, flavour enhancers, preservatives, sequesterants, and sweeteners.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
SODIUM DIACETATE	262(ii)	GMP		7	Acidity regulator, Preservative, Sequesterant	**CX/FA 16/48/7:** Hold. The CCPFV is considering the food additive provisions of CODEX STAN 260-2007. Not listed in the current *Standard for Pickled Fruits and Vegetables* (CODEX STAN 260-2007) **EU:** Supports hold pending more info on use level **Iran:** disagrees with the use of sodium diacetate because of vinegar, oil or brine. **RF:** does not support. According to Codex Stan 192-1995 FA with ADI (0.15 mg/kg bw) should not be used with ML=GMP.	Requests information on actual use level

Food Category No. 04.1.2.4 Canned or bottled (pasteurized) fruit

Corresponding commodity standards: multiple commodity standards the majority of which allow only limited use of specific food additives. Those that list antioxidants list ascorbic acid for this function. None list tocopherols. Only 254-2007 lists a general reference to provisions in FC 04.1.2.4 of the GSFA.

Note: At the time of CCFA47, this category was under discussion by the EWG on Alignment (see REP14/FA, para 44).

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
SODIUM DIACETATE	262(ii)	GMP		7	Acidity regulator, Preservative, Sequesterant	**Brazil:** This food additive has a numerical of ADI 0-15 mg/kg bw. A GMP level is not appropriate in this case. **Iran:** disagrees with the use of sodium diacetate because of pasteurization. **RF:** Supports discontinuation. According Codex Stan 192-1995 FA with ADI (0.15 mg/kg bw) should not be used with	Discontinue

						ML=GMP.	
TARTRATES	334, 335(ii), 337	1300	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**RF:** Supports discontinuation. According to Codex Stan 192-1995 FA with ADI (0.30 mg/kg bw) should not be used with ML=GMP.	Discontinue

Food Category No. 04.1.2.5 (Jams, jellies, marmalades)

Corresponding commodity standards: 296-2009[15]: allows Table 3 acidity regulators, antifoaming agents, firming agents, preservatives, and thickeners. Also lists specific acidity regulators, antifoaming agents, colours, and preservatives.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
SORBITAN ESTERS OF FATTY ACIDS	491 - 495	25		7	Emulsifier, (Stabilizer - INS 492, 493 and 494 only)	**CX/FA 16/48/7** Adopt at 4,000 mg/kg with new Note "Excluding products conforming to the Standard for Jams, Jellies and Marmalades (CODEX STAN 296-2009)" **EU:** seeks clarification on what non-standardized products require the additive. Group ADI of 0-25 mg/kg bw as sum of sorbitan esters of lauric, oleic, palmitic and stearic acids established at 26th JECFA (1982). There seems to be one-to-one relationship between CS 296-2009 and FC 04.1.2.5. What would be the non-standardized products? **Japan:** Supports proposal; used in jams to prevent foaming. The use of this additive results in increased manufacturing yield. Maximum use level is 7 mg/kg. **USA**: allowed in USA at 4,000 mg/kg as stabilizer **RF:** does not agree with proposal. Use of these FA in this FC could mislead consumers. These FA are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need technological justification for FA in this FC and in high concentrations. Consider intake of fatty acids from all FA uses additives. Unclear what products this FA would be used in if “excluding products conforming to	Adopt with new Note "Excluding products conforming to the Standard for Jams, Jellies and Marmalades (CODEX STAN 296-2009)"

[15] CODEX STAN 296-2009 specifically states it does not apply to products intended for further processing or special dietary uses, reduced or low sugar content, or where sweetening properties have been replaced wholly or partially by food additive sweeteners.

						the Standard for Jams, Jellies and Marmalades (CODEX STAN 296-2009)"	

Food Category No. 04.1.2.6 (Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5)

Corresponding commodity standards: 160-1987: lists specific acidity regulators and preservatives.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; included for information purposes only

Food Category No. 04.1.2.7 (Candied fruit)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal
PROPYLENE GLYCOL	1520	50000		7	Emulsifier, Glazing Agent, Humectant	**CX/FA 16/48/7:** Adopt at 1,000 mg/kg. Comments indicate use at that level by some members **EU:** Technological need? Excessive ML – child of 20kg reaches ADI 0.25 mg/kg bw by eating 10g. ADI established at 17th JECFA (1973) **Indonesia**: supports the adoption at ML of 1000 mg/kg with additional INS Functional classes as carrier **RF:** Supports adoption at ML as carrier only	Adopt at 1,000 mg/kg
STEAROYL LACTYLATES	481(i), 482(i)	2000		7	Emulsifier, Flour Treatment Agent, Foaming Agent, Stabilizer	**CX/FA 16/48/7:** Adopt - comments indicate use by some members **EU:** Technological need in this FC? **RF:** does not agree with proposal due to lack of tech. justification Use of these FA in this FC could mislead consumers. These FA are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need technological justification for using FA in this FC and in high concentrations. Consider intake of fatty acids from all FA uses.	Request information on technological justification
TARTRATES	334, 335(ii), 337	GMP	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**CX/FA 16/48/7:** Adopt - comments indicate use by some members **EU:** Technological need? GMP not appropriate for FA with numeric ADI. **India:** allows Tartaric Acid INS 334 at GMP levels. **RF:** Discontinue due to lack of tech. justification	Request information on actual use levels

Food Category No. 04.1.2.8 (Fruit preparations, including pulp, purees, fruit toppings and coconut milk)

Corresponding commodity standards: 240-2003 (Aqueous Coconut Products): lists specific bleaching agents, ES&T, and preservatives; 314R-2013 (Date Paste): no additives allowed

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	334, 335(ii), 337	GMP	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**CX/FA 16/48/7:** Adopt with new Notes excluding products conforming to commodity standards **EU:** Technological justification? If provided, adopt with new Notes excluding products conforming to commodity standards **RF:** Discontinue due to lack of tech. justification. According to Codex Stan 192-1995, FA with ADI (L(+)-tartaric acid (0.30 mg/kg bw) should not be used with ML=GMP.	Request information on actual use level

Food Category No. 04.1.2.9 (Fruit-based desserts, incl. fruit-flavoured water-based desserts)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
DIOCTYL SODIUM SULFOSUCCINATE	480	15		7	Emulsifier, Humectant	**CX/FA 16/48/7:** Adopt with note “for use in gelatin powder only” **EU:** technological need? To the EU recollection it might be a **secondary food additive use?** The use as secondary food additive should be indicated in a (separate) note ADI of 0-0.1 mg/kg bw established at the 44th JECFA (1995) **USA**: allowed in dry gelatin dessert at 15 mg/kg as humectant. used in fumaric acid-acidified gelatin dessert powders to lower surface tension of water to permit wetting of fumaric acid. This allows dissolution of gelatin dessert powder in warm water. Without, boiling water is necessary to dissolve the gelatin dessert powder. Propose note "for use in gelatin powder only"	Adopt with note “for use in gelatin powder only”

Food Category No. 04.1.2.10 (Fermented fruit products)

Corresponding commodity standards: 260-2007: lists specific acidity regulators, antifoaming agents, antioxidants, colours, firming agents, flavour enhancers, preservatives, sequesterants, and sweeteners

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	334, 335(ii), 337	GMP	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**CX/FA 16/48/7:** Hold. Provision is not included in the current Standard for Pickled Fruits and Vegetables (CODEX STAN 260-2007)" **EU:** Technological justification? **RF:** According to Codex Stan 192-1995, FA with ADI (L(+)-tartaric acid (0.30 mg/kg bw) should not be used with ML=GMP. Discontinue due to lack of tech. justification	Request information on actual use level

Food Category No. 04.1.2.11 (Fruit fillings for pastries)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; included for information purposes only

Food Category No. 04.1.2.12 (Cooked fruit)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	334, 335(ii), 337	GMP	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**CX/FA 16/48/7:** Adopt **EU:** technological need? GMP not appropriate for additive with numeric ADI **RF:** Discontinue due to lack of tech. justification	Request information on actual use level

Food Category No. 04.2.1 (Fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: None; subcategories have corresponding commodity standards

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~PROPYLENE GLYCOL~~	~~1520~~	~~50000~~		~~7~~	~~Emulsifier, Glazing Agent,~~	**CX/FA 16/48/7:** Move to subcategory	Move to subcategory

					~~Humectant~~	04.2.1.2 **Brazil:** At this level, 30g of the product is enough to reach the ADI for adults (ADI of 0.25 mg/kg bw) and 7.5g for children. Seek clarification on actual use level. Suggest decreasing ML. If the technological justification is just for nuts and nut products, a new note should be created for this purpose **EU:** Supports proposal; not appropriate for parent category **USA:** allowed in USA in nut and nut products at 50,000 mg/kg **RF:** ML too high; should not exceed 3000 mg/kg	04.2.1.2

Food Category No. 04.2.1.1 (Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators justified with Note 262,ES&T not horizontally justified

Corresponding commodity standards: 038-1981: only allows specific acidity regulators; 40R-1981, 131-1981, 171-1989, 185-1993, 186-1993, 188-1993, 197-1995, 200-1995, 218-1999, 224-2001, 225-2001, 238-2003, 293-2008, 300-2010, 303-2011, 304R-2011, 307-2011: do not allow food additives

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**50000**			**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Do not move from 04.2.1 – no information provided on use **Brazil:** At this level, 30g of the product is enough to reach the ADI for adults (ADI of 0-25 mg/kg bw) and 7.5g for children. Seek clarification on the actual use level. Suggest decreasing this level. **EU, RF:** ES&T not horizontally justified; corresponding commodity standards do not allow food additives; with some exceptions additives shall not be used in unprocessed foods; discontinue – no technological justification and info on ML provided **Singapore:** This FC is defined as raw vegetables presented fresh from harvest. Use of food additives in this FC is not justified, as this may mislead consumers with regard to the freshness and quality of the product.	Do not move from parent category

Food Category No. 04.2.1.2 (Surface-treated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators not horizontally justified, ES&T hold until additives in additives

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal
GLYCEROL	422	GMP	16	7	Humectant, Thickener	**CX/FA 16/48/7:** hold for additives in additives discussion **EU:** Reflecting decision at CCFA48 (to continue with the current practice to address the use of secondary additives by using notes) the technological justification for the use of secondary additives should be provided. With some exceptions additives shall not be used in unprocessed foods; discontinue – no technological justification and info on ML provided **RF:** -Need technological justification for using FA in this FC. Discontinue	Request information on use
PROPYLENE GLYCOL	**1520**	**50000**			**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** hold for additives in additives discussion **Brazil:** At this level, 30g enough to reach ADI for adults (ADI of 0.25 mg/kg bw) and 7.5g for children. Seek clarification on the actual use level. Suggest decreasing level. If the technological justification is just for nuts and nut products, a new note should be created for this purpose. **EU:** Reflecting decision at CCFA48 (to continue with the current practice to address the use of secondary additives by using notes) the technological justification for the use of secondary additives should be provided. With some exceptions additives shall not be used in unprocessed foods; discontinue – no technological justification; proposed ML is excessive **USA**: allowed in USA in nut and nut products (Parent FC 04.2.1) at 50,000 mg/kg **RF:** No technological justification . ML too high; should not exceed 3000 mg/kg. Discontinue	Request information on use
PROPYLENE GLYCOL ALGINATE	405	10000		4	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer,	**CX/FA 16/48/7:** hold for additives in additives discussion **EU:** Reflecting decision at CCFA48 (to continue with the current practice to address the use of secondary additives by using notes) the technological justification for the use of secondary	Request information on use

					Thickener	additives should be provided. With some exceptions additives shall not be used in unprocessed foods; discontinue – no technological justification and info on ML provided **RF:** No technological justification. Child ≤ 20 kg would reach the ADI (0.70 mg/kg bw) with only 140 g/kg food. Discontinue.	
SUCROSE ESTERS OF FATTY ACIDS	473	1000		4	Emulsifier, Stabilizer	**CX/FA 16/48/7:** hold for additives in additives discussion **EU:** Reflecting decision at CCFA48 (to continue with the current practice to address the use of secondary additives by using notes) the technological justification for the use of secondary additives should be provided. With some exceptions additives shall not be used in unprocessed foods; discontinue – no technological justification and info on ML provided **RF:** does not agree with proposal. Discontinue. Use of this FA in this FC could mislead consumers. This FA is derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need technological justification for using FA in this FC and in high concentrations. Consider intake of fatty acids from all FA uses	Request information on use

Food Category No. 04.2.1.3 (Peeled, cut or shredded fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds and nuts and seeds)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**50000**			**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Discontinue - ES&Ts not horizontally justified **EU:** With some exceptions additives shall not be used in unprocessed foods; discontinue – no technological justification and info on ML provided **India:** Supports proposal **RF:** Supports discontinuation.	Do not move from parent category

Food Category No. 04.2.2 (Fresh vegetables (Processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

Corresponding commodity standards: None; subcategories have corresponding commodity standards

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
~~PROPYLENE GLYCOL~~	~~1520~~	~~50000~~	~~79~~[16]	~~7~~	~~Emulsifier, Glazing Agent, Humectant~~	**CX/FA 16/48/7:** Consider in subcategories **EU:** supports proposal **CX/FA 16/48/7 USA**: allowed in USA in nut and nut products (Parent FC 04.2.1) at 50,000 mg/kg **RF:** Consumption of 200g by 60kg person equals 6.6 times ADI. ML should not exceed 3000 mg/kg. Discontinue.	Consider in subcategories

Food Category No. 04.2.2.1 (Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: 038-1981, 140-1983, allow only specific additives, 114-1981: only allows specific sequesterants/processing aids; 41-1981, 110-1981, 111-1981, 77-1981, 112-1981, 113-1981, 133-1981, 132-1981, & 104-1981: do not allow food additives;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**50000**	**79**		**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Do not move, ES&Ts not justified in this subcategory. **EU:** Technological need? ES&T not horizontally justified; ML excessive; discontinue **India:** does not allow additives in this FC **CX/FA 16/48/7 USA**: allowed in USA in nut and nut products at 50,000 mg/kg **RF:** Supports proposal; FA not allowed in this FC. No technological justification and ADI of 0-25 mg/kg bw. Consumption of 200 g by 60 kg person equals 6.6 times ADI In solid food the ML for INS1520 should not exceed 3000 mg/kg.	Do not move from parent category

Food Category No. 04.2.2.2 (Dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

Corresponding commodity standards: 38-1981: lists specific acidity regulators, 39-1981, 295R-2009: do not discuss food additives

[16] Note 79: For use on nuts only.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**50000**	**76**		**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Discuss further **EU, RF:** technological need? At 50,000 mg/kg a 20 kg child reaches ADI by consuming 10 g nuts. What is the function in dehydrated potatoes? Additives with ADI not specified not suitable? ADI of 0-25 mg/kg bw was established at the 17th JECFA (1973) **CX/FA 16/48/7 USA**: allowed in dehydrated potatoes at 5,000 mg/kg. Note 76 is "use in potatoes only" **RF:** Discontinue due to lack of technological justification. This FA could only be used as a carrier in secondary FA with ML = 3000 in solid food products.	Adopt at 5,000 mg/kg with Note 76 "For use in potatoes only"

Food Category No. 04.2.2.3 (Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce)

Corresponding commodity standards: 38-1981: lists specific acidity regulators, 66-1981: refers to acidity regulators, antioxidants, colour retention agents, firming agents, flavour enhancers, preservatives, and thickeners listed in FC 04.2.2.3 of GSFA; 115-1981: lists specific dispersing agents, firming agents, preservatives thickeners, acidity regulators, flavours; 260-2007: allows acidity regulators, antifoaming agents, antioxidants, colours, firming agents, sequesterants, sweeteners listed in FC 04.2.2.3 of GSFA

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal
PROPYLENE GLYCOL	**1520**	**50000**	**79**		**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Hold while CCPV considers food additive provisions in CODEX STAN 260-2007. Not allowed in current standards **EU:** discontinue – no technological justification provided; ML is excessive; not permitted in corresponding commodity standards **RF:** Discontinue. No technological justification and ADI of 0-25 mg/kg bw. Consumption of 200 g by 60 kg person equals 6.6 times ADI This FA could only be used as a carrier in secondary FA with ML = 3000 in solid food products.	Do not move from parent FC
PROPYLENE GLYCOL ALGINATE	405	6000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer,	**CX/FA 16/48/7** Hold while CCPV considers food additive provisions in CODEX STAN 260-2007. Allowed in CS 115-1981 at 500 mg/kg singly or in combination with other emulsifiers **EU:** is 6000 ppm needed if one of the commodity	Adopt at 6,000 mg/kg with note excluding CODEX STANs 38-1981 and 260-2007 and

					Thickener	standards permits only 500 ppm? **USA**: allowed in the USA at 6,000 mg/kg as ES&T **RF:** agrees with use according to CODEX STAN 260-2007 with allowed ML= 500 mg/kg singly or in combination with other emulsifiers	allowing use in CODEX STAN 115-1981 at 500 mg/kg singly or in combination with other emulsifiers
SODIUM DIACETATE	262(ii)	GMP		7	Acidity regulator, Preservative, Sequesterant	**CX/FA 16/48/7** Hold while CCPV considers food additive provisions in CODEX STAN 260-2007. Not allowed in current standards **EU:** Agrees more info needed **Iran:** disagrees with the use of sodium diacetate because of vinegar, oil or brine. **RF:** does not agree with proposal established ADI (0-15 mg/kg bw) should not be used with ML=GMP.	Request information on use and actual use levels

Food Category No. 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds)

Corresponding commodity standards: 13-1981: specific acidity regulators, firming agents listed in FC 04.2.2.4; 38-1981, 57-1981: lists specific acidity regulators; 145-1985:specific antioxidants, acidifying agents, bleaching agents, colouring agents, flavours 241-2006: allows tartrates; 257R:-2007:specific acidity regulator, anticaking agent, stabilizers; 258R-2007: lists specific acidity regulators, antioxidants, preservatives, 297-2009: allows Table 3 acidity regulators, colour retention agents, and calcium salts of firming agents. List specific colours and colour retention agents. Allows specific thickeners in creamed corn. Allows Table 3 thickeners, emulsifiers, stabilizers in canned mushroom sauce, colours and flavour enhancers in canned mushrooms

Other information: This category was under discussion by the EWG on Alignment to CCFA47 (see REP14/FA, para 44).

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal
NISIN	234	6.25	233	6	Preservative	**EU:** supports discontinuation; preservative not needed. FC 04.2.2.4 refers to fully preserved products; not in the corresponding standards **IFAC:** Supports discontinuation. Does not appear to be any products in this FC in international trade Use of nisin helps to reduce time/temperature requirements of the heat sterilization process for canned vegetables, thus helping to maintain the textural and color quality of the canned products. Technological need data supports varying application levels of nisin depending on vegetable product type, initial microbial load & heat processing regimes. Typical recommended application levels range from 2.5-5 mg/kg for low	Discontinue, not allowed in corresponding commodity standards

						acid products and 1.25-2.5 mg/kg for tomatoes and tomato based products. **Iran:** disagrees with the recommendation because of pasteurization **RF:** Supports discontinuation due to antibiotic resistance	
PROPYLENE GLYCOL	**1520**	**50000**	**79**		**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Requests information on technological justification, actual use level, and actual function **EU:** no information provided - discontinue **RF:** Discontinue. No technological justification. This FA could be used only as carrier in secondary FA with ML in the finish solid food product =3000mg/kg.	Do not move from parent category
PROPYLENE GLYCOL ALGINATE	405	10000		7	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Stabilizer, Thickener	**EU, RF:** supports discontinuation	Discontinue, not allowed in corresponding commodity standards
SODIUM DIACETATE	262(ii)	GMP		7	Acidity regulator, Preservative, Sequesterant	**Brazil:** This food additive has a numerical ADI 0-15 mg/kg bw. A GMP level is not appropriate in this case. **EU, RF:** supports discontinuation **Iran:** disagrees with the recommendation because of pasteurization	Discontinue, not allowed in corresponding commodity standards
TARTRATES	334, 335(ii), 337	10000	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**Note:** CODEX STAN 241-2003 Allows tartrates at 1300 mg/kg as tartaric acid **EU:** accepts the proposal for the sake of alignment with the commodity standards **RF:** Supports proposal in ML=2000 mg/kg because ADI=0-30 mg/kg bw	Adopt at 1300 mg/kg with note 45 and note excluding CODEX STANs 13-1981, 38-1981, 57-1981, 145-1985, 257R-2007, 259R-2007, and 297-2009

Food Category No. 04.2.2.5 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g. peanut butter))

Corresponding commodity standards: 57-1981: lists specific acidity regulators.

Other information: This category was under discussion by the EWG on Alignment to CCFA47 (see REP14/FA, para 44).

Additive	INS	Max	Notes	Step /	INS Functional	Comments by EWG on first Circular/	EWG Proposal

		Level (mg/kg)		Adopted	Class	information from CCFA48	
PROPYLENE GLYCOL	**1520**	**50000**	**79**		**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Requests information on technological justification, actual use level, and actual function **Note:** not allowed in corresponding CODEX STANs **EU:** technological need? ML excessive; not allowed in corresponding CODEX STANs **discontinue** **USA**: allowed in USA in nut products at 50,000 mg/kg **RF:** Discontinue. No technological justification. This FA could be used only as carrier in secondary FA with ML in the finish solid food product =3000mg/kg	Request information on use level
PROPYLENE GLYCOL ALGINATE	405	10000		4	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	**EU, RF:** Supports discontinuation	Discontinue
STEAROYL LACTYLATES	481(i), 482(i)	5000	2	7	Emulsifier, Flour Treatment Agent, Foaming Agent, Stabilizer	**EU, RF:** Supports discontinuation	Discontinue
TARTRATES	334, 335(ii), 337	GMP	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**Brazil:** This food additive has a numerical ADI. A GMP level is not appropriate in this case. **EU, RF:** supports discontinuation	Discontinue
TOCOPHEROLS	307a, b, c	25		7	Antioxidant	**EU, RF:** supports discontinuation **ELC**: Per definition this food category may contain nut and seed purees and spreads, such as peanut butter. Nuts and seeds are high in oils and high in unsaturated fatty acids. Those products may frequently require protection against oxidation using a fat soluble antioxidant. Tocopherol is a suitable candidate. A use level of 25 ppm though is unlikely to be sufficient.	Adopt at 200 mg/kg

						Usually 200 ppm are needed. **Japan:** Tocopherols are used as an antioxidant in peanut butter to prolong its shelflife. The maximum use level is 300 mg/kg.	

Food Category No. 04.2.2.6 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g. vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5)

Corresponding commodity standards: 38-1981: lists specific acidity regulators; 57-1981: lists specific acidity regulators; 259R-2007: does not discuss food additives; 308R-2011: Does not allow food additives; 321-2015: Does not allow food additives.

Other information: This category was under discussion by the EWG on Alignment to CCFA47 (see REP14/FA, para 44).

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000		7	Emulsifier, Stabilizer	**EU, RF:** Supports discontinuation	Discontinue
PROPYLENE GLYCOL	**1520**	**50000**	**79**		**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Requests information on technological justification, actual use level, and actual function **Note:** not allowed in corresponding CODEX STANs **EU:** discontinue; technological need? ML excessive; in conflict with corresponding CODEX STANS **USA**: allowed in USA in nut products at 50,000 mg/kg **RF:** Discontinue. No technological justification. This FA could be used only as carrier in secondary FA with ML in the finish solid food product =3000mg/kg	Request information on use level
PROPYLENE GLYCOL ALGINATE	405	5000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	**EU, RF:** supports discontinuation if no info provided	Discontinue Note: Not allowed in CODEX STANS 38-1981, 57-1981, 308R-2011 or 321-2015
SORBITAN ESTERS OF FATTY ACIDS	491-495	5000		7	Emulsifier, Stabilizer (ins 492, 493, and 494 only)	**EU, RF**: supports discontinuation if no info provided Use of these FA in this FC could mislead consumers. These FA are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Therefore, need technological	Discontinue Note: Not allowed in CODEX STANS 38-1981, 57-1981, 308R-2011 or 321-2015

						justification for using these FA in this FA and in such high concentrations. Consider intake of fatty acids from all FA uses. .	
SUCROSE ESTERS OF FATTY ACIDS	473	5000		7	Emulsifier, Foaming agent, Glazing agent, Stabilizer	**EU, RF:** supports discontinuation if no info provided **RF** Use of these FA in this FC could mislead consumers. These food additives are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Therefore, need technological justification for using this FA in this FC and in such high concentrations. Consider intake of fatty acids from all FA uses.	Discontinue Note: Not allowed in CODEX STANS 38-1981, 57-1981, 308R-2011 or 321-2015
TARTRATES	334, 335(ii), 337	2000	45	7	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**EU, RF:** supports discontinuation if no info provided	Discontinue Note: Not allowed in CODEX STANS 38-1981, 57-1981, 308R-2011 or 321-2015

Food Category No. 04.2.2.7 (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3seeds)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T are horizontally justified

Corresponding commodity standards: 223-2001: allows specific acidity regulators, flavour enhancers, texturizers, thickeners/stabilizers; 038-1981: only allows acidity regulators; 294R-2009: allows specific preservatives, flavour enhancers, antioxidants acidity regulators, stabilizers; 260-2007: allows firming agents, preservatives, sequesterants, antifoaming agents, antioxidants, flavour enhancers, acidity regulators, colours as per Table 2 FC 04.2.2.7; 151-1985: does not discuss food additives;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Comments by EWG on first Circular/ information from CCFA48	EWG Proposal
PROPYLENE GLYCOL	**1520**	**50000**	**79**		**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Hold while CCPV considers food additive provisions in CODEX STAN 260-2007 **EU:** Discontinue; ML excessive; technological need? In conflict with corresponding CODEX STANS **RF:** Discontinue. No technological justification. This FA could be used only as carrier in secondary FA with ML in the finish solid food product =3000mg/kg.	Do not move from FC 04.2.2

PROPYLENE GLYCOL ALGINATE	405	10000		4	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	CX/FA 16/48/7: Hold while CCPV considers food additive provisions in CODEX STAN 260-2007 **EU, RF:** supports discontinuation if no info provided	Discontinue
TARTRATES	334, 335(ii), 337	10000	45	4	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	**CX/FA 16/48/7:** Hold while CCPV considers food additive provisions in CODEX STAN 260-2007 **EU:** supports discontinuation if no info provided **RF:** agrees with proposal at ML=2000 mg/kg because ADI=0-30 mg/kg bw.	Discontinue

Food Category No. 04.2.2.8 (Cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**50000**	**79**		**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7** Do not move from FC 04.2.2 **EU, RF:** Discontinue; technological need? At ML 50,000 child of 20 kg reaches ADI by eating 10 g ADI of 0-25 mg/kg bw established at the 17th JECFA (1973) (RF:FA could be used only as carrier in secondary FA. ML should not exceed 3000 mg/kg.)	Do not move from FC 04.2.2

Food Category No. 05.0 (Confectionery)

Corresponding commodity standards: None, Multiple subcategories have corresponding commodity standards

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~PROPYLENE GLYCOL~~	~~1520~~	~~240000~~		~~7~~	~~Emulsifier, Glazing Agent, Humectant~~	**CX/FA 16/48/7:** Move to subcategories. **CCFA48:** Requests information on actual use level for each subcategory **EU:** Consider use in subcategories; supports discontinuation if no info on subcategories provided.	If no information in subcategories provided, Discontinue and do not move to subcategories

						USA: allowed in USA in confections and frostings at 240,000 mg/kg **RF:** Consider use in subcategories.	
~~SORBITAN ESTERS OF FATTY ACIDS~~	~~491 - 495~~	~~20000~~		~~7~~	~~Emulsifier, (Stabilizer - INS 492, 493 and 494 only)~~	**CX/FA 16/48/7:** Move to subcategories **EU:** Consider use in subcategories **USA**: allowed in USA at GMP as thickener	If no information in subcategories provided, Discontinue and do not move to subcategories

Food Category No. 05.1 (Cocoa products and chocolate products including imitations and chocolate substitutes)

Corresponding commodity standards: None, Multiple subcategories have corresponding commodity standards

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~PROPYLENE GLYCOL ALGINATE~~	~~405~~	~~5000~~		~~7~~	~~Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener~~	**CX/FA 16/48/7:** Move to subcategories. **CCFA48:** Requests information on actual use level for each subcategory **EU:** Consider use in subcategories **USA**: allowed in USA in confections and frostings at 5,000 mg/kg as stabilizer	Consider use in subcategories
~~SUCROSE ESTERS OF FATTY ACIDS~~	~~473~~	~~10000~~		~~7~~	~~Emulsifier, Stabilizer~~	**CX/FA 16/48/7:** Move to subcategories **EU:** Consider use in subcategories **USA**: allowed in USA at GMP as thickener	Consider use in subcategories

Food Category No. 05.1.1 (Cocoa mixes (powders) and cocoa mass/cake)

Corresponding commodity standards: 105-1981: refers to acidity regulators, anticaking agents, bulking agents, emulsifiers, sweeteners, and thickeners listed in GSFA FC 05.1.1. Also specific Table 3 additives; 141-1983: refers to acidity regulators and, emulsifiers listed in GSFA FC 05.1.1. Also specific Table 3 additives.

Other information: This category was under discussion by the EWG on Alignment to CCFA47 (see REP14/FA, para 44).

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
DIOCTYL SODIUM SULFOSUCCINATE	480	4000		7	Emulsifier, Humectant	Not discussed in CX/FA 16/48/7. **EU, RF:** Technological need? ADI of 0-0.1 mg/kg bw established by 44th JECFA (1995)	Discontinue
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Requests information on technological justification, actual use level, and actual function **Note:** was allowed in CODEX STAN 105-1981 at 2000 mg/kg prior to revision of that standard to include a general reference to	Adopt at 2,000 mg/kg as per CODEX STAN 105-1981

						the GSFA **EU:** seeks clarification – was this additive allowed before alignment in CS 105-1981? It does not seem to be the case **RF:** Supports proposal; with technological function carrier for flavour and other secondary food additives **Iran:** disagrees with the recommendation and use of FA in cocoa powder because of its specification and use area. ML is too high. **USA**: allowed in USA in confections (parent FC 05.0) at 240,000 mg/kg	
PROPYLENE GLYCOL ALGINATE	**405**	**5000**			**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**CCFA48:** Request information on use **EU, RF:** support proposal **USA**: allowed in USA in confectionaries at 5,000 mg/kg as a stabilizer	Do not move – commodity standards do not allow stabilizer
STEAROYL LACTYLATES	481(i), 482(i)	2000		7	Emulsifier, Flour treatment agent, Foaming agent, Stabilizer	**CCFA48:** Request information on use **EU, RF:** Discontinue These FA are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Therefore, need technological justification for using these FA in this FC and in such high concentrations. **Malaysia:** Use level 4000 mg/kg Justification: stearoyl lactylates are commonly used to increase solubility of cocoa powder into water, since fat in cocoa powder may hinder cocoa powder to dissolve easily in water without emulsifier	Discontinue if no information on use provided
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**CCFA48:** Request information on use **EU, RF:** Support discontinue **Japan:** proposes maximum use level of this food additive provision be changed to 5,000 mg/kg. Sucrose esters of fatty acids are used as an emulsifier in cocoa mixes. Maximum use level is 5,000 mg/kg. **USA**: allowed in USA in parent FC 05.0 at GMP as thickener	Adopt at 5,000 mg/kg

TOCOPHEROLS	307a, b, c	500	15[17]	7	Antioxidant	**CCFA48:** Request information on use **EU, RF:** Support discontinue	Discontinue

Food Category No. 05.1.2 (Cocoa mixes (syrups))

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Request information on use in this subcategory **CCFA48:** Requests information on technological justification, actual use level, and actual function **EU, RF:** Supports discontinuation I**ran**: disagrees with the recommendation and use of propylene glycol because of its specification and use area. ML is too high. **USA**: allowed in USA in confections (parent FC 05.0) at 240,000 mg/kg	Do not move if no information on use level provided
PROPYLENE GLYCOL ALGINATE	**405**	**5000**			**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**CCFA48:** Request information on use **EU:** in what confectionary products is it used/ needed? A general allowance in confectionaries does not illustrate the need and justification for cocoa mixes (syrups) **RF:** tDiscontinue if no technological justification provided. **CX/FA 16/48/7 USA**: allowed in USA in confectionaries at 5,000 mg/kg as stabilizer	Adopt
SORBITAN ESTERS OF FATTY ACIDS	**491 - 495**	**20000**			**Emulsifier, (Stabilizer - INS 492, 493 and 494 only)**	**CX/FA 16/48/7:** Adopt at 10,000 mg/kg **CCFA48:** Request information on use **EU:** technological justification for cocoa mixes (syrups)? **USA**: INS 491 allowed in USA in non-standardized confectionery coating or cacao product at 10,000 mg/kg as emulsifier. Delays fat blooming in cacao products, improves texture in confectionary coatings. **RF:** Discontinue if no technological justification provided. FA not used in this FC.	Adopt at 10,000 mg/kg

[17] Note 15: On the fat or oil basis.

						No technological justification. These FA are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need for technological justification for using these FA in this FC and in such high concentrations. Consider intake of fatty acids from all FA uses	
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**CX/FA 16/48/7:** Adopt **CCFA48:** Request information on use **EU:** technological justification for cocoa mixes (syrups)? **USA**: allowed in USA at 10,000 mg/kg. Delays fat blooming in cacao products, improves texture in confectionary coatings. **RF:** Discontinue if no technological justification provided. Not used this FA in this FC. No technological justification. These FA are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need for technological justification for using these FA in this FC and in such high concentrations. Consider intake of fatty acids from all FA uses.	Adopt at 10,000 mg/kg

Food Category No. 05.1.3 (Cocoa-based spreads, incl. fillings)

Corresponding commodity standards: 86-1981: does not allow food additives.

Other information: This category was under discussion by the EWG on Alignment to CCFA47 (see REP14/FA, para 44).

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Request information on use **EU:** supports discontinuation **RF:** Supports discontinuation. This FA could be used only as carrier in secondary FA with ML in the finish solid food product =3000mg/kg **Brazil:** At this level, 7g of the product is enough to reach the ADI for adults (ADI of 0-25 mg/kg bw) and 1.5g for children. If adopted, suggest decreasing ML. In Brazil it's allowed as emulsifier at a ML of 1000	Adopt at 1,000 mg/kg

						mg/kg **Iran:** disagrees with the recommendation and use of propylene glycol because of its specification and use area. ML is too high. **USA**: allowed in USA in confections (parent FC 05.0) at 240,000 mg/kg	
PROPYLENE GLYCOL ALGINATE	**405**	**5000**			**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**CCFA48:** Request information on use **EU:** Technological need? General permission in confectionaries does not provide the info whether needed in cocoa-based spreads, incl. fillings. In what non-standardised products it is needed? **RF:** Discontinue due to lack of tech. justification. **USA**: allowed in USA in confectionaries at 5,000 mg/kg as stabilizer	Adopt with note XS86
SODIUM DIACETATE	262(ii)	GMP	4[18]	4	Acidity regulator, Preservative, Sequestrant	**Brazil, Iran:** This FA has a numerical ADI (0-15 mg/kg bw). GMP not appropriate. **EU:** supports request for further info) **RF:** Discontinue due to lack of tech. justification	Request information on actual use level
SORBITAN ESTERS OF FATTY ACIDS	**491 - 495**	**20000**			**Emulsifier, (Stabilizer - INS 492, 493 and 494 only)**	**CCFA48:** Request information on use **EU:** Discontinue if no further info provided **RF:** Discontinue due to lack of tech. justification	Do not move from parent category
STEAROYL LACTYLATES	481(i), 482(i)	5000	**XS86**	7	Emulsifier, Flour treatment agent, Foaming agent, Stabilizer	**EU, RF:** Support discontinue	Discontinue
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**CCFA48:** Request information on use **EU:** Technological need? **Japan:** Supports proposal; used as emulsifiers in chocolate spreads and chocolate fillings for fine bakery wares to uniformly disperse ingredients such as cacao butter/cacao mass and soften the products for easier processing. ML is 10000 mg/kg. **USA**: allowed in USA in parent FC 05.0 at GMP as thickener **RF:** Discontinue due to lack of tech. justification	Adopt with Note XS86
TARTRATES	334,	5000	45[19]	4	All: Acidity	**EU:** was technological justification provided	Adopt at 2000

[18] Note 4: For use in decoration, stamping, marking or branding the product only.

	335(ii), 337				regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer	that we can adopt? **RF:** agrees with proposals in ML=2000 mg/kg	mg/kg with Notes 45 and XS86
TOCOPHEROLS	307a, b, c	500	15[20]	7	Antioxidant	**EU, RF:** Support discontinuation if no further info provided **Indonesia**: proposes ML of 100 mg/kg. Use level in Indonesia is below 100 mg/kg	Adopt at ML = 100

Food Category No. 05.1.4 (Cocoa and chocolate products)

Corresponding commodity standards: 87-1981: refers to acidity regulators, antioxidants, bulking agents, colours, emulsifiers, glazing agents, and sweeteners listed in GSFA FC 05.1.4. Also specific Table 3 additives.

Other information: This category was under discussion by the EWG on Alignment to CCFA47 (see REP14/FA, para 44).

A provision for Sorbitan esters of fatty acids (INS 491-495) was adopted in 2016, so the provision from FC 05.0 is not discussed here.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
ETHYL MALTOL	637	1000		7	Flavour Enhancer	**EU, RF:** Supports discontinuation	Discontinue, flavour enhancers not allowed in corresponding standards
MALTOL	636	200		7	Flavour Enhancer	**EU, RF:** discontinue if no further info provided.	Discontinue, flavour enhancers not allowed in corresponding standards
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Request information on use **Brazil, Iran:** ML is too high **EU:** Discontinue **USA:** allowed in USA in confections (parent FC 05.0) at 240,000 mg/kg **RF:** Discontinue due to lack of tech. justification. ML too high.This FA could be used only as carrier in secondary FA with ML	Do not move from parent category

[19] Note 45: As tartaric acid.
[20] Note 45: As tartaric acid.

						in the finish solid food product =3000mg/kg	
PROPYLENE GLYCOL ALGINATE	**405**	**5000**			**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**CCFA48:** Request information on use **EU:** Supports proposal **USA**: allowed in USA in confectionaries at 5,000 mg/kg as stabilizer **RF:** Discontinue due to lack of tech. justification.	Do not move, stabilizers are not allowed in corresponding standard
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10,000		7	Emulsifier, Stabilizer	**EU, RF:** Discontinue **Malaysia**: use level: 50 mg/kg Justification: this food additive can also be introduced from the inclusion of chocolate. In order for the inclusion to function well in chocolate, manufacturers add this food additive as a stabilizer to ensure homogeneity of product, to limit fat crystallization, to reduce fat blooming (greying of product); to help ensure the right mouthfeel (or snap of the product); to help with prolonged shelf-life	Discuss further
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**EU:** Technological need? **Japan:** Supports proposal used in chocolate products up to 10000 mg/kg to uniformly disperse ingredients such as cocoa fat and cocoa mass and soften the products. Those products fall within the Standard for Chocolate and Chocolate products (CS 87-1981), while CS 87-1981 does not permit use of this additive. According to *Procedures for consideration of the entry and review of food additive provisions in the General standard for food additives* in the procedure manual, it clearly states; "If the Codex commodity committee has been adjourned, the Committee on Food Additives may revise the food additive provisions in commodity standards under the purview of the adjourned committee, as necessary." Codex Committee on Cocoa Products and Chocolate (CCCPC) has adjourned, so CCFA should revise food additive provisions for chocolate and chocolate products. Japan also recalls that CCFA48 adopted some food additive provisions (e.g. INS907 in	Adopt

						FC04.1.2.2) for both standardized and non-standardized foods, while corresponding commodity standards do not permit use of such additives. Therefore Japan would like to suggest considering the draft provision for not only non- standardized but also standardized foods. **USA**: allowed in USA in parent FC 05.0 at GMP as thickener **RF:** Discontinue due to lack of tech. justification.	
SUCROSE OLIGOESTERS TYPE I AND TYPE II	473a	6000	**XS87**	4	Emulsifier, Glazing agent, Stabilizer	**EU:** Technological need? **Japan:** Supports proposal used in chocolate products at 6000 mg/kg as a crystallization inhibitor to prevent fat bloom in standardized food, while CS 87-1981 does not permit to use this additive. **RF:** Discontinue due to lack of tech. justification.	Adopt at 6000 mg/kg without Note XS87

Food Category No. 05.1.5 (Imitation chocolate, chocolate substitute products)

Corresponding commodity standards: None

Other information: A provision for Sucrose esters of fatty acids (INS 473) was adopted in 2016, so the provision from FC 05.0 is not discussed here

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
ETHYL MALTOL	637	1000		7	Flavour Enhancer	**CX/FA 16/48/7:** discontinuation – no information provided on use **CCFA48:** Requests further information on technological function, actual use level, and actual function **EU, RF:** Discontinue	Discontinue
MALTOL	636	200		7	Flavour Enhancer		
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Request information on use levels in this subcategory **EU:** Discontinue **Iran:** ML is too high **RF:** Discontinue due to lack of tech. justification. This FA could be used only as carrier in secondary FA with ML in the finish solid food product =3000mg/kg **Malaysia:** Allowed at GMP level as solvent **USA:** allowed in USA in confections (parent	Adopt at GMP levels

						FC 05.0) at 240,000 mg/kg	
PROPYLENE GLYCOL ALGINATE	**405**	**5000**			**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**CCFA48:** Request information on use **EU:** Technological need? **USA**: allowed in USA in confectionaries at 5,000 mg/kg as stabilizer **RF:** Discontinue due to lack of tech. justification.	Adopt
SODIUM DIACETATE	262(ii)	GMP		4	Acidity regulator, Preservative, Sequesterant	**CX/FA 16/48/7:** Adopt **CCFA48:** Request information actual use level **EU, RF:** Supports proposal	Discontinue
SORBITAN ESTERS OF FATTY ACIDS	**491 - 495**	**20000**			**Emulsifier, (Stabilizer - INS 492, 493 and 494 only)**	**EFEMA, ELC, IFAC**: Supports proposal Sorbitan esters are commonly used in imitation chocolate. Sorbitan esters are stabilizing the crystal form of the fat thus retarding blooming (grey chocolate) and ensuring the right mouth feel (snap). Has the effect of prolonged shelf life at varying temperatures. Ensures a homogenous product Typical use level: 3.000- max: 10.000 mg/kg **Japan:** supports 2nd circular proposal. Sorbitan esters of fatty acids are used as emulsifier to provide smooth mouthfeel. Maximum use level is 10,000 mg/kg. **RF:** Discontinue due to lack of tech. justification	Adopt at 10,000 mg/kg

Food Category No. 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4)

Corresponding commodity standards: 309R-2011 corresponds to subcategory 05.2.2 - only allows acidity regulators and emulsifiers listed in Table 3.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
ETHYL MALTOL	637	1000		7	Flavour Enhancer	**CX/FA 16/48/7** Discontinue – no information on use **CCFA48:** Requests information on technological justification, actual use level, and actual function **EU, RF:** Discontinue	Discontinue
MALTOL	636	200		7	Flavour Enhancer		

Food Category No. 05.2.1 (Hard candy)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Request information on use **Brazil:** At this level, 7g of the product is enough to reach the ADI for adults (ADI of 0-25 mg/kg bw) and 1.5g for children. If adopted, suggests to drop this level. In Brazil it's allowed as emulsifier at a ML of 1000 mg/kg. **EU, Iran:** ML is too high **Japan:** proposes maximum use level be changed to 5,300 mg/kg. Propylene glycol is used as an emulsifier to blend flavouring with other ingredients of the hard candy uniformly. **USA:** allowed in USA in confections (parent FC 05.0) at 240,000 mg/kg **NZ:** Supports adoption at 2,200 mg/kg **RF:** Supports proposal in case use of this FA only as carrier in secondary FA with ML in the finish solid food product not more 3000 mg/kg	Adopt at 5,300 mg/kg
SORBITAN ESTERS OF FATTY ACIDS	**491 - 495**	**20000**			**Emulsifier, (Stabilizer - INS 492, 493 and 494 only)**	**CCFA48:** Request information on use **EU:** 5,000 is sufficient **Japan:** supports proposal. Sorbitan esters of fatty acids are used as an emulsifier to provide smooth texture. **RF:** FA not used in this FC. No technological justification. These food additives are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need technological justification for using these FA in this FC and in such high concentrations. Consider intake of fatty acids from all FA uses. **USA**: allowed in USA at GMP as thickener	Adopt at 5,000 mg/kg

Food Category No. 05.2.2 (Soft candy)

Corresponding commodity standards: 309R-2011: allows acidity regulators and emulsifiers listed in Table 3

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Request information on use **Brazil:** At this level, 7g of the product is enough to reach the ADI for adults (ADI of 0-25 mg/kg bw) and 1.5g for children. If adopted, suggests to drop this level. In Brazil it's allowed as emulsifier at a ML of 1000 mg/kg. **EU, Iran:** ML is too high **Japan:** proposes maximum use level be changed to 4,500 mg/kg. Propylene glycol is used as an emulsifier to blend flavouring with other ingredients of the soft candy uniformly. **USA:** allowed in USA in confections (parent FC 05.0) at 240,000 mg/kg **NZ:** Supports this provision. It is used as a humectant, at levels around 2,200 mg/kg **RF:** Supports proposal in case use of this FA only as carrier in secondary FA with ML in the finish solid food product not more 3000 mg/kg	Adopt at 4,500 mg/kg
SORBITAN ESTERS OF FATTY ACIDS	**491 - 495**	**20000**			**Emulsifier, (Stabilizer - INS 492, 493 and 494 only)**	**CCFA48:** Request information on use **EU:** 5,000 is sufficient **EFEMA, and IFAC:** Used to support the whipping of sugar-based and cocoa-based soft candies. These additives are used at levels between 1,000 to 5,000 mg/kg. **EFEMA, ELC, IFAC:** supports proposal **Japan:** used in soft candy as emulsifier. ML is 900 mg/kg. **RF:** FA not used in this FC. No technological justification. These food additives are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need technological justification for using these FA in this FC and in such high concentrations. Consider intake of fatty acids from all FA uses. **USA**: allowed in USA at GMP as thickener	Adopt at 5,000 mg/kg

Food Category No. 05.2.3 (Nougats and marzipans)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CCFA48:** Request information on use **Brazil:** At this level, 7g of the product is enough to reach the ADI for adults (ADI of 0-25 mg/kg bw) and 1.5g for children. If adopted, suggests to drop this level. In Brazil it's allowed as emulsifier at a ML of 1000 mg/kg. **EU:** Need in nougats and marzipans? **Iran:** ML is too high **USA:** allowed in USA in confections (parent FC 05.0) at 240,000 mg/kg **RF:** Supports proposal in case use of this FA only as carrier in secondary FA with ML in the finish solid food product not more 3000 mg/kg	Adopt at 1,000 mg/kg
SORBITAN ESTERS OF FATTY ACIDS	**491 - 495**	**20000**			**Emulsifier, (Stabilizer - INS 492, 493 and 494 only)**	**CCFA48:** Request information on use **EU:** 5,000 is sufficient **EFEMA, ELC, and IFAC:** Used to prevent fat crystallization in cocoa-based candy products. These additives are used at levels between 3,000 and 10,000 mg/kg. **EFEMA, ELC, IFAC:** Supports proposal **RF:** FA not used in this FC. No technological justification. These food additives are derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need technological justification for using these FA in this FC and in such high concentrations. Consider intake of fatty acids from all FA uses. **USA**: allowed in USA at GMP as thickener	Adopt at 10,000 mg/kg

Food Category No. 05.3 (Chewing gum)

Corresponding commodity standards: None.

Other information: A provision for Sorbitan esters of fatty acids (INS 491-195) was adopted in 2016, so the provision from FC 05.0 is not discussed here

Additive	INS	Max Level	Notes	Step /	INS	Information from CCFA48/Comments by EWG	EWG Proposal

		(mg/kg)		Adopted	Functional Class		
ETHYL MALTOL	637	1000		7	Flavour Enhancer	**CX/FA 16/48/7:** Adopt **CCFA48:** Request information on the technological justification, actual use level, and actual function **EU:** It seems that the use of this substance is recognized as flavouring and not as flavour enhancer. Therefore, it should be considered whether permission as a flavour enhancer in chewing gum is appropriate. In comments, ICGA refers to typical average level 90-300 ppm and max. actual use level of 750 ppm. **ICGA:** Supports adoption as flavour enhancer. Ready to discuss max use level. See Annex I to ICGA response letter for add'l. justification. **RF:** Discontinue die to lack of tech. justification. **USA:** Allowed as synthetic flavouring substances in food.	Adopt
MALTOL	636	200		7	Flavour Enhancer		Adopt
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	476	20000		7	Emulsifier	**CX/FA 16/48/7:** Adopt at 10,000 mg/kg **CCFA48:** Request information on the actual use level **EU:** no rationale provided for ML of 10.000. In India permitted at GMP (is it permitted in general or specifically in chewing gum?). According to the ICGA permitted in chewing gum in Brazil and Argentina at 500 mg/kg. Therefore, 500 ppm should be sufficient. **ICGA:** Adopt at 10,000 mg/kg. See Annex I to ICGA response letter for add'l. justification. **India:** supports adoption at 10000 mg/Kg, as India permits use at GMP levels. **RF:** Discontinue due to lack of tech. justification.	Adopt at 10,000 mg/kg
POLYOXYETHYLENE STEARATES	430, 431	20000		7	Emulsifier	**CX/FA 16/48/7:** Adopt at 5,000 mg/kg **CCFA48:** Request information on the actual use level **EU:** Does not seem to be needed/used in chewing gum in international trade. ICGA reports the max. level of 200 mg/kg. **ICGA:** Adopt at 5,000 mg/kg. See Annex I to ICGA response letter for add'l. justification. **RF:** FA not used in this FC. No technological justification. ML higher than ADI. **USA:** approved as a defoaming agent in all processed foods	Adopt at 5,000 mg/kg

PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Adopt at 20,000 mg/kg **CCFA48:** Requests information on technological justification, actual use level, and actual function use **EU:** Secondary food additive use? In the EU permitted as carrier of additives, enzymes, flavourings, and nutrients at level. The ML from all sources shall be below 3000 ppm (1000 in the case of beverages respectively). ICGA reported ML of 10000 ppm **Iran:** Technological need? ML too high. **ICGA:** Adopt at 20,000 mg/kg. See Annex I to ICGA response letter for add'l. justification. **RF:** agrees with proposal in case use of this FA only as carrier in secondary FA with ML in the finish solid food product not more 3000mg/kg **USA**: Supports adoption Allowed in USA in confections (parent FC 05.0) at 240,000; also affirmed GRAS as an emulsifier at GMP levels.	Adopt at 20,000 mg/kg

Food Category No. 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit), and sweet sauces)

Corresponding commodity standards: None.

Other information: A provision for Sorbitan esters of fatty acids (INS 491-195) was adopted in 2016, so the provision from FC 05.0 is not discussed here

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL	**1520**	**240000**			**Emulsifier, Glazing Agent, Humectant**	**CX/FA 16/48/7:** Discuss further **CCFA48:** Requests information on technological justification, actual use level, and actual function **EU:** discontinue – no info on technological justification provided **RF:** agrees with proposal in case use of this FA only as carrier in secondary FA with ML in the finish solid food product not more 3000mg/kg USA: Supports adoption at 20,000 mg/kg. **RF:** need? Not allowed in RF. **USA:** allowed in USA in confections and frostings (parent FC 05.0) at 240,000 mg/kg	Do not move from parent FC
SUCROSE OLIGOESTERS,	473a	20000		2	Emulsifier,	**NOTE**: proposal is to revise existing adopted	Revise existing

TYPE I AND TYPE II					Glazing agent, Stabilizer	provision for INS473a at 5,000 mg/kg with Note 348.[21] also already adopted provisions for INS 474 and 473. note 348 is "singly or in combination" for all 3 additives **EU:** 5,000 mg/kg is sufficient. Request for higher ML should be accompanied by appropriate justification, including the types of products for which higher ML is needed. Is FC 11.1.2 more appropriate for authorization of additives for powder sugars? **Japan:** supports the 2nd Circular Proposal. Japan also proposes that Note 348 in the GSFA should be revised to correct name of INS 473 as follows: Note 348: Singly or in combination: ~~sorbitan~~ **sucrose** esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474). **RF:** Adopt at ML=5000 mg/kg and with Note 348	adopted provision: 5,000 mg/kg with Note 348 and new Note "for use at 20,000 mg/kg in powder sugars for fine bakery wares." Correct Note 348 as reflected in Japan's comment.

Food Category No. 06.0 (Cereals and cereal products, derived from cereal grains, from roots and tubers, pulses, legumes and pith or soft core of palm tree, excluding bakery wares of food category 07.0)

Corresponding commodity standards: None, multiple corresponding commodity standards in subcategories.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
~~POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID~~	~~476~~	~~5000~~		~~7~~	~~Emulsifier~~	**CX/FA 16/48/7:** Move to subcategories to consider against corresponding commodity standards **Note:** CCFA48 discussed use in each subcategory and adopted provisions in FC 06.4.3 and 06.5 but decided that use was not supported in all other subcategories. However, the CCFA48 also decided to hold provisions in FCs 06.8.1-06.8.4 which were affected by development of Regional Standard for Non-fermented Soybean Products (CODEX STAN 322R-2015). Therefore this document only shows provisions for INS 476 in FCs 06.8.1-06.8.4. **EU, RF:** Support discontinuation **Iran:** supports the recommendation	Discontinue, consider use in FCs 06.8.1-06.8.4

[21] Note 348: Singly or in combination: sorbitan esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474).

Food Category No. 06.1 (Whole, broken, or flaked grain, including rice)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T are not horizontally justified

Corresponding commodity standards: 202-1995: does not allow food additives; 169-1989, 201-1995, 172-1989, 153-1985, 199-1995, 198-1995: does not discuss food additives

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TALC	553(iii)	GMP		7	Anticaking Agent, Glazing Agent, Thickener	**CX/FA 16/48/7:** Adopt with note "for use in rice only" **CCFA48:** Requests information on actual use level in rice. **EU:** Discontinue Not permitted in the standard for rice CODEX STAN 198-1995 **India:** doesn't allow additives in this food category. **RF:** Supports proposal	Discontinue

Food Category No. 06.2 (Flours and starches (including soybean powder))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T are not horizontally justified

Corresponding commodity standards: None; subcategory 06.2.1 has corresponding commodity standards;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
~~POLYGLYCEROL ESTERS OF FATTY ACIDS~~	~~475~~	~~10000~~		~~7~~	~~Emulsifier~~	**Note:** 48 CCFA discussed use in all subcategories – only requested information on use in soy flour. Therefore provision in this document is only moved to FC 06.2.1 **Brazil,** **EU, RF:** Support discontinuation **India, Iran:** supports proposal	Discontinue, discuss in FC 06.2.1
~~TARTRATES~~	~~334, 335(ii), 337~~	~~6000~~	~~45~~	~~4~~	~~All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer~~	**Note:** 48 CCFA discussed use in both subcategories – adopted provision in FC 06.2.1 at 5000 mg/kg and notes 45 & 186[22]. Therefore provision in this document is only moved to FC 06.2.2 **EU, RF:** Support discontinuation **India, Iran:** supports proposal	Discontinue, discuss in FC 06.2.2

[22] Note 186: For use in flours with additives only.

~~TOCOPHEROLS~~	~~307a, b, c~~	~~600~~		~~7~~	~~Antioxidant~~	**Note:** 48 CCFA discussed use in both subcategories – adopted provision in FC 06.2.1 at 5000 mg/kg and notes 15[23] & 186. Therefore provision in this document is only moved to FC 06.2.2 **EU, RF:** support discontinuation **India, Iran:** supports proposal	Discontinue, discuss in FC 06.2.2

Food Category No. 06.2.1 (Flours)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators not horizontally justified, ES&T justified with Note 25: "For use at GMP in full fat soy flour only"

Corresponding commodity standards: 301R-2011: references FC 06.2.1 Tables 1 & 2; 176-1989, 154-1985, 173-1989, 170-1989, 178-1991, 155-1985: do not discuss food additives; 152-1985: lists specific enzymes and flour treatment agents;;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10000**			**Emulsifier**	**NOTE:** 48 CCFA discussed if used in full fat soy flour (see Horizontal Approach) **EU:** no technological justification provided - discontinue **RF:** FA not used in this FC. No technological justification. These FA are derived from saturated fatty acids which need to be lowered in diet.	Do not move from FC 06.2

Food Category No. 06.2.2 (Starches)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T are not horizontally justified

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**6000**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Do not move from parent food category **EU:** Technological need? **India:** doesn't allow this food additive in this category **RF:** agrees with proposal at ML= 2000 because ADI = 0.30 mg/kg bw	Adopt at 2000 mg/kg with Note 45

[23] Note 15: On the fat or oil basis.

TOCOPHEROLS	**307a, b, c**	**600**			**Antioxidant**	**CX/FA 16/48/7:** Adopt **CCFA48:** Requests information if use is for food or food additive **EU**: ML too high; technological justification? **India:** doesn't allow this food additive in this category **RF:** Discontinue due to lack of tech. justification. Starches don't contain oils and fats.	Request technological justification

Food Category No. 06.3 (Breakfast cereals, including rolled oats)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; included for information purposes only.

Food Category No. 06.4 (Pastas and noodles and like products (e.g. rice paper, rice vermicelli, soybean pastas and noodles))

Corresponding commodity standards: 249-2006 corresponds to subcategory 06.4.3

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
SUCROSE ESTERS OF FATTY ACIDS	473	2000		4	Emulsifier, Stabilizer	**CX/FA 16/48/7:** Discuss use in subcategories **Note:** 48 CCFA adopted provisions for INS 473 in every subcategory of 06.4. Recommend Discontinue. **EU, RF:** support discontinuation	Discontinue

Food Category No. 06.6 (Batters (e.g. for breading or batters for fish or poultry))

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10000		7	Emulsifier	**CX/FA 16/48/7:** Adopt **CCFA48:** Requests information on technological justification, actual use level, and actual function. **EU, RF:** Support discontinuation	Discontinue

Food Category No. 06.8.1 (Soybean-based beverages)

Corresponding commodity standards: 322R-2015: for soybean-based beverages allows: acidity regulators, antioxidants, colours, emulsifiers, flavour enhancers, stabilizers, and sweeteners listed in FC 06.8.1 and Table 3. Also lists specific food additives for specific technical effects.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
POLYDIMETHYLSILOXANE	900a	50		4	Anticaking Agent, Antifoaming Agent, Emulsifier	**CX/FA 16/48/7:** Hold. CCASIA is developing CODEX STAN 322R-2015. **CCFA48:** Consider use in this FC (Rep16/FA, para 67). **EU, RF**: Support discontinuation; INS 900a typically used as antifoaming anticaking agent – i.e. functional classes not listed in 322R-2015.	Discontinue
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5000**			**Emulsifier**	**CX/FA 16/48/7:** Hold. CCASIA is developing CODEX STAN 322R-2015. **EU, RF:** Support proposal	Do not move from FC 06.0
PROPYLENE GLYCOL ESTERS OF FATTY ACIDS	477	500		4	Emulsifier	**CX/FA 16/48/7:** Hold. CCASIA is developing CODEX STAN 322R-2015. **CCFA48:** Consider use in this FC (Rep16/FA, para 67). **EU, RF:** Supports discontinuation	Discontinue
SUCROSE ESTERS OF FATTY ACIDS	473	500		4	Emulsifier, Stabilizer	**CX/FA 16/48/7:** Hold. CCASIA is developing CODEX STAN 322R-2015. **CCFA48:** Consider use in this FC (Rep16/FA, para 67). **EU:** Accepts proposal **Japan:** CS 322R permits sucrose esters of fatty acids as an emulsifier. Japan proposes that Note 348 in the GSFA should be revised to correct name of INS 473 as follows: Note 348: Singly or in combination: **Sucrose** esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474). **RF:** Discontinue	Adopt at 20,000 mg/kg with corrected Note 348[24] (see Japan's comment)

Food Category No. 06.8.2 (Soybean-based beverage film)

Corresponding commodity standards: 322R-2015: for dehydrated soybean curd film allows preservative from Table 3 and sulfites.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
POLYGLYCEROL	**476**	**5000**			**Emulsifier**	**CX/FA 16/48/7:** Hold. CCASIA is developing	Do not move from

[24] Singly or in combination: sorbitan esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474).

ESTERS OF INTERESTERIFIED RICINOLEIC ACID						CODEX STAN 322R-2015. **EU:** Supports proposal; not in CS 322R-2015; recommends discontinue as it notes that in Dehydrated Soybean Curd Film only "Preservatives listed in Table 3 of the GSFA STAN 192-1995 are acceptable for use in this product. In addition, other food additives (listed in 322R-2015) may be used."=sulfites In both cases INS 476 is not listed and Emulsifiers are not authorised. **RF:** supports proposal	FC 06.0

Food Category No. 06.8.3 (Soybean curd (tofu))

Corresponding commodity standards: 322R-2015:for soybean curd allows: acidity regulators, firming agents, and stabilizers listed in FC 06.8.3 and Table 3.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5000**			**Emulsifier**	**CX/FA 16/48/7:** Hold. CCASIA is developing CODEX STAN 322R-2015. **EU:** Discontinue; emulsifiers are not authorized in CODEX STAN 322R-2015. **RF:** Discontinue due to lack of tech. justification	Do not move from FC 06.0

Food Category No. 06.8.4 (Semi-dehydrated soybean curd)

Corresponding commodity standards: 322R-2015: for compressed soybean curd allows: acidity regulators, firming agents, and preservatives listed in Table 3. Also allows sodium diacetate.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5000**			**Emulsifier**	**CX/FA 16/48/7:** Hold. CCASIA is developing CODEX STAN 322R-2015. **EU:** Discontinue; emulsifiers are not authorized in CODEX STAN 322R-2015. **RF** Discontinue due to lack of tech. justification	Do not move from FC 06.0

Food Category No. 06.8.4.1 (Thick gravy-stewed semi-dehydrated soybean curd)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; INS 476 is discussed in parent FC 06.8.4.

Food Category No. 06.8.4.2 (Deep fried semi-dehydrated soybean curd)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; INS 476 is discussed in parent FC 06.8.4.

Food Category No. 06.8.4.3 (Semi-dehydrated soybean curd, other than food categories 06.8.4.1 and 06.8.4.2)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; INS 476 is discussed in parent FC 06.8.4.

Food Category No. 07.0 (Bakery wares)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~PROPYLENE GLYCOL ALGINATE~~	~~405~~	~~5000~~	-	~~7~~	~~Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener~~	**CX/FA 16/48/7:** Adopt at 10,000 mg/kg **Note:** PWG to CCFA48 made no recommendation – discuss use in subcategories **EU:** supports proposal **USA**: allowed for use in USA at 5,000 mg/kg as ES&T **RF:** Agrees with proposal	Discontinue, discuss in subcategories
~~SODIUM DIACETATE~~	~~262(ii)~~	~~4000~~	-	~~7~~	~~Acidity regulator, Preservative, Sequesterant~~	**CX/FA 16/48/7:** Adopt **Note:** PWG to CCFA48 made no recommendation – discuss use in subcategories **EU:** Supports proposal; consider in subcategories. Lower ML and exclude from bread prepared solely with wheat flour, water, yeast or leaven, salt. **USA**: allowed for use in USA at 4,000 mg/kg	Discontinue, discuss in subcategories
~~TARTRATES~~	~~334, 335(ii), 337~~	~~10000~~	~~45~~	~~7~~	All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337:	**CX/FA 16/48/7:** Adopt at 5,000 mg/kg **Note:** PWG to CCFA48 made no recommendation – discuss use in subcategories **EU:** Supports proposal; consider in subcategories. Lower ML and exclude from bread prepared solely with wheat	Discontinue, discuss in subcategories

					Emulsifying salt, Stabilizer	flour, water, yeast or leaven, salt.	
~~TOCOPHEROLS~~	~~307a, b, c~~	~~200~~	-	~~7~~	~~Antioxidant~~	**CX/FA 16/48/7:** Adopt at 500 mg/kg with Note 15 "On the fat or oil basis" **Note:** PWG to CCFA48 made no recommendation – discuss use in subcategories **EU:** Supports proposal; consider in subcategories. Exclude from bread prepared solely with wheat flour, water, yeast or leaven, salt. **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses.	Discontinue, discuss in subcategories

Food Category No. 07.1 (Bread and ordinary bakery wares and mixes)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~SUCROSE ESTERS OF FATTY ACIDS~~	~~473~~	~~10000~~	-	~~4~~	~~Emulsifier, Stabilizer~~	**CX/FA 16/48/7:** Adopt **CCFA48:** Requests further information on the actual use level **EU:** Supports discontinue **India:** Support adoption. India allows at GMP. **Japan:** adopt. used as foam stabilizers to provide voluminous and softness of bread **USA:** allowed in baked goods (parent FC 07.0) at GMP as an emulsifier, stabilizer	Discontinue, discuss in subcategories

Food Category No. 07.1.1 (Bread and rolls)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
SORBITAN ESTERS OF FATTY ACIDS	491 - 495	10000		7	Emulsifier, (Stabilizer - INS 492, 493 and 494 only)	**CX/FA 16/48/7:** Adopt **CCFA48:** Requests further information on the actual use level **EU:** Does not support. EU not aware of need for these emulsifiers in bread and rolls (only for fine bakery wares). Could the products for which it is needed be better specified? ML of 10000 is too high – child of 20kg would reach the ADI by eating 50g – bread is a staple food	Request more information on use level of 10,000 mg/kg

						Japan: Sorbitan esters of fatty acids are used to increase volume and to improve elasticity in both bread and rolls. 1,000 mg/kg is sufficient. **RF:** Used at ML = 10,000	
SUCROSE ESTERS OF FATTY ACIDS	473	10000		4	Emulsifier, Stabilizer	**CX/FA 16/48/7:** Adopt **CCFA48:** Requests further information on the actual use level **EU:** Does not support. EU is not aware of need for these emulsifiers in bread and rolls (only for fine bakery wares). Could the products for which it is needed be better specified? ML of 10000 is too high – child of 20kg would reach the ADI by eating 60g – bread is a staple food **India:** Supports adoption **Japan:** would like to provide actual use level. Sucrose esters of fatty acids are used to provide uniform emulsification. Maximum use level is 1,000 mg/kg. Note 348 should be added to this food additive provision since INS 473 share the ADI with INS 473a and 474. **RF:** agrees with proposal only for fat emulsions for baking, flour confectionery. **USA:** allowed in baked goods (parent FC 07.0) at GMP as an emulsifier, stabilizer	Adopt

Food Category No. 07.1.1.1 (Yeast-leavened breads and specialty breads)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** questions the need: is it used in yeast-leavened breads? In such products yeast is used to increase the volume. **Japan:** Supports adoption; used in bread to increase its volume. Maximum use level is 4,000 mg/kg. **RF:** agrees with proposal only for carrier function. ML should be discussed further. **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares	Adopt at 4,000 mg/kg

						(FC 07.0)	
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** agrees further information needed. Not needed in bread prepared solely with wheat flour, water, yeast or leaven, salt. **Iran:** Does not support; there is no justification for use in this FC **RF:** agrees with proposal **USA**: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	Request information on use in this FC
STEAROYL LACTYLATES	481(i), 482(i)	5000			Emulsifier, Flour Treatment Agent, Foaming Agent, Stabilizer	**CCFA48:** Requests information on actual use level **Note:** CCFA48 adopted provision for stearoyl lactylates in all other FCs of 07.1, although at various use levels. Adopted in FC 07.1.1.2 at 3000 mg/kg. **EFEMA, ELC, IFAC:** Supports proposal **EU:** To limit exposure, use in bread prepared solely with wheat flour, water, yeast or leaven, salt should be excluded. At 5,000 ppm a child of 20 kg would reach the ADI ((JECFA ADI 20 mg/kg bw/d) by eating 80 g; ML of 3000 should suffice for the intended use. EU has exposure concerns even at ML of 3000ppm the ADI is exceeded in the EU for toddlers, children, and adolescents at mean level and for all population groups at P95th (EFSA, 2013) and bread is the main contributor. Bread=staple food!! **India:** Supports adoption **Japan:** Supports proposal **NZ:** Supports use at ML 5,000 mg/kg.The technological purpose is as an emulsifier. The two major functions of emulsifiers in bread making are dough conditioning or strengthening and shelf life extension or crumb softening. Emulsifiers are not added directly to breads (they are contained within the bread improvers purchased and as such the amounts are	Adopt

						proprietary to the supplier **RF:** Supports proposal at ML = 3,000 **USA:** allowed in yeast-leavened bakery products (subcategories 07.1.1.1, 07.1.3, 07.1.4, 07.1.6) as flour treatment agent. 5,000 mg/kg necessary, increases volume, retards staling, finer texture of product	
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**EU:** Questions the need. Lower ML and exclude from bread prepared solely with wheat flour, water, yeast or leaven, salt. **Japan:** Supports proposal **RF:** Supports proposal at ML = 2,000 (ADI 0 – 30).	Adopt at 4,000 mg/kg with Note 45
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Lower ML and exclude from bread prepared solely with wheat flour, water, yeast or leaven, salt. Was any tech. justification provided? **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses	Adopt

Food Category No. 07.1.1.2 (Soda breads)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** justified in some other subcategories of FC 7 not in this subcategory; technological justification shall be provided **RF:** agrees with proposal only for carrier function. ML should be discussed further. **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares (FC 07.0)	Request information if used similar to FC 07.1.1.1
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** technological justification shall be provided **Iran:** Does not support; there is no justification for use in this FC	Request information on use in this FC

						USA: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**EU:** technological justification shall be provided **RF:** does not agree with proposal. No technological justification for use of this FA in this FC. ML does not correspond with ADI	Request information if used similar to FC 07.1.1.1
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** technological justification shall be provided **RF:** Does not support due to lack of tech. justification.	Adopt

Food Category No. 07.1.2 (Crackers, excluding sweet crackers)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** Accepts proposal **RF:** agrees with proposal for carrier function only. ML should be discussed further **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares (FC 07.0)	Adopt at 2,000 mg/kg
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** Accepts proposal **India:** Support adoption as India allows through Parent Cat. 7.1 @ 4000 mg/kg **Iran:** Does not support; there is no justification for use in this FC. **RF:** agrees with proposal **USA**: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	Adopt
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**EU:** Accepts proposal **India:** Support adoption **Japan:** supports 2nd circular proposal. Sucrose esters of fatty acids are used to increase its volume and provide softness for the final products.	Adopt

						RF: Does not support due to lack of tech. justification. **USA:** allowed in baked goods (parent FC 07.0) at GMP as an emulsifier, stabilizer	
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**<u>All</u>: Acidity regulator, Sequesterant** **<u>INS 334:</u> Antioxidant, Flavour enhancer** **<u>INS 335(ii) and 337:</u> Emulsifying salt, Stabilizer**	**EU:** Accepts proposal **India:** Support adoption at 10000 mg/kg as India allows through Parent Cat. 7.1 at GMP Levels **Japan:** Supports proposal used in bread as acidity regulator to increase its volume. Maximum use level is 5,000 **RF:** Does not support due to lack of tech. justification.	Adopt at 5,000 mg/kg
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Accepts proposal **ELC**: Supports adoption. This FC contains products that contain added fat/oil and which, after baking, are intentionally low in moisture content (crisp, brittle). Under those conditions fats can be very prone to oxidation which renders them organoleptic ally unacceptable. Use of tocopherol is indicated at a use level of 200 ppm. **Indonesia**: proposes ML of 100 mg/kg **Japan**: supports 2nd circular proposal. Tocopherols are used in crackers to prevent oxidation. Maximum use level is 200 mg/kg. **RF:** Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Adopt at 200

<u>Food Category No.</u> 07.1.3 (Other ordinary bakery products (e.g. bagels, pita, English muffins))

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** agrees to request further info **RF:** agrees with proposal for carrier function only. ML should be discussed further in context of secondary additives **USA**: allowed for use in USA at 5,000	Request information on use in this FC

						mg/kg as ES&T in all Bakery Wares (FC 07.0)	
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** Technological need for other ordinary bakery products? For a 20kg child ADI reached by eating 75g. **India:** Support adoption at 4000 mg/Kg, as India allows Through Parent Cat. 7.1 @ 4000mg/kg **Iran:** Does not support; there is no justification for use in this FC **RF:** agrees with proposal **USA**: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	Adopt
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**EU:** Technological need for other ordinary bakery products? **India:** Support adoption at 10000 mg/Kg as India allows through Parent Cat. 7.1 @ GMP **RF:** agrees with proposal at ML = 5,000 mg/kg **USA:** allowed in baked goods (parent FC 07.0) at GMP as an emulsifier, stabilizer	Adopt at 5,000 mg/kg
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**EU:** agrees to request further info **India:** Support adoption at 10000 mg/Kg as India allows through Parent Cat. 7.1 @ GMP **RF:** No technological justification for use of this FA in this FC. ML does not correspond with ADI	Request information on use level
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Technological need for other ordinary bakery products? **Japan:** supports proposal. Tocopherols are used as antioxidant. Maximum use level is 200 mg/kg. **RF:** Does not support due to lack of tech. justification	Adopt

Food Category No. 07.1.4 (Bread-type products, including bread stuffing and bread crumbs)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** agrees to request further info **RF:** agrees with proposal for carrier function only. ML should be discussed further in context of secondary additives **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares (FC 07.0)	Request information on use in this FC
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** Technological need for this category? **India:** Support adoption at 4000 mg/kg as India allows Through Parent Cat. 7.1 @ 4000mg/kg **Iran:** Does not support; there is no justification for use in this FC **RF:** agrees with proposal **USA**: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	Adopt
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**EU:** Technological need for this category? **India:** Support adoption at 10000 mg/kg as India allows Through Parent Cat. 7.1 @ GMP **RF:** agrees with proposal at ML = 5,000 mg/kg **USA:** allowed in baked goods (parent FC 07.0) at GMP as an emulsifier, stabilizer	Adopt at 5,000 mg/kg
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**EU:** agrees to request further info **India:** Support adoption at 10000 mg/kg as India allows Through Parent Cat. 7.1 @ GMP **RF:** No technological justification for use of this FA in this FC. ML does not correspond with ADI	Request information on use level
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Technological need for this category? **RF:** does not agree with proposal due to lack of technological justification	Adopt

Food Category No. 07.1.5 (Steamed breads and buns)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** accepts proposal **Japan:** Supports proposal. FA is used in steamed buns to prevent retrogradation. Maximum use level is 500 mg/kg. **RF:** agrees with proposal for carrier function only. ML should be discussed further in context of secondary additives **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares (FC 07.0)	Adopt at 500 mg/kg
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** Technological need for this category? **India:** Support adoption at 4000 mg/Kg, as India allows Through Parent Cat. 7.1 @ 4000mg/kg **Iran:** Does not support; there is no justification for use in this FC **RF:** agrees with proposal **USA**: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	Adopt
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**EU:** Technological need? **India:** Support adoption at 10000 mg/Kg as India allows through Parent Cat. 7.1 @ GMP **Japan:** used in steamed breads to prevent retrogradation. Maximum use level is 700 mg/kg. This food additive is also used in steamed bun with filling as a form stabilizer to increase volume and provide softness. The max level is 5,000 mg/kg in steamed bun (without filling). **RF:** agrees with proposal at ML = 5,000 mg/kg **USA:** allowed in baked goods (parent FC 07.0) at GMP as an emulsifier,	Adopt at 5,000 mg/kg

						stabilizer	
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**<u>All</u>: Acidity regulator, Sequesterant** **<u>INS 334:</u> Antioxidant, Flavour enhancer** **<u>INS 335(ii) and 337:</u> Emulsifying salt, Stabilizer**	**EU:** Technological need? **India:** Support adoption at 10000 mg/Kg as India allows through Parent Cat. 7.1 @ GMP **Japan:** used in steamed breads and steamed buns as acidity regulator to increase volume. Maximum use level is 1,300 mg/kg. **RF:** does not agree with proposal due to lack of tech. justification	Adopt at 1,300 mg/kg with Note 45
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Technological need? **RF:** Does not agree due to lack of tech. justification.	Adopt

<u>Food Category No.</u> 07.1.6 (Mixes for bread and ordinary bakery wares)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU** ML is too high; a child of 20 kg would reach the ADI by consuming 70g. Is the ML expressed as consumed? **Japan:** Supports proposal; used in bakery mix to increase volume after baking. 20,000 mg/kg of this additive is necessary for bakery mix which is to be used with flour and other ingredients. **RF:** agrees with proposal for carrier function only. ML should be discussed further in context of secondary additives **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares (FC 07.0)	Adopt at 20,000 mg/kg
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** Technological need for this category? **India:** Support adoption at 4000 mg/Kg as India allows through Parent Cat. 7.1 @ 4000mg/kg **Iran:** Does not support; no justification for use in this FC **RF:** agrees with proposal	Adopt at 4,000 mg/kg

						USA: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Stabilizer**	**EU:** Agrees to request further info **India:** Support adoption at 10000 mg/Kg as India allows through Parent Cat. 7.1 @ GMP **Japan:** Sucrose esters of fatty acids are used to increase its volume after baking and provide softness for the final products. Maximum use level is 15,000 mg/kg (flour basis) in bakery mix which is to be mixed with flour. **RF:** Need technological justification **USA:** allowed in baked goods (parent FC 07.0) at GMP as an emulsifier, stabilizer	Adopt at 15,000
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**EU:** ML is too high; a child of 20 kg would reach the ADI by consuming 30g. Is the ML expressed as consumed? **India:** Support adoption at 10000 mg/Kg as India allows through Parent Cat. 7.1 @ GMP **Japan:** Supports proposal; used in bakery mix to increase volume of final products. Maximum use level is 20,000 mg/kg. 20,000 mg/kg of this additive is necessary for bakery mix which is to be used with flour and other ingredients. **RF:** Does not agree due to lack of tech. justification.	Adopt at 20000 mg/kg with Note 45
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Technological need for this category? **Japan:** Supports proposal. FA used to prevent oxidation and to prolong shelf life. Maximum use level is 100 mg/kg **RF:** Does not agree due to lack of tech. justification.	Adopt

Food Category No. 07.2 (Fine bakery wares (sweet, salty, savoury) and mixes)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions for discussion in FC 07.2. Provisions from the parent FC 07.0 are discussed in each of the subcategories for FC 07.2.

Food Category No. 07.2.1 (Cakes, cookies and pies (e.g. fruit-filled or custard types))

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** Accepts proposal **Japan:** used in cakes to increase volume. Maximum use level is 3,000 mg/kg. Supports proposal **Malaysia:** supports proposal **RF:** agrees with proposal for carrier function only. ML should be discussed further. Supports at ML = 2,000 **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares (FC 07.0)	Adopt at 3,000 mg/kg
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** agrees to request further info **Iran:** Does not support; there is no justification for use in this FC **RF:** agrees with proposal **USA**: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	Request information on use in this FC
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**EU:** Technological need? **India:** Support adoption at 10000 mg/Kg as India allows at GMP level. **Indonesia**: supports adoption at 5000 mg/kg **Japan:** Supports proposal. Used in cakes and cookies to increase volume. Maximum use level is 100 mg/kg for cakes and 5,000 mg/kg for sweet biscuits. **Malaysia:** supports proposal **RF:** does not agree with proposal due to lack of tech. justification	Adopt at 5,000 mg/kg with Note 45
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Technological need for this category? **Japan:** Tocopherols are used to prevent oxidation of oil containing as	Adopt

						ingredients of the biscuits. Maximum use level is 200 mg/kg. For cookies containing almond paste as one of the ingredients, 500 mg/kg of tocopherols are used since almond paste is oxidized easily. **RF:** Does not support due to lack of tech. justification. **ELC**: Supports proposal. The use of tocopherols at 200 ppm is indicated for those products in this food category that contain added fat in their recipe and require a longer shelf life (weeks and longer). In the EU, this food category is covered under FC 7.2 for which the use of tocopherols is permitted at *quantum satis* level (GMP). Permissions in the EU are based on a sound technical justification, among others.	

Food Category No. 07.2.2 (Other fine bakery products (e.g. doughnuts, sweet rolls, scones, and muffins)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** Accepts proposal **Japan:** Supports proposal **RF** Supports ML = 2000 **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares (FC 07.0)	Adopt at 2,000 mg/kg
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** agrees to request further info **Iran:** Does not support; there is no justification for use in this FC **RF:** agrees with proposal **USA**: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	Request information on use in this FC
TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer**	**EU:** Accepts proposal **Japan:** Supports proposal **RF:** does not agree with proposal due to lack of tech. justification	Adopt at 500 mg/kg with Note 45

					INS 335(ii) and 337: Emulsifying salt, Stabilizer		
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Technological need for this category? **RF:** Does not agree due to lack of tech. justification. **ELC**: Supports proposal. Products in this FC that contain added fat/oil in their recipe and which are produced for a long shelf life (i.e. not for consumption within days).). In the EU, this FC is covered under FC 7.2 for which the use of tocopherols is permitted at *quantum satis* level (GMP). Permissions in the EU are based on a sound technical justification, among others. 200 ppm is an appropriate use level	Adopt

Food Category No. 07.2.3 (Mixes for fine bakery wares (e.g. cakes, pancakes))

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
PROPYLENE GLYCOL ALGINATE	**405**	**5000**		**7**	**Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener**	**EU:** limit at 2,000 mg/kg. ML is high. Is the ML expressed as consumed? **Japan:** Supports proposal; used in mixes for fine bakery wares to increase volume after baking. 10,000 mg/kg is necessary for the mixes which are to be used with flour and other ingredients. **RF:** Supports adoption at ML = 2000 **USA**: allowed for use in USA at 5,000 mg/kg as ES&T in all Bakery Wares (FC 07.0)	Adopt at 10,000 mg/kg
SODIUM DIACETATE	**262(ii)**	**4000**		**7**	**Acidity regulator, Preservative, Sequesterant**	**EU:** Agrees to request further info **Iran:** Does not support; there is no justification for use in this FC **RF:** agrees with proposal **USA**: allowed for use in USA in all Bakery Wares (FC 07.0) at 4,000 mg/kg	Request information on use in this FC

TARTRATES	**334, 335(ii), 337**	**10000**	**45**	**7**	**<u>All</u>: Acidity regulator, Sequesterant <u>INS 334:</u> Antioxidant, Flavour enhancer <u>INS 335(ii) and 337:</u> Emulsifying salt, Stabilizer**	**EU:** ML is too high; a child of 20 kg would reach the ADI by consuming 75g. Is the ML expressed as consumed? **Japan:** Supports proposal; used in to increase volume after baking. Maximum use level is 8,000 mg/kg for cake mix used with flour and other ingredients. Maximum use level is 450 mg/kg for other mixes falling within this food category. **RF:** does not agree with proposal due to lack of tech. justification.	Adopt at 8,000 mg/kg with Note 45
TOCOPHEROLS	**307a, b, c**	**200**		**7**	**Antioxidant**	**EU:** Technological need for this category? **Japan:** Supports proposal; used in mixes for fine bakery wares to prevent oxidation during its shelf life. Maximum use level is 100 mg/kg. **RF:** Does not support due to lack of tech. justification. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg	Adopt

<u>Food Category No.</u> 08.0 (Meat and meat products, including poultry and game)

Corresponding commodity standards: Corresponding standards for subcategories 08.2.2 and 08.3.2

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
~~POLYGLYCEROL ESTERS OF FATTY ACIDS~~	~~475~~	~~5000~~		~~7~~	~~Emulsifier~~	**CX/FA 16/48/7:** Consider use in subcategories **Note:** CX/FA 16/48/7 and the PWG to CCFA48 did not recommend adoption for any subcategory **EU, Iran:** supports the proposal – Discontinue and consider use in subcategories	Information on use only provided for subcategory 08.4 in response to first circular. Discontinue and consider only in FC 08.4
~~POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID~~	~~476~~	~~5000~~		~~7~~	~~Emulsifier~~		
~~TARTRATES~~	~~334, 335(ii), 337~~	~~GMP~~	~~45~~	~~7~~	~~All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and~~	**CX/FA 16/48/7:** Consider use in subcategories **CCFA48**: Requests information on numerical use level **EU, Iran:** supports the proposal - Consider use in subcategories	Discontinue, Consider use in subcategoreis

					~~337: Emulsifying salt, Stabilizer~~		

Food Category No. 08.1(Fresh meat, poultry, and game)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T are not horizontally justified

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
POTASSIUM LACTATE	326	20000		7	Acidity Regulator, Antioxidant, Emulsifier, Humectant	**CX/FA 16/48/7:** Consider use in subcategories **Note:** CX/FA 16/48/7 and the PWG to CCFA48 did not recommend adoption for any subcategory **EU, Singapore:** Agrees with discontinuation **Iran:** supports the proposal - Consider use in subcategories **CX/FA 16/48/7 USA**: allowed in USA in meat, meat products, poultry, and poultry products (Parent Category 08.0) at 2,000 mg/kg as a flavour – not food additive use	Discontinue, do not consider in subcategories as no information provided in response to 1st Circular
PROTEASE FROM ASPERGILLUS ORYZAE VAR	1101(i)	GMP		7	Flavour Enhancer, Flour Treatment Agent, Stabilizer	**CX/FA 16/48/7:** Consider use in subcategories **Note:** CX/FA 16/48/7 and the PWG to CCFA48 did not recommend adoption for any subcategory **EU, Singapore:** Agrees with discontinuation **Iran:** supports the proposal - Consider use in subcategories	Discontinue, do not consider in subcategories as no information provided in response to 1st Circular
SODIUM LACTATE	325	20000		7	Acidity Regulator, Antioxidant, Bulking Agent, Emulsifier, Humectant, Thickener	**CX/FA 16/48/7:** Consider use in subcategories **Note:** CX/FA 16/48/7 and the PWG to CCFA48 did not recommend adoption for any subcategory **EU, Singapore:** Agrees with discontinuation **Iran:** supports the proposal - Consider use in subcategories **CX/FA 16/48/7 USA**: allowed in USA in meat, meat products, poultry, and poultry products (Parent Category 08.0) at 2,000 mg/kg as a flavour – not food additive use	Discontinue, do not consider in subcategories as no information provided in response to 1st Circular

Food Category No. 08.1.1(Fresh meat, poultry, and game, whole pieces or cuts)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators not horizontally justified, ES&T justified with Note 16 "for use in glaze, coatings or decorations for fruit, vegetables, meat or fish"

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Request information on use level **CCFA48**: Requests information on numerical use level **EU:** Opposes the provision. Believes that fresh meat shall be additives free. Use of additives in fresh meat might mislead the consumer. No justification provided - discontinue **India:** In India no additive permitted in India in this food category **RF:** Does not agree with proposal because in untreated products food additives not used in compliance with Codex Stan 192-1995 **Singapore:** Use of food additives in this FC is not justified. May mislead consumers.	Do not move from FC 08.0

Food Category No. 08.1.2 (Fresh meat, poultry, and game, comminuted)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators not horizontally justified, ES&T are horizontally justified

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Request information on use level **CCFA48**: Requests information on numerical use level **EU:** Opposes the provision. Believes that fresh meat shall be additives free. Use of additives in fresh meat might mislead the consumer. No justification provided - discontinue **India:** In India no additive permitted in India in this food category **RF:** does not agree with proposal because in untreated products food additives not used in	Do not move from FC 08.0

						compliance with Codex Stan 192-1995 **Singapore:** Use of food additives in this FC is not justified. May mislead consumers.	
TOCOPHEROLS	307a, b, c	300	15	7	Antioxidant	**CX/FA 16/48/7:** Adopt **CCFA48**: Requests information on the actual use level, and if the actual use level could mislead consumers **EU:** opposes. Could mislead consumer (antioxidants could give spoiled meat fresh appearance). Do sausages, meatballs, pizza toppings, beef patties fall under fresh meat category? **India:** In India no additive permitted in India in this food category **USA**: allowed in sausages, meatballs, pizza toppings, beef patties in USA at 300 mg/kg as antioxidant **RF:** does not agree with proposal because in untreated products food additives not used in compliance with Codex Stan 192-1995. Used for Vit E and antioxidant in many foods. ML should consider exposure from all FA uses. ML in RF is 200 mg/kg **Singapore:** Use of food additives in this FC is not justified. May mislead consumers.	Adopt

Food Category No. 08.2 (Processed meat, poultry, and game products in whole pieces or cuts)

Corresponding commodity standards: corresponding commodity standards to subcategory 08.2.2

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; Provisions from Parent FC 08.0 are discussed in subcategories

Food Category No. 08.2.1 (Non-heat treated processed meat, poultry, and game products in whole pieces or cuts)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; Provisions from Parent FC 08.0 are discussed in subcategories

Food Category No. 08.2.1.1 (Cured (including salted) non-heat treated processed meat, poultry, and game products in whole pieces or cuts)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Request information on use level **CCFA48**: Requests information on numerical use level **EU:** Agrees to request further info **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** does not agree with proposal due to lack of tech. justification	Request information on actual use level

Food Category No. 08.2.1.2 (Cured (including salted) and dried non-heat treated processed meat, poultry, and game products in whole pieces or cuts)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Request information on use level **CCFA48**: Requests information on numerical use level **EU:** Agrees to request further info **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** does not agree with proposal due to lack of technical justification.	Request information on actual use level

Food Category No. 08.2.1.3 (Fermented non-heat treated processed meat, poultry, and game products in whole pieces or cuts)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and**	**CX/FA 16/48/7:** Request information on use level **CCFA48**: Requests information on numerical use level **EU:** Agrees to request further info **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator	Request information on actual use level

					337: Emulsifying salt, Stabilizer	**RF:** does not agree with proposal due to lack of tech. justification	

Food Category No. 08.2.2 (Heat-treated processed meat, poultry, and game products in whole pieces or cuts)

Corresponding commodity standards: 96-1981, 97-1981: lists specific preservatives, antioxidants, flavour enhancers, acidity regulators, humectants, thickeners

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Request information on use level **CCFA48**: Requests information on numerical use level **EU:** Agrees to request further info **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** does not agree with proposal due to lack of tech. justification	Request information on actual use level

Food Category No. 08.2.3 (Frozen processed meat, poultry and game products in whole pieces or cuts)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant INS 334: Antioxidant, Flavour enhancer INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Request information on use level **CCFA48**: Requests information on numerical use level **EU:** Agrees to request further info **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** does not agree with proposal due to lack of tech. justification	Request information on actual use level

Food Category No. 08.3 (Processed comminuted meat, poultry, and game products)

Corresponding commodity standards: Corresponding standards for subcategory 08.3.2.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; Provisions from Parent FC 08.0 are discussed in subcategories

Food Category No. 08.3.1 (Non-heat treated processed comminuted meat, poultry, and game products)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	There are no provisions under discussion in this Food Category; Provisions from Parent FC 08.0 are discussed in subcategories

Food Category No. 08.3.1.1 (Cured (including salted) non-heat treated processed comminuted meat, poultry, and game products)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Request information on use level **CCFA48**: Requests information on numerical use level **EU:** Tech need? GMP not appropriate for additives with numerical ADI. **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** Agrees with proposal @ ML ≤ 500 mg/kg	Adopt at 500 mg/kg with Note 45

Food Category No. 08.3.1.2 (Cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Adopt **CCFA48**: Requests information on numerical use level **EU:** Tech need? GMP not appropriate for additives with numerical ADI. **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** Agrees with proposal @ ML = 500 mg/kg if tech. justification established.	Adopt at 500 mg/kg with Note 45

Food Category No. 08.3.1.3 (Fermented non-heat treated processed comminuted meat, poultry, and game products)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Adopt **CCFA48**: Requests information on numerical use level **EU:** Tech need? GMP not appropriate for additives with numerical ADI. **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** Agrees with proposal @ ML = 500 mg/kg if tech. justification established.	Adopt at 500 mg/kg with Note 45.

Food Category No. 08.3.2 (Heat-treated processed comminuted meat, poultry, and game products)

Corresponding commodity standards: 88-1981, 89-1981, 98-1981: List specific preservatives, antioxidants, flavour enhancers, acidity regulators, humectants, colours

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant, Flavour enhancer** **INS 335(ii) and 337: Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Adopt **CCFA48**: Requests information on numerical use level **EU:** Tech need? GMP not appropriate for additives with numerical ADI. **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** Agrees with proposal @ ML = 500 mg/kg if tech. justification established	Adopt at 500 mg/kg with Note 45

Food Category No. 08.3.3 (Frozen processed comminuted meat, poultry, and game products)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**All: Acidity regulator, Sequesterant** **INS 334: Antioxidant,**	**CX/FA 16/48/7:** Adopt **CCFA48**: Requests information on numerical use level **EU:** Tech need? GMP not appropriate for	Adopt at 500 mg/kg with Note 45

					Flavour enhancer **<u>INS 335(ii) and 337:</u> Emulsifying salt, Stabilizer**	additives with numerical ADI. **CX/FA 16/48/7 USA**: allowed in USA in parent FC 08.2 at GMP as acidity regulator **RF:** Agrees with proposal @ ML = 500 mg/kg if tech. justification established	

<u>Food Category No.</u> 08.4 (Edible casings (e.g. sausage casings))

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Information from CCFA48/ Comments by EWG	EWG Proposal
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**5000**			**Emulsifier**	**CX/FA 16/48/7:** Do not move from parent FC **EU:** Tech need for emulsifiers?	Adopt
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5000**			**Emulsifier**	**RF:** Does not support due to lack of tech. justification. FA not used in this FC. FA is derived from saturated fatty acids which (like magnesium stearate INS470 - see Agenda 5e of CCFA48) need to be lowered in diet. Need technological justification for using FA in this FC and in such high concentration. and estimation of Theoretical Maximum Daily Intake of fatty acids with all categories of food additives **USA:** Supports adoption. Used as emulsifiers to adjust the moisture level to prevent the casings from sticking together during manufacture. Casings are used at less than 0.85% in the finished product the sausage, so 5000 mg/kg is 43 mg/kg in product as eaten (final sausage)	Adopt
TARTRATES	**334, 335(ii), 337**	**GMP**	**45**		**<u>All</u>: Acidity regulator, Sequesterant** **<u>INS 334:</u> Antioxidant, Flavour enhancer** **<u>INS 335(ii) and 337:</u> Emulsifying salt, Stabilizer**	**CX/FA 16/48/7:** Adopt **CCFA48:** Requests information on numerical use level **EU:** Tech need? GMP not appropriate for additives with numerical ADI **RF:** Agrees with proposal @ ML ≤ 2000 mg/kg	Adopt at 2000 mg/kg with Note 45

Appendix 2: Proposals to revise adopted provisions in food categories 5.0 and 5.1 and related subcategories to align with the use of those food additives in corresponding commodity standards

1. Among several topics, the CCFA48 requested the EWG on the GSFA CCFA49 to:[1]

- Request information on the use of food additives in food categories 05.0 and 05.1 and related sub-categories

Introduction

2. There are 5 commodity standards that correspond to the subcategories of food category 05.0; four related to chocolate and cocoa products and one regional standard specific to Halwa Tehenia.[2]

3. The CCFA47 and CCFA48 discussed the alignment of provisions for the use of food additives that appear in the GSFA and those provisions which appeared in the four commodity standards related to chocolate and cocoa products.[3, 4] These commodity standards correspond to the subcategories of food categories (FCs) 05.0 and 05.1; specifically FCs 05.1.1, 05.1.3 and 05.1.4. The alignment work was completed by CCFA48, and the food additive section of these commodity standards was revised to remove listings for specific additives and instead refer to provisions listed in the corresponding food categories in the GSFA.[5] Likewise, CCFA48 revised the provisions in the corresponding FCs of the GSFA to reflect the specific listings for food additives that had previously been included in the four commodity standards related to chocolate and cocoa products.[6]

4. The *Regional Standard for Halwa Tehenia* (CODEX STAN 309R-2011) was adopted by the Codex Alimentarius Commission in 2011.[7] This commodity standard corresponds to a subcategory of FC 05.0; specifically, FC 05.2.2. CODEX STAN 309R-2011 also limits the food additives that can be used in food corresponding to this standard. At the time that CODEX STAN 309R-2011 was adopted there were already multiple adopted provisions in the GSFA in FC 05.0 and 05.2.2. Those adopted provisions in the GSFA were not revised to reflect that CODEX STAN 309R-2011only allows specific food additives.

5. CCFA48 tasked the EWG on the GSFA to CCFA49 to request information on the use of food additives in food categories 5.0 and 5.1 and related sub-categories. While compiling the provisions for discussion, it was determined that several adopted provisions in the GSFA in food categories that correspond to the four commodity standards related to chocolate and cocoa products are not in alignment with the specific listings for food additives that had previously been included in those four standards. It was also noted that several adopted provisions in the GSFA in food categories that correspond to CODEX STAN 309R-2011 are not in alignment with that standard.

Background:

6. The alignment exercise carried out by CCFA48 (CX/FA 16/48/6) for the four commodity standards related to chocolate and cocoa products aligned the food additive provisions in those standards with the corresponding GSFA food additive provisions. The four commodity standards related to chocolate and cocoa products correspond to the GSFA food categories as follows:

- *Standard for Cocoa Powders (Cocoas) and Dry Mixtures of Cocoa and Sugars* (CODEX STAN 105-1981) – GSFA FC 05.1.1
- *Standard for Cocoa (Cacao) Mass (Cocoa/Chocolate Liquor) and Cocoa Cake* (CODEX STAN 141-1983) – GSFA FC 05.1.1
- *Standard for Cocoa Butter* (CODEX STAN 86-1981) – GSFA FC 05.1.3
- *Standard for Chocolate and Chocolate Products* (CODEX STAN 87-1981) – GSFA FC 05.1.4

7. It should be noted that, prior to its revision by CCFA48, CODEX STAN 87-1981 listed provisions for butylated hydroxyanisole (BHA; INS 320), butylated hydroxytoluene (BHT; INS 321), tertiary butylhydroquinone (TBHQ; INS 319) and propyl gallate (INS 310). The GSFA provision for propyl gallate is found in the broader food category 05.1, while the GSFA provisions for BHA, BHT, and TBHQ are found in the sub-category 05.1.4. The provision for propyl gallate was included in CX/FA 16/48/6, and as such, the provision in the commodity standard was aligned with the GSFA provision in food category 05.1 (see REP 16/FA, Appendix VII, Part G). However, the provisions for BHA, BHT and TBHQ were omitted in CX/FA

[1] REP 16/FA, para. 101.
[2] CODEX STAN 192-1995, Annex C.
[3] REP 15/FA, paras. 56, 58.
[4] REP 16/FA, paras. 37-43, 52.
[5] REP 16/FA, para. 52, Appendix V).
[6] REP 16/FA, para 52, Appendix VII, Part G and H.
[7] REP 11/CAC, para. 86.

16/48/6 as an oversight. Consequently, the adopted provisions for these additives in GSFA FC 05.1.4 were not revised to reflect their listing in CODEX STAN 87-1981. Additionally, there are adopted provisions in GSFA FC 05.1.4 that were not revised during the alignment exercise to reflect that they were not allowed in foods corresponding to CODEX STAN 87-1981. These GSFA provisions were omitted from CX/FA 16/48/6 as an oversight.

8. The *Standard for Halwa Tehenia* (CODEX STAN 309R-2011) corresponds to GSFA food category 05.2.2 (Soft candy). This commodity standard has not been considered by CCFA as part of the previous alignment exercises.

Working Document:

9. The EWG issued two circulars for comment. For the topic discussed in Appendix 2, the EWG received comments from Brazil, the European Union (EU), Japan, Iran, Malaysia, and the Russian Federation (RU). The current document presents proposals to revise adopted provisions in the subcategories of FC 05.0 to align those provisions with food additive provisions either currently listed in the commodity standards that correspond to those subcategories, or originally listed in those commodity standards prior to revision of those commodity standards CCFA48. The proposals presented in the current document are based upon a consensus approach taking into account alignment with corresponding Codex commodity standards, the mandate of the EWG, and comments on the first circular proposals by members of the EWG.

10. The working document for the second circular is divided into two Parts.

-Part 1 presents proposed revisions to provisions in food category 0.5 and its subcategories listed in Table 2 of the GSFA.

-Part 2 presents proposals for consequential revisions to the provisions listed in Table 3 of the GSFA, as well to the “References to Commodity Standards for GSFA Table 3 Additives” section of Table 3 of the GSFA.

Conventions

11. The following conventions were used to prepare the current:

- Proposals to revise the existing adopted provisions are indicated with either **bolded** or ~~strikethrough~~ font. New text to be added to the existing adopted provision is indicated in **bolded** font. Text to be deleted from the existing adopted provision is indicated in ~~strikethrough~~ font.

- Notes indicated in grey highlight are new notes introduced at CCFA48

Appendix 2, Part 1: Revisions to provisions in Table 2 of the GSFA (Food Category 05.0 and subcategories)

General Comments from EWG member on proposals for Appendix 2, Part 1:

Malaysia: Supports the EWG proposal to revise the adopted provision on Table 1 and Table GSFA.

Iran: Agree with the whole recommendation in this appendix.

Specific proposals in CX/FA 17/49/7:

Food Category No. 05.1.4 (Cocoa and chocolate products)[8]

Corresponding commodity standards: 87-1981: refers to acidity regulators, antioxidants, bulking agents, colours, emulsifiers, glazing agents, and sweeteners listed in GSFA FC 05.1.4. Also lists specific Table 3 additives.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
Alitame	956	300	161, **XS87**	Adopted 2007	Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: INS 956 not used in Customs Union
Aspartame	951	3000	161, 191, **Note C**	Adopted 2008	Flavour enhancer, Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports proposal for only energy-reduced products or with no added sugar, specialized products
Butylated hydroxyanisole	320	200	15, 130, ~~141~~, **Note 303**	Adopted 2006	Antioxidant	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Butylated hydroxytoluene	321	200	15, 130, ~~141~~, **Note 303**	Adopted 2006	Antioxidant	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=100 mg/kg
Carnauba wax	903	5000	3, **XS87**	Adopted 2006	Acidity regulator, Anticaking agent, Bulking agent, Carrier, Glazing agent	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=500 mg/kg

[8] It should be noted that the *Standard for Chocolate and Chocolate Products* (CODEX STAN 87-1981), which corresponds to food category 05.1.4, contains provisions fort butylated hydroxyanisole (BHA; INS 320), butylated hydroxytoluene (BHT; INS 321), tertiary butylhydroquinone (TBHQ; INS 319) and propyl gallate (INS 310). The GSFA provision for propyl gallate is found in the broader food category 05.1, while the GSFA provisions for BHA, BHT, and TBHQ are found in the sub-category 05.1.4. The provision for propyl gallate was included in CX/FA 16/48/6, and as such, the provision in the commodity standard was aligned with the GSFA provision in food category 05.1 (see REP 16/FA, Appendix VII, Part G). However, the provisions for BHA, BHT and TBHQ were omitted in CX/FA 16/48/6 as an oversight. Consequently, the provisions for these additives in the commodity standard were not aligned with the GSFA provisions in food category 05.1.4. Therefore, to complete the alignment between CODEX STAN 87-1981and the GSFA, the recommendations for alignment of BHA, BHT, and TBHQ are included here. Additionally, there are adopted provisions in GSFA food category 05.1.4 that were not aligned with CODEX STAN 87-1981 for which their use was not permitted in the standardized food .These GSFA provisions were omitted from CX/FA 16/48/6 as an oversight. Therefore, to complete the alignment between CODEX STAN 87-1981 and the GSFA, the recommendations for the alignment of these adopted GSFA provisions (by adding Note XS87) are included.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
Castor oil	1503	350	**XS87**	Adopted 2007	Anticaking agent, Carrier, Emulsifier, Glazing agent	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Neotame	961	80	161, **XS87**	Adopted 2007	Flavour enhancer, Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=100 mg/kg for only energy-reduced products or with no added sugar, specialized products
Sucralose (trichlorogalactosucrose)	955	800	161, **XS87**	Adopted 2007	Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal for only energy-reduced products or with no added sugar, specialized products
Tertiary butylhydroquinone	319	200	15, 130, ~~141~~, **Note 303**	Adopted 2006	Antioxidant	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal

Note 3: For use in surface treatment only.
Note 15: On the fat or oil basis.
Note 130: Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylhydroquinone (INS 319), and propyl gallate (INS 310).
~~Note 141: For use in white chocolate only.~~
Note 161: Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
Note 191: If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as aspartame, should not exceed this level.
Note C: Except for products conforming to the Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981) at 2000 mg/kg.
Note 303: Excluding products (other than white chocolate) conforming to the Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981).
Note XS87: Excluding products conforming to the Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981).

Food Category No. 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4)

Corresponding commodity standards: 309R-2011 corresponds to subcategory 05.2.2 - only allows acidity regulators and emulsifiers listed in Table 3.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
Alitame	956	300	161, **XS309R**	Adopted 2007	Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: INS 956 do not used in Customs Union
Allura red AC	129	300	**XS309R**	Adopted 2009	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=100 mg/kg
Beeswax	901	GMP	3, **XS309R**	Adopted 2001	Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
Benzoates	210-213	1500	13, **XS309R**	Adopted 2003	Preservative	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Brilliant blue FCF	133	300	**XS309R**	Adopted 2005	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=100 mg/kg
Butylated hydroxyanisole	320	200	15, 130, **XS309R**	Adopted 2007	Antioxidant	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Butylated hydroxytoluene	321	200	15, 130, **XS309R**	Adopted 2007	Antioxidant	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=100 mg/kg
Candelilla wax	902	GMP	3, **XS309R**	Adopted 2001	Carrier, Emulsifier, Glazing agent, Thickener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Caramel III – ammonia caramel	150c	50,000	**XS309R**	Adopted 2012	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Does not agree with proposal. ML is so higher. ADI (0-200 mg/kg bw) ADI will be attained with portion of 240 g product
Caramel IV – sulfite ammonia caramel	150d	50,000	**XS309R**	Adopted 2012	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Does not agree with proposal. ML is so higher. ADI (0-200 mg/kg bw) ADI will be attained with portion of 240 g product
Carmines	120	300	**XS309R**	Adopted 2005	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Does not agree with proposal. ADI INS120 0-5 mg/kg bw. So on in 1 kg food product x 60 kg bw are 300 mg Carmines.
Carnauba wax	903	5000	3, **XS309R**	Adopted 2006	Acidity regulator, Anticaking agent, Bulking agent, Carrier, Glazing agent	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Does not agree with proposal. ADI INS120 0-7 mg/kg bw. So on in 1 kg food product x 60 kg bw are 420 mg Carnauba wax. ML is so higher
Carotenes, beta-, vegetable	160a(ii)	500	**XS309R**	Adopted 2005	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Carotenes and caratenoids are biological activity supplement with established Adequate level of consumption – 5 mg/per day person. ML is so higher
Carotenoids	160a(i),	100	**XS309R**	Adopted	Colour	Revise Adopted	**EU**: Supports EWG Proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
	a(iii), e, f			2009		Provision as Proposed	**RU**: Carotenes and caratenoids are biological activity supplement with established Adequate level of consumption – 5 mg/per day person. ML is so higher
Castor oil	1503	500	**XS309R**	Adopted 2007	Anticaking agent, Carrier, Emulsifier, Glazing agent	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: ADI (0-0.7 mg/kg bw) ML is so higher
Cyclamates	952(i), (ii), (iv)	500	17, 156, 161, **XS309R**	Adopted 2007	Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal for only energy-reduced products or with no added sugar, specialized products
Diacetyltartaric and fatty acid esters of glycerol	472e	10,000	**XS309R**	Adopted 2005	Emulsifier, Sequestrant, Stabilizer	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Fast green FCF	143	100	**XS309R**	Adopted 2009	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Hydroxybenzoates, para-	214, 218	1000	27, **XS309R**	Adopted 2012	Preservative	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=300
Indigotine (indigo carmine)	132	300	**XS309R**	Adopted 2009	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Iron oxides	172(i)-(iii)	200	**XS309R**	Adopted 2005	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Microcrystalline wax	905c(i)	GMP	3, **XS309R**	Adopted 2001	Antifoaming agent, Glazing agent	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Mineral oil, high viscosity	905d	2000	3, **XS309R**	Adopted 2004	Antifoaming agent, Glazing agent	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Neotame	961	330	158, 161, **XS309R**	Adopted 2007	Flavour enhancer, Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: ADI neotame (0-2 mg/kg bw) ML is so higher
Phosphates	338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i),(ii); 343(i)-	2200	33, **XS309R**	Adopted 2012	Acidity regulator, Anticaking agent, Antioxidant, Emulsifier, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
	(iii); 450(i)-(iii), (v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542						
Polydimethylsiloxane	900a	10	**XS309R**	Adopted 1999	Anticaking agent, Antifoaming agent, Emulsifier	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Polyglycerol esters of fatty acids	475	2000	Note 367, XS309R	Adopted 2016	Emulsifier, Stabilizer	Retain as adopted	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Polyglycerol esters of interesterified ricinoleic acid	476	3000	XS309R	Adopted 2016	Emulsifier	Retain as adopted	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Polysorbates	432-436	1000	**XS309R**	Adopted 2007	Emulsifier, Stabilizer	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Ponceau 4R (cochineal red A)	124	300	161, **XS309R**	Adopted 2008	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Propyl gallate	310	200	15, 130, **XS309R**	Adopted 2001	Antioxidant	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Propylene glycol alginate	405	5000	**XS309R**	Adopted 2016	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Stabilizer, Thickener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal
Propylene glycol esters of fatty acids	477	5000	**XS309R**	Adopted 2001	Emulsifier	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal
Riboflavins	101(i), (ii)	1000	**XS309R**	Adopted 2005	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal **Brazil**: misses FA INS number 101 (iii)
Saccharins	954(i)-(iv)	500	161, 163, **XS309R**	Adopted 2007	Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal for only energy-reduced products or with no added sugar, specialized products
Shellac, bleached	904	GMP	3, **XS309R**	Adopted 2001	Glazing agent	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Sodium diacetate	262(ii)	1000	XS309R	Adopted 2016	Acidity regulator, Preservative, Sequestrant	Retain as adopted	**EU**: Supports EWG Proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
Sorbates	200-203	1000	42, **XS309R**	Adopted 2012	Preservative	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Stearoyl lactylates	481(i), 482(ii)	5000	XS309	Adopted 2016	Emulsifier, Flour treatment agent, Foaming agent, Stabilizer	Retain as adopted	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Steviol glycosides	960	700	26, 199, **XS309R**	Adopted 2012	Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal for only energy-reduced products or with no added sugar, specialized products
Sucralose (trichlorogalactosucrose)	955	1800	161, 164, **XS309R**	Adopted 2008	Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=800 mg/kg for only energy-reduced products or with no added sugar, specialized products
Sucrogylcerides	474	5000	Note 348, **XS309R**	Adopted 2016	Emulsifier	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Sucrose esters of fatty acids	473	5000	Note 348, **XS309R**	Adopted 2016	Emulsifier, Foaming agent, Glazing agent, Stabilizer	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Sucrose oligoesters, type I and type II	473a	5000	Note 348, **XS309R**	Adopted 2016	Emulsifier, Glazing agent, Stabilizer	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Sunset yellow FCF	110	300	161, **XS309R**	Adopted 2008	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: There are need in take in consideration possible combination INS122, INS 110, INS 155, INS124. IN combination ML for these FD should not exceeded 50 mg/kg
Tartrates	334; 335(ii)	2000	45, XS309R	Adopted 2016	Acidity regulator, Antioxidant, Emulsifying salt, Flavour enhancer, Sequestrant, Stabilizer	Retain as adopted	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal **Brazil**: Misses FA INS number 337
Tertiary butylhydroquinone	319	200	15, 130, **XS309R**	Adopted 2006	Antioxidant	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Tocopherols	307a, b, c	500	15, XS309R	Adopted 2016	Antioxidant	Retain as adopted	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal

Note 1: As adipic acid
Note 3: For use in surface treatment only.
Note 13: As benzoic acid.

Note 15: On the fat or oil basis.
Note 17: As cyclamic acid.
Note 26: As steviol equivalents.
Note 27: As para-hydroxybenzoic acid.
Note 33: As phosphorus.
Note 42: As sorbic acid
Note 45: As tartaric acid.
Note 130: Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylhydroquinone (INS 319), and propyl gallate (INS 310).
Note 156: Except for use in microsweets and breath freshening mints at 2500 mg/kg.
Note 158: Except for use in microsweets and breath freshening mints at 1000 mg/kg.
Note 161: Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
Note 163: Except for use in microsweets and breath freshening mints at 3000 mg/kg.
Note 164: Except for use in microsweets and breath freshening mints at 30,000 mg/kg.
Note 199: Except for use in microsweets and breath freshening mints at 6000 mg/kg as steviol equivalents.
Note 348: Singly or in combination: sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type I (INS 473a), and sucroglycerides (INS 474).
Note 367: For use at 10,000 mg/kg in candy containing not less than 10% oil.
Note XS309R: Excluding products conforming to the Codex Regional Standard for Halawa Tehenia (CODEX STAN 309R-211).

RU: (NOTE) - colours (INS122, INS129, INS E160e, INS160f, INS110, INS104),INS142,INS143,INS132,INS120,INS155, INS100, INS160d, INS161b, INS124, INS133, INS 131, INS 102, INS 151) used individually or in combination

Food Category No. 05.2.2 (Soft candy)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
Acesulfame potassium	950	1000	157, 161, 188, **XS309R**	Adopted 2007	Flavour enhancer, Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=500 mg/kg for only energy-reduced products or with no added sugar, specialized products However there need take in consideration cases when INS 950 and INS 951 used in combination
Aspartame	951	3000	148, 161, **XS309R**	Adopted 2008	Flavour enhancer, Sweetener	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal in ML=500 mg/kg for only energy-reduced products or with no added sugar, specialized products/ However there need take in consideration cases when INS 950 and INS 951 used in combination
Chlorophylls and chlorophyllins, copper complexes	141(i), (ii)	100	**XS309R**	Adopted 2009	Colour	Revise Adopted Provision as Proposed	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
Grape skin extract	163(ii)	1700	181, **XS309R**	Adopted 2012	Colour	Revise Adopted Provision as	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
						Proposed	
Hydrogenated poly-1-decenes	907	2000	XS309R	Adopted 2016	Glazing agent	Retain as adopted	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal

Note 148: Except for use in microsweets and breath freshening mints at 10,000 mg/kg.
Note 157: Except for use in microsweets and breath freshening mints at 2000 mg/kg.
Note 161: Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
Note 181: As anthocyanin.
Note 188: If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as acesulfame potassium, should not exceed this level.
Note XS309R: Excluding products conforming to the Codex Regional Standard for Halawa Tehenia (CODEX STAN 309R-211).

Appendix 2, Part 2: Consequential revisions to Table 3

1) The four standards related to chocolate and cocoa products (CODEX STANs 86-1981, 87-1981, 105-1981, and 141-1983) and have already been aligned with Table 3. Therefore the consequential revisions to Table 3 as a result of the current topic are limited to the alignment of the *Regional Standard for Halwa Tehenia* (CODEX STAN 309R-2011).

2) The proposals for consequential revisions to Table 3 can be split into two topics: 1) those pertaining to the provisions for specific food additives in the main body of Table 3 for Table 3 additives allowed by CODEX STAN 309R-2011; and 2) those pertaining to the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3. Topic 1 contains Proposals A and B which are two different proposals on how to approach the consequential revisions to provisions for specific food additives in the main body of Table 3. Topic 2 contains Proposal C which is specific to the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3 and is independent of the EWG decision on Proposals A and B.

Topic 1) Proposals pertaining to CODEX STAN 309R-2011 and the provisions for specific food additives in the main body of Table 3

3) The "Principles established that have guided the direction and development of the Decision Tree" [9] present current practice for aligning Table 3 of the GSFA with provisions for Table 3 additives in commodity standards. This involves revisions to two sections of Table 3: the main body of Table 3, and the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3.

- The main body of Table 3 presents provisions for Table 3 additives which include, among other information, a fifth column ("Acceptable, including foods conforming to the following commodity standards") which lists commodity standards in which the use of the food additive is acceptable. It is the list of commodity standards for the provisions for relevant Table 3 additives that is revised to reflect the use of the Table 3 additive in the specific commodity standard.
- The "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3 presents information on whether a commodity standard: allows all Table 3 additives; restricts Table 3 additives to those of specific functional classes; or restricts Table 3 additives to specific additives as listed in the main body of Table 3. The information in the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3 is organized by food categories that are not listed in the Annex to Table 3.

Although the "Principles established that have guided the direction and development of the Decision Tree" contains specific guidance on how to revise the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3, it does not contain specific guidance on how or if to revise the main body of Table 3 when the commodity standard allows all Table 3 additives or restricts Table 3 additives to those of specific functional classes

4) As the commodity standards under discussion allow the use of Table 3 additives under specific circumstances, the EWG discussed proposals to revise Table 3 to address the use of Table 3 additives in those commodity standards. In the first circular of the EWG it was noted that CODEX STAN 309R-2011 allows any Table 3 additive with the technological function of "acidity regulator" or "emulsifier". Specific to the consequential revision of related provisions for relevant food additives in the main body of Table 3, the first circular continued the practice established by the alignment of CODEX STAN 117-1981. CODEX STAN 117-1981 allows the use of any Table 3 additive with the technological effect of acidity regulators, anticaking agents, antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, humectants, packaging gases, preservatives, stabilizers, sweeteners and thickeners. When the CCFA aligned Codex Stan 117-1981 with the GSFA, they included "CS 117-1981" in the list of acceptable commodity standards in the main body of Table 3 for each provision with one of these functional effects. Therefore the first circular proposed including "CS 309R-2011 in the list of acceptable commodity standards in the main body of Table 3 for each provision with the technological effect of "acidity regulator" or "emulsifier".

5) In response to the first circular, several EWG members noted that if the practice of listing every commodity standard for every provision in the main body of Table 3 will eventually make Table 3 so big as to be unusable. Therefore the second circular discussed a proposal to list commodity standards for specific provisions in the main body of Table 3 only when the additive is specifically listed in the commodity standard, and to refer to the Reference Section of Table 3 for commodity standards that allow either any Table 3 additive of any Table 3 additives of a specific functional class. However, the Chair of the EWG also notes that this proposal would also effect the mandate of the EWG on Alignment.

6) Therefore, the Chair of the EWG offers the following proposals:

[9] CX/FA 16/48/6, Appendix 1.

Proposal A: Request the EWG on Alignment to consider a revised approach to listing corresponding commodity standards in Table 3

The proposal is to request the EWG on Alignment to consider a revised approach to listing corresponding commodity standards in Table 3 – that is, to list commodity standards for specific provisions in the main body of Table 3 only when the additive is specifically listed in the commodity standard, and to refer to the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3 (the "References" Section of Table 3) for commodity standards that allow either any Table 3 additive on a general basis, or any Table 3 additives of a specific functional class. This result of this proposal is that provisions for additives in the main body of Table 3 would not list commodity standards that allow general classes of food additives. Those commodity standards would only appear in the "References" Section of Table 3. The main body of Table 3 would only list a commodity standard corresponding to a specific additive if that commodity standard only allows specific Table 3 additives. This proposal would involve:

- Consider a revision of the "Principles established that have guided the direction and development of the Decision Tree" to reflect the new approach.
- Consider a revise of the title of the fifth column of Table 3 from "Acceptable, including foods conforming to the following commodity standards" to reflect the new approach. An initial proposed title revision is: "Specific allowance in the following commodity standards*****" with the explanatory footnote "* This column lists commodity standards that allow only certain Table 3 additives. If a commodity standard allows Table 3 additives on a general basis or based on functional class, that information is contained in the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3.
- Analyze the existing commodity standard listed in fifth column of Table 3 ("Acceptable, including foods conforming to the following commodity standards") to determine if any refer to commodity standards which allow Table 3 additives based on functional class (current example: CS 117-1981).

Proposal B: As an interim measure, revise the provisions for additives with "emulsifier" or "acidity regulator" function in Table 3 to include "CS 309R-2011"

As an interim measure while the EWG on Alignment considers Proposal A, the EWG Chair recommends that the CCFA continue the existing approach and add "CS 309R-2011" to the list of acceptable commodity standards in Table 3 for provisions for food additives with technological function of "emulsifier" or "acidity regulator" as per the following table:

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
260	ACETIC ACID (GLACIAL)	Acidity regulator, Preservative	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
472a	ACETIC AND FATTY ACID ESTERS OF GLYCEROL	Emulsifier, Sequestrant, Stabilizer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1422	ACETYLATED DISTARCH ADIPATE	Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1414	ACETYLATED DISTARCH PHOSPHATE	Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
1451	ACETYLATED OXIDIZED STARCH	Emulsifier, Stabilizer, Thickener	8	2005	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
1401	ACID-TREATED STARCH	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
406	AGAR	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	8	1999	CS96-1981, CS97-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal **RU**: Supports EWG Proposal
400	ALGINIC ACID	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	8	1999	CS105-1981, CS117-198, **CS309R-2011**1	Supports Proposal	**EU**: Supports EWG Proposal
1402	ALKALINE TREATED STARCH	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
403	AMMONIUM ALGINATE	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
503(i)	AMMONIUM CARBONATE	Acidity regulator, Raising agent	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
503ii	AMMONIUM HYDROGEN CARBONATE	Acidity regulator, Raising agent	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
527	AMMONIUM HYDROXIDE	Acidity regulator	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
300	ASCORBIC ACID, L-	Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant	8	1999	CS 88-1981, CS 89-1981, CS 96-1981, CS 97-1981, CS 98-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1403	BLEACHED STARCH	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
263	CALCIUM ACETATE	Acidity regulator, Preservative, Stabilizer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
170i	CALCIUM CARBONATE	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	8	1999	CS87-1981, CS105-1981, CS117-1981 (anticaking agents in dehydrated products only), CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
578	CALCIUM GLUCONATE	Acidity regulator, Firming agent, Sequestrant	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
526	CALCIUM HYDROXIDE	Acidity regulator, Firming agent	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
327	CALCIUM LACTATE	Acidity Regulator, Emulsifying Salt, Flour treatment agent, Firming agent, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
352(ii)	CALCIUM MALATE, DL-	Acidity regulator	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
529	CALCIUM OXIDE	Acidity regulator, Flour treatment agent	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
516	CALCIUM SULFATE	Acidity regulator, Firming agent, Flour treatment agent, Sequestrant, Stabilizer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
410	CAROB BEAN GUM	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
407	CARRAGEENAN	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	8	1999	CS96-1981, CS97-1981, CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
427	CASSIA GUM	Emulsifier, Gelling	8	2012	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
		agent, Stabilizer, Thickener					
330	CITRIC ACID	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
472c	CITRIC AND FATTY ACID ESTERS OF GLYCEROL	Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1400	DEXTRINS, ROASTED STARCH	Carrier, Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1412	DISTARCH PHOSPHATE	Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
467	ETHYL HYDROXYETHYL CELLULOSE	Emulsifer, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
297	FUMARIC ACID	Acidity regulator	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
418	GELLAN GUM	Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, ~~**CS309R-2011**~~	Remove listing of CS 309R-2011	**Brazil, EU, Japan:** Gellan Gum does not have emulsifier or acidity regulator function and CS-309R-2011 only allows acidity regulators and emulsifiers as listed in Table 3
575	GLUCONO DELTA-LACTONE	Acidity regulator, Raising agent, Stabilizer	8	1999	CS89-1981, CS98-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
412	GUAR GUM	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
414	GUM ARABIC (ACACIA GUM)	Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener	8	1999	CS87-1981, CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
507	HYDROCHLORIC ACID	Acidity regulator	8	1999	~~CS 98-1981~~ **CS117-1981**, **CS309R-2011**	Supports Proposal	**EU**: Supports adding CS 309R-2011

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
							Japan: "CS98-1981" is listed but is a mistake as that standard does not allow acidity regulators. INS 507 is acceptable for food conforming to "CS117-1981"
463	HYDROXYPROPYL CELLULOSE	Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1442	HYDROXYPROPYL DISTARCH PHOSPHATE	Anticaking agent, Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981 (anticaking agents in dehydrated products only) , **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
464	HYDROXYPROPYL METHYL CELLULOSE	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1440	HYDROXYPROPYL STARCH	Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
416	KARAYA GUM	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
425	KONJAC FLOUR	Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
270	LACTIC ACID, L-, D- AND DL-	Acidity regulator	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
472b	LACTIC AND FATTY ACID ESTERS OF GLYCEROL	Emulsifier, Sequestrant, Stabilizer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
966	LACTITOL	Emulsifier, Sweetener, Thickener	8	1999	CS87-1981, CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
322(i)	LECITHIN	Antioxidant, Emulsifier	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
504i	MAGNESIUM CARBONATE	Acidity regulator, Anticaking agent, Colour retention agent	8	1999	CS87-1981, CS105-1981, CS117-1981 (anticaking agents in dehydrated products only), CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
580	MAGNESIUM GLUCONATE	Acidity regulator, Firming agent, Flavour enhancer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
528	MAGNESIUM HYDROXIDE	Acidity regulator, Colour retention agent	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
504(ii)	MAGNESIUM HYDROXIDE CARBONATE	Acidity regulator, Anticaking agent, Carrier, Colour retention agent	8	1999	CS117-1981 *(anticaking agents in dehydrated products only)*, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal **Japan**: The note “anticaking agents in dehydrated products only” is omitted from this draft.
329	MAGNESIUM LACTATE, DL-	Acidity regulator, Flour treatment agent	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
530	MAGNESIUM OXIDE	Anitcaking agent, Acidity regulator	8	1999	CS87-1981, CS105-1981, CS117-1981 (anticaking agents in dehydrated products only), CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
470(iii)	MAGNESIUM STEARATE	Anitcaking agent, Emulsifier, Thickener	8	2016	CS117-1981 (anticaking agents in dehydrated products only), **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
296	MALIC ACID, DL-	Acidity regulator	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
965(i)	MALTITOL	Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener	8	1999	CS87-1981, CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
965(ii)	MALTITOL SYRUP	Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener	8	1999	CS87-1981, CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
461	METHYL CELLULOSE	Bulking agent, Emulsifier, Glazing agent, Stabilizer,	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
		Thickener					
465	METHYL ETHYL CELLULOSE	Emulsifier, Foaming agent, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
460(i)	MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981 (anticaking agents in dehydrated products only) , **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
471	MONO- AND DI-GLYCERIDES OF FATTY ACIDS	Antifoaming agent, Emulsifer, Stabilizer	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1410	MONOSTARCH PHOSPHATE	Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1404	OXIDIZED STARCH	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
440	PECTINS	Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener	8	1999	CS87-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1413	PHOSPHATED DISTARCH PHOSPHATE	Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
261i	POTASSIUM ACETATE	Acidity regulator, Preservative	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
402	POTASSIUM ALGINATE	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	8	1999	CS96-1981, CS97-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
501(i)	POTASSIUM CARBONATE	Acidity regulator, Stabilizer	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
332(i)	POTASSIUM DIHYDROGEN CITRATE	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
577	POTASSIUM GLUCONATE	Acidity regulator, Sequestrant	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
501(ii)	POTASSIUM HYDROGEN CARBONATE	Acidity regulator, Raising agent, Stabilizer	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
~~515(ii)~~	~~POTASSIUM HYDROGEN SULFATE~~	~~Acidity regulator~~	~~8~~	~~2014~~	~~CS117-1981, **CS309R-2011**~~	Supports Proposal to remove INS 515(ii)	**EU, Japan**: currently not in Table 3; no JECFA specifications exist; the INS No is 515(ii)
525	POTASSIUM HYDROXIDE	Acidity regulator	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
326	POTASSIUM LACTATE	Acidity regulator, Antioxidant , Emulsifier, Humectant	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
515(i)	POTASSIUM SULFATE	Acidity regulator	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
460ii	POWDERED CELLULOSE	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981 (anticaking agents in dehydrated products only) , **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
407a	PROCESSED EUCHEUMA SEAWEED (PES)	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	8	2001	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
470i	SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	Anticaking agent, Emulsifier, Stabilizer	8	1999	CS117-1981 (anticaking agents in dehydrated products only) , **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
470ii	SALTS OF OLEIC ACID WITH CALCIUM,	Anticaking agent, Emulsifier,	8	1999	CS117-1981 (anticaking agents in dehydrated products only) , **CS309R-**	Supports Proposal	**EU**: Supports EWG Proposal

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
	POTASSIUM AND SODIUM	Stabilizer			**2011**		
262i	SODIUM ACETATE	Acidity regulator, Preservative, Sequestrant	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
401	SODIUM ALGINATE	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	8	1999	CS96-1981, CS97-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
500(i)	SODIUM CARBONATE	Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener	8	1999	CS87-1981, CS105-1981, CS117-1981 (anticaking agents in dehydrated products only), CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
466	SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
331(i)	SODIUM DIHYDROGEN CITRATE	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	8	1999	CS89-1981, CS96-1981, CS97-1981, CS98-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
350(ii)	SODIUM DL-MALATE	Acidity regulator, Humectant	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
365	SODIUM FUMARATES	Acidity regulator	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
500(ii)	SODIUM HYDROGEN CARBONATE	Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener	8	1999	CS87-1981, CS105-1981, CS117-1981 (anticaking agents in dehydrated products only), CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
350(i)	SODIUM HYDROGEN DL-MALATE	Acidity regulator, Humectant	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports adding CS 309R-2011

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
							Japan: "CS98-1981" is listed but is a mistake as that standard does not allow acidity regulators. INS 507 is acceptable for food conforming to "CS117-1981"
514(ii)	SODIUM HYDROGEN SULFATE	Acidity regulator	8	2012	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
524	SODIUM HYDROXIDE	Acidity regulator	8	1999	CS87-1981, CS105-1981, CS117-1981, CS141-1983, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
325	SODIUM LACTATE	Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying Salt, Humectant, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
500(iii)	SODIUM SESQUICARBONATE	Acidity regulator, Anticaking agent, Raising agent	8	1999	CS117-1981 (anticaking agents in dehydrated products only) , **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
514(i)	SODIUM SULFATE	Acidity regulator	8	2001	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1420	STARCH ACETATE	Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1450	STARCH SODIUM OCTENYL SUCCINATE	Emulsifier, Stabilizer, Thickener	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1405	STARCHES, ENZYME TREATED	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
413	TRAGACANTH GUM	Emulsifier, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
1518	TRIACETIN	Carrier, Emulsifer, Humectant	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
380	TRIAMMONIUM CITRATE	Acidity regulator	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
333(iii)	TRICALCIUM CITRATE	Acidity regulator, Emulsifying salt, Firming agent, Sequestrant, Stabilizer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal

INS No.	Additive	INS Functional Class	Step	Year	Acceptable, in foods conforming to the following commodity standards	EWG Proposal	Comments by EWG members on Proposal
332(ii)	TRIPOTASSIUM CITRATE	Acidity regulator,Emulsifying salt, Sequestrant, Stabilizer	8	1999	CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
331(iii)	TRISODIUM CITRATE	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	8	1999	CS89-1981, CS96-1981, CS97-1981, CS98-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
415	XANTHAN GUM	Emulsifier, Foaming agent, Stabilizer, Thickener	8	1999	CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal
967	XYLITOL	Emulsifier, Humectant, Stabilizer, Sweetener, Thickener	8	1999	CS87-1981, CS105-1981, CS117-1981, **CS309R-2011**	Supports Proposal	**EU**: Supports EWG Proposal

Topic 2) Proposal pertaining aligning CODEX STAN 309R-2011 in the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3.

7) Foods corresponding to the *Standard for Halwa Tehenia* (CODEX STAN 309R-2011) are included in food category 05.2.2 (Soft candy). The Food Additive Section of CODEX STAN 309R-2011 contains a general reference to the GSFA. As noted above, the parent category 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), and therefore its sub-category 05.2.2, are not included in the Annex to Table 3. Therefore CODEX STAN 309R-2011 should be included in the "References to Commodity Standards" section of Table 3.

Proposal C) "References to Commodity Standards for GSFA Table 3 Additives" Section of Table 3 of the GSFA

Revise the "References to Commodity Standards for GSFA Table 3 Additives" Section of Table 3 of the GSFA as follows

05.2.2	**Soft candy**
	Acidity regulators and emulsifiers listed in Table 3 are acceptable for use in foods conforming to this Standard.
Codex standard	***Standard for Halwa Tehenia*** **(CODEX STAN 309R-2011)**

Appendix 3: Request for information on use levels and technical justification for the use of benzoates in food category 14.1.4 (Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks)

1. Among several topics, the CCFA48 requested the EWG on the GSFA to CCFA49 to:[1]

- Request information on use levels and technical justification for the use of benzoates in food category 14.1.4

Introduction:

2. CCFA48 lowered the maximum level (ML) for the food additive group Benzoates[2] for use as a preservative in food category 14.1.4 (Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks) from 600 mg/kg (with Note 123 "Except for use in beverages with pH greater than 3.5 at 1000 mg/kg), to 250 mg/kg and removed Note 123.[3] This revision was based on a recommendation in CX/FA 16/48/3 that CCFA48 consider the feasibility of reducing the ML for benzoates in food category 14.1.4. The recommendation in CX/FA 16/48/3 was a result of an exposure estimate on benzoates conducted by the 80th JECFA. [4]

3. While CCFA48 noted that an ML of 600 mg/kg for benzoates in food category 14.1.4 was not appropriate, it also noted that any proposed reduction of the ML needed to take into account national data, technological need, and the need to protect the health of consumers.[5] As a result, CCFA48 lowered the ML for benzoates in food category 14.1.4 on an interim basis until CCFA49, and agreed to request information on the use levels, technological justification, and exposure to benzoates in food category 14.1.4 as part of the EWG on the GSFA.[6] Based on these additional data, and the work of this EWG, the 49th GSFA will work towards finalizing the provision for benzoates in food category 14.1.4 and removing the interim basis note. The current interim provision for benzoates in the GSFA in food category 14.1.4 is as follows:

BENZOATES			
Benzoic acid	INS 210	Functional Class:	Preservative
Sodium benzoate	INS 211	Functional Class:	Preservative
Potassium benzoate	INS 212	Functional Class:	Preservative
Calcium benzoate	INS 213	Functional Class:	Preservative

Food Cat No	Food Category	Max. Level	Notes
14.1.4	Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	250 mg/kg	13 and 301

Note 13: As benzoic acid.
Note 301: Interim maximum level until CCFA49.

[1] REP 16/FA, para. 101.
[2] The food additive group Benzoates includes Benzoic acid (INS 210), Sodium benzoate (INS 211), Potassium benzoate (INS 212), and Calcium benzoate (INS 213).
[3] REP 16/FA, paras. 20-23.
[4] Evaluation of certain food additives and contaminants (Eightieth report of the Joint FAO/WHO Expert Committee on Food Additives) WHO Technical Report Series, No. 990, 2014.
[5] REP 16/FA, para. 21.
[6] REP 16/FA, paras. 23 and 101.

Background:

4. A group acceptable daily intake (ADI) of 0-5 mg/kg body weight for benzoates, expressed as benzoic acid, was established at the 46th JECFA in 1997 based on a no observable adverse effect level at the highest dose (500 mg/kg bw) tested in a long term study in rats.[7,8] The 36th Codex Committee on Food Additives and Contaminants (CCFAC36) in 2004 recommended adoption of a provision for benzoates in food category 14.1.4 at an ML of 600 mg/kg, as benzoates, with the inclusion of Note 123 ("Except for use in beverages with pH greater than 3.5 at 1000 mg/kg").[9] The 27th Codex Alimentarius Commission (CAC27) (2004) adopted the provision recommended by CCFAC36, however, the ML was adopted on an interim basis based on the inclusion of Note 301 ("Interim maximum level") with the understanding that a review would be conducted by CCFAC within three years, and that comprehensive information on the use levels of benzoates in different types of foods, the results of intake studies (particularly in children), and other relevant information would be supplied to JECFA.[10] CCFA46 (2014) discussed removing the "interim basis" note from the provision for benzoates in food category 14.1.4, but was unable to come to a consensus on this issue. Consequently, CCFA46 requested that JECFA perform an exposure estimate on the use of benzoates in food category 14.1.4.[11]

5. The 80th JECFA performed exposure assessments for the use of benzoates in non-alcoholic "soft" beverages, as well as from use in all foods.[4,12] JECFA indicated that, for most countries, non-alcoholic beverages were the largest contributor to benzoate exposure. JECFA received data from industry on "average typical" and maximum benzoate levels in beverages for 796 products from six countries (Australia, Brazil, China, Mexico, South Africa, and the USA). For beverages included in food category 14.1.4, these data indicated an average typical level range for benzoates from 83-209 mg/L, and a maximum level range from 173-627 mg/L. Norway also submitted data with average typical benzoate levels in soft drinks and flavoured water ranging from 109-142 mg/L and maximum levels from 131-148 mg/L. JECFA also listed analytically determined benzoate levels reported in the scientific literature for non-alcoholic beverages from several different countries ranging from 63-259 mg/L.

6. Using the average typical levels reported in the information discussed above, JECFA performed exposure estimates for benzoates in non-alcoholic soft beverages (which JECFA indicated corresponds to GSFA food category 14.1). None of the population groups included in the estimate exceeded the ADI for consumers-only exposure at the mean value. However, at the 95th percentile for consumers-only, two population groups were reported to have exposure ranges that exceeded the ADI: 1) toddlers and young children (1-7 years) at 1.7-10.9 mg/kg body weight; and 2) other children, including adolescents (8-17 years) at 0.5-7.0 mg/kg body weight.

Questions Posed in the First Circular of the EWG:

7. In the first circular, the EWG was invited to comment on the current proposal in the GSFA for benzoates in food category 14.1.4 (250 mg/kg with Note 13 "As benzoic acid," and Note 301 "Interim maximum level until CCFA49") as well as the questions listed, below:

A. What ML for benzoates (expressed as benzoic acid) is sufficient to be both protective of safety and functionally effective for use in most products included under food category 14.1.4 (Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks)?

i. Please provide a scientific rationale as to why the use level you are proposing is necessary and sufficient to achieve the functional effect in most products included under food category 14.1.4.

B. Are there products currently in international trade for which the currently proposed ML of 250 mg/kg is not sufficient?

i. Please identify specific products in food category 14.1.4 that are available in international trade for which a level greater than 250 mg/kg benzoates (as benzoic acid) is required to achieve the functional effect of preservative.

ii. For the specific products identified in B(i):

[7] Evaluation of certain food additives and contaminants (Forty-sixth report of the Joint FAO/WHO Expert Committee on Food Additives) WHO Technical Report Series, No. 868, 1997.
[8] Toxicological Evaluation of Certain Food Additives and Food Contaminants, WHO Food Additive Series, No. 18, 1983. Toxicological Monographs of the 27th JECFA Meeting.
[9] ALINORM 04/27/12, para. 72, Appendix VI.
[10] ALINORM 04/27/41, paras. 27-29.
[11] REP 14/FA, paras. 18-19 and Appendix XV.
[12] Safety evaluation of certain food additives and contaminants. WHO Food Additive Series, No. 71, 2015. Toxicological Monographs of the 80th Meeting.

a. Please indicate the ML (expressed as mg/kg benzoic acid) that is necessary to provide the functional effect of preservative in these specific products.

b. Please provide a scientific rationale as to why the higher levels are necessary to achieve the functional effect in these specific products.

c. Please provide a rational as to why the use levels for these specific products are not of concern in the context of JECFA's exposure assessment and of the use level for benzoates in most products in FC 14.1.4.

Comments Received in Response to First Circular

8. In total, comments on the first circular were received from thirteen members of the EWG (Brazil, China, Costa Rica, European Union, India, Iran, Japan, Malaysia, Mexico, Singapore, Thailand, USA, and ICBA). Ten of the EWG members, in general, supported a use level of at least 250 mg/kg for food category 14.1.4. Of these ten EWG members, six also supported the addition of a footnote permitting the use of benzoates at an ML of 500 mg/kg in concentrates and beverages with a pH greater than 3.5. Three of the EWG members supported lowering the ML below the interim level of 250 mg/kg, with one proposal of 150 mg/kg, and one proposal of 100 mg/kg.

Brief summary of comments in favor of a use level of 250 mg/kg for benzoates in food category 14.1.4 provided in response to the first circular

9. Many EWG members indicated that a benzoate use level of 250 mg/kg was required in beverages falling under food category 14.1.4 to prevent microbiological spoilage during the shelf life of the beverage. Some members indicated that the adoption of a use level below 250 mg/kg would result in significant market disruption. Several EWG members indicated that data on the minimum inhibitory concentration (MIC) of benzoic acid for common beverage spoilage microorganisms demonstrate that a use level around 250 mg/kg is protective for beverages with a lower pH. However, these EWG members also indicated that the MIC for benzoates increased at higher pHs, in part due to the lower levels of undissociated benzoic acid available at higher pHs. For this reason, higher uses levels of benzoates are necessary in beverages with higher pHs in order to achieve the technical effect. It was also noted that the use of benzoates in beverages at levels that are sub-lethal to microorganisms could have unintended consequences, such as the adaptation of microorganisms to the preservative benzoates. Finally, it was also indicated that benzoates are especially beneficial for use in concentrates (such as those used in fountain beverage machines), as preservatives other than benzoates are less soluble in water and can result in post-mix machine clogging.

Brief summary of comments in favor of a use level lower than 250 mg/kg for benzoates in food category 14.1.4 provided in response to the first circular

10. It was acknowledged that there is a technological need for preservatives in food category 14.1.4, and that benzoates are effective in beverages having a lower pH. However, it was also noted that preservatives other than benzoates can be used, and that microbial content can be lowered through other means such as processing and GMP practices. One commenter stated that benzoates do not appear to be acceptable at higher pHs from a safety perspective based on a potential higher exposure to benzoates. A comment by one member indicated that in their opinion a further reduction of the ML for benzoates was needed to address the recommendations made by the 80th JECFA with regards to exceedance of the ADI by certain populations. The same commenter also indicated their belief that based on the exposure estimate prepared by the 80th JECFA (which incorporated typical benzoate use levels from 83 to 209 mg/kg) that the appropriate ML for benzoates in food category 14.1.4 should fall below 209 mg/kg.

Questions Posed in the Second Circular of the EWG

11. As noted in the summary of comments, above, many arguments were provided indicating that a use level of 250 mg/kg is technologically justified and required to maintain the quality and safety of beverages included under food category 14.1.4. However, comments were also received indicating that benzoate levels above 150 mg/kg were not needed in beverages falling under food category 14.1.4, and that the committee needed to take into account the exposure estimate prepared by the 80th JECFA which incorporated a typical use level range for benzoates from 83-209 mg/L in the exposure estimate. As a potential compromise, the EWG was asked to comment on the acceptability of a use level of 200 mg/kg in food category 14.1.4 as a potential compromise, with the addition of a note permitting use at 500 mg/kg (as consumed) for products with a pH greater than 3.5 and concentrates. Members of the EWG were asked to consider the following when submitting their comments on the compromise proposal:

- Members of the EWG who argued in favor of a use level higher than 200 mg/kg were asked to focus their comments on how higher use levels of benzoates in food category 14.1.4 are safe taking into account the exposure estimate for benzoates prepared by the 80th JECFA.[12,**Error! Bookmark not defined.**]

- Members of the EWG who argued in favor of a use level lower than 200 mg/kg were asked to focus their comments on how a use level of 200 mg/kg does not address the concerns listed in the report of the 80th JECFA.

Comments Received in Response to Second Circular

12. In total, comments on the second circular were received from 9 members of the EWG (Australia, Canada, Costa Rica, European Union, India, Russian Federation, Singapore, USA, and ICBA). Only one EWG member was supportive of the compromise use level of 200 mg/kg for benzoates in food category 14.1.4, but without addition of the footnote allowing use at 500 mg/kg in concentrates and beverages with a pH greater than 3.5. Two members of the EWG supported a lower use level of 150 mg/kg. Four members supported a higher use level of 250 mg/kg, with three of these members also supporting a footnote for use at 500 mg/kg in concentrates and beverages with a pH greater than 3.5. One member indicated permission in their country at levels higher than 250 mg/kg and reiterated the need for higher levels in beverages with higher pH levels.

13. One member proposed a multi-step scenario to allow industry time to lower their benzoate use levels over time or find alternatives. The first step in the proposed scenario would be to maintain the interim ML of 250 mg/kg for benzoates in food category 14.1.4, and add permissions for use at 500 mg/kg in concentrates and beverages with a pH higher than 3.5 for a set time period. At the end of the set time period, CCFA would consider further reducing the ML for benzoates in food category 14.1.4 to 150 mg/kg, or another ML, as appropriate.

14. One member, who was in support of a lower use level of 150 mg/kg, noted that a level of 150 mg/kg was below the level of 209 mg/kg used by JECFA in their exposure assessment (representing the high end of reported average typical benzoate use levels used by JECFA in their exposure estimate).[4] As the upper range of the JECFA exposure assessment exceeded the ADI at the 95th percentile for certain populations, they reiterated that the ML for benzoates in food category 14.1.4 should be somewhere below 209 mg/kg. The member also was against the inclusion of a footnote permitting use at a higher level for concentrates and beverages with a pH greater than 3.5, as they believed that brand loyalty to products with the higher use level would result in exceedance of the ADI.

15. Two members, who were in support of a higher use level of 250 mg/kg, submitted dietary exposure estimates in support of a higher use level for benzoates in food category 14.1.4. The submitted estimates are summarized below.

Comments from Australia

- Australia submitted benzoate exposure estimates for certain Australian population groups (primarily children) based on the use of benzoates in 24 food categories (including water-based flavoured drinks). These estimates incorporated mean benzoate levels taken from the 21st Australian Total Diet Study and used dietary intake based on two 24 hour recalls from the 2007 Australian National Children's Nutrition and Physical Activity Survey (ANCNPAS).[13] It was reported that the ADI for benzoates (0-5 mg/kg bw/d) was not exceeded for Australian consumers of foods containing benzoates at the 90th percentile for the population groups of 2-5 year olds, 6-12 year olds, and 13-16 year olds, with exposures of 2.3 mg/kg bw/d, 2.2 mg/kg bw/d, and 1.8 mg/kg bw/d, respectively.

- Australia also submitted a published journal article estimating benzoate exposure from use in food in New Zealand.[14] The publication provided benzoate exposure in New Zealand based on consumption of 30 foods (including soft drinks). Exposure was determined using analytically-determined mean benzoate levels and 24 hour dietary recall data from the 2002 National Children's Nutrition Survey. Benzoate exposure was presented for 14 population groups (ranging from 5-12 year old children to 65+ year old adults). None of the 14 population groups exceeded the ADI for benzoates at the 95th percentile for consumers of foods containing benzoates.

[13] 21st Australian Total Diet Study: http://www.foodstandards.gov.au/publications/Pages/21staustraliantotald2963.aspx
[14] P. Cressey, S. Jones. "Levels of preservatives (sulfite, sorbate and benzoate) in New Zealand foods and estimated dietary exposure", Food Additives and Contaminants: Part A, 26:5, 604-613, 2009.

Comments from ICBA

- ICBA provided refined exposure estimates for four countries that have national limits for benzoates in beverage categories that exceed 400 mg/kg (USA, Canada, Mexico and Brazil), and may represent the most conservative or highest levels of benzoate intake from consumption of beverages falling under GSFA food category 14.1.4. Both probabilistic and brand loyal exposure assessment scenarios were presented. Exposure estimates based on probabilistic modeling scenarios took into account market-weighted distribution of actual benzoate use levels (including those that did not contain benzoates, and also those with benzoate levels above 250 mg/kg). Brand loyal exposure estimates assigned a level of 250 mg/kg to the highest contributing beverage type for each country (e.g., regular carbonated soft drinks for the USA, Canada and Mexico). In the brand loyal models for the USA and Canada, regular carbonated beverages with a pH> 3.5 were assigned higher levels (i.e., 428 mg/kg for the USA and 438 mg/kg for Canada), although it was noted that these products only represent approximately 2% of the non-alcoholic beverage market in the USA and Canada. The remaining beverage types in the brand loyal exposure estimate scenario were assigned a market-weighted mean benzoate use level according to market share.
    - For the probabilistic exposure scenarios, mean and 95th percentile exposure estimates (only up to the 90th percentile was reported for Brazil) for non-alcoholic beverages were below the ADI for benzoates for all population groups (including toddlers and children) in all markets (USA, Canada, Mexico and Brazil).
    - For the brand loyal exposure scenarios for the USA and Canada, exposure estimates for non-alcoholic beverages were below the ADI for benzoates at the mean and 95th percentile for all population groups (including toddlers and children). However, when only considering the consumption of regular carbonated beverages by the subset of the population that regularly consumes carbonated beverages, the intake by 1 to 7 year old consumers in the USA and Canada slightly exceeded the ADI at the 95th percentile with an intake of 5.36 mg/kg bw/d. In addition, for Mexico, 1-7 year old consumers of non-alcoholic beverages slightly exceeded the ADI at the 95th percentile with an intake of 5.27 mg/kg bw/d. All other population groups in Mexico had benzoate exposures below the ADI at the 95th percentile for non-alcoholic beverages. All reported population groups for Brazil were below the ADI for non-carbonated beverages at the 95th percentile.

Recommendation

16. The EWG was tasked by CCFA48 to request information on the use levels and technical justification for the use of benzoates in food category 14.1.4 (Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks). While a great deal of information was shared with the EWG (as summarized above in the comments received in response to the first and second circulars), a consensus decision on the appropriate maximum level for benzoates in food category 14.1.4 could not be reached.

17. The Chair of the EWG recommends that CCFA49 consider the following three options that cover the range of MLs considered by the EWG for the use of benzoates in food category 14.1.4.

Option 1

An ML of 150 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid).

Option 2

An ML of 200 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note “Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed.”

Option 3

An ML of 250 mg/kg for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (As benzoic acid) and the new note “Except for use in beverages with a pH greater than 3.5 and concentrates at 500 mg/kg as consumed.”

Appendix 4: Request for information on the use of food additives associated with Note 22 in non-standardized foods as defined in Section 1 of CODEX STAN 311-2013

1 Among several topics, CCFA48 requested the EWG on the GSFA to CCFA49 to:[1]

- Request information on the use of food additives associated with Note 22 in non-standardized food as defined in Section 1 of the *Standard for Smoked Fish, Smoke-flavoured Fish and Smoke-dried Fish* (CODEX STAN 311-2015).

Background:

2 The *Standard for Smoked Fish, Smoke-flavoured Fish and Smoke-dried Fish* (CODEX STAN 311-2013) was adopted by the Codex Alimentarius Commission (CAC) in 2013.[2] This commodity standard corresponds to food category (FC) 09.2.5 (*Smoked,dried, fermented, and/or salted fish and fish products, including molluscs, crustaceans and echinoderms*) of the GSFA.[3] CODEX STAN 311-2013 lists specific food additives that can be used in food corresponding to this standard. Section 1 (*Scope*) of CODEX STAN 311-2013 defines products that are covered by the standard:

> *"This standard applies to smoked, smoke-flavoured and smoke-dried fish prepared from fresh, chilled or frozen raw material. It deals with whole fish, fillets and sliced and similar products thereof. The standard applies to fish, either for direct consumption, for further processing, or for addition into speciality or minced products where fish constitutes only part of the edible contents."*

And also defines products that are not covered by the standard:

> *"It does not apply to fish treated with carbon monoxide (filtered, "clear" or 'tasteless' smoke), fish packaged in hermetically sealed containers processed to commercial sterility. Speciality or minced products as such are not included (e.g. fish-salads)."*

3 At the time that CODEX STAN 311-2013 was adopted there were already multiple adopted provisions in the GSFA in FC 09.2.5. A number of those adopted provisions were associated with Note 22, which read "*For use in smoked fish products only*".

4 When forwarding CODEX STAN 311-2013 to the CAC for adoption the 32nd Codex Committee on Fish and Fishery Products (CCFFP) noted that there were adopted provisions in FC 09.2.5 of the GSFA for food additives that were not technologically justified in products covered by CODEX STAN 311-2013.[4] Therefore the CCFFP requested the CCFA to associate a note with the relevant provisions in FC 09.2.5 of the GSFA to specify that these additives were not allowed in the products covered by CODEX STAN 311-2013.[5, 6] CCFA45 considered CCFFPs request and agreed that the EWG on Alignment to CCFA46 should prepare recommendations to align the provisions in FC 09.2.5 with CODEX STAN 311-2013.[7] However, due to an oversight the mandate of the EWG on Alignment did not include this request.[8, 9] Therefore the CCFA47 agreed to request the EWG on Alignment to the CCFA48 to take on this work.[10]

[1] REP 16/FA, para. 101.
[2] REP 13/CAC, para. 38.
[3] CODEX STAN 192-1995, Annex C.
[4] REP 13/FFP, para. 37.
[5] REP 13/FFP, para. 38.
[6] CX/FA 13/45/2, para. 9.
[7] REP 13/FA, paras. 29 & 30.
[8] REP 13/FA, para. 51.
[9] CX/FA 15/4/6, paras 8, 12, and 19
[10] REP 15/FA, para. 58.

5 The EWG on Alignment to CCFA48 prepared proposals to align the provisions in FC 09.2.5 with CODEX STAN 311-2013.[11] The EWG noted that food additives with provisions in FC 09.2.5 with Note 22 were not listed in CODEX STAN 311-2013 and therefore were not technologically justified in foods covered by that standard. However, the EWG also noted that CODEX STAN 311-2013 defines products that are not covered by the standard. Therefore, the EWG proposed that Note 22 be revised to read "*For use in non-standardized smoked fish products only*." The EWG also proposed that adopted provisions in FC 09.2.5 with Note 22 be revised to also include a new note, Note XS 311 "*Excluding products conforming to the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013)*." The EWG proposed that the combination of these two notes in a GSFA provision indicates that the additive may not be used in standardized smoked fish products (Note XS311) but may be used in non-standardized smoked fish products (Note 22).[12]

6 The proposals of the EWG on Alignment to CCFA48 were discussed by the in-session WG on Alignment to CCFA48, which provided recommendations to CCFA48 on this work.[13] While discussing the recommendation for provisions in FC 09.2.5 with Note 22, CCFA48 had further discussion as to whether these additives are used in non-standardized smoked fish products.[14] As a result of these discussions CCFA48:

i) revised Note 22 to read: "For use in non-standardised smoked fish products only, as defined in Section 1 of the *Standard for Smoked Fish, Smoke-flavoured Fish and Smoke-dried Fish* (CODEX STAN 311-2015)"; and

ii) tasked the EWG on the GSFA to CCFA49 to request information on the use of food additives associated with Note 22 in non-standardized products as defined in Section 1 of CODEX STAN 311-2015, with the understanding that relevant provisions would be discontinued / revoked if information is not provided. It was noted that if information on use and technological justification for provisions for colours were provided those provisions would be maintained in the GSFA at the current step.

Procedure of the EWG:

7 The EWG issued two circulars for comment. For the topic discussed in Appendix 2, the EWG received comments from Brazil, the European Union (EU), Japan, Malaysia, Norway, and the Russian Federation (RU). The first circular requested information on the types of non-standardized products as defined in Section 1 of CODEX STAN 311-2013 the food additive was used in, as well as the technological justification for that use. The second circular presented proposals for provisions for comment by the EWG based upon the types of products and technological justifications presented in comments to the first circular.

8 Comments to the first circular by EWG members noted that there are several provisions in FC 09.2 which have Note XS311 associated with them, but do not have Note 22. Those provisions were not included in the first circular as those provisions do not have Note 22 associated with them. Those EWG members which submitted comment on the provisions in FC 09.2 which have Note XS311 requested that the EWG also consider the provisions in FC 09.2 with Note XS311 since FC 09.2 is a parent category of FC 09.2.5. As such, the second circular requests information on the actual use and technological justification for the use additives with provisions listed in FC 09.2.5 with Note XS311, in non-standardized products as defined in Section 1 of CODEX STAN 311-2013. However, since the issuance of the second circular the Chair of the EWG has further considered if the same concerns which form the mandate of the EWG also apply to those provisions in FC 09.2 with Note XS311. In the opinion of the EWG Chair the provisions in FC 09.2 with Note XS311 do not fall within the mandate of the EWG as they have not previously had Note 22 associated with them and therefore were never restricted to use in smoked fish products only. As the provisions in FC 09.2 with Note XS311 do not fall within the mandate of the EWG, those provisions are not included in the current document.

[11] CX/FA 16/48/6, Appen. 5 and 6.
[12] CX/FA 16/48/6, pg 37.
[13] 48 CCFA, CRD 3, Recommendation 5.
[14] REP 16/FA, paras. 45 and 46.

Working Document:

9. The first and second circulars of the EWG did not discuss the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015. However, in response to the second circular several EWG members questioned what products fell within the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015 and whether the uses provided in response to the first circular were included in that scope. Due to time constraint the EWG was not able to discuss the questions raised in the second circular on the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015. As such, Part 1 of this Appendix requests discussion on the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015.

10 Part 2 of this Appendix provides recommendations for each provision in FC 09.2.5 associated with Note 22. The provisions under discussion are presented in the format of the Table 2 of the GSFA. The proposals in Part 2 of this Appendix take into account alignment with corresponding CODEX STAN 311-2015, and comments provided by members of the EWG. However, as consensus was not reached on the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015, many of these recommendations request further information, and are dependent on the outcome of the discussion on Part 1 of this Appendix.

Appendix 4, Part 1: request for discussion on the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015

1. The first and second circulars of the EWG did not discuss the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015. The first circular requested information for the provisions in FC 09.2.5 with Note 22 on the types of non-standardized products as defined in Section 1 of CODEX STAN 311-2013 the food additive was used in, as well as the technological justification for that use. The second circular presented proposals for provisions for comment by the EWG based upon the types of products and technological justifications presented in comments to the first circular. However, in response to the second circular several EWG members questioned what products fell within the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015 and whether the uses provided in response to the first circular were included in that scope.

2. The Chair of the EWG notes that Section 1 of CODEX STAN 311-2015, as well as the descriptor of FC 09.2.5 provides indications as to the type of smoked-fish products that may qualify as non-standardized products as defined in Section 1 of CODEX STAN 311-2015.

- "*whole fish, fillets and sliced and similar products thereof":* The first paragraph of Section 1 of Codex Stan 311-2015 clearly states that the standard applies to these products

- "*fish treated with carbon monoxide (filtered, "clear" or 'tasteless' smoke), fish packaged in hermetically sealed containers processed to commercial sterility":* The second paragraph of Section 1 of Codex Stan 311-2015 clearly states that the standard does not apply to these products.

- specialty or minced smoked products: The descriptor for FC 09.2.5 includes "smoked or salted fish paste" implying that certain types of fish paste are included in FC 09.2.5. The first paragraph of Section 1 of Codex Stan 311-2015 implies that the standard only applies to "*whole fish, fillets and sliced and similar products thereof"* that are "*for addition into speciality or minced products where fish constitutes only part of the edible contents".* The second paragraph of Section 1 states "*Speciality or minced products as such are not included (e.g. fish-salads)"* – Codex Stan 311-2015 does not apply to these products. Therefore Codex Stan 311-2015 applies to smoked fish cuts that are added to specialty or minced products, but does not apply to specialty or minced smoked fish products themselves (*i.e.,* smoked fish pastes or spreads that consist of finely comminuted fish).

3. For the purposes of the provisions listed in Appendix 4, Part 2, the Chair of the EWG recommends that CCFA48 discuss the scope of non-standardized products as defined in Section 1 of CODEX STAN 311-2015 in the context of the products listed below, with the expectation that should CCFA48 agree on the below scope relevant provisions in Appendix 4, Part 2 would be limited to those products via the use of an appropriate Note:

- fish treated with carbon monoxide (filtered, "clear" or 'tasteless' smoke);
- fish packaged in hermetically sealed containers processed to commercial sterility; and
- smoked fish pastes or spreads that consist of finely comminuted fish.

Appendix 4, Part 2: Recommendations on Provisions in FC 09.2.5 with Note 22

General comments:

RU: colours (INS122, INS129, INS E160e, INS160f, INS110, INS104),INS142,INS143,INS132,INS120,INS155, INS100, INS160d, INS161b, INS124, INS133, INS 131, INS 102, INS 151) should be used individually or in combination

Norway: The origination of Note 22 was "for use in smoked fish only". Norway does not support the original Note 22, nor the new Note 22 which restricts use to non-standardized smoked fish as defined in CODEX STAN 311-2013.

Food Category No. 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including molluscs, crustaceans and echinoderms)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted/ Year Revised	INS Functional Class	Information from CCFA48/ Comments by EWG on first Circular	EWG Proposal
ALLURA RED AC	129	300	22	2009	Colour	**IACM:** Used in Salmon substitutes to restore color lost in processing and to make products more appealing – maintain in CODEX STAN 311-2013 **Norway:** supports removal of Note 22 and add Note NN **RU:** recommends ML = 100 mg/kg	Remove Note 22 and add Note NN – INS 129 is listed in CODEX STAN 311-2013 at 300 mg/kg.
AMARANTH	123	300	22	7	Colour	**IACM**: Used in Salmon substitutes; fish paste; crustacean paste; smoked fish to restore color lost in processing and to make products more appealing to consumer and achieve shade associated with product. **EU, Norway, RU:** Discontinue	Discontinue unless information provided supporting use in products discussed in Appendix 4, Part 1
AZORUBINE (CARMOISINE)	122	500	22	7	Colour	**IACM:** Used in smoked fish to restore color lost in processing and to make products more appealing **EU:** Discontinue; technological justification for the use in non-standardised products was not provided; technological justification in smoked fish was appraised by the CCFFP (CS 311-2013) and this colour was not considered to be technologically justified **Norway:** examples don't comply with Note 22. **RU:** add Note XS311, keep at current step	Discontinue unless information provided supporting use in products discussed in Appendix 4, Part 1
BEET RED	162	GMP	22	7	Colour	**IACM:** Used in heat processed fish pastes, dried salted tuna (Spanish product "mojama") to restore color lost in processing and to make products more appealing **EU:** smoke-dried fish covered by CS 311-2013; beet red not listed – i.e. not technologically justified; do fish pastes fall in FC 09.2.5? If not discontinue **Norway:** examples don't comply with Note 22 **RU:** add Note XS311, keep at current step	Add Note XS311, keep at current step – example includes dried salted tuna which is in this FC but not covered by CODEX STAN 311-2013.

BRILLIANT BLACK (BLACK PN)	151	500	22	7	Colour	**IACM:** Used in Fish paste, crustacean paste, smoked fish, pre-cooked crustaceans to restore color lost in processing and to make products more appealing **EU**: not technologically justified in smoked fish according to CS 311-2013; not clear whether fish paste, crustaceans paste and pre-cooked crustaceans fall in FC 09.2.5 **Norway:** examples don't comply with Note 22 **RU:** recommends ML = 100 mg/kg	Discontinue unless information provided supporting use in products discussed in Appendix 4, Part 1
BROWN HT	155	500	22	7	Colour	**IACM:** Used in Fish paste, crustacean paste, smoked fish, to restore colour lost in processing and to make products more appealing **EU**: not technologically justified in smoked fish according to CS 311-2013; not clear whether fish paste and crustaceans paste fall in FC 09.2.5 **Norway:** examples don't comply with Note 22 **RU:** recommends ML = 100 mg/kg	Discontinue unless information provided supporting use in products discussed in Appendix 4, Part 1
CANTHAXANTHIN	161g	15	22, XS311	2011, rev. 2016	Colour	**IACM:** Used in heat processed fish paste to restore colour lost in processing and to make products more appealing **EU:** does fish paste fall in FC 09.2.5? **Norway:** revoke – examples do not fall under this FC **RU:** maintain adopted provision	Revoke unless information provided supporting use in products discussed in Appendix 4, Part 1
CARMINES	120	300	22, XS311	2005, rev. 2016	Colour	**IACM:** heat processed fish pastes, salmon substitutes, fish paste to restore colour lost in processing and to make products more appealing, and to give colour to salmon substitutes **EU**: a proper categorization of the mentioned foods has to considered **Norway:** revoke – examples do not fall under this FC **RU:** recommends ML = 100 mg/kg	Revoke unless information provided supporting use in products discussed in Appendix 4, Part 1
CHLOROPHYLLS	140	GMP	22	7	Colour	**IACM:** Used in heat processed fish paste to restore colour lost in processing and to make products more appealing **EU:** a proper categorization of the mentioned foods has to considered **Norway:** examples don't comply with Note 22 **RU:** add Note XS311, keep at current step	Discontinue unless information provided supporting use in products discussed in Appendix 4, Part 1
CURCUMIN	100(i)	500	22	7	Colour	**IACM:** Used in heat processed fish pastes; smoked, dried and/or salted fish to restore colour lost in processing and to make products more appealing **Norway:** examples don't comply with Note 22 **RU:** recommends ML = 100 mg/kg	Add Note XS311, remove Note 22, add note "for use in dried and/or salted fish only" – these products are not covered by CS 311-

							2013 but are included in FC 09.2.5.
GRAPE SKIN EXTRACT	163(ii)	1000	22, XS311	2009, rev. 2016	Colour	**IACM:** Used in Smoked fish; pre-cooked crustaceans; fish paste and crustacean paste; salmon substitutes to restore colour lost in processing and to make products more appealing **Norway:** examples don't comply with Note 22 **RU:** maintain adopted provision	Revoke unless information provided supporting use in products discussed in Appendix 4, Part 1
INDIGOTINE (INDIGO CARMINE)	132	300	22, 161, XS311	2009, rev. 2016	Colour	**IACM:** Used in Salmon substitutes to restore colour lost in processing and to make products more appealing **EU:** does salmon substitute fall in 09.2.5? **Norway:** examples don't comply with Note 22 **RU:** recommends ML = 100 mg/kg	Revoke adopted provision
IRON OXIDES	172(i - iii)	250	22, XS311	2005, rev. 2016	Colour	**IACM:** Used in Salmon substitutes; fish paste; crustacean paste; smoked fish to restore colour lost in processing and to make products more appealing **EU**: a proper categorization of the mentioned foods has to considered **Norway:** examples don't comply with Note 22	Revoke unless information provided supporting use in products discussed in Appendix 4, Part 1
LUTEIN FROM TAGETES ERECTA	161b(i)	100	22	4	Colour	**IACM:** Used in salmon substitutes; fish paste; crustacean paste; smoked fish to restore colour lost in processing and to make products more appealing, with the advantage of being more stable than other yellow colours **EU, Norway, RU:** supports discontinuation	Discontinue unless information provided supporting use in products discussed in Appendix 4, Part 1
NITRATES	251, 252	365	22, 30	7	Colour Retention Agent, Preservative	**EU:** hold discussion for other agenda item on nitrates & nitrites **Malaysia:** supports use at 200 mg/kg total nitrate/nitrite as preservative **Norway:** Discontinue or hold until nitrates/nitrites discussed **RU:** ML too high	Add Note XS311, hold at current step for general discussion on nitrates/nitrites
NITRAITES	249, 250	130	22, 32	7	Colour Retention Agent, Preservative	**EU:** hold discussion for other agenda item on nitrates & nitrites **Malaysia:** supports use at 200 mg/kg total nitrate/nitrite as preservative **Norway:** Discontinue or hold until nitrates/nitrites discussed **RU:** ML too high	Add Note XS311, hold at current step for general discussion on nitrates/nitrites
PONCEAU 4R (COCHINEAL RED A)	124	100	22, XS311	2008, rev. 2016	Colour	**IACM:** Used in fish paste; crustacean paste; smoked fish to restore colour lost in processing and to make products more appealing **EU:** not technologically justified in smoked fish according	Revoke unless information provided supporting use in products discussed in Appendix 4, Part 1

						to CS 311-2013; not clear whether fish paste and crustaceans paste fall in FC 09.2.5 **Norway:** revoke, examples don't fall under this FC. **RU:** recommends ML = 100 mg/kg	
PROPYLENE GLYCOL	1520	20,000	22	7	Emulsifier, Glazing agent, Humectant	**EU, Norway, RU:** Discontinue, functional classes are not recognized in CS 311-2013	Discontinue
QUINOLINE YELLOW	104	500	22	7	Colour	**IACM:** Used in fish paste; crustacean paste to restore colour lost in processing and to make products more appealing **EU:** not clear whether fish paste and crustaceans paste fall in FC 09.2.5 **Norway:** examples don't comply with Note 22 **RU:** ML too high	Discontinue unless information provided supporting use in products discussed in Appendix 4, Part 1
RIBOFLAVINS	101 (i-iii)	300	22, XS311	2005, rev. 2016	Colour	**Brazil:** The justification to this food additive is the same to any other colours used in this FC, i.e, to restore colour lost in processing and to make products more appealing. **IACM:** Used in Salmon substitutes; fish paste; crustacean paste; smoked fish to restore colour lost in processing and to make products more appealing, for achieve special shade. IACM supports the continued use of riboflavins at the level of 300 mg/kg. **Norway:** revoke, examples don't comply with Note 22 **RU:** Riboflavins are vitamins with recommended level, not tech justification, ML is too high.	Revoke unless information provided supporting use in products discussed in Appendix 4, Part 1
SUNSET YELLOW FCF	110	100	22	2008	Colour	**IACM:** Used in salmon substitutes to restore colour lost in processing and to make products more appealing. maintain in CODEX STAN 311-2013 **Norway:** supports revise adopted provision to remove Note 22, add Note NN **RU:** supports maintain adopted with removal of Note 22	Revise adopted provision to remove Note 22, add Note NN – INS 129 is listed in CODEX STAN 311-2013
TARTRAZINE	102	500	22	7	Colour	**IACM:** Used in fish paste; crustacean paste; smoked fish to restore colour lost in processing and to make products more appealing. maintain in CODEX STAN 311-2013 **EU, RU**: the ML in CS 311-2013 is 100 mg/kg **Norway:** supports revise adopted provision to remove Note 22, add Note NN	Revise to 100 mg/kg, Remove Note 22 and add Note NN - INS 129 is listed in CODEX STAN 311-2013
TITANIUM DIOXIDE	171	GMP	22	7	Colour	**IACM:** Used in fish paste; crustacean paste; smoked fish; precooked crustacean to restore colour lost in processing and to make products more appealing **Norway:** revoke, examples do not fall into this FC **RU:** supports Add Note XS311, keep at current step	Discontinue unless information provided supporting use in products discussed in Appendix 4, Part 1

Note 22: For use in non-standardized smoked fish products only as defined in section 1 of the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013).
Note 30: As residual NO3 ion.
Note 32: As residual NO2 ion.
Note 161: Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
Note XS311: Excluding products conforming to the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013).
Note NN: For use in products conforming to the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013, only.

Appendix 5: Request to consider the appropriateness of the food additive provisions (adopted and in the Step process) in the renamed food categories 01.1, 01.1.1, 01.1.3 and 01.1.4

1 Among several topics, CCFA48 requested the EWG on the GSFA to CCFA49 to:[1]

- Consider the appropriateness of the food additive provisions (adopted and in the Step process) in the renamed food categories 01.1, 01.1.1, 01.1.3 and 01.1.4

Background:

2 Many of the foods covered in Food Category (FC) 01.1.1 of the GSFA are defined in the *General Standard for the Use of Dairy Terms* (CODEX STAN 206-1999). The physical working group (PWG) on the GSFA to CCFA45 noted inconsistencies between provisions for the technologically justified use of food additives in FC 01.1.1 and its subcategories, and the definitions of corresponding foods and the use of food additives in those foods as defined in CODEX STAN 206-1999.[2] The PWG recommended that CCFA45 form a new EWG on Dairy Terms to prepare proposals to address this issue, and CCFA45 agreed to this recommendation.[3, 4]

3 The EWG on Dairy Terms proposed that this issue be addressed through a revision of the structure of FC 01.1 *Milk and Diary Based Drinks* and its subcategories.[5] CCFA46 agreed to this proposal and requested that the EWG on Dairy Terms to CCFA47 prepare recommendations for revising the structure of FC 01.1 and to prepare a project document for new work that would also include an analysis of the implications of the proposed revisions on the food additive provisions in the GSFA.[6] CCFA47 considered the report of the EWG on Dairy Terms (CX/FA 15/47/12) and agreed to request the Codex Alimentarius commission to approve new work on the revision of food category 01.1 and its sub-categories.[7] CCFA47 also requested that the EWG on Dairy Terms to CCFA48 prepare recommendations for revising FC 01.1 and its subcategories.[7]

4 The CCFA48 considered FA45/CRD 17, which contained proposals based on the report of the EWG on Dairy Terms (CX/FA 16/48/12) as well as comments on this report contained in CX/FA 16/48/12 Add.1, 2, and FA45/CRD 18.[8] As a result of this discussion the Committee agreed to:

(i) Revise the structure, title, and descriptor of FC 01.1 and its subcategories.[9] The historical subcategories of FC 01.1 would be restructured into revised FCs 01.1.1, 01.1.3, and 01.1.4. The revised FC 01.1 would also include a new subcategory, FC 01.1.2 *Other fluid milks (plain)*; and

(ii) Include plain drinks based on fermented milk in FC 01.2.1 *Fermented milks (plain)* as they share the same food additive provisions according to the Standard for Fermented Milks (CODEX STAN 243-2003).

5 CCFA48 noted that there are no provisions for the use of food additives in the new FC 01.1.2 as the scope of the new FC 01.1.2 did not correspond to the scope of a historical FC. CCFA48 requested that proposals for inclusion of food additive provisions in the new food category 01.1.2 “Other fluid milks (plain)” should be submitted in response to the circular letter (CL 2016/8-FA) requesting proposals for new and/or revision of adopted food additive provisions in this food category.[10]

6 CCFA48 also noted that the scope of the revised FCs (*i.e*. 01.1, 01.1.1, 01.1.3, and 01.1.4) had not substantially changed from the scope of the corresponding historical FCs. Therefore, CCFA48 determined that it was not necessary to revoke and/or discontinue the provisions in historical FCs, but rather that those provisions should be placed in the corresponding revised FCs. CCFA48 also requested that the EWG on the GSFA to CCFA49 consider these food additive provisions (both adopted and in the Step process) in the revised FCs 01.1, 01.1.1, 01.1.3, 01.1.4 to the to verify their appropriateness.

---

[1] REP 16/FA, para. 101.
[2] FA45/CRD2.
[3] FA45/CRD2, Recommendation 9.
[4] REP 13/FA, para. 77.
[5] CX/FA 14/46/11.
[6] REP 14/FA, para. 77.
[7] REP 15/FA, para 92.
[8] REP 16/FA, paras 78-86
[9] The revised food category 01.1 is provided in the Annex to this Appendix.
[10] REP 16/FA, Para. 86.

Working Document:

7 The EWG issued two circulars for comment. For the topic discussed in Appendix 5 the EWG received comments from Canada, China, the European Union (EU), Japan, India, Iran, Malaysia, New Zealand (NZ), United States of America (USA), Russian Federation (RU), CCC, EFMA, ELC, IACM, IDF, IFAC, and NATCOL. Part 1 of the current document presents proposals for requests existing provisions, in revised FCs 01.1, 01.1.1, 01.1.3, and 01.1.4 in the context of the descriptors for those food categories, corresponding commodity standards, and comments submitted by EWG members in response to the first circular. The descriptors for those food categories are provided in Part 1 to this Appendix. The proposals presented in Part 2 of the current document are based upon a consensus approach taking into account alignment with corresponding Codex commodity standards and comments on the first circular proposals by members of the EWG. These recommendations are based on a "weight of evidence" approach; that is, comments containing justifications were given more weight than comments with no supporting justification.

8 The provisions under discussion are presented in the format of the Table 2 of the GSFA. To assist, Table 1 below explains the movement of the provisions under discussion from the historical FC 01.1 and its subcategories to the corresponding revised FCs.

Table 1. Historical and Corresponding New Food Categories: FC 01.1 and its sub-categories

Historical Food Categories	**Movement of Existing Provisions**	**Related Food Categories after CCFA48 Revision**
FC 01.1 (Milk and dairy-based drinks)	Provisions maintained in new FC 01.1	**FC 01.1** (Fluid milk and milk products)
FC 01.1.1 (Milk and buttermilk (plain))	Provisions maintained in new FC 01.1.1, as well as copied to the new FC 01.1.3.[11]	**FC 01.1.1** (Fluid milk (plain)) **FC 01.1.3 (**Fluid buttermilk (plain))
FC 01.1.1.1 (Milk (plain))	Provisions moved to new FC 01.1.1	**FC 01.1.1** (Fluid milk (plain))
FC 01.1.1.2 (Buttermilk (plain))	Provisions moved to new FC 01.1.3	**FC 01.1.3 (**Fluid buttermilk (plain))
FC 01.1.2 (Dairy-based drinks, flavoured and/or fermented (e.g. chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks))	Provisions moved to new FC 01.14	**FC 01.1.4** (Flavoured fluid milk drinks)

[11] The historical FC 01.1.1 was a parent category for both the historical FC 01.1.1.1 (now new FC 01.1.1), and the historical FC 01.1.1.2 (now new FC 01.1.3).

Appendix 5, Part 1: Descriptors for Food Category 01.1 and subcategories after CCFA48

Food Category System

01.0 Dairy products and analogues, excluding products of food category 02.0

01.1. Fluid Milk and Milk Products

01.1.1. Fluid Milk (plain)

01.1.2. Other Fluid Milk (plain)

01.1.3. Fluid Buttermilk (plain)

01.1.4. Flavoured Fluid Milk Drinks

Food Category Descriptors

01.0 Dairy products and analogues, excluding products of food category 02.0

Includes all types of dairy products that are derived from the milk of any milking animal (e.g. cow, sheep, goat, buffalo). In this category, with the exception of food category 1.1.2, a “plain” product is one that is not flavoured, nor contains fruit, vegetables or other non-dairy ingredients, nor is mixed with other non-dairy ingredients, unless permitted by relevant standards. Analogues are products in which milk fat has been partially or wholly replaced by vegetable fats or oils.

01.1 Fluid milk and milk products

Includes all plain and flavoured fluid milks based on skim, part-skim, low-fat and whole milk, excluding plain fermented products and plain renneted milk products of food category 1.2. Fluid milks are 'milk products' as defined in CODEX STAN 206-1999, that are obtained by the processing of milk, and may contain food additives and other ingredients functionally necessary for processing. Raw milk (“milk” as defined in CODEX STAN 206-1999) shall not contain any food additives.

01.1.1 Fluid milk (plain)

Plain fluid milk obtained from milking animals (e.g., cows, sheep, goats, buffalo) that has been processed. Includes pasteurized, ultra-high temperature (UHT) treated, sterilized, homogenized, or fat adjusted milk. Includes, but is not limited to, skim, part-skim, low-fat and whole milk.

01.1.2 Other fluid milks (plain)

Includes all plain fluid milk, excluding products of food categories 01.1.1 Fluid milk (plain), 01.1.3 Fluid buttermilk (plain), and 01.2 Fermented and renneted milk products (plain). Includes, but is not limited to, plain recombined fluid milks, plain reconstituted fluid milks, plain composite milks, non-flavoured vitamin and mineral fortified fluid milks, protein adjusted milks, lactose reduced milk, and plain milk-based beverages. In this food category, plain products contain no added flavouring nor other ingredients that intentionally impart flavour, but may contain other non-dairy ingredients.

01.1.3 Fluid buttermilk (plain):

Fluid buttermilk is the nearly milkfat-free fluid remaining from the butter-making process (i.e. churning fermented or non-fermented milk and cream). Fluid buttermilk is also produced by fermentation of fluid skim milk, either by spontaneous souring by the action of lactic acid-forming or aroma-forming bacteria, or by inoculation of heated milk with pure bacterial cultures (cultured buttermilk).14 Fluid buttermilk may be pasteurized or sterilized.

01.1.4 Flavoured fluid milk drinks

Includes all mixes and ready-to-drink fermented or not fermented milk-based drinks with flavourings and/or food ingredients that intentionally impart flavour, excluding mixes for cocoa (cocoa-sugar mixtures, category 05.1.1). Examples, include but are not limited to, chocolate milk, chocolate malt drinks, strawberry-flavoured yoghurt drink, lactic acid bacteria drinks, whey-based drinks, and lassi (liquid obtained by whipping curd from the lactic acid fermentation of milk, and mixing with sugar or intense sweetener).

Appendix 5, Part 2: Provisions in Tables 1 and 2 of the GSFA in food categories 01.1, 01.1.1, 01.1.3 and 01.1.4

COMMENTS for FC 01.1

EU: Does not support listing of food additive provisions in this parental category due to the very limited technological need for food additives in the subcategory 01.1.1.

Food Category No. 01.1 (Fluid milk and milk products)

Corresponding commodity standards: none; 243-2003 corresponds to subcategory 01.1.4.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
~~TOCOPHEROLS~~	~~307a, b, c~~	~~200~~		~~7~~	~~Antioxidant~~	Move to subcategories	**EU**: Accepts to move to subcategories **India**: There is no technical justification for use of antioxidants in this FC **NZ**: Used to enhance the keep qualities by inhibiting/reducing the potential for fat oxidation in UHT products; Add Note 227 **China:** Use may be indicated to assure a shelf stable product of sufficient shelf life and which does not develop a rancid off taste and/or off-flavour; 200 ppm use level is generally indicated as technologically justified **RF**: Used for vitamin E and antioxidant in many foods; ML should consider exposure from all FA uses; Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of antioxidants in this FC **IDF**: FC01.1 is a parent category, which includes raw milk where no food additives are allowed. All food additives provisions should be put in subcategories. **ELC**: Supports Proposal **US**: Used in the US with the limitation of 0.03% on fat basis. Not used in combination with other antioxidants; Foods in general **Canada**: Recommend considering provision in each subcategory case-by-case

COMMENTS for FC 01.1.1

NZ: The new food category (FC) 01.1.1 Fluid milk (plain) needs additives for UHT and sterilized milk only. These are acidity regulator, emulsifier, and stabilizer technological functions (e.g. citrates and phosphates).

IDF: the Codex EWG proposal stating “Adopt; with Note 227” was confusing. Clarification from the EWG would be appreciated on its interpretation.

Canada: Does not generally permit additives in fluid milk (plain) corresponding to FC 01.1.1. Therefore, if there is no general agreement among the Committee on the technological justification for the use of an additive in this FC, Canada would support discontinuing consideration of the provision.

Food Category No. 01.1.1 (Fluid milk (plain))

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
AGAR	406	4000		7	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: There is no technical justification for use in this FC **RF and EU**: Supports Discontinuation
CARBON DIOXIDE	290	GMP	59	7	Carbonating agent, Foaming agent, Packaging gas, Preservative, Propellant	Discontinue	**RF and India**: There is no technical justification for use in this FC **EU**: Supports Discontinuation if no technological justification is provided
CAROB BEAN GUM	410	GMP		7	Emulsifier, Stabilizer, Thickener	Adopt; with Note 227[12]	**EU**: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer **India**: There is no technical justification for use in this FC **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; FC could mislead consumers **NZ**: Adopt with note 227, Note 227 only allows use in sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products. **US**: For use in foods in general **Canada**: If agreement is reached that the use of the additive is justified in certain products of this subcategory, recommend adding a note to restrict use to those products.
CARRAGEENAN	407	10000		7	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Adopt; with Note 227	**EU**: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer **India**: There is no technical justification for use in this FC **RF**: Does not agree with 2nd circular proposal because

[12] Note 227: “For use in sterilized and UHT treated milks only.”

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
							in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **IFAC**: Supports Proposal; Carrageenan is an important component of UHT plain milks due to its heat stability and unique interaction with casein protein in the milk which results in the formation of structures which reduce problems with age gelation. This renders the UHT product stable despite high heat treatment. We would not object to the inclusion of Note 227. **NZ**: Propose ML of GMP as this is an additive in Table 3; Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products. **US**: For use in foods in general **Canada**: If agreement is reached that the use of the additive is justified in certain products of this subcategory, recommend adding a note to restrict use to those products.
GELLAN GUM	418	GMP		7	Stabilizer, Thickener	Adopt; with Note 227	**EU**: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer **India**: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of this FA in this FC. Use of this FA in this FC could mislead consumers **IFAC**: Supports; Like carrageenan, gellan can be used in in UHT plain milks due to its heat stability by formation of structures which reduce problems with age gelation. This renders the UHT product stable despite high heat treatment. We would not object to the inclusion of Note 227. **NZ**: Used to preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product; Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
							US: For use in foods in general **Canada**: If agreement is reached that the use of the additive is justified in certain products of this subcategory, recommend adding a note to restrict use to those products.
GUAR GUM	412	6000		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer **India**: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC **NZ**: Table 3 additive; Suggests ML of GMP **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general **Canada**: Canada does not permit the use of Emulsifiers/Stabilizers/Thickeners in products that would be subject to FC 01.1.1. However, if the consensus of the EWG is to recommend adoption of provisions for the emulsifiers/stabilizers/thickeners carob bean gum and gellan gum because they are technologically justified, why is information on technological justification requested for guar gum, which has the same functional classes? Would the “horizontal approach” for the use of E/S/T not be appropriate for FC 01.1.1?
KARAYA GUM	416	200		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: There is no technical justification for use in this FC **RF and EU**: Supports Discontinuation **US**: For use in foods in general **Canada**: Canada does not permit the use of Emulsifiers/Stabilizers/Thickeners in products that would be subject to FC 01.1.1. However, if the consensus of the EWG is to recommend adoption of provisions for the emulsifiers/stabilizers/thickeners carob bean gum and gellan gum because they are technologically justified, why is the proposal for karaya gum, which has the same functional classes, to discontinue? Would the “horizontal approach” for the use of E/S/T not

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
							be appropriate for FC 01.1.1?
KONJAC FLOUR	425	GMP		7	Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: There is no technical justification for use in this FC **RF and EU**: Supports Discontinuation
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: There is no technical justification for use in this FC **RF and EU**: Supports Discontinuation
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	10000		7	Antifoaming agent, Emulsifier, Stabilizer	Adopt; with Note 227	**India**: There is no technical justification for use in this FC **EU**: Does not support and seeks clarification – the phrase “to preserve the nutritional quality and enhance stability by stabilizing the cream, protein and added ingredient phases of the UHT product” is used by NZ to justify all additives in this category. To the EU knowledge milk is a complete stable emulsion of fat and water and apart from phosphates and sodium citrates no other additives are needed in this subcategory **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **IFAC**: Mono- and di- glycerides of fatty acids can be used as an emulsifier/anti-fouling agent by reducing surface tension of the milk, which prevents fouling layer build-up and then allows for longer run-times of equipment. (Note 227 should be added. ML=1000 mg/kg) **NZ**: To preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product. Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products **Canada**: If agreement is reached that the use of the additive is justified in certain products of this

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
							subcategory, recommend adding a note to restrict use to those products.
NITROGEN	941	GMP	59	7	Foaming agent, Packaging gas, Propellant	Adopt	**RF**: There is no technical justification for use in this FC **NZ**: Used to preserve the nutritional quality by gas injection to fill headspace in aseptic UHT packaging **EU**: Supports discontinuation without technological justification
NITROUS OXIDE	942	GMP		7	Antioxidant, Foaming agent, Packaging gas, Propellant	Discontinue; no information on technological justification provided	**RF and India**: There is no technical justification for use in this FC **EU**: Supports discontinuation without technological justification **Canada:** If agreement is reached that the use of the additive is justified as a packaging gas, recommend add Note 59 (as recommended for nitrogen and carbon dioxide). Canada does question, however, whether nitrous oxide has any uses as a packaging gas or is used only as a propellant (e.g. for spray whipped cream).
PECTINS	440	GMP		7	Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener	Adopt; with Note 227	**EU**: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer **India**: There is no technical justification for use in this FC **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products **Canada**: If agreement is reached that the use of the additive is justified in certain products of this subcategory, recommend adding a note to restrict use to those products.
PHOSPHATES	338; 339(i)-(iii); 340(i)-(iii); 341(i)-	1500	33 & 227	Adopted (2012)	Antioxidant, Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant,	Adopt; with Note 227	**India**: Required as stabilizers to prevent curdling in UHT and Sterilized milks; Add Note 227 **NZ**: Used as an aid in the manufacture of UHT products by buffering *pH* change as an acidity regulator **EU**: Note 227 should be kept; to the EU knowledge no need for phosphates in pasteurized milk; need is limited

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
	(iii); 342(i),(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542				Stabilizer, Thickener, Firming agent, Flour treatment agent		to UHT and sterilized milk and ML of 450 ppm should be sufficient **RF**: Supports Proposal **IFAC**: Supports Proposal; Phosphates are important components of UHT plain milks due to their ability to stabilize proteins and prevent phase separation after the milk, particularly milks with higher fat content, are exposed to high heat. Annual, cyclic variations in protein and vitamin balance of milk can affect heat stability of milk. The use of phosphates can help compensate for these variations, while also ensuring a consistent product. We support the inclusion of Note 227. We have consulted our members and been advised that the maximum usage level need to achieve this technical functionality is 1500 mg/kg. IFAC notes this provision was adopted at a usage level of 1500 mg/kg recently (2012). Given the technical justification for this usage level, we recommend it be maintained with the appropriate notes. **Canada:** This provision was recently adopted (2012). Although it is unclear which Member provided the justification, the ML of 1500 mg/kg was considered necessary to stabilize calcium in UHT goat milk (CX/FA 12/44/7, appendix I). CCFA may wish to consider verifying if this justification is still applicable, and if so, there would be no need to revise the adopted provision.
POLYDEXTROSES	1200	GMP		7	Bulking agent, Glazing agent, Humectant, Stabilizer, Thickener	Adopt	**EU**: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer **India**: Proposal Not Supported; there is no technical justification for use in this FC **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited; no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **IFAC**: Supports Proposal; As noted in the first circular, polydextrose adds body to low/reduced fat milks, contributing to mouthfeel and the perception of creaminess, thereby increasing organoleptic acceptability to consumers. As consumers continue to

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
							look for ways to reduce caloric intake, tools like polydextroses allow manufacturers to provide acceptable products with fewer calories, including low and no fat milks. **Canada**: If there is no Member support for this provision, recommend discontinuing the provision.
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Proposal Not Supported; there is no technical justification for use in this FC **EU**: Supports Discontinuation **RF**: Supports Discontinuation; PES is used as stabilizer, improving heat stability of proteins by forming structures that reduce problems with age gelation. (Only relevant for sterilized and UHT treated milks, so Note 227 should be added. ML=1000 mg/kg)
SODIUM ALGINATE	401	GMP		4	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Proposal Not Supported; there is no technical justification for use in this FC **RF and EU**: Supports Discontinuation
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		4	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Adopt; with Note 227	**India**: Proposal Not Supported; there is no technical justification for use in this FC **EU**: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer **RF**: Does not support because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **IFAC**: Supports Proposal. Like other gums, cellulose gum can be used in in UHT plain milks due to its heat stability. This renders the UHT product stable (prevents separation) despite high temperatures. We would not object to the inclusion of Note 227. **NZ**: Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
							US: For use in foods in general **Canada**: If agreement is reached that the use of the additive is justified in certain products of this subcategory, recommend adding a note to restrict use to those products.
TARA GUM	417	GMP		7	Gelling agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Proposal Not Supported; there is no technical justification for use in this FC **RF and EU**: Supports Discontinuation
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**Adopt; with Note 227**	**EU**: Accepts to move to subcategories **India**: Proposal Not Supported; there is no technical justification for use of antioxidants in this FC **RF**: Used for vitamin E and antioxidant in many foods; ML should consider exposure from all FA uses **NZ**: Used to enhance the keep qualities by inhibiting/reducing the potential for fat oxidation in UHT products; Add Note 227 **China and ELC**: Use may be indicated to assure a shelf stable product of sufficient shelf life and which does not develop a rancid off taste and/or off-flavour; 200 ppm use level is generally indicated as technologically justified **US**: Used in the US with the limitation of 0.03% on fat basis. Not used in combination with other antioxidants
TRISODIUM CITRATE	331(iii)	GMP		7	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	Adopt; with Note 227	**RF**: Does not support because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. Use of these food additives could mislead consumers about quality of milk (plain). There is not technological justification for to use these FA in this FC **India**: Required as stabilizers to prevent curdling in UHT and Sterilized milks. Proposed to be adopted with Note 227. **NZ**: As an aid in the manufacture of UHT products by buffering pH change as an acidity regulator. Should the other citrates be included as adopted for buttermilk (plain) (ie old FC 1.1.1.2) at GMP ie INS 331(i), 331(ii), 332(i), 332 (ii). Add note 227 **EU**: There is a technological need for trisodium citrate in UHT goat milk. Goat milk produces heavy sediment on UHT treatment. There is an experimental evidence that

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
							trisodium citrate is able to act as an efficient stabilizer reducing ionic calcium which prevents formation of the sediment. To the EU's knowledge 4000 ppm is the ML sufficient to achieve the desired effect. **IDF**: Supports adoption in this food category with note 227. The heat stability of milk may be affected by variations in milk composition throughout the lactation cycle of the individual milking species, especially when subjected to high heat treatments such as UHT and sterilization. Such seasonal physicochemical variations can sometimes be exacerbated due to climatic, nutritional and other stress factors on the animals. Addition of stabilisers such as phosphates and citrates help improve heat stability of milk by uniquely interacting with the protein and mineral components in such a way that increases the stability and reduces the tendency to age gelation. Use of these additives can thus be justified, at least on a seasonal basis, in certain regions of the world for high temperature treatments designed to give long shelf life, shelf stable, fluid milks. **Canada**: Proposal is to adopt in subcategories. What are the subcategories of 01.1.1? If agreement is reached that the use of the additive is justified in certain products of 01.1.1, recommend adding a note to restrict use to those products.
XANTHAN GUM	415	GMP		7	Emulsifier, Foaming agent, Stabilizer, Thickener	Adopt; with Note 227	**India and NZ**: Required as stabilizers to prevent curdling in UHT and Sterilized milks; Add Note 227 (NZ Noted should the other citrates be included as adopted for buttermilk (plain) (ie old FC 1.1.1.2) at GMP ie INS 331(i), 331(ii), 332(i), 332 (ii)) **EU**: Does not support the adoption – thickeners are not needed and will have an impact on milk viscosity changing the character of milk and misleading the consumer **RF**: Does not support because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
							Canada: If agreement is reached that the use of the additive is justified in certain products of this subcategory, recommend adding a note to restrict use to those products.

COMMENTS for FC 01.1.3

EU: there is a substantial difference in the technological need for additives between "natural buttermilk non-heat-treated after fermentation" and "pasteurized and sterilized buttermilk". Whilst no additives are needed and justified for the former some additives are needed for the latter. This is currently reflected in the GSFA by Note 261 (*"For use in heat treated buttermilk only"*).

NZ: There are a lot of additives at Step 7 for buttermilk. New Zealand does not permit any additives in buttermilk other than buttermilk from UHT goat's milk. Some additives are restricted by footnotes, 261 (*"For use in heat treated buttermilk only"*) and 227 (*"For use in sterilized and UHT treated milk only"*).

Food Category No. 01.1.3 (Fluid buttermilk (plain)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Emulsifier, Sequestrant, Stabilizer	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general

AGAR	406	4000		7	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
ALGINIC ACID	400	6000		7	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
CALCIUM ALGINATE	404	6000		7	Antifoaming agent, Bulking agent, Carrier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
CARBON DIOXIDE	290	GMP	59	7	Carbonating agent, Foaming agent, Packaging gas, Preservative, Propellant	Discontinue; no information on technological justification provided	**RF**: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU:** Supports discontinuation without technological

							justification **Canada:** If the recommendation for carbon dioxide is to adopt its use as a packaging gas for fluid milk products subject to FC01.1.1, why would this carbon dioxide not be justified for the same function for buttermilk?
CAROB BEAN GUM	410	5000		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
CARRAGEENAN	407	6000		7	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7	Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC
GELLAN GUM	418	GMP		7	Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification

							RF: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general
GLYCEROL	422	GMP		7	Humectant, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general
GUAR GUM	412	6000		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
GUM ARABIC (ACACIA GUM)	414	GMP		7	Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers
HYDROXYPROPYL CELLULOSE	463	GMP		7	Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification

							RF: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general
HYDROXYPROPYL STARCH	1440	GMP		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general
KARAYA GUM	416	200		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3
KONJAC FLOUR	425	GMP		7	Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer,	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification

					Thickener		**RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7	Emulsifier, Sequestrant, Stabilizer	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **US**: For use in foods in general
LECITHIN	322(i)	GMP		7	Antioxidant, Emulsifier	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **US**: For use in foods in general
MAGNESIUM CARBONATE	504(i)	GMP	261	Adopted (2013)	Acidity regulator, Anticaking agent, Colour retention agent	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC
MAGNESIUM CHLORIDE	511	GMP		7	Colour retention agent, Firming agent, Stabilizer	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general

MAGNESIUM HYDROXIDE	528	GMP	261	Adopted (2013)	Acidity regulator, Colour retention agent	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF and EU**: Supports Discontinuation
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP	261	Adopted (2013)	Acidity regulator, Anticaking agent, Carrier, Colour retention agent	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers
METHYL CELLULOSE	461	GMP		7	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general
METHYL ETHYL CELLULOSE	465	GMP		7	Emulsifier, Foaming agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **US**: For use in foods in general
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no

							technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	10000		7	Antifoaming agent, Emulsifier, Stabilizer	Adopt; with Note 227 at GMP	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **IFAC**: Mono- and di- glycerides of fatty acids can be used as an emulsifier/anti-fouling agent. They help reduces surface tension of the milk, which prevents fouling layer build-up and then allows for longer run-times of equipment. (Note 227 should be added. ML=1000 mg/kg) **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
NITROGEN	941	GMP	59	7	Foaming agent, Packaging gas, Propellant	Discontinue; no information on technological justification provided	**RF**: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC **India**: Supports Proposal in 1st circular; Use of additive functions as a propellant and packaging gas appear to be technologically justified in these food categories. **EU:** Supports discontinuation without technological justification **Canada:** If the recommendation for nitrogen is to adopt its use as a packaging gas for fluid milk products subject to FC01.1.1, why would nitrogen not be justified for the same function for buttermilk?
NITROUS OXIDE	942	GMP		7	Antioxidant, Foaming agent, Packaging gas, Propellant	Discontinue; no information on technological justification provided	**RF**: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC **India**: Supports Proposal in 1st circular; Use of additive functions carbonating agent, propellant and packaging gas appear to be technologically justified in these food categories. **EU:** Supports discontinuation without technological justification **Canada:** If the recommendation for nitrous oxide will be to adopt its use as a packaging gas for fluid milk products subject to FC01.1.1 (see Canada's comment on that item), why would nitrous oxide not be justified for the same function for buttermilk? Canada does question, however, whether nitrous oxide has any uses as a packaging gas or is used only as a propellant (e.g. for spray whipped cream).

OXIDIZED STARCH	1404	GMP		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF and EU**: Supports Discontinuation **US**: For use in foods in general
PECTINS	440	GMP		7	Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF and EU**: Supports Discontinuation **US**: For use in foods in general
PHOSPHATES	338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i),(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542	1500	33 & 227	Adopted (2012)	Antioxidant, Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener, Firming agent, Flour treatment agent	Adopt; with Note 227 and add Note 261 at 1000 ML	**RF**: Supports Proposal in 1st circular; Suggests ML of 1000 mg/l **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: If the technological need is demonstrated it could be adopted at appropriate ML with Note 261 **IFAC**: Supports the 2nd circular proposal. Phosphates are important components of UHT plain milks due to their ability to stabilize proteins and prevent phase separation after the milk, particularly milks with higher fat content, are exposed to high heat. Annual, cyclic variations in protein and vitamin balance of milk can affect heat stability of milk. The use of phosphates can help compensate for these variations, while also ensuring a consistent product. We would not object to the inclusion of Note 227 and support the inclusion of Note 227. We have consulted our members and been advised that the maximum usage level need to achieve this technical functionality is 1500 mg/kg. IFAC notes this provision was adopted at a usage level of 1500 mg/kg recently (2012). Given the technical justification for this usage level, we recommend it be maintained with the appropriate notes. **Canada:** This provision was recently adopted (2012). CCFA may wish to consider verifying if this justification is still applicable, and if so, there would be no need to revise the adopted provision.
POLYDEXTROSES	1200	GMP		7	Bulking agent, Glazing agent, Humectant, Stabilizer, Thickener	Adopt	**EU**: Could accept only with note 261 **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories **IFAC**: Contributes organoleptically to mouthfeel and the perception of creaminess. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no

							technical justification for use of this FA in this FC **IFAC**: Supports the 2nd circular proposal. As noted in the first circular, polydextrose adds body to low/reduced fat buttermilks, contributing to mouthfeel and the perception of creaminess, thereby increasing organoleptic acceptability to consumers. As consumers continue to look for ways to reduce caloric intake, tools like polydextroses allow manufacturers to provide acceptable products with fewer calories, including low and no fat buttermilks. **US**: For use in foods in general **Canada:** Has IFAC identified actual use or potential use of this additive? Recommend requesting information on whether dairy industry has technological need to use polydextroses in products subject to FC 01.1.3
POTASSIUM ALGINATE	402	6000		7	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **NZ**: If proposed this should be with a ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	261	Adopted (2013)	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited There is no technical justification for use of this FA in this FC
POTASSIUM LACTATE	326	GMP	261	Adopted (2013)	Acidity regulator, Antioxidant, Emulsifier, Humectant	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions acidity regulator and emulsifier appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **US**: For use in foods in general

POWDERED CELLULOSE	460(ii)	GMP		7	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited There is no technical justification for use of this FA in this FC
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **US**: For use in foods in general
PROPYLENE GLYCOL ALGINATE	405	3000		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **US**: For use in foods in general
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7	Anticaking agent, Emulsifier, Stabilizer	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **US**: For use in foods in general
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7	Anticaking agent, Emulsifier, Stabilizer	Discontinue; no information on technological justification provided	**RF**: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC **EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive

							functions emulsifier, stabilizer appear to be technologically justified in these food categories **US**: For use in foods in general
SODIUM ALGINATE	401	6000		7	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU:** Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **NZ**: ML of GMP as this is an additive in Table 3 **US**: For use in foods in general
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	2000		7	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Adopt; with Note 227 and Note 261	**EU**: Could accept only with note 261 **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **IFAC**: can support the 2nd circular proposal. Like other gums, cellulose gum can be used in in UHT milks to prevent protein aggregation. This renders the UHT product stable (prevents separation) despite high temperatures. We would not object to the inclusion of Note 261. **NZ**: Used to preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product. ML of GMP as this is an additive in Table 3Adopt with note 227, Note 227 only applies to sterilized UHT treated milks. Therefore we disagree that the note would exclude pasteurized products. **Canada**: If the consensus of the EWG is to recommend adoption of the provision for the emulsifier/stabilizer/thickener cellulose gum because it is technologically justified, why is information on technological justification requested for other additives having the same functional classes? Would the “horizontal approach” for the use of E/S/T not be appropriate for FC 01.1.3?
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	261	Adopted (2013)	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant,	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification

					Stabilizer		**RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC
SODIUM LACTATE	325	GMP	261	Adopted (2013)	Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying salt, Humectant, Thickener	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, acidity regulator and thickener appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **US**: For use in foods in general
TARA GUM	417	GMP		7	Gelling agent, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions as a stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**Adopt; with Note 227**	**India**: Proposal Not Supported in 1st circular; there is no technical justification for use of antioxidants in this FC **NZ**: Used to enhance the keep qualities by inhibiting/reducing the potential for fat oxidation in UHT products; Add Note 227 **China**: Use may be indicated to assure a shelf stable product of sufficient shelf life and which does not develop a rancid off taste and/or off-flavour; 200 ppm use level is generally indicated as technologically justified **RF**: Used for vitamin E and antioxidant in many foods; ML should consider exposure from all FA uses. Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC **ELC**: Use may be indicated to assure a shelf stable product of sufficient shelf life and which does not develop a rancid off taste and/or off-flavour; 200 ppm use level is generally indicated as technologically justified; Supports proposal **US**: Used in the US with the limitation of 0.03% on fat basis. Not used in combination with other antioxidants **Canada**: recommend that CCFA consider whether the ML

							applies to the finished product as consumed or is on the fat or oil basis. If the latter, Note 15 should be added.
TRAGACANTH GUM	413	GMP		7	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**EU**: Supports discontinuation without technological justification **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited There is no technical justification for use of this FA in this FC **US**: For use in foods in general
TRIPOTASSIUM CITRATE	332(ii)	GMP	261	Adopted (2013)	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	Discontinue; no information on technological justification provided	**India**: Supports Proposal in 1st circular; Use of additive functions acidity regulator, stabilizer appear to be technologically justified in these food categories. **EU**: Supports discontinuation without technological justification **RF**: Proposal Not Supported; there is no technical justification for use in this FC. Support proposal only for goat milk **US**: For use in foods in general **Canada:** Why is information on technological justification requested for to tripotassium citrate, but the proposal for trisodium citrate is to adopt with Note 261? If the sodium salt is justified, would the potassium salt not also be justified in the same products?
TRISODIUM CITRATE	331(iii)	GMP	261	Adopted (2013)	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	Adopt; Add Note 261	**India**: Supports Proposal in 1st circular; Use of additive functions acidity regulator, stabilizer appear to be technologically justified in these food categories. **NZ**: Used as an aid in the manufacture of UHT products by buffering *pH* change as an acidity regulator; Add Note 261 **EU**: Supports Proposal in 1st circular; Add Note 261 **RF**: Proposal Not Supported; there is no technical justification for use in this FC. Support proposal only for goat milk **US**: For use in foods in general
TRISODIUM CITRATE	331(iii)	GMP		7	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	Adopt; Add Note 261	**India**: Supports Proposal in 1st circular; Use of additive functions acidity regulator, stabilizer appear to be technologically justified in these food categories. **NZ**: Used as an aid in the manufacture of UHT products by buffering *pH* change as an acidity regulator; Add Note 261 **EU**: Used UHT goat milk. Act as an efficient stabilizer reducing ionic calcium which prevents formation of the sediment; Suggests ML of 4000 ppm.

							RF: Proposal Not Supported; there is no technical justification for use in this FC. Support proposal only for goat milk
XANTHAN GUM	415	3000		7	Emulsifier, Foaming agent, Stabilizer, Thickener	Adopt; Add Note 261	**EU**: Proposal Not Supported in 1st circular; there is no technical justification for use in this FC **India**: Supports Proposal in 1st circular; Use of additive functions emulsifier, stabilizer and thickener appear to be technologically justified in these food categories. **RF**: Does not agree with 2nd circular proposal because in compliance with Codex Stan 192-1995 in plain products food additives not used or used limited. There is no technical justification for use of this FA in this FC Use of this FA in this FC could mislead consumers **NZ**: Used to preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product; Add Note 261. ML of GMP as this is an additive in Table 3 **US**: For use in foods in general **Canada**: If the consensus of the EWG is to recommend adoption of the provision for the emulsifier/stabilizer/thickener xanthan gum because it is technologically justified, why is information on technological justification requested for other additives having the same functional classes? Would the “horizontal approach” for the use of E/S/T not be appropriate for FC 01.1.3?

COMMENTS for FC 01.1.4

Calorie Control Council (CCC): Sweeteners are used in this food category to provide sweetness without the use of sugar. Sweeteners make a number of low- and reduced-calorie products in this category possible, which may assist people with blood glucose control, weight management, and control of sugar intake.

Having a variety of sweeteners available in this food category is important because no single sweetener is perfect for all uses. With several sweeteners available, each can be used on its own or in combination with other sweeteners to achieve the technological function that is best suited to each application. Most sweetener blends are synergistic, meaning the sweetness of the blend is greater than the sum of the individual parts. This results in needing to use lower levels of each individual sweetener.

Sweeteners that are used in products within this food category have been approved as safe by regulatory agencies around the world, including the Joint FAO/WHO Expert Committee on Food Additives (JECFA). Therefore, the Council believes that the use of sweeteners in this food category is justified.

IDF: The following food additives are not listed in the EWG document:

- Acidity regulators 334, 335(i)-(ii), 336(i)-(ii) and 337 are authorized at 2000 mg/kg in Codex stand 243). Adipic Acid (INS 355) is also authorized at 1500mg/kg, pending Codex conclusion on his matter.
- Carbon dioxide (INS 290) is also listed in Codex Stan 243 at GMP as carbonating agent,
- Benzoates (INS 210-213) are listed at a level of 300mg/kg (as benzoic acid) in Codex Stan 243
- Cyclodextrine beta (INS 459) is listed at a level of 5 mg/kg in Codes Stan 243
- Polydimethylsiloxane (INS 900a) is listed at a level of 50 mg/kg in Codex Stan 243

Additionally, while focusing its comments on products covered by Codex Stan 243-2003, IDF recognizes that this food category covers a wide range of products. Innovation on these products will only increase their number, and with it the potential list of food additives needed.

Food Category No. 01.1.4 (Flavoured fluid milk drinks)

Corresponding commodity standards: 243-2003: Pertains to drinks based on fermented milk. For Flavoured products allows specific Acidity Regulators, Carbonating agents, Colours, Emulsifiers, Flavour enhancers, Packaging Gases, Stabilizers, Sweeteners, and Thickeners. Also lists specific Preservatives for Flavoured products not heat treated after fermentation.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Proposal	Comments by EWG members on Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	Adopted (2007)	Flavour enhancer, Sweetener	Retain Adopt	**India and Iran**: Supports Proposal in 1st circular **EU**: Supports Adoption **NZ and CCC**: Replace sweetness of sugar **RF**: For only energy-reduced products or with no added sugar **US**: For use in general except meat and poultry **Japan**: Used as a sweetener in milk-based drinks containing fruits or cocoa and yoghurt drinks containing fruit. The maximum use level is 150 mg/kg. CS243-2003 permits to use this additive at 350 mg/kg as a sweetener. Supports the 2nd Circular Proposal. Acesulfame potassium (INS950) is used not only for energy reduction or sugar replacement but for acidity masking. Acesulfame potassium is used in products less than 25% of energy reduction. The maximum use level is 150 mg/kg. **Canada**: Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.
ADVANTAME	969	6		2	Sweetener, Flavour enhancer	Adopt; Add Note 145	**India and Iran**: Supports Proposal in 1st circular **NZ and CCC**: Replace sweetness of sugar **EU**: Supports Adoption **RF**: For only energy-reduced products or with no added sugar **IDF**: This is a new food additive, therefore not included in Codex Stan 243. However, IDF can support the proposal to adopt.
ALITAME	956	100	161	Adopted (2007)	Sweetener	Retain Adopted	**India and Iran**: Supports Proposal in 1st circular **NZ and CC**: Replace sweetness of sugar **EU**: Supports Adoption **RF**: Not Used **Canada:** Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.
ALLURA RED	129	300	52 & 161	Adopted (2009)	Colour	Retain Adopted	**RF and Iran**: Proposal Not Supported in 1st circular

AC							**India, IACM and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **EU**: Supports Adoption **ELC**: As a colour agent to suit customer requirements; Supports Proposal
AMARANTH	123	300	52	7	Colour	Adopt	**Iran**: Proposal Not Supported in 1st circular **India, IACM and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **EU**: There might be exposure concerns; EU suggest that it is discussed whether amaranth is really needed for these products (to the EU's knowledge not) and if yes whether the ML could be reduced **RF**: Not Used **IDF**: This Food Additive is not listed in Codex Stan 243. **ELC**: As a colour agent to suit customer requirements ; Supports Proposal **Canada**: Information from Canadian industry indicates use of amaranth in flavoured fluid milk products at up to 50 mg/kg, and in eggnog at up to 15 mg/kg. Canada supports lowering the ML to 50 mg/kg.
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	20	8 & 52	4	Colour	Adopt	**India, Iran and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **RF**: Suggests ML of 10 mg/l **EU**: Supports having further discussion on the need and actual use level **NATCOL**: Supports Actual use: 5 - 20 ppm **IACM**: Maximum use level of 20 ppm reported **ELC**: As a colour agent to suit customer requirements**;** Supports Proposal **US**: For use in foods in general **Canada**: 2nd circular proposal unclear. Adopt at 20 mg/kg but also request information on actual use level? If the proposal is to both adopt and to request information on actual use level, should the same recommendation be made for "annatto extracts, norbixin-based" (i.e. to adopt and to request information)?
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	20	52 & 185	4	Colour	Adopt	**India, Iran and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **RF**: ML of 10 mg/l **EU**: Supports having further discussion on the need and actual use level **NATCOL**: Supports adoption at 5 - 20 ppm **IACM**: Maximum use level of 20 mg/Kg reported **ELC**: As a colour agent to suit customer requirements;

							Supports adoption at 20 mg/kg. **US**: For use in foods in general **Canada**: 2nd circular proposal unclear. Adopt at 20 mg/kg but also request information on actual use level? If the proposal is to both adopt and to request information on actual use level, should the same recommendation be made for "annatto extracts, norbixin-based" (i.e. to adopt and to request information)?
ASPARTAME	951	600	161 & 191	Adopted (2007)	Flavour enhancer, Sweetener	Adopt; New note: For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 1000 mg/kg	**Iran**: Proposal Not Supported in 1st circular **India**: Supports Proposal in 1st circular **RF**: For only energy-reduced products or with no added sugar **NZ and CCC**: Replace sweetness of sugar **EU**: Supports Adoption **IDF**: This food additive is listed at a level of 1000 mg/kg in Codex Stan 243 **US**: For use in foods in general **Japan**: Used as a sweetener in milk-based drinks with fruits and yoghurt drinks with fruit juice. The maximum use level is 200 mg/kg. Proposes new note be added to align the food additive provision of the CS 243-2003 with the relevant provision of the GSFA. New note; For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 1000 mg/kg **Canada**: Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.
ASPARTAME-ACESULFAME SALT	962	350	113 & 161	Adopted (2009)	Sweetener	Adopt	**Iran**: Proposal Not Supported in 1st circular **India**: Supports Proposal in 1st circular **RF**: For only energy-reduced products or with no added sugar **EU**: Supports Adoption **NZ**: Replace sweetness of sugar **Canada:** Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.
AZORUBINE (CARMOISINE)	122	150	52	7	Colour	Adopt	**Iran**: Proposal Not Supported in 1st circular **RF and India**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **EU**: Supports having further discussion on ML **IACM**: Supports maintaining at least at current level; use levels reported between 50-300 pm **ELC**: As a colour agent to suit customer requirements; Supports adoption at 150 mg/kg.

BRILLIANT BLACK (BLACK PN)	151	150	52	7	Colour	Adopt	**Iran**: Proposal Not Supported in 1st circular **RF and India**: Supports Proposal in 1st circular **EU**: Supports having further discussion on ML **IACM**: Supports maintaining at least at current level; use levels reported between 100-300 pm **ELC**: As a colour agent to suit customer requirements; Supports adoption at 150 mg/kg.
BRILLIANT BLUE FCF	133	150	52	Adopted (2008)	Colour	Adopt	**Iran**: Proposal Not Supported in 1st circular **RF, India and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **EU**: Supports having further discussion on ML **IACM**: Use levels reported between 100-150 pm **ELC**: As a colour agent to suit customer requirements; Supports adoption at 150 mg/kg. **US**: For use in foods in general **Canada:** Canada allows use in non-standardized flavoured fluid milk beverages at 100 ppm singly or in combination with Fast Green FCF (INS 143). Recommend ML of 100 mg/kg and a new note “Singly or in combination with Fast Green FCF (INS 143)” However, Canada notes that the Codex Standard for fermented milks (CS243) allows 150 mg/kg, without a combination note.
BROWN HT	155	150	52	7	Colour	Adopt	**Iran**: Proposal Not Supported in 1st circular **RF and India**: Supports Proposal in 1st circular **NZ and ELC**: As a colour agent to suit customer requirements **EU**: Supports having further discussion on ML **IACM**: Supports maintaining at least current level; Use levels reported between 50-300 pm
CANTHAXANTHIN	161g	15	52 & 170	Adopted (2011)	Colour	Adopt	**RF**: Proposal Not Supported in 1st circular **India and IACM**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **EU**: There might be exposure concerns; EU suggest that it is discussed whether canthaxanthin is really needed for these products (to the EU’s knowledge not) and if yes whether the ML could be reduced **IDF**: This Food Additive is not listed in Codex Stan 243. **NATCOL**: Supports Proposal **ELC**: As a colour agent to suit customer requirements; Supports Proposal
CARAMEL II - SULFITE CARAMEL	150b	50000	52	4	Colour	Adopt; New note: For use in products	**RF, India, Iran and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements

						conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 150 mg/kg	**EU**: Supports having further discussion on ML **IDF**: This food additive is listed at a level of 150 mg/kg in Codex Stan 243. **IACM**: Supports reduction in level; Maximum use level of 10000 ppm reported **ELC**: As a colour agent to suit customer requirements; Supports adoption at 50000 mg/kg. **US**: For use in foods in general
CARAMEL III - AMMONIA CARAMEL	150c	2000	52	Adopted (2009)	Colour	Adopt	**RF, India, IACM, Iran and China**: Supports Proposal in 1st circular **EU**: Supports Adoption **NZ**: As a colour agent to suit customer requirements **ELC**: As a colour agent to suit customer requirements; Supports Proposal **US**: For use in foods in general
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	2000	52	Adopted (2011)	Colour	Adopt	**RF, India, IACM, Iran and China**: Supports Proposal in 1st circular **EU**: Supports Adoption **NZ**: As a colour agent to suit customer requirements **ELC**: As a colour agent to suit customer requirements; Supports Proposal **US**: For use in foods in general
CARMINES	120	150	52	Adopted (2008)	Colour	Adopt	**Iran**: Proposal Not Supported in 1st circular **RF, India, IACM and China**: Supports Proposal in 1st circular **EU**: Supports Adoption **NZ**: As a colour agent to suit customer requirements **NATCOL**: Supports Proposal **ELC**: As a colour agent to suit customer requirements; Supports Proposal **US**: For use in foods in general
CAROTENES, BETA-, VEGETABLE	160a(ii)	1000	52	Adopted (2008)		Adopt; New note: For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 600 mg/kg	**RF, India, IACM, Iran and China**: Supports Proposal in 1st circular **EU**: Adopted use level seems to be quite higher than needed in Japan and in CS 243-2003 and for INS 160a(i) a(iii), e, f **NZ**: As a colour agent to suit customer requirements. **IDF**: This food additive is listed at a level of 600 mg/kg in Codex Stan 243. **NATCOL**: Supports Proposal **ELC**: As a colour agent to suit customer requirements; Supports Proposal **Japan**: Used in milk-based drinks with fruit juice to adjust colour of the products. The maximum use level is 50

							mg/kg. Proposes new note be added to this food additive provision to align the food additive provision of the CS 243-2003 with the relevant provision of the GSFA. New note: For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 600 mg/kg.
CAROTENOIDS	160a(i), a(iii),e,f	150	52	Adopted (2009)	Colour	Adopt; New note: For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 100 mg/kg	**RF, India, IACM, EU and Iran**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **IDF**: This food additive is listed at a level of 100 mg/kg in Codex Stan 243. **NATCOL**: Supports Proposal **ELC**: As a colour agent to suit customer requirements; Supports Proposal **Japan**: Used in yoghurt drinks containing fruit juice to adjust colour of the products. The maximum use level is 120 mg/kg. Proposes new note be added to this food additive provision to align the food additive provision of the CS 243-2003 with the relevant provision of the GSFA. New note: For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 100 mg/kg
CHLOROPHYLLS AND CHLOROPHYLLINS, COPPER COMPLEXES	141(i),(ii)	50	52 & 190	Adopted (2009)	Colour	Adopt	**RF, India, IACM, EU, Iran and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **ELC**: As a colour agent to suit customer requirements; Supports Proposal **NATCOL**: Supports Proposal
CURCUMIN	100(i)	150	52	7	Colour	Adopt; New note: For use in products conforming to the Codex Standard for Fermented Milk (CODEX STAN 243 - 2003) at 100 mg/kg	**RF, India, Malaysia and Iran**: Supports Proposal in 1st circular **ELC**: As a colour agent to suit customer requirements; Supports adoption at 150 mg/kg **EU**: Supports having further discussion on ML **IDF**: this food additive is listed at a level of 100 mg/kg in Codex Stan 243. **NATCOL and IACM**: Supports Proposal; Adoption Actual use: 50 - 150 ppm **US**: For use in foods in general
CYCLAMATES	952(i), (ii), (iv)	250	17 & 161	Adopted (2007)	Sweetener	Adopt	**Iran**: Proposal Not Supported in 1st circular **India**: Supports Proposal in 1st circular **RF**: For only energy-reduced products or with no added sugar **EU**: Supports Adoption **NZ and CCC**: Replace sweetness of sugar **Canada**: JECFA's ADI for cyclamates is 0-11 mg/kg bw (as cyclamic acid). There are many provisions for

							cyclamates in the GSFA, with some having high maximum levels of use. Since there are a number of alternative sweeteners available for use today that may have a better safety profile, Canada suggests that CCFA request information on whether cyclamates are in fact needed in products of food category 01.1.4, some of which might be beverages that are consumed in greater amounts. If cyclamates are no longer required in products of this category, Canada recommends the provision be revoked. If cyclamates are required in these products, CCFA may wish to consider requesting from JECFA a re-evaluation of cyclamates (last evaluated by JECFA in 1982) and an updated exposure assessment, and for advice on whether existing provisions for cyclamates in the GSFA need to be reconsidered.
DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL	472e	5000		Adopted (2005)	Emulsifier, Sequestrant, Stabilizer	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 1000 mg/kg	**RF**: Proposal Not Supported in 1st circular **India**: Supports Proposal in 1st circular **China**: Supports Proposal in 1st circular; Used to preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product **NZ**: Used to preserve the nutritional quality and enhance the stability by stabilizing the cream, protein and added ingredient phases of the UHT product **IFAC**: Stabilize proteins in drinks with low *pH*, thereby assisting in prevention of the precipitation of proteins. In those drinks containing phenols, such as drinks flavoured with coffee or tea, these additives stabilize proteins by influencing the phenol-protein interactions, thereby assisting in prevention of the formation of precipitate. The typical use level is 1,000 mg/kg. **EU**: Supports having further discussion on ML **IDF**: This food additive is listed at a level of 1000 mg/kg in Codex Stan 243. **ELC** and **EFEMA**: Stabilize proteins in drinks with low *pH*, thereby assisting in prevention of the precipitation of proteins. In those drinks containing phenols, such as drinks flavoured with coffee or tea, these additives stabilize proteins by influencing the phenol-protein interactions, thereby assisting in prevention of the formation of precipitate. This food additive is listed at a level of 1000 mg/kg in Codex Stan 243.
DIOCTYL SODIUM SULFOSUCCINATE	480	25	19	7	Emulsifier, Humectant	Discontinue; no information on technological justification	**RF**: Proposal Not Supported in 1st circular **India**: Supports Proposal in 1st circular **EU**: Supports having further discussion on ML **IDF**: This Food Additive is not listed in Codex Stan 243

						provided	**Canada:** Canada permits dioctyl sodium sulfosuccinate as a wetting agent in fumaric-acid acidulated dry beverage bases at a maximum level of 10 ppm (mg/kg) in the finished beverage. Canada questions the technological need for this additive in dairy products subject to FC 01.1.4**.**
ETHYL MALTOL	637	200		7	Flavour enhancer	Discontinue; no information on technological justification provided	**RF**: Proposal Not Supported in 1st circular **India**: Supports Proposal in 1st circular **EU**: Supports having further discussion on ML **IDF**: This Food Additive is not listed in Codex Stan 243. **US**: For use in foods in general
FAST GREEN FCF	143	100	52	Adopted (2008)	Colour	Adopt	**RF and Iran**: Proposal Not Supported in 1st circular **India, IACM and EU**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **ELC**: As a colour agent to suit customer requirements ; Supports Proposal **US**: For use in foods in general **Canada**: Recommend adding a new note "Singly or in combination with Brilliant Blue FCF (INS 133)" However, Canada notes that the Codex Standard for fermented milks (CS243) allows 100 mg/kg, without a combination note.
GRAPE SKIN EXTRACT	163(ii)	150	52 & 181	Adopted (2009)	Colour	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 100 mg/kg	**RF, India, IACM, EU, Iran and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **IDF**: This food additive is listed at a level of 100 mg/kg in Codex Stan 243. **NATCOL**: Supports Proposal **ELC**: As a colour agent to suit customer requirements ; Supports Proposal
INDIGOTINE (INDIGO CARMINE)	132	300	52	Adopted (2009)	Colour	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 100 mg/kg	**Iran**: Proposal Not Supported in 1st circular **RF, India and China**: Supports Proposal in 1st circular **NZ**: As a colour agent to suit customer requirements **EU**: Supports having further discussion on ML **IDF**: This food additive is listed at a level of 100 mg/kg in Codex Stan 243. **IACM**: Supports Proposal in 1st circular; Use levels reported between 100-300 pm **ELC**: As a colour agent to suit customer requirements ; Use levels reported between 100-300 pm **US**: For use in foods in general
IRON OXIDES	172(i)-(iii)	20	52	Adopted (2008)	Colour	Adopt; with New note: For	**RF, India, IACM, EU and Iran**: Supports Proposal in 1st circular

						use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 100 mg/kg	**NZ**: As a colour agent to suit customer requirements **IDF**: This food additive is listed at a level of 100 mg/kg in Codex Stan 243. **ELC**: Supports Proposal; As a colour agent to suit customer requirements
LUTEIN FROM TAGETES ERECTA	161b(i)	100	52	4	Colour	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 150 mg/kg	**RF, India, IACM, Iran and China**: Supports Proposal in 1st circular **NATCOL**: Generally support the continued use of this category as well as the use level which is sufficient to cover current colour uses in drinks. **NZ**: As a colour agent to suit customer requirements **EU**: Supports having further discussion on ML **IDF**: This food additive is listed at a level of 150 mg/kg in Codex Stan 243. **ELC**: As a colour agent to suit customer requirements; Supports Proposal **Canada**: JECFA's ADI for lutein is 0-2 mg/kg bw, shared with zeaxanthin. Since there is likely significant consumption of flavoured fluid milk drinks of this food category and there is already dietary exposure to lutein from its natural occurrence in foods, CCFA may wish to carefully consider whether this colour should be permitted in in all products of this category, just certain ones, or none, and whether the ML is acceptable from a safety perspective if it should be permitted in some products. Should a new note "Singly or in combination with zeaxanthin, synthetic (INS 161h(i)" be added?
MALTOL	636	200		7	Flavour enhancer	Discontinue; no information on technological justification provided	**RF**: Proposal Not Supported in 1st circular **India and Iran**: Supports Proposal in 1st circular **EU**: Supports having further discussion on ML **IDF**: This Food Additive is not listed in Codex Stan 243. **US**: For use in foods in general
NEOTAME	961	20	161	Adopted (2007)	Flavour enhancer, Sweetener	Adopt	**RF**: Not Used **India, Iran**: Supports Proposal **NZ and CCC**: Replace sweetness of sugar **EU**: Supports Adoption **US**: For use in foods in general **Canada**: Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.
NISIN	234	12.5	233	3	Preservative	Adopt	**RF and Iran**: Proposal Not Supported in 1st circular **India**: Supports Proposal

							IFAC and ELC: Products in this food category are heat labile. Heat resistant pores of thermophilic bacteria are commonly found in milk (e.g. Bacillus cereus, Bacillus spp.) In pasteurized products, spores that survive the pasteurization process can outgrow when disruptions in the cold chain occur, resulting in product spoilage and food wastage. Studies show that nisin inhibits thermophilic bacterial spore outgrowth and thereby helps to extend product shelf life and to ensure food safety. In thermally processed products, studies show nisin improves the bacteriocial effect of heat sterilization by reducing the thermal resistance of these sporeformers. This enables manufacturers to moderate thermal processing regimes, which in turn reduces organoleptic and nutritional changes caused by high temperature processing and increases acceptability to the consumer. We note that 243-2003 specifically allows preservative in flavored Fermented Milks Heat Treated After Fermentation and Drinks based on Fermented Milk Heat Treated After Fermentation—IFAC's understanding is that this food category would correspond to such products. **EU**: Not convinced about the technological need. If this use is supported by the Codex Members then it should be associated with note 220 (as for sorbates) **Canada:** Recommend restricting use to those products for which there is technological justification
PHOSPHATES	338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i),(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542	1320	33	Adopted (2012)	Antioxidant, Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener, Firming agent, Flour treatment agent	Adopt at 1000 ML	**India**: Supports Proposal in 1st Circular **EU**: Supports having further discussion on ML **NZ**: Used as an aid in the manufacture of UHT products by buffering *pH* change as an acidity regulator **China**: Supports Proposal ; Used as an aid in the manufacture of UHT products by buffering *pH* change as an acidity regulator **RF**: Suggests ML of 1000 mg/l **IFAC**: Supports Proposal; Phosphates are important components of UHT and serialized milks (including flavored milks) due to their ability to stabilize proteins and prevent phase separation after the milk, particularly milks with higher fat content, are exposed to high heat. Annual, cyclic variations in protein and vitamin balance of milk can affect heat stability of milk. The use of phosphates can help compensate for these variations, while also ensuring a consistent product. We have consulted our members and been advised that the maximum usage level need to achieve this technical

							functionality is 1500 mg/kg. IFAC notes this provision was adopted at a usage level of 1500 mg/kg recently (2012). Given the technical justification for this usage level, we recommend it be maintained with the appropriate notes. **IDF**: This food additive is listed at a level of 1000 mg/kg in Codex Stan 243. Also 450(ix) is not listed in Codex stan 243. **Canada:** This provision was recently adopted (2012). CCFA may wish to consider verifying if this justification is still applicable, and if so, there would be no need to revise the adopted provision.
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000		7	Emulsifier, Stabilizer	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 2000 mg/kg	**India**: Supports Proposal in 1st Circular **EU**: Supports having further discussion on ML **RF**: Suggest ML of 2000 mg/l **IDF**: This food additive is listed at a level of 2000 mg/kg in Codex Stan 243. **Japan**: Polyglycerol esters of fatty acids (INS475) are used in milk-based drinks with fruit juice to provide stable emulsification and prevent separation of milk-fat. The maximum use level is 2000 mg/kg. CS 243-2003 permits to use this additive at 2000 mg/kg as an emulsifier
POLYSORBATES	432-436	3000		Adopted (2008)	Emulsifier, Stabilizer	Adopt at 1000 ML	**India**: Supports Proposal in 1st Circular **EU**: Was technological justification provided?; if yes EU supports having further discussion on ML **RF**: Suggests ML of 1000 mg/l
PONCEAU 4R (COCHINEAL RED A)	124	150	52 & 161	Adopted (2008)	Colour	Adopt at 300 ML	**India, IACM and China**: Supports Proposal **EU**: Supports having further discussion on ML **NZ and ELC**: Used as a colour agent to suit customer requirements **RF**: Suggests ML of 1000 mg/l **IACM**, **ELC**: Supports maintaining at least current level; Maximum use level of 300 ppm reported
PROPYLENE GLYCOL ALGINATE	405	10000		4	Emulsifier, Stabilizer, Thickener	Discontinue; no information on technological justification provided	**RF**: Proposal Not Supported in 1st circular **India**: Supports Proposal in 1st Circular **EU**: Supports having further discussion on ML **IDF**: This Food Additive is not listed in Codex Stan 243
PROPYLENE GLYCOL ESTERS OF FATTY ACIDS	477	5000		Adopted (2001)	Emulsifier	Adopt	**RF, India, Malaysia and EU**: Supports Proposal **US**: For use in foods in general
QUINOLINE YELLOW	104	150	52	7	Colour	Adopt	**Iran**: Proposal Not Supported in 1st circular **RF**: Suggests ML of 10 mg/l **India and IACM**: Supports Proposal in 1st Circular **NZ**: Used as a colour agent to suit customer requirements

							EU: Supports having further discussion on ML **ELC**: The food category definition includes addition of flavourings and/or food ingredients that intentionally impart flavour. It is important for consumers that the flavour of a food product and its optical appearance match up. For this reason, the addition of food colours is required to meet consumer expectations in relation to the intended flavour of the product. Supports adoption at 150 mg/kg **IACM**: Supports maintaining at least current level; Use levels reported between 50-300 pm
RIBOFLAVINS	101(i),(ii)	300	52	Adopted (2008)	Colour	Adopt	**RF, India, IACM, EU and Iran**: Supports Proposal in 1st Circular **NATCOL**: Generally support the continued use of this category as well as the use level which is sufficient to cover current colour uses in drinks. **NZ**: Used as a colour agent to suit customer requirements **ELC**: Supports Proposal; Used as a colour agent to suit customer requirements **US**: For use in foods in general
SACCHARINS	954(i)-(iv)	80	161	Adopted (2007)	Sweetener	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 100 mg/kg	**Iran**: Proposal Not Supported in 1st circular **India**: Supports Proposal in 1st Circular **RF**: For only energy-reduced products or with no added sugar **EU**: Supports Adoption **NZ and CCC**: Replace sweetness of sugar **IDF**: This food additive is listed at a level of 100 mg/kg in Codex Stan 243. 100 mg/kg" **Canada**: Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.
SODIUM ALUMINOSILICATE	554	60	6 & 253	Adopted (2013)	Anticaking agent	Discontinue	**RF and Iran**: Proposal Not Supported in 1st circular **India**: Use of additive function anticaking agent is not technologically justified in these food categories. **EU**: Agrees – indispensability of the need for aluminium containing additive should be demonstrate; if not demonstrated -discontinue **IDF**: This Food Additive is not listed in Codex Stan 243. **US**: For use in foods in general **Canada:** Note 253 restricts the use of sodium aluminosilicate to dry mix hot chocolate only. Is this food subject to the food category 01.1.4 or to 05.1.1? If the latter, Canada recommends revoking this provision and, of technological justification is provided for its use in dry hot chocolate mix, reconsidering the provision for FC

							05.1.1
SORBATES	200-203	1000	42 & 220	Adopted (2012)	Preservative	Adopt at 300 ML	**RF and Iran** Proposal Not Supported in 1st circular **India**: Supports Proposal **EU**: Supports having further discussion on ML **IDF**: Codex Stan 243 allows the use of these Food Additives only in flavoured fermented milks heat treated after fermentation and flavoured drinks based on fermented milks heat treated after fermentation **US**: For use in foods in general **Canada:** This provision was recently adopted (2012). CCFA may wish to consider verifying if this justification is still applicable, and if so, there would be no need to revise the adopted provision. Canada would note that CS243-2003 would allow for the use of sorbates in flavoured fermented milks, which are included in this FC.
SORBITAN ESTERS OF FATTY ACIDS	491-495	5000		7	Emulsifier, Stabilizer	Adopt	**RF, India and Malaysia**: Supports Proposal **US**: For use in foods in general **Japan**: Support Proposal; Sorbitan estars of fatty acids (INS491-495) Used in milk-based drinks with cocoa or other ingredients to provide stable emulsification and keep uniform mixture. The maximum use level is 750 mg/kg. CS 243-2003 permits to use this additive at 5000 mg/kg as an emulsifier.
STEAROYL LACTYLATES	481(i), 482(i)	5000		7	Emulsifier, Flour treatment agent, Foaming agent, Stabilizer	Adopt	**RF and India**: Supports Proposal **ELC and EFEMA**: Supports Proposal; Stabilize proteins in drinks with low *pH*, helping to prevent the precipitation of proteins. In drinks containing phenols, such as drinks flavoured with coffee or tea, these additives influence the phenol-protein interactions, helping prevent the formation of precipitate. The typical use level for stearoyl lactylates is 1,000 mg/kg **EU**: ML should not be higher than 1000; exposure concerns in the EU - flavoured fermented milk products including heat treated products are the main contributor **IFAC**: Supports Proposal; As noted in the first circular, the substance is needed to stabilize protein drinks with a low PH and to prevent separation. We note support from several EWG members and clear technical justification.
STEVIOL GLYCOSIDES	960	200	26 & 201	Adopted (2011)	Sweetener	Adopt	**RF and EU**: For only energy-reduced products or with no added sugar **India and Iran**: Supports Proposal **NZ and CCC**: Replace sweetness of sugar **IDF**: Supports Proposal; This is a new food additive, therefore not included in Codex Stan 243.

							Japan: Used as a sweetener in drinks based on fermented milk and yoghurt drinks. The maximum use level is 150 mg/kg. Japan Notes that CS 243-2003 does not permit to use this additive; Supports proposal; Steviol glycosides (INS960) are used not only for energy reduction or sugar replacement but for acidity masking. Steviol glycosides are used in products less than 25% of energy reduction. The maximum use level is 150 mg/kg.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	300	161	Adopted (2007)	Sweetener	Adopt; with New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 400 mg/kg	**RF**: For only energy-reduced products or with no added sugar **EU**: Supports Adoption **India**: Supports Proposal **NZ and CCC**: Replace sweetness of sugar **IDF**: This food additive is listed at a level of 400 mg/kg in Codex Stan 243. **US**: For use in foods in general **Japan**: Used as a sweetener in drinks based on fermented milk, yoghurt drinks and milk-based drinks with fruit juice. The max level is 200 mg/kg. CS 243-2003 permits to use this additive at 400 mg/kg as a sweetener**;** Proposes new note be added to align the food additive provision of the CS 243-2003 with the relevant food additive provision of the GSFA. New note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 400 mg/kg. Sucralose (INS955) is used not only for energy reduction or sugar replacement but for acidity masking. Sucralose is used in products less than 25% of energy reduction. The maximum use level is 200 mg/kg. **Canada**: Request information on whether it would be preferable, from the perspective of international trade, to maintain Note 161 or replace it with Note 145.
SUCROGLYCERIDES	474	5000		Adopted (2009)	Emulsifier	Adopt; with Note 348	**RF and India**: Supports Proposal **EU**: Supports Proposal ; Shares the same ADI with INS 473 – Note - Singly or in combination: sucrose esters of fatty acids (INS 473) and sucroglycerides (INS 474) **Canada**: Recommend adding Note 348, with the following two corrections: “Singly or in combination: sorbitan sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474).” (The second correction is the space inserted between “type” and “I”)
SUCROSE ESTERS OF	473	5000		7	Emulsifier, Foaming	Adopt; with	**RF and India**: Supports Proposal

FATTY ACIDS					agent, Glazing agent, Stabilizer	Note 348	**EU**: The use seems to be limited to heat-treated milk-based drinks; in addition to the EU's knowledge it is need only for powders needed for the preparation of hot beverages (the same would apply to INS 474) **Japan**: Used in heat-treated milk-based drinks with cocoa or other ingredients to provide stable emulsification and prevent separation of fat. This additive is also used to inhibit precipitation caused by thermal denaturation of protein and demulsification by heating in the sterilization process. The maximum use level is 5000 mg/kg. CS 234-2003 also permits to use this additive at 5000 mg/kg as an emulsifier. Proposes Note 348 be added to this food additive provision since sucrose esters of fatty acids (INS 473) share the ADI with sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474). Japan also proposes that Note 348 should be revised to correct name of INS 473 as follows: Note 348 Singly or in combination: sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474). **Canada**: Recommend adding Note 348, with the following two corrections: "Singly or in combination: sorbitan sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474)." (The second correction is the space inserted between "type" and "I")
SUNSET YELLOW FCF	110	300	52	Adopted (2008)	Colour	Adopt	**Iran**: Proposal Not Supported **India, IACM, and China**: Supports Proposal **EU**: Supports having further discussion on ML **NZ**: Used as a colour agent to suit customer requirements **RF**: Suggests ML of 5 mg/l **IACM**: Use levels reported between 50-300 pm **ELC**: Used as a colour agent to suit customer requirements**;** Supports adoption at 300 mg/kg. **US**: For use in foods in general
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**Adopt; with Note 227**	**India:** Proposal Not Supported in 1st circular; there is no technical justification for use of antioxidants in this FC **RF:** Used for vitamin E and antioxidant in many foods; ML should consider exposure from all FA uses **NZ:** Used to enhance the keep qualities by inhibiting/reducing the potential for fat oxidation in UHT products; Add Note 227 **China and ELC:** Use may be indicated to assure a shelf stable product of sufficient shelf life and which does not develop a rancid off taste and/or off-flavour; 200 ppm use

							level is generally indicated as technologically justified **US:** Used in the US with the limitation of 0.03% on fat basis. Not used in combination with other antioxidants **IDF**: These food additives are not listed in Codex Stan 243, nor in current FC 01.1.2 **ELC**: Supports Proposal **Canada**: recommend that CCFA consider whether the ML applies to the finished product as consumed or is on the fat or oil basis. If the latter, Note 15 should be added. Also, recommend adding Note 168 "Singly or in combination: d-alpha tocopherol (INS 307a), tocopherol concentrate, mixed (INS 307b) and dl-alpha-tocopherol (INS 307c)."
TARTRAZINE	102	300	52	7	Colour	Adopt	**Iran**: Proposal Not Supported in 1st circular **RF, India, IACM, Malaysia and China**: Supports Proposal **NZ and ELC**: Used as a colour agent to suit customer requirements **EU**: Supports having further discussion on ML **IACM**: Use levels reported between 100-300 pm **US**: For use in foods in general
ZEAXANTHIN, SYNTHETIC	161h(i)	100	52	4	Colour	Adopt; with New Note: For use in products conforming to the Codex Standard for fermented milk (CODEX STAN 243 - 2003) at 150 mg/kg	**RF**: Proposal Not Supported in 1st circular **India, IACM and Iran**: Supports Proposal **NZ**: Used as a colour agent to suit customer requirements **EU**: Supports having further discussion on ML **IDF**: This food additive is listed at a level of 150 mg/kg in Codex Stan 243. **ELC**: Used as a colour agent to suit customer requirements; Supports Proposal **Canada**: JECFA's ADI for zeaxanthin is 0-2 mg/kg bw, shared with lutein. Since there is likely significant consumption of flavoured fluid milk drinks of this food category and there is already dietary exposure to zeaxanthin from its natural occurrence in foods, CCFA may wish to carefully consider whether this colour should be permitted in all products of this category, just certain ones, or none, and whether the ML is acceptable from a safety perspective if it should be permitted in some products. Should a new note "Singly or in combination with lutein (INS 161b(i)" be added?

General Comments on discussion and FC 01.1.2

Brazil: "Considering, for example, the production technology of UHT non-flavoured vitamin and mineral fortified fluid milks, protein adjusted milks, lactose reduced milk are the same for plain fluid milk, Brazil, though FC 01.1.2 did not correspond to the scope of a historical FC, proposes an exception with the inclusion of phosphates as stabilizer in new FC 01.1.2 Other fluid milks (plain), at 1500 mg/kg, as phosphorus, for use in sterilized and UHT treated milks only.

The stabilizer addition in milk is allowed to promote an increase in its thermal stability. In UHT milks, phosphates, singly or in combination, act as stabilizers of casein and can be added before the ultra-pasteurization.

For UHT milk production is accepted only the use of stabilizers. The stabilizers aren't preservatives and don't inhibit bacterial growth. They only maintain the physical-chemical quality of the product, preventing calcium from reacting with proteins and coagulate in the container. The prolonged durability of the UHT milk is made possible by the use of ultra-high-temperature process."

NZ: The new FC 1.1.1 does not contain the reconstituted recombined milk which are in the new FC1.1.2 so most of these additives will be justified for use in the new FC1.1.2. Even though the EWG will not consider FC 1.1.2, it may be helpful for EWG members to also consider the new FC 01.1.2 for completeness and consistency, and submit their views in response to the circular letter on new GSFA provisions (CL 2016/8 FA).