

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5b

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fiftieth Session

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS

Comments of the European Union and Uganda

European Union

The European Union (EU) would like to thank the Codex Secretariat for compiling the replies to CL 2017/47-FA.

General comments

The EU would like to express its concern as regards several proposals included in CX/FA 18/50/8.

For many proposed provisions the EU is concerned about the poor quality and adequacy of the information provided. The EU is of the view that the adequacy of the information submitted should be screened by the Committee before deciding to enter the provisions in the step process. A lot of resources could be saved if the Committee does not need to discuss further the provisions for which no adequate information was submitted. The EU encourages the Committee to consider drafting a guidance which would provide more clarity about the adequacy of the information to be provided in reply to the CL. This would clarify what are the expectations of the Committee and make the process more transparent.

Specific comments

The EU observes that proposals were submitted for several provisions which have already been entered in the step process. In addition, some proposals were submitted for the categories wherein (or in its subcategories) there are adopted provisions, however, no appropriate justification for the proposed revisions was provided. In many cases no information on the justification for use was provided for the food categories for which the use was requested. The use at 'GMP' was requested for food additives with numerical ADIs thus not allowing the Committee to verify whether the proposed use is of no safety (exposure) concern. In some cases the information/references on the dietary intake assessment and its relevancy for the proposed uses was not provided. Finally, to the EU's understanding proposals for new provisions should not substitute the alignment which might be needed for certain food categories.

The EU would be happy to provide more specific comments on the individual proposals during the discussion of the Working Group on the GSFA.

Uganda

Uganda submitted proposals for the addition of Azorubine/Carmoisine (INS 122), Quinoline yellow (INS 104) and Tartrazine (INS 102) as new food additive provisions to FC 14.1.4 "Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks in the GSFA. The three are synthetic colours currently permitted for use in FC 01.1.4 "Flavoured fluid milk drinks" and 12.5 "Soups and broths" in the GSFA. INS 102 is additionally permitted for use in FC 09.2.5 "Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms".

In the European Union, **REGULATION (EC) No 1334/2008** permits the use of the three colourants in FC 14.1.4 – Flavoured drinks "with combined maximum limit".

The details of Uganda's proposals in response to CL 2017/47-FA are contained in working document 5.2 (CX/FA 18/50/8).

NOTE: INDIA SUBMITTED SIMILAR REQUESTS FOR INS 102 AND INS 122.