

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2, 4a, 5c, 5d, 6 and 8

CRD 21

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fiftieth Session

Comments of Uganda

Item 2

B. Matters for action

20th Session of Codex Committee on Fresh Fruits and Vegetables (CCFFV20)

Post-harvest treatment for fresh fruits and vegetables for referral to CCFA50

Uganda supports the recommendation by CCFFV20 to CCFA to include mono- and diglycerides of fatty acids (INS 471) and salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium (INS 470 (i)) to the GSFA under food categories: **04.1.1.2** “surface-treated fresh fruits” and **04.2.1.2** “surface-treated fresh vegetables”. These food additives are approved for use in other food categories such as **01.2.1** “Fermented milks (plain)”, **08.1.2** “Fresh meat, poultry and game, comminuted”, **06.4.1** Fresh pastas and noodles and like products, **09.2.2** “Frozen battered fish, fish fillets and fish products, including molluscs, crustaceans, and echinoderms” and **13.2** “Complementary foods for infants and young children”.

The JECFA evaluation of the toxicology of mono- and diglycerides showed that there are no harmful effects associated with these food additives and their ADI is therefore “**unlimited**”. With the exception of FC **13.2**, they are approved for use at GMP level in the GSFA. In addition, mono- and diglycerides are consumed every day in any normal mixed diet and are also formed from triglycerides during the digestion and absorption of every meal containing fat.

Formulations containing these additives are currently used as glazing agents for fresh fruits and vegetables in some countries and they have been reported to extend their postharvest shelf-life as well as maintenance of nutrients and organoleptic qualities.

Item 4a

Uganda notes that the Acceptable Daily Intake (ADI) for Brilliant blue (INS 133) was lowered from 0 – 12.5 mg/kg bw to 0 – 6 mg/kg bw by JECFA at its 84th meeting in 2017. Brilliant blue is approved for use in a large portion of food categories in the GSFA and this poses potential for a wide range of application in many food products and thus a high level of dietary exposure. Therefore, this necessitates a review of the Maximum Levels (MLs) of use across all product categories in the GSFA where INS 133 is permitted as a colourant to ensure that the MLs are commensurate with the new ADI.

Item 5c

There is limited knowledge concerning the conversion of nitrates to nitrites, ingoing amount of nitrates and/or nitrites versus the residual nitrates and/or nitrites and the conversion of nitrites to nitrosamines. Uganda proposes that data is collected from different Codex Member countries on the use of nitrates and nitrites to establish the minimum amount that can be used to achieve the desired technological purposes. Further assessments of dietary exposure are required to review the ADI and Maximum permitted Levels for ingoing amounts of nitrates and nitrites.

Uganda proposes that focus should be on setting MLs for ingoing nitrates/nitrites in line with the general principles for the use of food additives elaborated in Section 3 of the Preamble of the GSFA.

Nitrosamines are process contaminants and CCFA is not best placed to set their MLs. Evaluation of exposure to nitrosamines should be referred to the Codex Committee on Contaminants in Food with the view of establishing MLs for nitrosamines in the General Standard for Contaminants in Food and Feed (GSCFF).

Item 5d

Uganda supports **recommendation 1**: to provide definitions for the terms “unprocessed” and “minimally processed” in the GSFA. The term “plain” in the GSFA is widely used with respect to FC **01.0** “Dairy products and analogues, excluding products of food category 02.0” to denote products that are not flavoured, nor contain fruit, vegetables or other non-dairy ingredients, nor are mixed with other non-dairy ingredients, unless permitted by relevant standards. Therefore, attaching the term “plain” to “minimally processed” is very deceptive with respect to this product category.

Uganda proposes that the term “plain” is detached from “minimally processed” and either reserved for FC **01.0** or defined per food category as need arises.

Uganda does not support **recommendation 2**: The provision not to use food additives in unprocessed (food raw materials or fresh food) and to restrict the use of food additives in minimally processed (plain) foods.

Recommendation 2 contradicts the provision for use of food additives in FC **04.1.1.2** “Surface-treated fresh fruit”, FC **04.1.1.3** “Peeled or cut fresh fruit”, FC **04.2.1.2** “surface-treated fresh vegetables. In addition, it does not support the referral from CCFFV20 to include mono- and diglycerides of fatty acids (INS 471) in the GSFA under FC 04.1.1.2 and FC 04.2.1.2.

Uganda proposes that consistency should be maintained to all food categories so that the use of food additives is guided by the principles laid out in Section 3 of the Preamble of the GSFA - GENERAL PRINCIPLES FOR THE USE OF FOOD ADDITIVES.

Item 6

23 (ii) First bullet:

- a) Uganda supports the expansion of the functional classes for mono- and diglycerides of fatty acids (INS 471) to include “glazing agent”. This is in line with the post-harvest treatment of fresh fruits and vegetables with mono- and diglycerides to promote the reduction of postharvest losses and food waste related to fresh fruits and vegetables.

Item 8

I. General Standard for Food Additives (GSFA)

Principles and Procedures for Reviewing the Provisions Currently in the Step Process.

Uganda is in support of **recommendation 1**: that the Committee utilises a new process by which provisions entered into the Step Process at Step 2 are automatically circulated for comments at Step 3 by the subsequent GSFA EWG. This will improve the Committee’s efficiency.

Colour and Sweetener Provisions / Provisions with Note 161

Uganda notes that in demonstrating the difference in regional philosophies on how the food additives should be used, Note 161 results in differing understandings between Codex Members of what is necessary to meet certain criteria in Section 3.2 of the Preamble to the GSFA thus compromising the global nature of the GSFA. Therefore, this Note creates barriers to trade.

Uganda is in support of **Recommendation 2 (Option 3)** that the Committee revises Section 3.2 of the GSFA Preamble to facilitate consensus on provisions for colours and sweeteners in a manner that removes the barrier to consensus, that “advantage” and “does not mislead the consumer” are often regionally dependent. This should be subject to further discussions.

II. Alignment of Food Additive Provisions in Commodity Standards and GSFA

Uganda is in support of all options in Recommendation 3 to accelerate the alignment of the GSFA with corresponding commodity standards. A combination of all the options promotes wide stakeholder engagement.

III. International Numbering System (INS)

Option 1 – Revise the “Background” subsection of Section 1 of the INS

Uganda is in support of Recommendation 4 which provides a revised text to the background section of the INS in order to provide clarity on the relationship between the INS and the GSFA.

Option 2 – Revise the INS circular letter to request proposals for deletion to address related provisions in the GSFA

Uganda suggests that the INS number should never be dissociated from the food additive. If the food additive provision is deleted from the GSFA, both the corresponding INS number and the name of the food additive should be deleted and never should an INS number be transferred from one food additive to another.

Uganda therefore supports Recommendation 5: to add the proposed text to Annex 1 and Annex 2 of the circular letter “Request for proposals for change and/or addition to Section 3 of the Class Names and International Numbering System for Food Additives (CAC/GL 36-1989)”.