

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2, 3a, 4b, 5a, 6, 7, and 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fourth Session

Comments of Russian Federation

Agenda item 2: MATTERS ARISING FROM THE 46TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION (CAC46) AND THE 85TH SESSION OF THE EXECUTIVE COMMITTEE OF THE CODEX ALIMENTARIUS COMMISSION (CCEXEC85)

Matters referred by CCFO28

The Russian Federation supports the recommendation of the CCFO28, that there is no technological justification for the use of chlorophylls (INS 140) in fats and oils, because their use could mislead consumers about the quality of these products.

We also agree that there is no technological justification for the use of paprika extract (INS 160c (ii)) in fat spreads and blended spreads, as stated by the CCFO28.

Agenda item 3a: MATTERS OF INTEREST ARISING FROM FAO/WHO AND FROM THE 96TH AND 97TH MEETINGS OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA) RESPECTIVELY

Matters related to azodicarbonamide (INS 927a)

The Russian Federation supports the deletion of the provision for azodicarbonamide (INS 927a) from the GSFA due to the safety concerns on this food additive.

Agenda item 4b: ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS: REPORT OF THE EWG ON ALIGNMENT

- *Annex 2: Proposed amendments to the food additive provisions of the Codex committee standards and for milk and milk products (CCMMP) and Tables 1, 2 and 3 of the GSFA relating to CCMMP*

The Russian Federation does not support the introduction of note T243, which allows the use of benzoates (INS 210-213), sorbates (INS 200, 202, 203) and nisin (INS 234) in flavoured fermented products, heat treated after fermentation in FC 01.7. We believe that this may encourage the use of food additives instead of compliance with hygienic requirements established for safety purposes during food products production, transportation and storage.

Agenda item 5a: GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE ELECTRONIC WORKING GROUP

- ***Appendix 1: Remaining draft and proposed draft provisions for sweeteners in the GSFA and adopted sweetener provisions with Note 161***

Horizontal Approach for the use of sweeteners in FC 07.1

The Russian Federation would like to reiterate its concern regarding the proposed horizontal approach for the use of sweeteners in FC 07.1. According to the GSFA "FC 07.1 Bread and ordinary bakery wares and mixes includes all types of non-sweet bakery products and bread-derived products".

In this regard, our proposal is to consider changing the GSFA descriptor for this FC, or creating a new food category of bakery products that allows the use of sweeteners.

- **Appendix 2: Draft and proposed draft provisions for colours in FCs 07.0, 12.0, 13.0 and 15.0 and their subcategories as well as adopted provisions for colours with Note 161 in FCs 07.0, 12.0, 13.0 and 15.0 and their subcategories**

Horizontal Approach for the use of colours in subcategories of FC 07.1

According to the national legislation, due to the absence of technological justification colours are not used in the Russian Federation in the following food categories: 07.1.1.1 Yeast-leavened breads and specialty breads, 07.1.1.2 Soda breads, 07.1.2 Crackers, excluding sweet crackers, 07.1.3 Other ordinary bakery products (e.g. bagels, pita, English muffins), 07.1.4 Bread-type products, including bread stuffing and bread crumbs, 07.1.5 Steamed breads and buns, 07.1.6 Mixes for bread and ordinary bakery wares.

The Russian Federation can not support Revised Option 2 Note: "Some Codex Members allow use of additives with sweetener and colour function in this Food Category while others consider that this Food Category includes only "plain products". For the purpose of this Food Category, "plain" refers to products without additives that have sweetener or colour functions." There is no definition for "plain products" in GSFA.

In this regard, we would suggest to discuss the inclusion of Note 161 for all the suggested colours in all of the FCs mentioned above (07.1.1.1, 07.1.1.2, 07.1.2-07.1.6).

Use of colours in FCs 13.3 – 13.6

The Russian Federation suggests considering the establishment of different MLs for solid and liquid products in food categories 13.3 "Dietetic foods intended for special medical purposes (excluding products of food category 13.1)", 13.4 "Dietetic formulae for slimming purposes and weight reduction", 13.5 "Dietetic foods (e.g. supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6)" and 13.6 " Food supplements".

- **Appendix 4: New and revised provisions in the GSFA entered into the step process at Step 2 as a result of CX/FA 23/53/9**

Provisions for Jagua (genipin-glycine) blue (INS 183)

The Russian Federation does not support the inclusion of jagua (genipin-glycine) blue (INS 183) in the GSFA. Currently, there is no justified full scope of jagua use and safe MLs for its content in certain food categories, as well as the specification for this food additive.

Proposals for use of Lauric arginate ethyl ester (INS 243) in FC 01.6.1 (Unripened cheese)

The Russian Federation does not support the deletion of all XS notes (XS221, XS262, XS273, XS275) for Lauric arginate ethyl ester (INS 243) in FC 01.6.1 (Unripened cheese).

Proposals for use of Methacrylate copolymer, basic (bmc) (INS 1205) in FCs 06.1 "Whole, Broken or Flaked Grain Including Rice", 11.1.1 "White sugar", 11.1.2 "Powdered sugar, powdered dextrose" and 11.2 "Brown sugar excluding products of food category 11.1.3"

The Russian Federation does not support the use of Methacrylate copolymer, basic (bmc) (INS 1205) in FCs 06.1 "Whole, Broken or Flaked Grain Including Rice", 11.1.1 "White sugar", 11.1.2 "Powdered sugar, powdered dextrose" and 11.2 "Brown sugar excluding products of food category 11.1.3". We do not see technical need in the use of this food additive in these FCs.

Proposals for use of Dimethyl dicarbonate (INS 242) in FCs 14.1.2 "Fruit and vegetables juices" and 14.1.3 "Fruit and vegetable nectars"

The Russian Federation does not support the inclusion of Dimethyl dicarbonate (INS 242) for use in FCs 14.1.2 "Fruit and vegetables juices" and 14.1.3 "Fruit and vegetable nectars".

The use of INS 242 in these types of beverages results in the formation of significant amounts of methanol, which may cause adverse effects to the health of consumers. At the same time, we do not see technological need for the use of INS 242 in these food categories.

Proposals for use of Propylene glycol (INS 1520) in FC 14.1.4 (Water-based flavoured drinks, including "sport", "energy", or "electrolyte" drinks and particulated drinks) and its subcategories

The Russian Federation is concerned about the safety of Propylene glycol (INS 1520) when used in FC 14.1.4 (Water-based flavoured drinks, including "sport", "energy", or "electrolyte" drinks and particulated drinks) and its subcategories. The issue requires additional studies of this food additive safety, including the need to ask JECFA

to reassess the safety of propylene glycol in carbonated and non-carbonated beverages and calculate its intake. If necessary, there could also be the need to request information from the Commission members about the MLs adopted for INS 1520 in their national/regional legislation.

We propose to leave the issue of using INS 1520 in FC 14.1.4 at Step 7.

Agenda item 5b: GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS (REPLIES TO CL 2023/46-FA)

Proposal for use of Basic methacrylate copolymer (INS 1205) in FCs 13.1 “Infant Formula”, 13.2 “Complementary Foods For Infants And Young Children”, 13.2 “Dietetic Foods Intended For Special Medical Purposes (Excluding Products Of Food Category 13.1)”, 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” and 12.2 “Herbs, Spices, Seasonings, And Condiments (E.G. Seasoning For Instant Noodles)”

The Russian Federation does not support the use of Basic methacrylate copolymer (INS 1205) in FCs 13.1 “Infant Formula”, 13.2 “Complementary Foods For Infants And Young Children”, 13.2 “Dietetic Foods Intended For Special Medical Purposes (Excluding Products Of Food Category 13.1)”, 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” and 12.2 “Herbs, Spices, Seasonings, And Condiments (E.G. Seasoning For Instant Noodles)”.

Currently there is no risk assessment for children’s health for INS 1205, and there is no technological need for the use of this food additive in all of the FCs mentioned above.

Proposal for use of 4-Hexylresorcinol (INS 586)

The Russian Federation considers it premature to include the 4-Hexylresorcinol (INS 586) in the GSFA. To date, JECFA has not established an ADI and ML for various food sources for the use of this substance as a food additive. We do not support this proposal.

Proposals for Mannoproteins from yeast cell walls (INS 455) and Metatartaric acid (INS 353) in FC 14.2.3 “Grape wines”

The Russian Federation does not support the proposals for the use of Mannoproteins from yeast cell walls (INS 455) and Metatartaric acid (INS 353) in FC 14.2.3 “Grape wines”.

Antioxidants are not approved for use in grape wines in the Eurasian Economic Union.

There is no JECFA toxicological evaluation report for yeast cell wall mannoproteins (INS 455).

Agenda item 6: PROPOSED DRAFT REVISION TO THE CLASS NAMES AND THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CXG 36-1989)

The Russian Federation supports the following proposals:

- not to include the function of carrier for sodium ascorbate (INS 301)
- not to include phycocyanin produced by bacteria for use as a blue colour
- to include the including the technological purpose of "nutrient carrier" for mannitol (INS 421).

Agenda item 7: PROPOSALS FOR ADDITIONS AND CHANGES TO THE PRIORITY LIST OF SUBSTANCES PROPOSED FOR EVALUATION BY JECFA (REPLIES TO CL 2023/47-FA)

The Russian Federation seeks the update on the situation regarding the JECFA risk assessment for the preservatives Nisin and Pyramycin (Natamycin), added to the Priority list earlier at the initiative of the Russian Federation.

Agenda item 8: DISCUSSION PAPER ON DIVERGENCE BETWEEN THE GENERAL STANDARD FOR FOOD ADDITIVES (GSFA), CODEX COMMODITY STANDARDS AND OTHER TEXTS – IDENTIFICATION OF OUTSTANDING ISSUES

The Russian Federation supports Option 3, which calls for a holistic review of the Codex Procedural Manual. Such an approach focuses not only on the alignment of the GSFA provisions and commodity standards, but also on preventing similar discrepancies between Commission texts affecting food additives from occurring in the future.