

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 3b, 4a, 4b, 5a, 5b, 6, 7, 8 and 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fourth Session

Comments of Ghana

Agenda item 3b: PROPOSED DRAFT SPECIFICATIONS FOR IDENTITY AND PURITY OF FOOD ADDITIVES ARISING FROM THE 96TH AND 97TH JECFA MEETINGS RESPECTIVELY

Position: Ghana appreciates the work of JECFA on the specifications and purity of food additives. We support the final adoption of additives specifications as recommended by JECFA:

Rationale: These food additives have been subjected to complete evaluation by JECFA with available data.

Agenda item 4a: ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS

Position: Ghana supports the endorsement of the food additives.

Rationale: The texts are aligned with provisions of the Procedural Manual.

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

Issue 1: Proposed Amendments to the Food Additive Provisions of the Subject Commodity Standards for Milk and Milk Products (CCMMP) and to Tables 1, 2 and 3 of the GSFA Relating to the Alignment of Standard for Fermented Milks (CXS 243-2003) and the Standard for Cream and Prepared Creams (CXS 288-1976).

Position: Ghana support the adoption of alignment for the commodity standards as proposed by the eWG including proposed consequential changes to table 1, 2 and 3..

Rationale: The commodity standards are standardised due to their relationship to the GSFA. The new classification in GSFA (01.7) as established accommodates flavoured fermented milks that comprise components apart from milk. The GSFA contains the suitably pertinent exclusionary remarks.

Issue 2: Proposed amendments to the food additive provisions of the Codex committee standards for processed fruits and vegetables (CCPFV) and Tables 1, 2 and 3 of the GSFA relating to CCPFV

Position: Ghana supports the proposed amendments.

Rationale: The commodity standards make provisions for additives contained in the GSFA or disallowance for additives. The proposed changes to the GSFA conforms to the requirements in the specific commodities standards.

Issue 3: Proposed amendments to the food additive provisions of Codex regional standards and Tables 1, 2 and 3 of the GSFA relating to regional standards.

Position: Ghana supports the adoption of the proposed alignment including proposed changes to GSFA tables.
Rationale:

Rationale: The alignment reflects the requirements for food additives as provided in the respective commodity standards.

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

Position: Ghana supports the final proposals of the EWG for each food category.

Use of steviol glycosides (sweeteners) in FC 07.1 and its sub-categories

Position: Ghana supports the adoption at 350 mg/kg with Note 26 and Note 477, as proposed by the EWG

Food Category 07.1 (Bread and ordinary bakery wares)

Position: Ghana supports the EWG proposals to the extent that there is an agreement for New Alternative Note regarding the use of the following sweeteners:

ACESULFAME POTASSIUM: remove Note 161 and adoption with Note 188 add new "Alternative Note"

ADVANTAME: Adopt with New "Alternative Note" 7

ASPARTAME: Remove Note 161, Adopt with Note 191 and Add New "Alternative Note"

ASPARTAME-ACESULFAME SALT: Adopt at 1000 mg/kg with Note 113 and New "Alternative Note"

NEOTAME: Remove Note 161; Adopt with New "Alternative Note"

STEVIOLE GLYCOSIDES: Adopt at 165 mg/kg; Add New "Alternative Note" SUCRALOSE (TRICHLOROGALACTOSUCROSE): Remove Note 161. Adopt with New "Alternative Note".

Agenda item 5b: GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS

Position: Ghana supports the proposed list for new and/or revision of the food additives provision in the GSFA, except for the following:

1. Food additives in FC: 04.1.2.5 - Jams, jellies, marmalades
2. Metatartaric acid INS 353, in grape wine (14.2.3) at GMP

Rationale: Metatartaric acid INS 353 has undergone the necessary evaluation and ADI has been set (Group ADI= 0-30 mg/kg b/w). The Committee therefore can not set it at GMP.

The Standards for jams, jellies and marmalades contain food additive provisions related to FC 04.1.2.5, and therefore, the working group on alignment can best address this.

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

Issue 1: To consider the additions to the Class Names and International Numbering System for Food Additives (CXG 36-1989) as presented in the annex in document CX/FA 24/54/9.

Position: Ghana supports the inclusion of the additives in the INS list as presented in the annex of document CX/FA 24/54/9.

Rationale: Members who proposed the inclusion of the additives on the INS list, showed that they are permitted for use in their countries. The text of CL 2023/45-FA specified that requests for the inclusion of new additives may be made by Codex members that authorize the additive for use in that country. Justifications for use were also provided and agreed to by the eWG.

Issue 2: Whether or not to include the function of carrier for sodium ascorbate (INS 301).

Position: Ghana does not support the inclusion of sodium ascorbate in the function of carrier.

Rationale: INS 301 already contains the function of antioxidant and cannot thus be inserted as required for a carrier.

Issue 3: Whether or not to include phycocyanin produced by bacteria for use as a blue colour.

Position: Ghana does not support the inclusion of phycocyanin produced by bacteria in the INS list at this stage.

Rationale: The additive's official name is not substantiated, and has not been authorized for use in the proposing country. The circular letter (CL 2023/45- FA) included a condition of approval of the additive in the requesting

country.

Agenda item 7: PROPOSALS FOR ADDITIONS AND CHANGES TO THE PRIORITY LIST OF SUBSTANCES PROPOSED FOR EVALUATION BY JECFA

Position: Ghana supports the priority lists and ranking based on consumer health risks, international trade concerns and data availability.

Rationale: The ranking should prioritize food additives that are of major concern in relation to consumer's safety and health, facilitate fair trade and where data has been provided.

Rationale. There is no information on the commercial use of these substances as food additives. Should data be submitted in future the additives may be included on the priority list.

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

Ghana recognizes the time and work devoted in the alignment work which is ongoing. It is our view that it is premature to undertake a holistic revision of the procedural manual when work is ongoing. It would be appropriate to consider minor amendments as proposed in option 2 to accommodate ongoing work. It is proposed that, a holistic revision of procedural manual be considered a upon completion of alignment work.

Agenda item 9: DISCUSSION PAPER ON THE DEVELOPMENT OF A STANDARD FOR BAKER'S YEAST

Position: Ghana agrees to the revised project document CX/FA 24/54/12 Appendix 1 and support the development of a standard for baker's yeast as a new work for approval by CAC47. **Rationale:** The current data related to baker's yeast production volumes supports international trade. Further the discussion paper also highlights the issue of consumer safety.