

# CODEX ALIMENTARIUS COMMISSION

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Food and Agriculture  
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**TO:** Codex Contact Points  
Contact Points of international organizations having observer status with Codex

**FROM:** Secretariat, Joint FAO/WHO Food Standards Programme,  
Codex Alimentarius Commission  
Viale delle Terme di Caracalla,  
00153 Rome, Italy

**SUBJECT:** Request for proposals for change and/or addition to Section 3 of the *Class Names and International Numbering System for Food Additives (CXG 36-1989)*

**DEADLINE:** 15 September 2020

**COMMENTS:** **To:** Secretariat  
Codex Committee on Food Additives  
China National Center for Food Safety Risk Assessment (CFSA),  
Building 2, No. 37 Guangqu Road, Chaoyang District, Beijing 100022, China, E-mail: [ccfa@cfsa.net.cn](mailto:ccfa@cfsa.net.cn)

**Copies to:** Secretariat  
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## REQUEST FOR INFORMATION AND COMMENTS

1. Members and observers are invited to provide proposals for changes/addition to the INS list. Comments should be submitted on the basis of the following Annexes attached to this Circular Letter:

**Annex 1** Principles for changes/addition to Section 3 of the *Class Name and International Numbering System for Food Additives (CXG 36-1989)*;

**Annex 2** Form for submission of proposals for changes to the INS list.

2. Information and comments, submitted in response to this Circular Letter, might be considered by the Electronic Working Group on INS, established by CCFA51, which will prepare proposed draft revision to the *Class Names and International Numbering System International Numbering System for Food Additives (CXG 36-1989)* for circulation for comments at Step 3 and consideration by CCFA52 (see REP19/FA, para.148 (ii) and CL 2020/34-FA, paras. 3(ii)b and 4(ii)b).

**Annex 1****PRINCIPLES FOR CHANGES/ADDITIONS TO SECTION 3 OF CLASS NAMES AND INTERNATIONAL NUMBERING SYSTEM (CXG 36-1989)****1. New additives**

Since the INS is an open list, requests for the inclusion of new additives may be made by Codex members that authorize the additive for use in that country and for which an INS number is needed. The numbers are roughly grouped by functional class. For example, colours are numbered from 100 to 199.

**2. New sub-classes of INS numbers**

The INS uses a hierarchical set of numbers, alphabetical suffixes (i.e., (a), (b), etc.), and numerical subscripts (i.e. (i), (ii), etc.) to identify food additives. Alphabetical suffixes are used to further characterize the different classes of an additive (e.g. produced by different processes).

As an example, four types of caramel are listed in the INS list: INS 150a “Caramel I – plain caramel,” INS 150b “Caramel II –sulfite caramel”, INS 150c “Caramel III – ammonia caramel,” and INS 150d “Caramel IV – sulfite ammonia caramel.” Numerical subscripts are used to distinguish between related additives that have different Codex specifications. As an example, three additives with numerical subscripts (INS160d(i) “Lycopene (synthetic),” INS 160d(ii) “Lycopene, tomato,” and INS 160d(iii) “Lycopene, *Blakeslea trispora*” are found under the “parent” additive INS 160d “Lycopenes.”

**3. New or additional technological purposes**

The Technological Purposes given in the INS are purely indicative and should not be taken in any way to be exhaustive. Proposals for the inclusion of a new Technological Purpose should be accompanied by a suitable reference, such as:

- Evidence that the compound has been or is capable of being used effectively for the technological purpose proposed; or
- A Codex commodity standard has provisions for the use of the compound with the proposed technological purpose; or
- The JECFA specification monograph lists the technological purpose under the heading “Functional Uses”; or
- A national food authority has permitted such a use; or
- The food industry is currently using a substance for the technological purpose proposed.

**4. Modification of an existing INS name or INS number of an additive from the INS list**

Proposals for the modification of an existing INS name or INS number should be accompanied by a suitable justification. A suitable justification is, for example:

- The INS list contains an error; or
- The name in the INS is so different from that used by JECFA that confusion may result; or
- The name in the INS list is unsuitable for labelling purposes; or
- The name in the INS list is inconsistent with the names of other related additives.

**5. Deletion of an additive from the INS list**

Proposals for deletion of INS entries cannot be submitted to this circular letter if there are existing provisions (adopted or in the Step Process) for the additive in the *General Standard for Food Additives* (XCS 192-1995). The Codex Committee on Food Additives must first remove those provisions from the GSFA prior to the submission of proposals to delete a corresponding INS entry.

Proposals for deletion of INS entries should be accompanied by a suitable justification. A suitable justification is, for example:

- Health risk issues, e.g. JECFA has withdrawn an acceptable daily intake (ADI) based on new toxicological data; or
- Evidence that the additive is not commercially manufactured or used; or
- Evidence that the additive cannot be considered to fall under the Codex definition of a food additive.

**Annex 2****FORM FOR SUBMISSION OF PROPOSALS FOR CHANGES TO THE INS LIST**

*In completing this form, only brief information is required. The form may be retyped if more space is needed under any one heading provided that the general format is maintained.*

**The change is requested by (Name):**

.....

**Justification for the requested INS change in Section 3: new or additional technological purpose**

*(Please select only the appropriate option and provide details in the space below. Proposals for deletion of INS entries cannot be submitted to this circular letter if there are existing provisions (adopted or in the Step Process) for the additive in the General Standard for Food Additives (CXS 192-1995).)*

- Evidence that the compound has been or is capable of being used effectively for the technological purpose proposed
- A Codex Commodity standard has provisions for the use of the compound
- The JECFA specification monograph lists the technological purpose under the heading "Functional Uses"
- A national food authority has permitted such a use
- The food industry is currently using a substance for the technological purpose proposed
- Other justification, what?

**Details:**

**Justification for the requested INS change in Section 3: modification of an existing INS name or INS number purpose** *(Please select only the appropriate option and provide details in the space below)*

- The INS list contains an error
- The name in the INS is so different from that used by JECFA that confusion may result
- The name in the INS list is unsuitable for labeling purposes
- The name in the INS list is inconsistent with the names of other related additives
- Other justification, what?

**Details**

**Justification for the requested INS change in Section 3: deletion of additive purpose** *(Please select only the appropriate option and provide details in the space below)*

- Health risk issues, e.g. JECFA has withdrawn an acceptable daily intake (ADI) based on new toxicological data
- Evidence that the additive is not commercially manufactured or used
- Evidence that the additive cannot be considered to fall under the definition of a food additive
- Other justification, what?

**Details**