CODEX ALIMENTARIUS COMMISSION





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Agenda Item 3a

CRD 7

Original Language

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES

Forty-eighth Session

Xi'an, China, 14-18 March 2016

MATTERS OF INTEREST ARISING FROM FAO AND WHO AND FROM THE 80^{TH} MEETING OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA)

Comments of Egypt, Indonesia, Philippines, Russian Federation, Senegal and African Union

EGYPT

We agree on the recommendations of JECFA on these food additives. Provided that the feasibility to review the maximum levels should be based on the 80th JECFA report.

INDONESIA

Indonesia supports the recommended action by CCFA as presented in the Table below, as follows:

INS	Food additive	Recommended action by CCFA	Indonesia Comments
	Benzoates: dietary exposure assessment	Note the JECFA conclusion on the current estimated dietary exposures for benzoates. In light of JECFA conclusion on actual use levels, consider: - The feasibility to reduce the ML for benzoates in GSFA food category 14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	Indonesia supports the recommendation JECFA to reduce the ML for benzoates in GSFA food category 14.1.4
470(iii)	Magnesium stearate	Note the JECFA conclusion on the ADI "not specified" for magnesium salts of stearic and palmitic acids and consider to: - Include magnesium stearate (INS 470(iii)) in Table 3 of GSFA and circulate for comments at Step 3; and - Request comments/proposals on uses and use levels of magnesium stearate (INS 470(iii)) for the food categories listed in the Annex to Table 3. Note the JECFA recommendation on exposure assessment for magnesium from use of food additives and consider to: - Recommend countries to submit information to JECFA on actual use level for magnesium-containing food additives.	Indonesia permits magnesium stearate as anticacking agent only for food category 05.2 confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4 and 05.3 chewing gum

PHILIPPINES

CCFA is invited to note the JECFA conclusion on the current estimated dietary exposure for benzoates. In light of JECFA conclusion on actual use levels, consider:

- The feasibility to reduce the ML for benzoates in GSFA food category 14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks.

Philippine Comments:

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Philippine supports the lowering of the ML for benzoates in GSFA food category 14.1.4 Water-based flavoured drinks including "sport," "energy," or "electrolyte" drinks and particulated drinks.

Rationale:

Based on the analytical data gathered from the laboratory analysis of water-based flavoured drinks conducted by a recognized laboratory, the average actual concentration levels of benzoate ranged from 169 to 221 mg/L, these levels are lower than the maximum use level of GSFA food category 14.1.4 which is 600 mg/L. Therefore, the max level for benzoate may be reduced to level enough to provide technological need.

RUSSIAN FEDERATION

<u>Potential allergenicity of enzymes: change to the number of amino acids in segments used in allergen database searches</u>

The Russian Federation agrees with the 80 th JECFA recommends that searches of established allergens into peptides should consider only eight amino acid sequences.

Revised guidance for WHO JECFA monographers

The Russian Federation agrees with great importance and timeliness of JECFA work in the field of providing a separate guidance document on enzymes. In our opinion it is necessary to include in this guidance document demands requirements to the source material and manufacturing process of enzyme (especially for production from microbial genetically modified sources - GMM). At present time in JECFA monographies in case of evaluating of enzymes, only systematic (species, generic) name of microorganisms' strains (for example: Serine protease (trypsin) from *Fusarium oxysporum* expressed in *Fusarium venenatum*) is pointed out.

In compliance with established rules only strains of microorganisms with unique No. which was given them after its risk estimation can be used in industry of enzymes production. It should also be noted that producers of GMM strain can be different and in this case novel strains can be obtained, e.g.:

- 1) expressed into *Fusarium oxysporum* section of DNA from *Fusarium venenatum* can have differences from strain estimated by JECFA;
- 2) DNA from Fusarium venenatum can be expressed into another place of DNA of Fusarium oxysporum;
- 3) for express of DNA another vectors can be used, including vectors from plasmids which answer for antibioticresistance, pathogenic, virulence quality of microorganisms and such (especially if this done purposely).

In these cases pathogenicity and toxigenicity and another characteristics of the source organism could have differences from estimated by JECFA strain. Obtained enzyme could have another amino acid sequence.

Therefore name of microorganisms – producers of enzyme **should include unique numbers given by producers and consolidated with responsible government body and based on risk estimation results** (information relating to pathogenicity and toxigenicity of the source organism, donor-strain, recipient-strain as well as other properties with potential impact on human health, e.g. the production of antibiotics as well as the presence of natural and/or acquired antibiotic/antimicrobial resistance genes).

Such requirements should also be presented in case with strains of microorganisms used to produce food additives and flavours.

SENEGAL

Problème: Modification du statut dose journalière admissible (DJA) en vertu de recommandations toxicologiques pour les six additifs alimentaires à la suite de l'évaluation du JECFA.

Position: Nous sommes d'accord sur les recommandations du JECFA sur ces additifs alimentaires. Nous demandons que les pays africains fornissent des données sur le niveau d'utilisation réelle pour le stéarate de magnésium et d'alcool polyvinylique (PVA) - le polyéthylène glycol (PEG) copolymère greffé; des informations pour compléter la révision des spécifications provisoires de β-glucanase et xylanase mixte de Disporotrichum dimorphosporum et de Rasamsonia emersonii, le dioxyde de silicium, amorphe et aluminosilicate de sodium.

Justification: JECFA est un comité scientifique indépendant qui effectue des évaluations des risques et fournit des avis scientifiques dans l'élaboration de normes et de directives alimentaires du Codex.

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AFRICAN UNION

Issue: Changes in acceptable daily intake (ADI) status under toxicological recommendations for six food additives as a result for JECFA evaluation.

Position: AU agrees on the recommendations of JECFA on these food additives. AU requests that African countries should provide data on actual use level for Magnesium stearate and Polyvinyl alcohol (PVA) – polyethylene glycol (PEG) graft copolymer; information to complete the revision of the tentative specifications of Mixed β -glucanase and xylanase from Disporotrichum dimorphosporum and from Rasamsonia emersonii, Silicon dioxide, amorphous and Sodium Aluminium Silicate.

Rationale: JECFA is an independent scientific committee which performs risk assessments and provides scientific advice in the development of Codex food standards and guidelines.