CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 5a, 5b **CRD 13**

Original Language

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-eighth Session

Xi'an, China, 14-18 March 2016

FOOD ADDITIVE PROVISIONS IN TABLES 1 AND 2 IN FOOD CATEGORIES 01.2 THOUGH 08.4, WITH THE EXCLUSION OF FOOD CATEGORIES 04.1.2.4, 04.2.2.4, 04.2.2.5, 04.2.2.6, 05.1.1, 05.1.3, AND 05.1.4 (OUTSTANDING FROM CCFA47)

AND

USE OF NISIN (INS 234) IN FOOD CATEGORY 08.3.2 IN GENERAL, AND SPECIFICALLY IN PRODUCTS CONFORMING TO THE CORRESPONDING COMMODITY STANDARDS

Comments of China, India, Indonesia, Japan, Malaysia, Philippines, Nigeria, Republic of Korea, Russian Federation, Senegal, Thailand, European Union, African Union, EFEMA and IFAC

AGENDA ITEM 5A

CHINA

Appendix 1: provisions in Tables 1 and 2 of the GSFA in food categories 01.2 through 08.4, with the exception of provisions in food categories that are to be considered by the e-WG on alignment, or provisions for food additives with “colour” or “sweetener” function.

	Food Category No.	Food Category	Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	e-WG proposal	China comments
1.	01.4	Cream (plain) and the like	NISIN	234	12.5	233	3	Preservative	Move to subcategory 01.4.4.Preservatives not allowed in CODEX STAN 288-1976	Suggest to maintain in the FC 01.4. China approved in the FC 01.0 Milk and dairy product at ML 12.5 mg/kg. -Technical justification: The plain cream is easily to be contaminated during the supply chain, Nisin is used to protect the product from bacteria contamination.
2.	02.1.2	Vegetable oils and fats	POLYGLYCEROL ESTERS OF FATTY ACIDS	475	20000		7	Emulsifier	Discuss further – not allowed in corresponding standards	Suggest to adopt. China approved in vegetable oil at ML 10000 mg/kg. -Technical justification: Polyglycerol esters of fatty acids is used as ES&T, anticaking agent.
3.	02.1.2	Vegetable oils and fats	PROPYLENE GLYCOL ALGINATE	405	11000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener		Suggest to adopt. China approved in hydrogenated vegetable oil at ML 5000 mg/kg. -Technical justification: Propylene glycol alginate is used as gelling agent, stabilizer and thickener.
4.	02.1.2	Vegetable oils and fats	SORBITAN ESTERS OF FATTY ACIDS	491-495	10000		7	Emulsifier, (Stabilizer - INS 493 and 494 only)		Suggest to adopt. China approved in hydrogenated vegetable oil at ML 10000mg/kg. -Technical justification: Hydrogenated vegetable oil separates out when the temperature changes frequently, sorbitan esters of fatty acids is used to make the vegetable oil

	Food Category No.	Food Category	Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	e-WG proposal	China comments
										stable.
5.	02.1.2	Vegetable oils and fats	STEAROYL LACTYLATES	481(i), 482(i)	3000		7	Emulsifier, Flour Treatment Agent, Foaming Agent, Stabilizer		Suggest to adopt. China approved in vegetable oil at ML 300 mg/kg. -Technical justification: The vegetable oil crystallizes when kept on the shelves. Stearoyl lactylates is used as emulsifier and stabilizer, to prevent vegetable oil from crystallization.
6.	02.1.2	Vegetable oils and fats	SUCROSE ESTERS OF FATTY ACIDS	473	10000		7	Emulsifier, Stabilizer	Discontinue	Suggest to maintain in the FC 02.1.2. China approved in oil and fats essentially free from water at ML 10000 mg/kg. -Technical justification: Sucrose esters of fatty acids is used in vegetable oil to exert the function of emulsifying and foam inhibition.
7.	02.2.3	Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	STEAROYL LACTYLATES	481(i), 482(i)	20000		7	Emulsifier, Flour Treatment Agent, Foaming Agent, Stabilizer	Discuss further. Used at 10,000 mg/kg by some members but others note safety concerns at that ML	Suggest to adopt in the FC 02.2.3. China approved in fat emulsions mainly of type oil-in-water at ML 5000 mg/kg. -Technical justification: Stearoyl lactylates is used as emulsifier and stabilize.
8.	06.2	Flours and starches (including soybean powder)	TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	6000	45	4	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer – INS 334 only)	Move to subcategories for consideration against corresponding commodity standards	Support. China approved in flours and starches at GMP.
9.	06.2.1	Flours	TARTRATES	334, 335(i),(ii),	6000	45		Acidity Regulator,	Adopt at 5,000 with note 186 "For use in	

	Food Category No.	Food Category	Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	e-WG proposal	China comments
				336(i),(ii), 337				Sequesterant, Stabilizer (Flavour enhancer – INS 334 only)	flours with additives only"	
10.	06.4	Pastas and noodles and like products (e.g. rice paper, rice vermicelli, soybean pastas and noodles)	SUCROSE ESTERS OF FATTY ACIDS	473	2000		4	Emulsifier, Stabilizer	Discuss use in subcategories	Support. China approved in pastas and noodles and like products at 4000 mg/kg.
11.	06.4.1	Fresh pastas and noodles and like products	SUCROSE ESTERS OF FATTY ACIDS	473	2000			Emulsifier, Stabilizer	Adopt with Note 211 "for use in noodles only".	
12.	06.4.2	Dried pastas and noodles and like products	SUCROSE ESTERS OF FATTY ACIDS	473	2000			Emulsifier, Stabilizer	Discontinue	Suggest to maintain in the FC 06.4.2. China approved in dried pastas and noodles and like products at 4000 mg/kg. -Technical justification: Sucrose esters of fatty acids exerts emulsifying and stabilization function in dried pastas and noodles and like products. It modifies the property of starch, protects the product from ageing, and prolongs the shelf life.
13.	06.4.3	Pre-cooked pastas and noodles and like products	SUCROSE ESTERS OF FATTY ACIDS	473	2000			Emulsifier Stabilizer	Adopt with Note 194	Support. China approved in pre-pastas and noodles and like products at 4000 mg/kg.

	Food Category No.	Food Category	Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	e-WG proposal	China comments
14.	06.4.3	Pre-cooked pastas and noodles and like products	SODIUM DIACETATE	262(ii)	3000		7	Acidity regulator, Preservative, Sequesterant	Discontinue	Suggest to maintain in this FC. China approved in pre-pastas and noodles and like products at 4000 mg/kg. -Technical justification: Sodium Diacetate is used as preservative, to keep the product fresh without changing its characters. The effect is better than benzoates.
15.	08.2.2	Heat-treated processed meat, poultry, and game products in whole pieces or cuts	STEAROYL LACTYLATES	481(i), 482(i)	4000		7	Emulsifier, Flour Treatment Agent, Foaming Agent, Stabilizer	Adopt with note excluding CS 96-1981 and 97- 1981	Support adopt in this FC. China approved in sausage at ML 2000 mg/kg.
16.	08.3.2	Heat-treated processed comminuted meat, poultry, and game products	STEAROYL LACTYLATES	481(i), 482(i)	4000		7	Emulsifier, Flour Treatment Agent, Foaming Agent, Stabilizer	Adopt with note "for use in minced and diced canned meat products only" and new note excluding CS 88-1981, 89-1981, and 98-1981	Support adopt in this FC, but delete the note. China approved in sausage at 2000 mg/kg. -Technical justification: Stearoyl lactylates are widely used in meat products. Using in sausage could improve the product’s stability and emulsion, could improve the food’s texture, and avoid surface cracking.

INDIA

Specific Comments: -

Appendix 1

1. Food Category No. 01.6.1 (Unripened Cheese)

Additive – Nisin

India supports the EWG proposal for use of Nisin in this food category.

Additive – Propylene glycol alginate

India supports the EWG proposal for adoption of propylene glycol alginate in this food category.

2. Food Category No. 01.6.4 (Processed Cheese)

Additive – Nisin

India supports the EWG proposal for use of Nisin in this food category.

3. Food Category No. 02.1.2(Vegetables oils and fats)

Additive- Tartrates

India does not support the EWG proposal to discontinue the use of Tartrates in food category 02.1.2. Use of Tartaric acid is permitted in India in this food category.

Additive – Tocopherols

India supports the use of tocopherol in Food category 02.1.2. India permits the use of Tocopherols in this food category.

4. Food Category No. 02.1.3 (Lard, tallow, fish oil and other Animal fats)

Additive- Tartrates

India does not support the EWG proposal to discontinue the use of Tartrates in food category 02.1.3. Use of Tartaric acid is permitted in India in this food category.

Additive – Tocopherols

India supports the use of tocopherol in Food category 02.1.3. India permits the use of Tocopherols in this food category.

5. Food Category No. 02.2.1 (Butter)

Additive- Sodium carbonate

India supports the use of sodium carbonate at GMP without note 303 as the provision is already adopted in CODEX without note 303 and Indian Regulation also permits its use at GMP in this food category without such restriction.

Additive-Sodium Hydrogen Carbonate

India supports the use of Sodium Hydrogen Carbonate at GMP without note 303 as the provision is already adopted in CODEX without note 303 and Indian Regulation also permits its use at GMP in this food category without such restriction.

6. Food Category No. 02.2.2 (Fat spreads, dairy fat spreads and blended spreads)

Additive- Polyglycerol Esters of Fatty Acid

India supports the use of Polyglycerol esters of fatty acids. India permits its use at 5000 mg/kg in this food category.

Additive-Polysorbates

India supports the use of Polysorbates. India permits its use at 5000 mg/kg in this food category.

Additive-Sorbitan esters of fatty acids

India supports the use of Sorbitan esters of fatty acids. India permits its use at 10,000 mg/kg in this food category.

Additive-Sucrose esters of fatty acids

India supports the use of sucrose esters of fatty acids. India permits its use at 10,000 mg/kg in this food category.

Additive: Tartrates

India supports the eWG proposal for the use of Tartrates in food category 02.2.2. India permits the use of tartaric acid in this food category.

7. Food Category No. 02.2.3(Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions)

This category number needs to be corrected as 2.3, as per GSFA.

Additive- Polyglycerol Esters of Fatty Acid

India supports the use of polyglycerol esters of fatty acids. However, the proposed maximum level appears to be too high. India permits its use at the level of 10,000 mg/kg in this food category.

Additive-Propylene Glycol Alginate

India supports the use of propylene glycol alginate. India permits its use at the level of 10,000 mg/kg in this food category.

8. Food Category No. 3.0 (Edible ices, including sherbet and sorbet)

Additive- Polyglycerol Esters of Fatty Acid

India supports the use of Polyglycerol esters of fatty acids. India permits its use at the level of 10,000 mg/kg in this food category.

Additive-Propylene Glycol Alginate

India supports the use of propylene glycol alginate. India permits its use at the level of 10,000 mg/kg in this food category

9. **Food Category No. 4.1.2.2 (Dried Fruits)**

Additive- Tartrates

India supports the adoption for the use of Tartrates. India permits the use of tartaric acid in this food category.

10. **Food Category No. 4.1.2.5 (Jams, jellies and marmalades)**

Additive-Propylene Glycol Alginate

India supports the use of Propylene Glycol Alginate in food category 4.1.2.5. India permits its use in this food category without any restriction and hence does not see the need of the new proposed note.

Additive- Tartrates

India supports the adoption for the use of Tartrates. India permits the use of tartaric acid in this food category.

11. **Food Category No. 4.1.2.6 (Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5)**

Additive- Tartrates

India supports the adoption for the use of Tartrates in food category 04.1.2.6. India permits the use of tartaric acid in this food category, including mango chutney and hence does not see the need for the proposed new note.

12. **Food Category No. 4.1.2.7 (Candied Fruits)**

Additive- Tartrates

India supports the EWG proposal for the use of Tartrates in food category 04.1.2.7. India permits the use of tartaric acid in this food category.

13. **Food Category No. 5.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4)**

Additive- Tartrates

India supports the use of Tartrates in this food category. However, the use level appears to be too high. India permits its use as tartaric acid at 2000 mg/kg in this food category.

Additive- Tocopherol

India supports the EWG proposal to adopt the use of tocopherol in food category 5.2. India permits its use at 500 mg/kg in this food category.

14. **Food Category No. 5.3 (Chewing Gum)**

Additive- Tocopherol

India supports the eWG proposal for the use of Tocopherol in food category 5.3. India permits its use at 1500mg/kg in this food category.

15. **Food Category No. 6.2.1 (Flours)**

Additive- Tocopherol

India supports the adoption for the use of Tocopherol in food category 6.2.1. India permits its use in this food category.

16. **Food Category No. 6.2.2 (Starches)**

Additive- Tocopherol

India supports the adoption for the use of Tocopherol in food category 6.2.2. India permits its use in this food category.

17. **Food Category No. 6.3 (Breakfast cereals, including rolled oats)**

Additive- Tocopherol

India supports the adoption for the use of Tocopherol in food category 6.3. India permits its use in this food category.

18. **Food Category No. 7.0 (Bakery wares)**

Additive- Tocopherol

India supports the adoption for the use of Tocopherol in food category 7.0. India permits its use in biscuits in this food category.

19. **Food Category No. 7.1 (Bread and ordinary bakery wares and mixes)**

Additive- Sucrose esters of fatty acids

India supports the adoption for the use of Sucrose esters of fatty acids in food category 7.1. India permits its use in this food category.

INDONESIA

Appendix 1: provisions in Tables 1 and 2 of the GSFA in food categories 01.2 through 08.4, with the exception of provisions in food categories that are to be considered by the e-WG on alignment, or provisions for food additives with "colour" or "sweetener" function.

Food Category No. 01.3 (Condensed milk and analogues (plain)

Corresponding commodity standards: None, multiple standards correspond to subcategories

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
~~TOCOPHEROLS~~	~~307a, b,c~~	~~200~~		~~7~~	~~Antioxidant~~	Consider use in subcategories – not allowed in standards corresponding to FC 01.3.1	Maintain provision in FC01.3 Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.3. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these products and have technological function in all subcategories

Food Category No. 01.3.1 (Condensed milk (plain)

Horizontal approach (FA/45CRD2AppendixFA/46CRD2AppendixV): NotintheAnnextoTable3

Corresponding commodity standards: 281-1971, 282-1971: list specific firming agents, ES&T and acidity regulators

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	Do not move from FC 01.3 – not allowed in corresponding standards	Adopt provision in FC01.3 Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.3. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these products and have technological function in all subcategories

Food Category No. 01.3.2 (Beverage whiteners)

Corresponding commodity standards: 250-2006, 252-2006: lists specific ES&Ts and acidity regulators

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	Adopt as listed with new Note excluding	Maintain provision in parent category 01.3. Rationale: As a tropical country, Indonesia needs antioxidant for

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
						products conforming to CODEX STAN 250-2006and CODEX STAN252-2006.	food product in food category 01.3. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No. 01.4 (Cream (plain) and thelike)

Corresponding commodity standards: 288-1976 corresponds to subcategories 01.4.1 -01.4.3

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
~~TOCOPHEROLS~~	~~307a, b, c~~	~~200~~		~~7~~	~~Antioxidant~~	Move to subcategory01.4.4 - CODEXSTAN 288-1976 does not allow antioxidants	Mantain in FC 01.4 – has function in all subcategories Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.4. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No. 01.4.4 (Creaman alogues)

Horizontal approach (FA/45CRD2AppendixFA/46CRD2AppendixV): Not in the AnnextoTable3

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b,c**	**200**		**7**	**Antioxidant**	Adopt as listed	Maintain in parent category 01.4 Rationale: Indonesia as a tropical country needs antioxidant for food product in food category 01.4. Indonesia considers that tocopherols as natural antioxidant is one of the effective antioxidants for these product and this antioxidant has technological function in all subcategories

Food Category No. 01.5.1 (Milk powder and cream powder (plain))

Horizontal approach (FA/45CRD2AppendixFA/46CRD2AppendixV): NotintheAnnextoTable3

Corresponding commodity standards: 207-1999: lists specific firming agents, acidity regulators, anticaking agents, antioxidants, emulsifiers, and stabilizers; 290-1995: lists specific bulking agents, acidity regulators, anticaking agents, and emulsifiers

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	307a, b,c	5000	7		Antioxidant	Discontinue	adopt in parent category 01.5 Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.5. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No. 01.6 (Cheese and analogues)

Horizontal approach (FA/45CRD2AppendixFA/46CRD2AppendixV): Subcategories01.6.3 and 01.6.6 are in the Annex toTable3

Corresponding commodity standards: None; Multiple commodity standards correspond to subcategories

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
NISIN	**234**	**12.5**	**233**		**Preservative**	**Indonesia:** proposes moving provisions for these additives from subcategories to parent category 01.6 as used in all subcategories	Indonesia considers that all subcategories have the same composition and the uses of nisin has technological function in all subcategories. Indonesia also considers that the uses of nisin can be effective and accordance with tropical condition in Indonesia which is need effectively preservatives such as nisin for cheese and analogues
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**		As a tropical country, Indonesia needs antioxidant for food product in food category 01.6. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No. 01.6.1 (Unripened cheese)

Horizontal approach(FA/45CRD2AppendixFA/46CRD2AppendixV): NotintheAnnextoTable3

Corresponding commodity standards: All list specific acidity regulators, preservatives, and stabilizers; 283-1987 (General standard for cheese): for unripended cheeses refers to CODEX STAN 221-2001; 221-2001 (Group standard for unripened cheese) specific thickeners, colours, foaming agents, anticaking agents; 262-

2006 (Mozzarella) specific colours, anticaking agents;273-1698(Cottage cheese);275-1973(Cream cheese) specific thickeners, emulsifiers, antioxidants, colours, foaming agents

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
NISIN	234	12.5	233	6	Preservative	Adopt as listed - listed in all corresponding standards	move to parent category 01.6 Rationale: Indonesia considers that all subcategories have the same composition and the uses of nisin has technological function in all subcategories. Indonesia also considers that the uses of nisin can be effective and accordance with tropical condition Indonesia which is need effectively preservatives such as nisin for cheese and analogues
TOCOPHEROLS	307a, b,c	200		7	Antioxidant	Adopt as listed with new note "Only for use in products conforming to the Standard for Cream Cheese (CODEX STAN 275-1973)" Codex Stan 275-1973 only lists 307 b and c	move to parent category 01.6 Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.3. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these products and have technological function in all subcategories

Food Category No. 01.6.2 (Ripened cheese)

Horizontal approach(FA/45CRD2AppendixFA/46CRD2AppendixV): NotintheAnnextoTable3

Corresponding commodity standards: Multiple standards correspond to FC01.6.2.1

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
NITRATES	251, 252	40	30	7	Colour Retention Agent, Preservative	Adopt at 50 mg/kg with 2 notes "excluding soft cheeses as defined in Codex Stan 283-1978" and "excluding products	agrees with proposal

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
						conforming to the standard for cheese in brine (Codex Stan 208-	
~~TOCOPHEROLS~~	~~307a, b,c~~	~~200~~		~~7~~	~~Antioxidant~~	Move to subcategory 01.6.2.3. Not listed in corresponding Commodity standards	maintain in FC 01.6.2 or move to parent FC 01.6. Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.6. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No. 01.6.3 (Whey cheese)

Corresponding commodity standards: 284-1971: refers to FC 01.6.3 and01.6.6.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b,c**	**200**			**Antioxidant**	Do not include in FC 01.6, or in FC 01.6.3	proposes including provisions for these additives in parent category 01.6 Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.6. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No 01.6.4 (Processed Cheese)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
NISIN	234	12.5	233	6	Preservative	Adopt	Move to parent FC 01.6. Rationale: Indonesia considers that all subcategories have the same composition and the uses of nisin has technological function in all subcategories.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
							Indonesia also considers that the uses of nisin can be effective and accordance with tropical condition Indonesia which is need effectively preservatives such as nisin for cheese and analogues
TARTRATES	334,335(i), (ii),336(i), (ii), 337	34900	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334only)	Adopt - Comments indicate use by somemembers	supports proposal
TOCOPHEROLS	307a,b, c	200		7	Antioxidant	Adopt - Comments indicate use by somemembers	move to parent FC 01.6. Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.6. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No 01.6.5 (Cheese analogues)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
NITRATES	251,252	40	30	7	Colour Retention Agent, Preservative	Adopt at 50 mg/kg with Note 30 - comments indicate use at that level by some members	Support original provision. Indonesia considers that the ML of 30 mg/kg has already given the technological function
NITRITES	249, 250	20	32	7	Colour Retention Agent, Preservative	Adopt - Comments indicate use by some members	supports proposal
TARTRATES	334,335(i),(ii), 336(i),(ii), 337	GMP	45	7	Acidity Regulator, Sequesterant, Stabilizer	Adopt	supports proposal

Food Category No. 01.6.6 (Whey protein cheese)

Corresponding commodity standards: 284-1971: refers to FC 01.6.3 and01.6.6.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b,c**	**200**			**Antioxidant**	Do not include in FC 01.6, or in FC 01.6.3	Indonesia proposes to include the provisions for tocopherols in parent category01.6 Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.6 Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No 01.7 (Dairy-based desserts (e.g. pudding, fruit, or flavoured yoghurt))

Corresponding commodity standards: 243-2003: allows various additives in various foods

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
PROPYLENE GLYCOL ALGINATE	405	10000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, GellingAgent, Stabilizer,Thickener	Adopt – allowed in CODEX STAN243- 2003 in allproducts atGMP	supports proposal
SORBITAN ESTERS OF FATTY ACIDS	491-495	5000		7	Emulsifier, (Stabilizer - INS 493 and 494 only)	Adopt with new note “Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003)”	supports proposal
SUCROSE ESTERS OF FATTYACIDS	473	10000		7	Emulsifier,Stabilizer	Adopt at 5,000 mg/kg with new note "singly or in combination: INS 473, 473a,and 474" and “Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003)”	supports proposal

Food Category No. 01.8 (Liquid whey and whey products, excluding whey cheeses)

Corresponding commodity standards: 289-1995 corresponds to subcategory 01.8.2

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	**Indonesia:** proposes moving provisions from subcategories to parent category 01.8 - used in all subcategories.	As a tropical country, Indonesia needs antioxidant for food product in food category 01.8. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and have technological function in all subcategories

Food Category No. 01.8.1 (Liquid whey and whey products, excluding whey cheeses)

Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	307a, b,c	200		7	Antioxidant	Adopt as listed, comments indicate use by some members	move to parent FC01.8 Rationale: Indonesia as a tropical country needs antioxidant for food product in food category 01.8 Indonesia considers that tocopherols as natural antioxidant is one of the effective antioxidants for these product and this antioxidant has technological function in all subcategories

Food Category No. 01.8.2 (Dried whey and whey products, excluding whey cheeses)

Corresponding commodity standards: 289-1995 corresponds to subcategory 01.8.2

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b,c**	**200**			**Antioxidant**	Adopt as listed, comments indicate use by some members	proposes adopt provision in parent FC Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 01.8. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product and

							have technological function in all subcategories

Food Category No. 02.1.2 (Vegetable oils and fats)

Horizontal approach (FA/45CRD2AppendixFA/46CRD2AppendixV): acidity regulators /ES&T not horizontally justified

Corresponding commodity standards: 019-1981, 210-1999: allows specific antioxidants, antioxidant synergists, and anti-foaming agent; 033-1981: does not allow food additives (except tocopherols);

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
SORBITAN ESTERS OF FATTYACIDS	491-495	10000		7	Emulsifier, (Stabilizer - INS 493 and 494only)	Discuss further – not allowed in corresponding standards	Indonesia proposes the ML of 10000 mg/kg for. As a coconut oil producer, Indonesia needs the uses of sorbitan esters of fatty acids for lowering melting point so the products would not freeze during transportation

Food Category No. 02.2.2 (Fat spreads, dairy fat spreads and blended spreads)

Corresponding commodity standards: 253-2006: lists specific acidity regulators, antifoaming agents, antioxidants, colours, preservatives, and propellants (ES&Ts and flavour enhancers only allowed in < 70% milk fat products); 256-2007: lists specific acidity regulators, ES&Ts, antifoaming agents, antioxidants, colours, flavour enhancers, packaging gases, and preservatives

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEICACID	476	10000		7	Emulsifier	Adopt at 4,000 mg/kg with note "excluding dairy fat spreads with > 70% milk fat content" - aligns with commodity standards	Indonesia supports proposal

Food Category No. 02.2.3 (Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions) Corresponding commodity standards: None.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
SORBITAN ESTERS OF FATTYACIDS	491 - 495	10000		7	Emulsifier, (Stabilizer - INS 493 and 494only)	Discuss further. Used at 50,000 mg/kg by some members but others note safety	Indonesia proposes the ML of 5000 mg/kg for sorbitan esters of fatty acids in food category 02.2.3. Indonesia is of the opinion that the proposed ML has already given technological

						concerns at that ML	function.

Food Category No 03.0 (Edible ices, including sherbet and sorbet)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	2000	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334only)	Adopt at 4,000 mg/kg - comments indicate use by some members	Indonesia proposes the ML of 2000 mg/kg. Indonesia considers that the proposed ML has already given the technological function. Indonesia also considers that the eWG proposed ML is exceed the ADI of tartrates.

Food Category No. 04.1.2 (Processed fruit)

Corresponding commodity standards: None. Multiple standards apply to subcategories, several of which do not allow food additives;

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b,c**	**200**			**Antioxidant**	**Indonesia :** proposes move provision from subcategry 04.1.2.2 to parent FC 04.1.2.	As a tropical country, Indonesia needs antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product. Indonesia also considers that processing for all subcategories usually need oils so the products would not sticky. The available oils in these products can prevent the growth of mold.

Food Category No. 04.1.2.1 (Frozen fruit)

Corresponding commodity standards: 52-1981,69-1981,75-1981,76-1981,103-1981:either no food additives permitted oral ow ascorbic and citric acid

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b,**	**200**			**Antioxidant**	Do not move from other subcategories – no information on use provided	Indonesia proposes to move the provision from subcategory 04.1.2.2 to parent FC04.1.2. Rationale: As a tropical country, Indonesia needs

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
							antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these products. Indonesia also considers that processing for all subcategories usually need oils so the products are not sticky. The available oils in these products can prevent the growth of mold.

Food Category No. 04.1.2.2 (Dried fruit)

Corresponding commodity standards: 67-1981, 130-1981: allows sorbic acid, sulphur dioxide, mineral oil (67-1981 only); 177-1991: allows antioxidants and preservatives in GSFA FC04.1.2.2.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	307a, b,c	200		7	Antioxidant	Adopt with new note "Excluding products conforming to the Standard forraisins (CODEX STAN67-1981) and the Standard forDried Apricots (CODEX STAN130-1981)"	Indonesia proposes to move the provision from FC 04.1.2.2 to parent FC 04.1.2 Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product. Indonesia also considers that processing for all subcategories usually need oils so the products are not sticky. The available oils in these products can prevent the growth of mold.

Food Category No. 04.1.2.3 (Fruit in vinegar, oil, orbrine)

Corresponding commodity standards: 260-2007: lists specific antioxidants, acidity regulators, antifoaming agents, colours, firming agents, flavour enhancers, preservatives, sequesterants, and sweeteners.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b,c**	**200**			**Antioxidant**	Do not move from	Indonesia proposes to move the provision from subcategory 04.1.2.2 to parent FC 04.1.2.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
						FC 04.1.2.2 – no information provided on use	Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product. Indonesia also considers that processing for all subcategories usually need oils so the products are not sticky. The available oils in these products can prevent the growth of mold.

Food Category No. 04.1.2.5 (Jams, jellies, marmalades)

Corresponding commodity standards: 296-2009[4]: allows Table 3 acidity regulators, antifoaming agents, firming agents, preservaties, and thickeners. Also lists specific acidity regulators, antifoaming agents, colours, and preservatives.

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	3000	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334 only)	Adopt as listed, corresponds to CODEX STAN296-2009	Indonesia supports proposal
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	Do not move from FC 04.1.2.2 – no information provided on use	Indonesia proposes move provision from subcategory 04.1.2.2 to parent FC04.1.2. Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product. Indonesia also considers that processing for all subcategories usually need oils so the products are not sticky. The available oils in these products can prevent the growth of mold.

Food Category No. 04.1.2.6 (Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5)

Corresponding commodity standards: 160-1987 : lists spesific acidty regulators and preservatives

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	3000	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334 only)	Adopt with new Note "Excluding products conforming to the Standard for Mango Chutney (CODEX STAN 160-1987)"	Indonesia supports proposal
TOCOPHEROLS	**307a, b,c**	**200**			**Antioxidant**	Do not move from FC 04.1.2.2 – no information provided on use	Indonesia proposes to move provision from subcategory 04.1.2.2 to parent FC04.1.2. Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these products. Indonesia also considers that processing for all subcategories usually need oils so the products are not sticky. The available oils in these products can prevent the growth of mold.

Food Category No. 04.1.2.7 (Candied fruit)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
PROPYLENEGLYCOL	1520	50000		7	Emulsifier, Glazing Agent, Humectant	Adopt at 1,000 mg/kg. Comments indicate use at that level by some members.	Indonesia supports the proposal. Indonesia considers that the proposed ML has already given the technological function
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	Do not move from FC 04.1.2.2 – no information provided on use	Indonesia proposes to move provision from subcategory 04.1.2.2 to parent FC04.1.2 Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product. Indonesia also considers that processing for all subcategories usually need oils so

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
							the products are not sticky. The available oils in these products can prevent the growth of mold.

Food Category No. 04.1.2.8 (Fruit preparations, including pulp, purees, fruit toppings and coconut milk)

Corresponding commodity standards: 240-2003 (Aqueous Coconut Products): lists specific bleaching agents, ES&T, and preservatives; 314R-2013 (Date Paste): no additives allowed

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
PROPYLENE GLYCOL	1520	200000		7	Emulsifier, Glazing Agent, Humectant	Adopt at 2,000 mg/kg with new notes excluding products conforming to commodity standards	Support the proposed ML of 2,000 mg/kg. Rationale: Indonesia considers that the exposure with the ML of 200000 mg/kg has exceed the ADI of propylene glycol. Therefore, Indonesia proposes the ML of 2000 mg/kg because the proposed ML has already given technological function

Food Category No. 04.1.2.10 (Fermented fruit products)

Corresponding commodity standards: 260-2007: lists specific acidity regulators, antifoaming agents, antioxidants, colours, firming agents, flavour enhancers, preservatives, sequesterants, and sweeteners

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	Do not move from FC 04.1.2.2 –no information provided on use	Indonesia proposes to move provision from subcategory 04.1.2.2 to parent FC04.1.2. Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product. Indonesia also considers that processing for all subcategories usually

							need oils so the products are not sticky. The available oils in these products can prevent the growth of mold.

Food category No.04.1.2.12 (Cooked fruit)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	Do not move from FC04.1.2.2 – no information provided on use	Indonesia proposes to move the provision from subcategory 04.1.2.2 to parent FC04.1.2. Rationale: As a tropical country, Indonesia needs antioxidant for food product in food category 04.1.2. Indonesia considers that as natural antioxidant, tocopherols is one of the effective antioxidants for these product. Indonesia also considers that processing for all subcategories usually need oils so the products are not sticky. The available oils in these products can prevent the growth of mold.

Food Category No. 05.1.2 (Cocoa mixes (syrups))

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TARTRATES	334, 335(i),(ii)336(i),(ii),337	2000	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334only)	Adopt	Indonesia supports the proposal

Food Category No. 05.1.5 (Imitation chocolate, chocolate substitute products)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments

TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	10000	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334only)	Adopt at 5,000 mg/kg with Note 45	Support the eWG proposal Rationale: Indonesia considers that the proposed ML has already given the technological function.

Food Category No. 05.3 (Chewing gum)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	30000	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334 only)	Adopt	Indonesia supports the proposal

Food Category No. 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit), and sweet sauces)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step/Adopted	INS Functional Class	eWG proposal	Indonesia Comments
TARTRATES	334,335(i),(ii),336(i),(ii), 337	8000	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334only)	Adopt	Indonesia supports the proposal

JAPAN

Japan would like to submit the following comments. We would like to provide the following additional comments regarding CX/FA 16/48/7. Addition is in **bold font** and deletion is in ~~strikethrough font~~.

1. Comments on Appendix 1

- **Food Category 5.2 Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4**

Additive	INS	Max Level (mg/kg)	Notes	eWG Proposal	Japan's comments
Polyglycerol esters of fatty acids	475	~~5000~~ **10000**		Adopt at 2,000 mg/kg with new note "Adopt with new note "Excluding products conforming to the Regional Standard for Halawa Tehenia (CODEX STAN 309R-2011)"	Japan proposes maximum use level be changed to 10,000 mg/kg. Polyglycerol esters of fatty acids are used to maintain uniform emulsification of candy. 10,000 mg/kg of polyglycerol esters of fatty acids are used in candy containing high amounts of oil.

- **Food Category 6.4.1 Fresh pastas and noodles and like products**

Additive	INS	Max Level (mg/kg)	Notes	eWG Proposal	Japan's comments

Additive	INS	Max Level (mg/kg)	Notes	eWG Proposal	Japan's comments
Propylene glycol	1520	20000		Adopt with Note 211 "for use in noodles only"	Japan proposes a following new note be added since propylene glycol is used not only noodles but also skins or crusts for spring rolls, wontons, and sho mai. New note "for use in noodles, skins or crusts for spring rolls, wontons, and sho mai." Propylene glycol is used in noodles, skins or crusts for spring rolls, wontons, and sho mai to prevent surface from drying.

- **Food Category 7.1.6 Mixes for bread and ordinary bakery wares**

Additive	INS	Max Level (mg/kg)	Notes	eWG Proposal	Japan's comments
Polyglycerol esters of fatty acids	475	~~6000~~ **15000**		Adopt at 10,000 mg/kg	Japan proposes maximum use level be changed to 15,000 mg/kg. Polyglycerol esters of fatty acids are used to prevent retrogradation of starches, increase volume and provide softness for the final products.

- **Food Category 7.2 Fine bakery wares (sweet, salty, savoury) and mixes**

Additive	INS	Max Level (mg/kg)	Notes	eWG Proposal	Japan's comments
Polyglycerol esters of fatty acids	475	10000		Adopt at 10,000 mg/kg	Japan proposes maximum use level for food category 07.2.3 be set separately at 15,000 mg/kg. Polyglycerol esters of fatty acids are used to prevent retrogradation of starches, increase volume and provide softness for the final products. Maximum use level in mixes for fine bakery wares is higher than that in fine bakery products since mixes for fine bakery wares, together with flour and water, are used to produce fine bakery products.
Sucrose esters of fatty acids	473	~~10000~~ **15000**		Adopt with note "singly or in combination: INS 473, 473a and 474"	Japan proposes maximum use level be changed to 15,000 mg/kg. Sucrose esters of fatty acids are used to prevent retrogradation of starches, increase volume and provide softness for the final products.

- **Food Category 7.2.3 Mixes for fine bakery wares (e.g., cakes, pancakes)**

Additive	INS	Max Level (mg/kg)	Notes	eWG Proposal	Japan's comments
Stearoyl lactylates	481(i), 482(ii)	8000		Adopt at 5,000 mg/kg	Japan proposes maximum use level be changed to 6,000 mg/kg. Stearoyl lactylates are used to prevent retrogradation of starches, increase volume and provide distinctive crispy texture.

MALAYSIA

Food Category No.	Additive	INS	Max Level (mg/kg)	INS Functional Class	eWG proposal	Malaysia comments
01.2.1 (Fermented milks (plain))	Polyglycerol esters of fatty acids	475	30,000	Emulsifier	Discontinue - Emulsifiers not allowed in plain fermented milks	Malaysia supports the discontinuation
05.1.5 (Imitation chocolate, chocolate substitute products)	Propylene glycol	1520	240,000	Emulsifier, Glazing Agent, Humectant	Request information on use in subcategories	Malaysia regulation allows propylene glycol at GMP level as solvent.
07.0 (Bakery Wares)	Tocopherols	307a, b, c	200	Antioxidant	Adopt at 500 with note 186 "For use in flours with additives only"	Malaysia supports the adoption at 500 mg/kg with note 186 "For use in flours with additives only".
08.3.3 (Frozen processed comminuted meat, poultry, and game products)	Nitrates	251, 252	365	Colour Retention Agent, Preservative	Adopt at 300 mg/kg	Malaysia supports the adoption at 300 mg/kg.

PHILIPPINES

Appendix 1: provisions in Tables 1 and 2 of the GSFA in food categories 01.2 through 08.4, with the exception of provisions in food categories that are to be considered by the e-WG on alignment, or provisions for food additives with "colour" or "sweetener" function.

Food Category No. 01.2.1.2 (Fermented milks (plain), heat-treated after fermentation)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators not horizontally justified, ES&T are horizontally justified

Corresponding commodity standards: 243-2003: allows table 3 packaging gases in foods corresponding to this food category

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
PROPYLENE GLYCOL ALGINATE	405	5000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	adopt at GMP with Note 234 - aligns with CODEX STAN 243-2003	Philippine supports proposal to adopt ML at 5000 mg/kg, conforms to CODEX STAN 243-2003

Food Category No. 01.4 (Cream (plain) and the like)

Corresponding commodity standards: 288-1976 corresponds to subcategories 01.4.1 - 01.4.3

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification

POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10000		7	Emulsifier	Adopt in FC 01.4 at 6,000 mg/kg as per CODEX STAN 2881976, also consider in subcategory 01.4.4 for use at higher level in non standardized foods	Philippine supports proposal to adopt ML at 6000 mg/kg, this conforms to CODEX STAN 288-1976

Food Category No. 01.4.2 (Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T are horizontally justified

Corresponding commodity standards: 288-1976: lists specific ES&T and acidity regulators, also packing gases and propellants in whipped cream and cream packed under pressure (which becomes whipped cream when removed from the container);

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
SUCROSE ESTERS OF FATTY ACIDS	473	10000		4	Emulsifier, Stabilizer	Adopt at 5,000 mg/kg as per CODEX STAN 288-1976	Philippine supports proposal to adopt ML at 5000 mg/kg, this conforms to CODEX STAN 288-1976

Food Category No. 01.4.3 (Clotted cream (plain))

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: 288-1976: lists specific ES&T and acidity regulators, also packing gases and propellants in whipped cream and cream packed under pressure (which becomes whipped cream when removed from the container);

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
PROPYLENE GLYCOL ALGINATE	405	5000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	Adopt at 5,000 mg/kg as per CODEX STAN 288-1976	Philippine supports proposal to adopt ML at 5000 mg/kg, this conforms to CODEX STAN 288-1976

Food Category No. 01.6.1 (Unripened cheese)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): Not in the Annex to Table 3

Corresponding commodity standards: All list specific acidity regulators, preservatives, and stabilizers; 283-1987 (General standard for cheese): for unripended cheeses refers to CODEX STAN 221-2001; 221-2001 (Group standard for unripened cheese) specific thickeners, colours, foaming agents, anticaking agents; 262-2006 (Mozzarella) specific colours, anticaking agents; 273-1698 (Cottage cheese); 275-1973 (Cream cheese) specific thickeners, emulsifiers, antioxidants, colours, foaming agents

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
NISIN	234	12.5	233	6	Preservative	Adopt as listed - listed in all corresponding standards	Philippine supports proposal to adopt ML at 12.5 mg/kg, this conforms to Codex standards for unripened cheese
PROPYLENE GLYCOL ALGINATE	405	9000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	Adopt at 5,000 mg/kg with new note "Excluding products conforming to the Standard for Mozzerella (CODEX STAN 262-2007)"	Philippine supports proposal to adopt ML at 5000 mg/kg, this conforms to CODEX STAN 221-2001, 275-1973, 273-1968
TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	1500	45	4	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334 only)	Adopt as listed with new note "Only for use in products conforming to the Standard for Cream Cheese (CODEX STAN 275-1973)"	Philippine supports proposal to adopt ML at 2000 mg/kg, this conforms to CODEX STAN 275-1973

Food Category No. 01.7 (Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt))

Corresponding commodity standards: 243-2003: allows various additives in various foods;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
ADIPATES	355, 356, 357, 359	6000	1	7	Acidity regulator	Adopt with notes “for gel-like desserts only”,“2,000 mg/kg in dry powdered dessert mixes only”, “1,500 mg/kg in flavoured products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003) only" and “Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003)”	Philippine supports proposal to adopt ML at 1500 mg/kg, this conforms to CODEX STAN 243-2003
ETHYL MALTOL	637	200		7	Flavour Enhancer	Adopt	Philippine supports proposal to adopt ML at 200 mg/kg, this conforms to CODEX STAN 243-2003
MALTOL	636	200		7	Flavour Enhancer		Philippine supports proposal to adopt ML at 200 mg/kg, this conforms to CODEX STAN 243-2003

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10000		7	Emulsifier	Adopt at 5,000 mg/kg with new notes: “2,000 mg/kg in flavoured products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003) only", “Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003)”	Philippine proposal to adopt ML at 2000 mg/kg, this conforms to CODEX STAN 243-2003
PROPYLENE GLYCOL ALGINATE	405	10000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	Adopt – allowed in CODEX STAN 243-2003 in all products at GMP	Philippine supports proposal to adopt ML at 10000 mg/kg, allowed in CODEX STAN 243-2003 in all products at GMP
SORBITAN ESTERS OF FATTY ACIDS	491-495	5000		7	Emulsifier, (Stabilizer - INS 493 and 494 only)	Adopt with new note “Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003)”	Philippine supports proposal to adopt ML at 5000 mg/kg, this conforms to CODEX STAN 243-2003
STEAROYL LACTYLATES	481(i) 482(i)	5000		7	Emulsifier, Flour Treatment Agent, Foaming Agent, Stabilizer	Adopt with new notes: “10,000 mg/kg in flavoured products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003) only"	Philippine supports proposal to adopt ML at 10000 mg/kg, conforms to CODEX STAN 243-2003
SUCROSE ESTERS OF FATTY ACIDS	473	10000		7	Emulsifier, Stabilizer	Adopt at 5,000 mg/kg with new note "singly or in combination: INS 473, 473a, and 474" and “Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003)”	Philippine supports proposal to adopt ML at 5000 mg/kg, this conforms to CODEX STAN 243-2003
TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	2000	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334 only)	Adopt with new note “Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003)”	Philippine supports proposal to adopt ML at 2000 mg/kg, this conforms to CODEX STAN 243-2003

Food Category No. 02.1.2 (Vegetable oils and fats)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: 019-1981, 210-1999: allows specific antioxidants, antioxidant synergists, and anti-foaming agent; 033-1981: does not allow food additives (except tocopherols);

Additive	INS	Max Level	Notes	Step /	Functional Class	eWG Proposal	Technological Justification

		(mg/kg)		Adopted			
TOCOPHEROLS	307a, b, c	300		7	Antioxidant	Adopt at 500 mg/kg with new notes "Excluding virgin or cold pressed oils" and "Except for use in refined olive oil, oilive oil, refined olivepomace oil and olive-pomace oil at 200 mg/kg to restore natural tocopherol lost in production"	Philippines proposal to adopt ML at 300 mg/kg, this conforms to CODEX STAN 210-1999

Food Category No. 02.1.3 (Lard, tallow, fish oil, and other animal fats)

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified

Corresponding commodity standards: 019-198: allows specific antioxidants, antioxidant synergists, and anti-foaming agent; 211-1999: allows specific antioxidants, antioxidant synergists;

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
TOCOPHEROLS	307a, b, c	300		7	Antioxidant	Adopt – if CCFO develops a standard for fish oils the provision can be modified accordingly	Philippine supports proposal to adopt ML at 300 mg/kg, this conforms to CODEX STAN 211-1999

Food Category No. 02.2.2 (Fat spreads, dairy fat spreads and blended spreads)

Corresponding commodity standards: 253-2006: lists specific acidity regulators, antifoaming agents, antioxidants, colours, preservatives, and propellants (ES&Ts and flavour enhancers only allowed in < 70% milk fat products); 256-2007: lists specific acidity regulators, ES&Ts, antifoaming agents, antioxidants, colours, flavour enhancers, packaging gases, and preservatives

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
PROPYLENE GLYCOL ALGINATE	405	10000		7	Bulking agent, Carrier, Emulsifier, Foaming Agent, Gelling Agent, Stabilizer, Thickener	Adopt at 3,000 mg/kg with note "excluding dairy fat spreads with > 70% milk fat content" - aligns with commodity standards	Philippine supports proposal to adopt ML at 3000 mg/kg, this conforms to CODEX STAN 253-2006 and CODEX STAN 256-2007
TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	5000	45	4	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334 only)	Adopt at 100 mg/kg with Note 45 and new note "5,000 mg/kg as tartartic acid in products conforming to the Standard for Dairy Fat Spreads (CODEX STAN 253-2006)"	Philippine supports proposal, with technological function in products conforming to CODEX STAN 256-2007 and CODEX STAN 253-2006

Food Category No. 04.1.2.8 (Fruit preparations, including pulp, purees, fruit toppings and coconut milk)

Corresponding commodity standards: 240-2003 (Aqueous Coconut Products): lists specific bleaching agents, ES&T, and preservatives; 314R-2013 (Date Paste): no additives allowed

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Functional Class	eWG Proposal	Technological Justification
SUCROSE ESTERS OF FATTY ACIDS	473	1500		7	Emulsifier, Stabilizer	Adopt with new Note "Excluding products conforming to the Regional Standard for Date Paste (CODEX STAN 314R-2013)"	Philippine supports proposal to adopt ML at 1500 mg/kg, this conforms to CODEX STAN 240-2003

REPUBLIC OF KOREA

The Republic of Korea is pleased to provide the following comments on the draft food additive provisions related to the General Standard for Food Additives. We would like to thank the Codex Secretariat to undertake the extensive work.

Nitrites (INS 249, 250)

The Republic of Korea does not support the use of nitrites in the following categories: 01.6.4 “Processed cheese”, 01.6.5 “Cheese analogues”, 08.1.1 “Fresh meat, poultry, and game, whole pieces or cuts” and 08.1.2 “Fresh meat, poultry, and game, comminuted”. There should be given technological justification for the use of nitrites in those food categories. Especially, their use in fresh meat can mislead consumers. In the Republic of Korea, nitrites are not allowed for use in the above food categories. Therefore, we suggest that the following draft provisions of the nitrites in food categories 01.6.4, 01.6.5, 08.1.1, and 08.1.2 should be discontinued.

Food Category No.	Food Category	Max Level (mg/kg)	Notes	Step	eWG proposal	Korea’s comments
01.6.4	Processed cheese	20	32	7	Adopt – Comments indicate use by some members	The Republic of Korea does not support eWG proposal. Technological justification is needed.
01.6.5	Cheese analogues	20	32	7	Adopt – Comments indicate use by some members	The Republic of Korea does not support eWG proposal. Technological justification is needed.
08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	130	32		Do not move from parent FC	The Republic of Korea does not support the use of nitrites in fresh meat. Technological justification is needed.
08.1.2	Fresh meat, poultry, and game, comminuted	130	32		Adopt at 150mg/kg	The Republic of Korea does not support eWG proposal. Technological justification is needed.

Note 32: As residual NO2 ion.

Nitrates (INS 251, 252)

The Republic of Korea proposes does not support the use of nitrates in fresh meats (Food category 08.1.1 and 08.1.2). The use of these additives can deceive consumer regarding freshness. Technological justification is needed when using in these food categories.

Food Category	Food Category	Max	Notes	Step	eWG proposal	Korea’s comments

No.		Level (mg/kg)				
08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	150	30		Do not move from parent FC	The Republic of Korea does not support the use of nitrites in fresh meat. Technological justification is needed.
08.1.2	Fresh meat, poultry, and game, comminuted	150	30		Adopt at 300mg/kg	The Republic of Korea does not support eWG proposal. Technological justification is needed.

Note 30: As residual NO3 ion

Sorbates (INS 200-203)

The Republic of Korea proposes to adopt maximum level for sorbates(INS 200-203) in food category 08.2(Processed meat, poultry, and game products in whole pieces or cuts) at 2000mg/kg. Maximum level of 200mg/kg as presented by eWG proposal is too low to achieve the desired preservative effect and it requires technological justification when using sorbates in processed meat at 200mg/kg.

Food Category No.	Food Category	Max Level (mg/kg)	Notes	Step	eWG proposal	Korea's comments
08.2	Processed meat, poultry , and game products in whole pieces or cuts	2000	42	6	Adopt at 200mg/kg with Notes 42, 3 and new note excluding CS 96-1981 and 97-1981	The Republic of Korea suggests maximum level of 2000mg/kg for food category 08.2.

Note 42: As Sorbic acid

RUSSIAN FEDERATION

Opinion of RU about proposals in Agenda Item 5(a) was presented in CRD 20 of CCFA 47.

We consider it is necessary to supplement these data with the following information:

1. In compliance with Opinion of The International Agency for Research on Cancer (IARC), published by WHO 26 October of 2015 year (Press Release N° 240) processed meat (include hot dogs (frankfurters), ham, sausages, corned beef, and biltong or beef jerky as well as canned meat and meat-based preparations and sauces) was classified as carcinogenic to humans (Group 1), based on sufficient evidence in humans that the consumption of processed meat causes colorectal cancer.

Processed meat contain chemicals that form during meat processing or cooking. For instance, carcinogenic chemicals that form during meat processing include nitrates, nitrites and N-nitroso compounds. **This fact clearly shows the need to reduce the maximum permissible content levels of food additives - nitrates and nitrites in meat products.**

2. In opinion of RU the proposals according using of nisin (INS 234) in the different food categories (01.4.4, 01.6, 01.6.1, 01.7, 07.2, 08.2.2, 08.3.2, 08.4) provided in Agenda Item 5(e) cannot be accepted unless additional risk assessment is done.

SENEGAL

Problème: l'alignement proposé des dispositions relatives aux additifs alimentaires dans la NGAA dans les catégories d'aliments 01.2 par 08.4 à l'exception des dispositions dans les catégories d'aliments 04.1.2.4, 04.2.2.4, 04.2.2.5, 04.2.2.6, 05.1.1, 05.1.3, et 05.1.4, dispositions relatives aux additifs alimentaires dans le Tableau 3 qui devaient être examinées par le groupe de travail électronique, et les dispositions relatives aux additifs alimentaires avec «couleur» ou la fonction «édulcorant».

Position: Nous notons et approuvons les modifications et soutenons les propositions du GTE par rapport au document CX / FA 15/47/9. En outre, nous appuyons les propositions EWG sur les additifs alimentaires sur les catégories d'aliments qui restaient de la 46e session.

Justification: L'approche horizontale permet un additif alimentaire pour une utilisation dans une sous-catégorie d'aliments spécifiés où il n'est pas prescrit et donc les niveaux de sécurité recommandés sont applicables dans ces sous-catégories.

THAILAND

In general, we support eWG proposal to move food additive provisions from a parent category to a sub category. We also agree that maximum level should be established for provision for food additives with numerical ADI.

However, Thailand does not support the eWG proposal on the adoption of provision for nitrate and nitrite in food category 08.1.2 (fresh meat, poultry and game, comminuted) at 300 mg/kg and 150 mg/kg, respectively. We consider that there is no technological need for the use of preservatives in fresh meat. In addition, nitrates and nitrites have associated with health risks, especially nitrites as its ADI is very low (0-0.06 mg/kg bw).

EUROPEAN UNION

General comments on CX/FA 16/48/7

The European Union (EU) comments from the electronic Working Group (eWG) are captured in the paper CX/FA 16/48/7. The EU appreciates the possibility to discuss further the draft provisions at the Working Group on the General Standard for Food Additives.

The EU recognises the amount and the complexity of the work taking into account the number of the provisions in the step process and the efforts for a consistent approach and an equal treatment of the provisions. The EU in particular appreciates that in many proposals the provisions of the corresponding commodity standards are reflected.

In the most cases the EU's specific comments relate to the justification of the technological need and the exposure from the proposed food additive uses. The EU hopes that the Working Group on the GSFA will consider those aspects and the participants in favour of the specific provisions will provide supporting information accordingly.

Nitrites (INS 249, 250) and nitrates (INS 251, 252)

The EU would like to draw the attention to the proposed provisions for nitrites and nitrates. The provisions for nitrites and nitrates should be carefully considered seeking an appropriate balance between the risks and benefits of their use – i.e. especially between the technological need to assure microbiological safety and a possible risk of formation of carcinogenic nitrosamines.

In the EU's view there are many pending issues which need to be addressed before agreeing on the use and use levels for nitrites and nitrates.

Use of nitrites and nitrates in different food categories

The EU takes note that the provisions are proposed for discussion in approx. 20 (sub)-categories. The EU is not convinced about the necessity to use nitrites and nitrates in all those categories. The technological need for the individual food categories has to be checked taking into account the current level of hygiene standards.

In addition, the proposed use levels in CX/FA 16/48/7 seem to be excessive and it is not clear on what grounds they were proposed. For example, to the EU's knowledge based on the scientific assessment[1] 50 – 100 mg added nitrite (expressed as sodium nitrite which would correspond to 33 – 67 mg expressed as NO_2 ion) per kg of meat products may suffice for many products. In other meat products, especially those with a low salt content and having a prolonged shelf-life, addition of between 50-150 mg/kg nitrite (i.e. 33 – 100 mg/kg expressed as NO_2 ion) is necessary to inhibit the growth of C. botulinum.

Use of nitrites and nitrates in meat products

The EU takes note that the mentioned additives when used in meat products do not act only as preservatives but have an effect on colour and flavour as well. The technological need and the appropriate maximum use level might be different for all mentioned aspects (preservation, colour and flavour) and might differ among different types of products as well. Those aspects should be taken into account when considering the use and the appropriate use levels in meat products.

Expression of maximum use levels

The EU takes note that the maximum use levels are normally expressed on the same basis as the ADI. However, there are some issues related to the use levels in case of nitrites and nitrates.

From the scientific point of view the in-going amount of nitrite, rather than the residual amount, contributes to the inhibitory activity against C. botulinum. The formation of nitrosamines seems to depend on the nitrite amounts that are added, and not on the much lower residual amounts, which, due to the substance's transformation in the foodstuff, are typically present in the product at the time of consumption. Therefore, it might be appropriate to control the input levels rather than the residual amounts. However, it should be noted that such approach is not easy to implement for all types of products (e.g. for immersion or dry cured products) and a certain residual amount of nitrite is necessary to assure microbiological safety as well.

As for residual amounts they tend to decrease over time significantly and they might hide excessive amounts of added nitrites, therefore, if the Committee would prefer to base the maximum levels on residual amounts it might be helpful to determine a precise point in time (e.g. at the end of the production process) when residual amounts should be checked. Indeed, this might be problematic for checking the products in international trade.

Possible formation of nitrosamines

Even if JECFA concluded that the studies available at the time of evaluation did not provide evidence that nitrite was carcinogenic to humans (49th report, 2002), there are uncertainties linked with a possible formation of carcinogenic nitrosamines from nitrite and N-nitrosatable compounds present in food and the gastrointestinal tract. This should be taken into account when considering the use and use levels for nitrites and nitrates.

In conclusion, in the EU's view several issues have to be clarified before concluding on the uses and use levels in the individual food categories. The necessity of the use of nitrites (and nitrates which might act as reservoirs for nitrites) has to be considered taking into account their low ADI (0-0.07 mg/kg bw/day, expressed as nitrite ion and applicable to all sources of intake) and a possible formation of nitrosamines. If, for certain products, the use is necessary then the use level should be minimised lowering the amounts of nitrates and nitrites added to food to the minimum required to achieve the necessary technological effect and to ensure microbiology safety.

Use of food additives in the food category 06.4.2 Dried pastas and noodles and like product

[1] EFSA Panel on Food Additives and Nutrient Sources added to Food (ANS); Statement on nitrites in meat products. EFSA Journal 2010; 8(5):1538. [12 pp.]

Pasta is a staple food especially in some countries. Therefore, the use of additives with numerical ADI's has to be carefully considered. In the past the EU pointed out several times that there is a difference in the technological need between pastas and noodles. Whilst such difference is reflected in the proposals for the categories 06.4.1 and 06.4.3 it is not the case for category 06.4.2 Dried pastas and noodles and like product.

To the EU's knowledge no additives are needed for dried pasta as such. There is a specific technological need for the use of additives in gluten free pasta and pasta intended for hypoproteic diets, however, to the EU's knowledge such need could be addressed by the additives with the ADIs not specified, therefore, it is not necessary to permitted additives with numerical ADIs. For those reasons the EU does not support the eWG proposal to adopt the provisions in category 06.4.2.

Correction of the EU's comments on certain draft provisions on polyglycerol esters of fatty acids (INS 475) and polyglycerol esters of interesterified ricinoleic acid (INS 476)

In case of certain provisions the EU in its comments stated that it could accept the adoption of the provision for INS 476 if it is used as an alternative to INS 475 since the ADI of INS 476 is three time higher than the ADI of INS 475.

However, those comments were based on an erroneous assumption that the ADI of INS 476 is 0-75 mg/kg bw/day while in reality it is only 0-7.5 mg/kg bw/day. In addition, it was clarified that both INS 475 and INS 476 represent distinct classes of products with individual chemical and physical properties which are suitable for different applications (i.e. INS 475 is an oil-in-water emulsifier, INS 476 water-in-oil emulsifier). Therefore, the mentioned EU comments on INS 475 and INS 476 in CX/FA 16/48/7 are not valid.

AFRICAN UNION

Issue: Proposed alignment of food additive provisions in the GSFA in food categories 01.2 through 08.4 with the exception of provisions in food categories 04.1.2.4, 04.2.2.4, 04.2.2.5, 04.2.2.6, 05.1.1, 05.1.3, and 05.1.4, provisions for Table 3 food additives which were to be addressed by the eWG, and provisions for food additives with "colour" or "sweetener" function.

Position: AU notes and endorses the changes and support the eWG proposals in relation to document CX/FA 15/47/9. In addition AU supports the eWG proposals on food additives on the food categories which where remaining from 46th session.

Rationale: The horizontal approach permits a food additive for use in a specified food sub-category where it is not prescribed and therefore the recommended safe levels are applicable in these sub-categories.

EUROPEAN FOOD EMULSIFIER MANUFACTURERS ASSOCIATION (EFEMA)

EFEMA, the European Food Emulsifier Manufacturers Association, has carefully reviewed the draft provisions where it has an interest. Our association has therefore extended or refined its technical justifications on a number of provisions. From an intake standpoint and bearing in mind that most of the emulsifiers at stake have a numerical ADI, EFEMA has also carefully reviewed it position on a number of maximum levels.

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
01.3.2 Beverage whiteners	Stearoyl Lactylates	INS 481 (i) and 482 (i)	5000		7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Adopt as listed (5,000 mg/kg) + New Note excluding products conforming to CODEX STAN 250-2006 and 252-2006	EFEMA agrees with revised maximum level at 3.000 mg/kg
01.4.4 Cream analogues	Stearoyl Lactylates	INS 481 (i) and 482 (i)	10000	2	7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Adopt as listed	EFEMA agrees with revised maximum 5.000 mg/kg
01.5.2 Milk and cream powder analogues	Polyglycerol Esters of Fatty Acids	INS 475	10000			Emulsifier	Adopt with new note excluding products conforming to CODEX STAN 251-2006	EFEMA agrees with revised maximum 5.000 mg/kg
01.7 Dairy-based desserts (pudding, fruit or flavoured yoghurt)	Polyglycerol Esters of Fatty Acids	INS 475	10000		7	Emulsifier	Adopt at 5,000 mg/kg with new notes “2,000 mg/kg in flavoured products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003) only", “Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN243-2003)”	EFEMA agrees with revised maximum 2.000 mg/kg
01.7 Dairy-based desserts (pudding, fruit or flavoured yoghurt)	Stearoyl Lactylates	INS 481 (i) and 482 (i)	5000		7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Adopt with new note Excluding plain products conforming to the Standard for Fermented Milks (CODEX STAN243-2003)	EFEMA supports proposal with new note
02.1.2 Vegetable oils and fats	Polyglycerol Esters of Fatty Acids	INS 475	20000		7	Emulsifier	Discuss further - not allowed in corresponding standards	**Shortenings:** Shortenings are fat products typically used in bakery wares. Shortenings are typically not sold to end consumers, but used as intermediates in processed foods such as bakery

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
								wares. Emulsifiers added to shortenings are not exerting a technological function in the shortening (fat/oil). Emulsifiers are rather added to the intermediate product (shortening) in order to exert a function in the designated end product. Thus the provisions for emulsifiers added to shortenings might be addressed in the relevant food categories. Thus the application should be covered by the provisions in the end product in accordance with the principle in Section 4.2 of the Preamble to the GSFA. (reverse carry-over principle). **Anticrystallization** Proposed dosage 600 mg/kg when used as anticrystallizer in palm olein based consumer products (cooking oil). The cooking oil is liquid in hot climates, but will crystallise during storage .on the shelves of air-conditioned supermarkets. The crystallisation is indeed a temperature-dependent; reversible process however, consumers tend to interpret the crystallized oil as spoilt. The emulsifier can postpone the on-set of the crystallization process and thereby enhance consumer perception and prevent food waste. Palm olein is a fraction of palm oil that is commonly used for consumer products in certain regions e.g. Asia and South

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
								America. The products can be palm olein or depending on availability, price etc. it can be mixtures with palm olein and other edible oils commonly used as cooking oil. In other regions (e.g. EU) other sources than palm olein such as soya bean oil, rape seed oil, sunflower oil or olive oil would be used for cooking oil.
02.1.2 Vegetable oils and fats	Sorbitan esters of fatty acids	INS 491-495	10000		7	Emulsifier (Stabilizer – INS 493 and 494 only)	Discuss further - not allowed in corresponding standards	**Anticrystallization** Proposed dosage 750 mg/kg when used as anticrystallizer in palm olein based consumer products (cooking oil). The cooking oil is liquid in hot climates, but will crystallise during storage on the shelves of air-conditioned supermarkets. The crystallisation is indeed a temperature-dependent; reversible process however, consumers tend to interpret the crystallized oil as spoilt. The emulsifier can postpone the on-set of the crystallization process and thereby enhance consumer perception and prevent food waste. Palm olein is a fraction of palm oil that is commonly used for consumer products in certain regions e.g. Asia and South America. The products can be palm olein or depending on availability, price etc. it can be mixtures with palm olein and other edible oils commonly used as cooking oil.

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
								In other regions (e.g.EU) other sources than palm olein such as soya bean oil, rape seed oil, sunflower oil or olive oil would be used for cooking oil.
02.1.2 Vegetable oils and fats	Stearoyl Lactylates	INS 481 (i) and 482 (i)	3000		7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Discuss further - not allowed in corresponding standards	**Shortenings:** Shortenings are fat products typically used in bakery wares. Shortenings are typically not sold to end consumers, but used as intermediates in processed foods such as bakery wares. Emulsifiers added to shortenings are not exerting a technological function in the shortening (fat/oil). Emulsifiers are rather added to the intermediate product (shortening) in order to exert a function in the designated end product. Thus the provisions for emulsifiers added to shortenings might be addressed in the relevant food categories. Thus the application should be covered by the provisions in the end product in accordance with the principle in Section 4.2 of the Preamble to the GSFA. (reverse carry-over principle). **Anticrystallization** Proposed dosage 300 mg/kg when used as anticrystallizer in palm olein based consumer products (cooking oil). The cooking oil is liquid in hot climates, but will crystallise during storage on the shelves of air-conditioned supermarkets. The crystallisation is indeed a temperature-dependent;

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
								reversible process however, consumers tend to interpret the crystallized oil as spoilt. The emulsifier can postpone the on-set of the crystallization process and thereby enhance consumer perception and prevent food waste. Palm olein is a fraction of palm oil that is commonly used for consumer products in certain regions e.g. Asia and South America. The products can be palm olein or depending on availability, price etc. it can be mixtures with palm olein and other edible oils commonly used as cooking oil. In other regions (e.g.EU) other sources than palm olein such as as soya bean oil, rape seed oil, sunflower oil or olive oil would be used for cooking oil.
02.2..2 Fat spreads, dairy fat spreads and blended spreads	Polyglycerol Esters of Fatty Acids	INS 475	20000		7	Emulsifier	Adopt at 5,000 mg/kg with note “excluding dairy fat spreads with >70% milk fat content” – aligns with commodity standards	EFEMA agrees with revised maximum level at 5,000 mg/kg and with note

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
02.2.2 Fat spreads, dairy fat spreads and blended spreads	Polyglycerol ester of interesterified ricinoleic acid	INS 476	10000		7	Emulsifier	Adopt at 4,000 mg/kg with note "excluding dairy fat spreads with > 70% milk fat content" - aligns with commodity standards	agrees with revised maximum level at 4,000 mg/kg and with note
Should be Food category no 02.3 02.2.3 fat emulsions mainly type-oil-in-water, including mixed and/or flavoured products based on fat emulsions	Polyglycerol Esters of Fatty Acids	INS 475	20000		7	Emulsifier	Adopt at 50,000 mg/kg. Comments indicate use at that level by some members	EFEMA agrees with revised maximum level at 5,000 mg/kg
02.2.3 fat emulsions mainly type-oil-in-water, including mixed and/or flavoured products based on fat emulsions	Polyglycerol ester of interesterified ricinoleic acid	INS 476	20000		7	Emulsifier	Adopt at 10,000 mg/kg. Comments indicate use at that level by some members	EFEMA agrees with revised maximum level at 5,000 mg/kg
02.2.3 fat emulsions mainly type-oil-in-water, including mixed and/or flavoured products based on fat	Sorbitan esters of fatty acids	INS 491 – 495	10000		7	Emulsifier (Stabilizer – INS 493 and 494 only)	Discuss further. Used at 50,000 mg/kg by some members but others note safety concerns at that ML	EFEMA agrees with revised maximum level at 5,000 mg/kg

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
emulsions								
02.2.3 fat emulsions mainly type-oil-in-water, including mixed and/or flavoured products based on fat emulsions	Stearoyl Lactylates	INS 481 (i) and 482 (i)	20000		7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Discuss further. Used at 10,000 mg/kg by some members but others note safety concerns at that ML	EFEMA agrees with revised maximum level at 3,000 mg/kg
03.0 edible ices	Stearoyl Lactylates	INS 481 (i) and 482 (i)	5000	15	7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Adopt	Widely used in ice cream when only simple mixing equipment is available, such as in the manufacture of artisan ice cream. SSL is needed to stabilize the ice cream powder during storage in cases where the ice cream mix is cold processed, i.e. no homogenization or heat treatment of the ice cream mix. The stabilizing effect of SSL ensures whipping properties of the ice cream mix. Thus, SSL makes cold processing possible and exerts stabilizing properties in the ice cream powder as well as during whipping and freezing. Dosage should be max. 2.000 mg/kg
05.1.5 Imitation chocolate, chocolate substitute products	Polyglycerol ester of interesterified ricinoleic acid	INS 476	5000		7	Emulsifier	Adopt at 10,000 mg/kg	Used in cocoa-based products with reduced saturated fat content. Gives yield value (improved flow properties). Used in fat reduced and in affordable products. Dosage should be max 5.000 mg/kg
05.1.5 Imitation chocolate, chocolate	Sorbitan esters of fatty acids	INS 491 – 495	20000			Emulsifier (Stabilizer – INS 493 and 494	Discuss further	Used for enhanced crystallisation and stabilization. Prevents blooming (grey chocolate as a result of recrystallization of the fat) and thereby extends shelf life of

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
substitute products						only)		the product. EFEMA agrees with revised maximum level at 10,000 mg/kg
05.2 Confectionery incl. hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	Polyglycerol Esters of Fatty Acids	INS 475	5000		7	Emulsifier	Adopt at 2,000 mg/kg (initial proposal was 5,000mg/kg) with new note excluding products conforming to CODEX STAN 309R-2011	EFEMA agrees revised maximum level at 2,000 mg/kg
05.2 Confectionery incl. hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	Sorbitan esters of fatty acids	INS 491-495	20000			Emulsifier (Stabilizer – INS 493 and 494 only)	Adopt at 6,000 mg/kg with new note: "Excluding products conforming to the Regional Standard for Halawa Tehenia (CODEX STAN 309R-2011)"	EFEMA agrees with revised maximum level at 5,000 mg/kg
05.4 Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces	Polyglycerol Esters of Fatty Acids	INS 475	10000		7	Emulsifier	Adopt at 2,000 mg/kg with note "10,000 mg/kg in whipped decorations"	EFEMA supports proposal, at 2,000 mg/kg
05.4 Decorations (e.g. for fine bakery wares),	Stearoyl Lactylates	INS 481 (i) and 482	5000		7	Emulsifier, flour treatment agent, foaming	Adopt at 5,000 mg/kg	EFEMA supports proposal

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
toppings (non-fruit) and sweet sauces		(i)				agent, stabilizer		
07.1 Bread and ordinary bakery wares and mixes	Stearoyl Lactylates	INS 481 (i) and 482 (i)	5000		7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Adopt	EFEMA agrees with revised maximum level at 3,000 mg/kg
07.2 Fine bakery wares (sweet, salty, savoury) and mixes	Polyglycerol Esters of Fatty Acids	INS 475	10000		7	Emulsifier	Adopt	EFEMA supports proposal INS 475 has an effect on whipping. Improves volume and stabilizes the foam. Improves the cake structure and volume. Is widely used in mixtures for whipped cakes.
07.2 Fine bakery wares (sweet, salty, savoury) and mixes	Sorbitan esters of fatty acids	INS 491 – 495	10000		7	Emulsifier (Stabilizer – INS 493 and 494 only)	Adopt	EFEMA supports proposal Used in mixtures for whipped cakes. Is used in combination with other emulsifiers to stabilize the structure (crystal form) of the batter. The cake structure and volume is improved.
07.2.1 Cakes, cookies and pies (e.g. fruit-filled or custard types)	Stearoyl Lactylates	INS 481 (i) and 482 (i)	5500		7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Adopt	EFEMA supports proposal INS 481 (i) and 482 (i) support mixing of ingredients and emulsification. Stabilizes the air bubbles when all-in method is used in the industry. Is used to strengthen/stabilize the cake and ensures improved cake volume
07.2.2 Other fine bakery products (e.g. doughnuts, sweet rolls, scones, and muffins	Stearoyl Lactylates	INS 481 (i) and 482 (i)	5000		7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Adopt	EFEMA supports proposal INS 481 (i) and 482 (i) support mixing of ingredients and emulsification. Stabilizes the air bubbles when all-in method is used in the industry. Is used to strengthen/stabilize the cake andensures improved cake volume

Food category	Additive	INS	Max levels (mg/kg)	Notes	Step/ adopted	INS functional class	e-WG proposal	EFEMA revised position
07.2.3 Mixes for fine bakery wares (e.g. cakes, pancakes)	Stearoyl Lactylates	INS 481 (i) and 482 (i)	8000		7	Emulsifier, flour treatment agent, foaming agent, stabilizer	Adopt at 5,000 mg/kg	EFEMA supports proposal at 5,000 mg/kg INS 481 (i) and 482 (i) support mixing of ingredients and emulsification. Stabilizes the air bubbles when all-in method is used in the industry. Is used to strengthen/stabilize the cake and ensures improved cake volume.

AGENDA 5B

CHINA

Nisin INS 234 Functional Class: Preservative

No.	Food Category	Max Level (mg/kg)	Notes	Step	China Comment
08.3.2	Heat-treated processed comminuted meat, poultry, and game products	25	233	3	Support. Nisin is approved and widely used in China in cooked meat products with ML 12.5 mg/kg. Both refrigerated and shelf-stable products are presented in the market.

Note 233: As nisin

NIGERIA

Nigeria welcomes the opportunity to comment on and supports the proposed draft provision for use of Nisin in Food category 09.3.2 as a preservative at ML of 25mg/kg and its use in corresponding CODEX STANs 89-1981 and 98-1981 and CODEX STAN 88-1981.

RUSSIAN FEDERATION

Opinion of RU about possibility of nisin (INS 234) use in different category of food including food category 08.3.2 in general, and specifically in products conforming to the corresponding Commodity Standards in Agenda 5(e) is presented.

In accordance with this opinion:

- Nisin A does not influence the growth of spoiling microorganisms – Proteus spp., Pseudomonas aeruginosa, and a lot of species of lactic-acid-producing bacterium, yeasts and moulds. Yeast and moulds not only resistant to nisin, but also could quickly destroy this bacteriocin.
- It is a fact that nisin and another antibiotics have common mechanisms of influence on microbial agent's genome regulation.
- Nisin can promote resistance of pathogenic microorganisms and opportunistic pathogens and increase risk of transfer of antibiotic resistance to representatives of the intestinal microflora, as well as speeding up virulence and pathogenic potential of microorganisms which cause food born illnesses.
- risk assessments of different types of nisin, which were obtained by using biotechnological methods (using genetically modified microorganisms) should be provided.
- provide safety of the products covered by the provisions of Standards for Luncheon Meat (CODEX STAN 89-1981) and for Cooked Cured Chopped Meat (CODEX STAN 98-1981) it is enough if its production, packaging, labeling will be in compliance with demands pointed out in sections 5, 6 and 7 of these standards.
- in academic literature there are data that using of nisin in canned meat products to reduce the viability of the spores of Clostridium botulinum (as processing aids). However evidence of the effectiveness of this method is incomplete. Nisin is not used in the Russian Federation and Customs Union in canned meat products corresponding to food category 08.3.2.
- based on the data on the possible negative impact nisin on the human health it is necessary conduct its further risk assessment and consider the possibility of exclusion of this food additive from the relevant INS list of Codex Stan 192-1995.

SENEGAL

Question: Avant-projet qui prévoit l'utilisation de la nisine dans la catégorie alimentaire 08.3.2 en général et dans les normes correspondantes.

Position: Nous soutenons le projet de disposition pour l'utilisation de la nisine dans la catégorie alimentaire 08.3.2 comme conservateur à ML de 25mg / kg et son utilisation dans les normes CODEX Stans 89-1981 et 98-1981 et CODEX STAN 88-1981 correspondant.

Justification: La nisine est un conservateur utilisé dans les viandes, en particulier dans les climats chauds ou dans les pays en développement (Afrique) où l'accès à la réfrigération stable peut être limitée. Nisine inhibe les micro-organismes d'altération, y compris l'acide lactique, Pseudomonas spp., Escherichia coli bactéries d'altération, contribuant ainsi à prolonger la durée de vie et de conserver la qualité des aliments. EIle est de plus en plus utilisée pour inactiver ou inhiber la croissance des micro-organismes alimentaires pathogènes comme Listeria monocytogenes, Staphylococcus aureus, et enteridis Salmonella et formant des spores de bactéries, Bacillus et Clostridium, contribuant ainsi à accroître la sécurité alimentaire. La viande et les produits carnés sont des aliments microbiologiquement sensibles. Leur haute teneur en eau et en protéines, la présence d'autres constituants solubles dans l'eau et d'autres propriétés intrinsèques fournissent un riche milieu nutritif favorable à la croissance de la détérioration et des micro-organismes pathogènes.

L' évaluation du JECFA a établi le niveau sécuritaire de nisine à 25 mg / kg dans cette catégorie d'aliments.

AFRICAN UNION

Issue: Proposed draft provision for the use of Nisin in food category 08.3.2 in general and in the corresponding standards.

Position: AU supports the proposed draft provision for use of Nisin in food category 08.3.2 as a preservative at ML of 25mg/kg and its use in corresponding standards CODEX STANs 89-1981 and 98-1981 and CODEX STAN 88-1981.

Rationale: Nisin is a preservative used in meats, particularly in warm climates or in developing nations (Africa) where access to stable refrigeration may be limited. Nisin inhibits spoilage microorganisms including *lactic acid*, *Pseudomonas* spp., *Escherichia Coli* spoilage bacteria, thus helping to prolong shelf life and retain food quality. It has also been used increasingly as a primary intervention to inactivate or inhibit the outgrowth of pathogenic food microorganisms such as *Listeria monocytogenes*, *Staphylococcus aureus*, and *Salmonella enteridis* and the spore forming bacteria, *Bacillus* and *Clostridium*, thereby helping to increase food safety. Meat and meat products are microbially sensitive foods. Their high water and protein content, presence of other water-soluble constituents and other intrinsic properties provide a supportive nutrient rich medium for the growth of spoilage and pathogenic microorganisms. JECFA evaluation has established safe level of Nisin at 25 mg/kg in this food category.

INTERNATIONAL FOOD ADDITIVES COUNCIL (IFAC)

This Conference Room Document (CRD) is respectfully submitted by the International Food Additives Council (IFAC). IFAC appreciates the Committee's consideration of this CRD related to the use of nisin in thermally processed shelf-stable meat products, which will be discussed under agenda items 5(b).

Introduction:

Nisin is a naturally occurring antimicrobial agent produced by some strains of the lactic acid bacterial (LAB) species *Lactococcus lactis*. Originally reported in 1928, nisin has been used as a preservative in a variety of foods since the 1950s. It was approved by the Food and Agriculture Organization of the United Nations (FAO) and World Health Organization (WHO) in 1969.

Consumer Demand for Gentler Processing

In many countries, consumers with increasingly busy lifestyles are driving demand for safe, convenient, good tasting, and shelf-stable/ready-to-eat food products. These health conscious and discerning consumers have also expressed preferences for products that are fresh-like and/or minimally processed (i.e. foods that are subjected to gentler preservation methods than the conventional canning, freezing or dehydration technologies) due to perceived nutritional benefits and negative changes in the organoleptic characteristics of more highly processed foods.

However, application of gentler preservation methods can lead to reduction in microbial stability and food safety. Thus, in industrialized countries, minimally processed foods are typically marketed as chilled refrigerated products. However, for developing countries, where gaps in cold chain distribution may occur, availability of safe shelf-stable food without the need for refrigeration is desirable.

Functionality in Shelf-Stable Meat Products

The food industry has long recognized that reduction of food-borne pathogens and extension of shelf life can be better achieved when multiple antimicrobial hurdles are incorporated. In minimally processed foods, this can be practiced by combining antimicrobials with milder heat treatments and/or other novel processing methods.

Multiple studies [2, 3, 4, 5] have shown that during thermal processing, spores damaged by heat have heightened sensitivity to nisin providing improved efficacy against spores in low-acid, heat-processed foods such as canned vegetables and meat products. As such, allowing the use of nisin in thermally processed meat products would give food manufacturers an additional tool to consider, select and validate as appropriate for creation of safe, innovative products with the characteristics and sensory quality that consumers seek.

Conclusions:

Use of nisin as a food preservative in shelf-stable products can be part of a multi-hurdle strategy that helps meet consumer tastes/preferences while ensuring the safety of food products, such as shelf-stable meats. Available evidence shows that nisin is extremely effective when used as part of such multi-hurdle strategies, particularly due to increased sensitivity of spores to nisin after thermal processing. Furthermore, nisin offers a critically important tool for developing nations with potential gaps in the cold chain to help ensure food safety while providing consumers with the shelf-stable meat products they want.

[2] Scott, V.N. & Taylor, S.L. (1981) Temperature, pH, and Spore Load Effects on the Ability of Nisin to Prevent the Outgrowth of *Clostridium botulinum* Spores; J Food Sci 46(1): 121–126.

[3] Paik, H.D. et al (2006) Effect of nisin on the storage of sous vide processed Korean seasoned beef; Food Control 7: 994–1000

[4] Sureshkumar, S. et al (2010) Effect of nisin and butylated hydroxy anisole on storage of buffalo meat sausage; J Food Sci Technol 47(3):358–363

[5] Feiner, G. (2006) Introduction to the microbiology of meat and meat products – 38.10 The hurdle principle in the production of meat & meat products in Meat Products Handbook: Practical Science and Technology; Woodhead Publishing Ltd & CRC Press LLC (2006) pp. 590-594