

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 3a, 5e, 5f, 5g, 8

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

Forty-eighth Session

Xi'an, China, 14-18 March 2016

#### COMMENTS OF KENYA

##### AGENDA ITEM 3a

###### Table 1: Benzoates: dietary exposure assessment

**Issue:** CCFA invited to consider the feasibility of reducing the ML for benzoates in GSFA food category 14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks.

###### COMMENT:

We support the revision of benzoates in the referred products.

###### Rationale:

We appreciate that the referred products are highly consumed in the vulnerable groups' especially young children and thus the need to re-evaluate the safety of the current recommended levels taking into consideration the dietary consumption pattern.

###### Other provisions in Table 1

###### COMMENT:

We support the adoption of recommendation as proposed by 80<sup>th</sup> JECFA meeting on the various food additives.

##### AGENDA ITEM 5e

**Issue:** Proposed revision of INS 414 Gum Arabic with a view of developing an INS for the various species.

###### COMMENT:

We do not support a safety evaluation of a specific gum Arabic species with a view of creating a new INS

###### Rationale:

We would like to note that despite Gum Arabic having two or more species taxonomically they belong to the same family and thus there is no significant difference in terms of safety. We take note that, the submitted data does not justify enough the need for safety evaluation and thus we are not convinced of any need to re-evaluate Gum Arabic (INS 414). We strongly believe the current safety evaluation data is valid based on the current use of gum Arabic.

##### AGENDA ITEM 5f

**Issue:** That the Committee considers the proposed food category 01.1 (Milk and dairy-based drinks) and its subcategories, and consequential changes, as presented in Annex 1.

###### COMMENT:

We do support adoption the revision of food category 01.1 as presented in Annex 1 of CX/FA 16/48/12

**Rationale:** We appreciate that based on innovation and new scientific evidences a number of new products are available in our market which did not fit well in the current description of food category 01.1 and thus providing a challenge in terms of application of the food additives provisions.

**AGENDA ITEM 5g**

**Issue: Recommendation 1 Foot note** “*The maximum level of the additive in grape wine set as good manufacturing practice must prevent (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine. Countries may seek guidance on GMP from internationally recognised bodies with expertise in oenological practices, such as the International Organisation of Vine and Wine (OIV, which recommends conditions for use for additives in wines) and the Joint FAO/WHO Expert Committee on Food Additives (JECFA, which assesses food additives for their safety and recommends specifications for those additives)*”

**COMMENT:**

We propose the foot note should only contain the first sentence and delete the rest so that it reads as follows, ‘*The maximum level of the additive in grape wine set as good manufacturing practice must prevent (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine.*’

**Rationale:**

The rest of the sentence adds as it appears to legitimate the advice of OIV to international standard. Advice of food additives should only be by JECFA and thus the current wording implies that OIV and JECFA are on the same status in regard to food additives contrary to the Codex procedural manual

**Issue: Recommendation 2 Adoption of a number of food provision as listed**

**COMMENT:**

We support the adoption of the provision.’

**Rationale:** The proposed additives are relevant additives in the production of wines and that they do not impact any changes to the wines.

**AGENDA ITEM 8**

**Issue: Recommendation 1** *The Committee is invited to follow option B, i.e. addressing the use of secondary additives by use of notes within the current GSFA food category system, for the food categories listed in Section 4.3 (i.e. 13.1 – Infant formulae, follow-up formulae, and formulae for special medical purposes for infants and 13.2 – Complementary foods for infants and young children) and recommendation 3* *In case no consensus is reached as regards the overall approach on the use of secondary food additives Recommendation 2) the Committee is invited to continue addressing this issue following the approach taken in the past (option B), i.e. by addressing the use of secondary additives by use of notes within the current GSFA food category system. No new work would be required for this option*

**COMMENT:**

We do not support the adoption these two recommendations.

**Rationale:**

Kenya is of the view that there is need to establish a new category to address the use of secondary food additives. As a result, we strongly support the adoption of recommendation 2 to establish the category as well as provide the guide for the use of the secondary food additives