



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-eighth Session

PROPOSAL OF NATCOL

NATCOL appreciates the opportunity to make a proposal to the 48th Session of the Committee on Food Additives (CCFA) for consideration under Agenda Item 10 - Other Business and Future Work. Natural Food Colour Association - is an international body acting on behalf of the natural food colour industry. NATCOL offers expertise on natural colours regarding their properties, use, and regulatory status. NATCOL is a non-profit organisation.

General Comment:

For consideration, we wish to make the following comment, **regarding the presentation of the use levels of food additives in foods that form only part of the food as eaten (i.e. casings, coatings, decorations, fillings, etc.) and those where the food must be re-constituted with water (dried foods, powders, etc.).** Indeed, we would greatly appreciate to have the WG GSFA consider this issue, especially since maximum permitted levels (MPLs) are established on the final product as consumed at Codex level (unless otherwise specified - see Preamble to the GSFA, Section 6 (c). We understand that the meaning was to indicate that the MPLs are not related to intermediate products but to the final product (as marketed / consumed) of a given food category since the concentration of an additive could differ during the production process (e.g. due to dilution or concentration steps). However, this causes ambiguity and a high level of uncertainty for data providers in the presentation of data as the basis for reporting is not always obvious to end users.

The products corresponding to the food categories at stake here would not normally be eaten as such. **Consequently, it might be helpful if footnotes could be added to use conditions for such foods to indicate whether the concentration relates to the food as described or as presented for consumption in an entire food or after re-constitution.** Examples of categories for which a footnote to clarify whether 'as eaten' or not could reduce the ambiguity / level of uncertainty include:

FCS No.	Title
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)
07.2	Fine bakery wares (sweet, salty, savoury) and mixes
08.4	Edible casings (e.g., sausage casings)
12.5.2	Mixes for soups and broths
12.6.3	Mixes for sauces and gravies
14.1.4.3	Concentrates (liquid or solid) for water-based flavoured drinks
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

We request that the WG GSFA consider these as examples and review the GSFA to identify all cases benefiting from inclusion of a footnote.