



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**CODEX COMMITTEE ON FOOD ADDITIVES**  
**Fiftieth Session**

**PROPOSED DRAFT SPECIFICATIONS FOR THE IDENTITY AND PURITY OF FOOD ADDITIVES ARISING FROM THE 84<sup>TH</sup> JECFA MEETING**

**Replies to CL 2018/10-FA of Costa Rica, Cuba, Japan, Kazakhstan, Paraguay, Rwanda, United States of America, International Chewing Gum Association (ICGA), International Union of Food Science and Technology (IUFOST) and EU speciality food ingredients**

**COSTA RICA**

Costa Rica thanks the working group for the work done and the opportunity to issue comments. In this regard, it wishes to express its support for the proposed specifications.

**CUBA**

Cuba is grateful to be able to express its comments on this matter and in principle supports the Proposed Draft Specifications for Food Additives at Step 3 formulated by JECFA/FAO.

**JAPAN**

Tamarind seed polysaccharide (N)

Japan proposes that tamarind seed polysaccharide be included in the list of Proposed Draft Specifications Resulting from the 84<sup>th</sup> JECFA Meeting (at Step 3) in Annex I of CX/FA 18/50/4 because the 84<sup>th</sup> JECFA newly established "full" specifications for tamarind seed polysaccharide (<http://www.fao.org/3/a-i8147e.pdf>), but tamarind seed polysaccharide does not appear in any Annexes of CX/FA 18/50/4.

If there are any specific reasons for not inclusion of tamarind seed polysaccharide in the proposed draft specifications list, Japan would like to request clarification on it.

**KAZAKHSTAN**

Kazakhstan is in agreement with the JECFA specifications for the following food additives:

- Brilliant blue FCF (R) (INS 133)
- $\beta$ -Carotene-rich extract from *Dunaliella salina* (N)
- Fast Green FCF (R) (INS 143)
- Microcrystalline cellulose (R) (INS 460(ii))
- Silicon dioxide, amorphous (R) (INS 551)
- Sodium aluminium silicate (R) (INS 554)
- Steviol glycosides (R) (INS 960)
- Sucrose esters of fatty acids (R) (INS 473)

The above food additive are allowed for use in the food industry in compliance with the Eurasian Economic Commission (EEC) Technical Regulations of the Customs Union 029/2012, which are mandatory to establish minimum requirements in food safety in the EEC members countries (i.e. Russian Federation, Armenia, Republic of Belarus, Republic of Kyrgyzstan, the Republic of Kazakhstan).

Regarding the food additive Gum ghatti (R) (INS 419), Kazakhstan has no specific comment as this additive is not regulated in the EEC Technical Regulations of the Customs Union 029/2012.

**PARAGUAY**

Paraguay recommends the adoption of INS 960 with the specifications designated as “full” by the JECFA. However, we would like to recommend additionally that INS 960 assigned to Steviol glycosides from *Stevia Rebaudiana* Bertoni should not become a parent additive for other steviol glycosides that can be produced with the same ADI and use levels in the GSFA. For instance, in case that the Committee approves that other steviol glycosides (e.g. obtained by *Yarrowia lipolitica*) have assigned a hierarchical INS, e.g. INS 960 (i), the consumers can be confused or misled, since they are not well-informed about the technological process of production of these sweeteners. We would like to point out that consumers choose the sweeteners based on stevia because of its natural origin from a plant

**RWANDA**

No comment the text is ok.

**UNITED STATES OF AMERICA**

The United States of America (USA) appreciates the opportunity to provide the following comments for consideration at the forthcoming 50<sup>th</sup> Session of the Codex Committee on Food Additives (CCFA) Food Additive Specifications Designated as Full (FAO JECFA Monographs 20, Rome, 2018)

The United States would like to note a typographical error in the list of food additives designated as Full in Annex 1 of CX/FA 18/50/4. We note that the food additive “Tamarind seed polysaccharide” is missing from the list of specifications designated as Full from the 84<sup>th</sup> JECFA. The 84<sup>th</sup> JECFA prepared new Full specifications for Tamarind seed polysaccharide as presented in FAO JECFA Monographs 20. Thus, the specifications for Tamarind seed polysaccharide should also be considered by CCFA50 for adoption by Codex.

In a related matter, we note that the specifications for Tamarind seed polysaccharide in CX/FA 18/50/3 are listed as Tentative in Table 1 of the document, when they should be listed as Full. This has repercussions for the “Recommended action by CCFA” for Tamarind seed polysaccharide as presented in Table 1. Since Tamarind seed polysaccharide has Full specifications and was assigned an ADI of “Not specified” by JECFA, it should be: 1) forwarded to the INS working group for consideration of an INS number; and 2) included in Table 3 of the GSFA and circulated for comment at step 3.

**INTERNATIONAL CHEWING GUM ASSOCIATION (ICGA)**

On behalf of ICGA and its members, please note that we support the adoption at Step 5/8 by the 41<sup>st</sup> session of the Codex Alimentarius Commission of all these full JECFA specifications for future inclusion in Codex text CAC/MISC 6 as Codex-approved specifications.

**INTERNATIONAL UNION OF FOOD SCIENCE AND TECHNOLOGY (IUFOST)**

IUFOST supports the approval of the specifications. In all Codex specifications the specification adopted by JECFA should also be the Codex specification.

**EU SPECIALTY FOOD INGREDIENTS**

$\beta$ -Carotene-rich extract from *Dunaliella salina* (N).

EU Specialty Food Ingredients wishes to submitted the following comments on the new specifications for  $\beta$ -Carotene-rich extract from *Dunaliella salina*:

Purity - Arsenic:

According to the basic producer, the upper limit for arsenic with max. 1 mg/kg does not reflect the whole data set that was initially provided. The basic producer suggested an upper limit for arsenic of 3 mg/kg.

Analytical values for arsenic from the years 2010 to 2017 (412 batches) show the following statistical results:

- Minimum: 0,1 mg/kg
- Maximum: 3,0 mg/kg
- Average: 0,86 mg/kg
- Standard deviation (random/sample): 0,62 mg/kg.
- 121 batches (29%) from 412 batches exceed the upper limit for arsenic with max. 1 mg/kg.

Taking into account a threefold standard deviation, the arsenic values are between 0 – 2,7 mg/kg. According to these results, an upper limit for arsenic of 1 mg/kg would be too low. In our view, an upper limit for arsenic of 3 mg/kg would be more realistic and justified.

Silicon dioxide, amorphous (R) (INS 551)

EU Specialty Food Ingredients wishes to submit the following comments on the revised specifications for silicon dioxide, amorphous:

- C.A.S. number for hydrated silica: The correct number is 112926-00-8 (instead of 112696-00-8);
- Solubility (Vol. 4):

According to the revised specifications for silicon dioxide, amorphous (INS 551) is insoluble in water or ethanol when solubility is determined after no more than 5 minutes (Vol. 4).

However, in our view, equilibrium cannot be achieved after such a short period of time in the case of silicon dioxide, amorphous (INS 551). Depending on the environmental conditions, silicon dioxide, amorphous (INS 551) is either partially or completely soluble in water, and dissolves (depolymerises) in water generating orthosilicic acid ( $H_4SiO_4$ ). At concentrations  $> 2$  mmol/L, orthosilicic acid condenses with additional molecules of orthosilicic acid to form disilicic acid ( $H_6Si_2O_7$ ), trisilicic acid, and oligo- and poly-silicic acids ( $H_{2n+2}Si_nO_{3n+1}$ ).

Therefore, we would like to propose to add a note that a different solubility behaviour can be obtained with other methods such as the OECD 105 or enhanced OECD 105.