

codex alimentarius commission



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Agenda Item 6(b)

CX/MMP 10/9/7
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON MILK AND MILK PRODUCTS

Ninth Session

Auckland, New Zealand, 1-5 February 2010

INCONSISTENT PRESENTATION OF FOOD ADDITIVE PROVISIONS IN CODEX STANDARDS FOR MILK AND MILK PRODUCTS

Discussion paper prepared by New Zealand

Inconsistent presentation

1. Food additive provisions in standards for milk products should be reviewed and corrected to facilitate future integration into the General Standard for Food Additives (GSFA). Incorrect presentation that exists particularly in the older standards is likely to complicate the comparison of food additive provisions in commodity standards with those in the GSFA, thus slowing the process of the integration work.
2. The following corrections could be considered:
 - Food additive provisions in several standards for milk products that do not conform with the *Format for Codex Commodity Standards* included in the Codex Procedural Manual¹, namely, tabulation of “INS number, name of additive, maximum level (in percentage or mg/kg), grouped by functional classes”.
 - Food additive provisions in standards that have not been revised for a long time may contain food additives that have not been assigned ADIs.²
 - There may be some food additive provisions whose endorsement was postponed or temporary, because the evaluation by the JECFA of the substance in question was not concluded at the time of endorsement. Many of these food additives have been assigned full numeric ADI or ADI “not limited / specified” since then.
3. These corrections can be made without requiring approval as new work, and without following the normal elaboration procedure, so long as the revisions do not substantively change the requirements of the standards. The revisions would be forwarded to CCFA for endorsement.
4. The International Dairy Federation (IDF) has informed us that they intend to provide draft corrected food additive provisions for consideration by CCMMP.

RECOMMENDATION

5. It is recommended that CCMMP resolve the inconsistencies in the presentation of food additive provisions in the standards for milk products by bringing them into conformity with the Format for Codex Commodity Standards, and updating where necessary in accordance with more recent ADIs, as described in paragraph 2 above.

¹ Format for Codex Commodity Standards: Food Additives. Page 46 (18th edition, English version).

² CX/FA 08/40/7

Integration of food additive provisions in commodity standards into the GSFA

6. Provisions for food additives in milk products exist also in the General Standard for Food Additives (GSFA) (CODEX STAN 192). The Commission has decided that the GSFA should be the single authoritative reference point for food additives³.

7. Some food additive provisions from commodity standards have been integrated into the GSFA, in the cases where GSFA food categories had a one-to-one correspondence with a single Codex commodity standard.

8. The Commission has agreed to a set of procedures to be considered as a starting point for proposing revisions for the integration of food additive provisions of Codex commodity standards into the GSFA⁴. These procedures describe how the work should be conducted between CCFA and commodity committees, or alternatively how to deal with standards when the relevant commodity committee has been adjourned or abolished.

9. However the Commission, following a recommendation by the Executive Committee (59th session), agreed at its 30th session that the CCFA should give the highest priority to the completion of the GSFA and that further integration activity should be suspended until the GSFA is completed⁵. Completion is likely to be several years in the future.

10. The Commission recognized that inconsistencies would exist between the GSFA and commodity standards until the General Standard would be finalized. An electronic Working Group, led by Switzerland, is preparing a discussion paper for comments and consideration at its next session, describing inconsistencies that exist between commodity standards and the GSFA that need to be considered as part of integration⁶.

11. There are several types of inconsistencies that need to be resolved in order to integrate food additive provisions for milk products into the GSFA, for instance:

- Differences between the standards for milk products and the GSFA in listed additives, additive functions and maximum levels, including the provision for additives with ADI not specified or not limited (the so-called GMP additives)
- Inconsistencies between food additive provisions of similar milk products
- Differences between the scope of the standards for milk products and the dairy categories of the food category system.

12. Other issues also need to be considered in relation to integration:

- Priorities for working on the various standards
- Allowing for processing aids, which are not listed in the Tables of the GSFA.

13. Dairy technical expertise will be needed to resolve these points. This could be provided by advice from CCMMP, or if it is adjourned, by direct participation in CCFA.

RECOMMENDATION

14. It is recommended that CCMMP note the process for integrating provisions for food additives into the GSFA, and the issues involved.

³ ALINORM 05/28/41, para. 142.

⁴ Procedures for Consideration of the Entry and Review of Food Additive Provisions in the General Standard for Food Additives, Codex Procedural Manual, 18th Edition, pages 80-85.

⁵ ALINORM 7/30 REP, para. 45.

⁶ ALINORM 09/32/12, para. 156.