



JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON FOOD ADDITIVES  
Fifty-first Session

MATTERS REFERRED BY THE CODEX ALIMENTARIUS COMMISSION AND  
OTHER SUBSIDIARY BODIES

**Matters for action**

**The 50<sup>th</sup> Session of the Codex Committee on Food Additives (CCFA50)**

The review of all group food additives in the GSFA<sup>1</sup>

1. CCFA50 agreed with the recommendation to request that the Codex Secretariat, in consultation with the JECFA Secretariats, undertake a review of all group food additives in the GSFA and prepare a more comprehensive document for consideration at CCFA51 including proposals on how to deal with the issue.
2. The report on the review of all group food additives in the GSFA is presented in Appendix I to this document.
3. The Committee **is invited to consider** the recommendations in paragraphs 10-12 of Appendix I.

The proposed amendments to the descriptors of FCs 14.1.4.2 and 14.1.5<sup>2</sup>

4. CCFA50 agreed to issue a Circular Letter (CL) seeking comments on the proposed amendments to the descriptors of FCs 14.1.4.2 and 14.1.5 and to consider the matter at CCFA51.
5. Comments were requested through CL 2018/29-FA, and the responses to the CL were received from Brazil, Colombia, the European Union, Japan, the United States of America and ICBA and they are compiled in Appendix II of this document in their original languages.
6. The Committee **is invited to make** a decision on this matter.

---

<sup>1</sup> REP18/FA para 18

<sup>2</sup> REP18/FA para 15

## Report on the review of all group food additives in the GSFA

### Background

1. At CCFA50<sup>3</sup>, the Codex Secretariat informed that, when preparing the document for endorsement and/or revision of maximum levels for food additives in commodity standards (ref. CX/FA 18/50/5), it was noted that carotenoids (INS 160a(i), INS 160a(iii), INS 160e, INS 160f); chlorophylls and chlorophyllins, copper complexes (INS 141(i), INS 141(ii)); and polysorbates (INS 432, INS 433, INS 434, INS 435, INS 436) are listed under the same respective food additive groups although they do not share the same group ADIs.

2. CCFA50 agreed to request that the Codex Secretariat, in consultation with the JECFA Secretariats, undertake a review of all group food additives in the GSFA and prepare a more comprehensive document for consideration at CCFA51 including proposals on how to deal with the issue. CCFA50 also endorsed the recommendations to include sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473(a)) and sucroglycerides (INS 474) in the review of group food additives undertaken by the Codex Secretariat.

### Methodology

3. The on-line databases, including the JECFA reports and toxicological monographs, JECFA specifications and the GSFA, as well as the *Class Names and the International Numbering System for Food Additives* (CXG 36-1989) were used as the resources for conducting the review.

4. Using the GSFA on-line database, group food additives, their individual additives as well as related notes assigned to all the provisions were examined. Specifications, Acceptable Daily Intakes (ADIs) including the reporting basis were further screened. When necessary, INS numbers were checked as part of the routine House-keeping work. Additional additives sharing the same respective group ADI but without group headings in the GSFA were included. The relevant information was copied, compared and then corresponding recommendations were proposed. The analysis is presented in table 1.

### Findings

5. The findings are presented based on the understanding of group food additives as presented in paragraphs 6-8.

6. The GSFA is a simple authoritative reference point of food additives. Food additives listed in the GSFA are recognized as suitable for use in foods in conformance with the provision of this standard. Only food additives that have been assigned as ADI or determined to be safe by the JECFA and an international numbering system (INS) designation by Codex will be considered for inclusion in the GSFA<sup>4</sup>.

7. Based on the available data, JECFA establishes ADIs and specifications for food additives. The ADI can be: respective or in a group, when a group of compounds displays similar toxic effects or share common toxic metabolites<sup>5</sup>.

8. In the case of food additives displaying similar toxic effects or sharing a common toxic metabolite, there is a need to consider the combined intake to prevent exceeding the ADI; therefore, the GSFA develops group headings for food additives which have group ADIs. When the use of food additives should be restricted or where the "reporting basis" is defined, it is understood that: (i) the relevant notes should be recorded to all the food additive provisions; and (ii) the reporting basis in the note should be consistent with that specified by the ADI of JECFA report.

9. After evaluating 31 categories of group food additives which include 121 individual food additives, the following findings are noted:

Finding 1: Thirteen categories do not have the term "group" in their common ADIs or PTWI.

Finding 2: Additives listed under one category (CAROTENOIDS) are assigned to more than one ADI.

Finding 3: No group heading in the GSFA for four categories however additives listed under three of them are only included in table three of the GSFA.

Finding 4: Reporting basis for seven categories are included in their ADIs but not in the notes of the GSFA

<sup>3</sup> REP18/FA, paras 17, 18 and 77

<sup>4</sup> The *General Standard for Food Additives* (CXS192-1995), preamble, Section 1.1

<sup>5</sup> EHC 240 Principles and Methods for the Risk Assessment of Chemicals in Food Annex 1 Glossary of Terms

Finding 5: Notes on the reporting basis for four categories are not aligned with the reporting basis of their ADIs

Finding 6: For three categories, notes are not consistently assigned to all the provisions

### **Recommendation**

10. In order to resolve all these issues, preliminary recommendations to all the respective group food additives are provided in the attached table. In general, for some food additives, if there are recommendations to JECFA, it is proposed that CCFA revisit these group food additives at a later stage.

11. In view of the fact that JECFA is going to re-evaluate two groups of food additives.(carotenoids and ortho –Phenylphenols) and have a general discussion on the use of the terms “group” ADI or PTWI as well as how to assign group ADIs at its next session, it is proposed that CCFA: (i) consider those relevant food additives at a later stage; and (ii) exam the appropriateness of:

- creating group heading for one category of group food additives (sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474));
- revisiting note for one category of group food additives (CYCLAMATES); and
- including notes for six categories of group food additives.

12. CCFA51 is invited to decide on the pragmatic follow-up actions.

Table 1: Analysis of all group food additives in the GSFA

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA																												
1	ASCORBYL ESTERS	304 Ascorbyl palmitate	Y	ADI (0-1.25mg/kg bw as the palmitate or stearate, or the sum of both(1973, 17th JECFA)	Group in GSFA Note 10: As ascorbyl stearate.	F1: Not include the term "group" in their common ADI  F5: 'reporting basis' in the note is not aligned with ADI  F6: Note 10 is not included in one provision (13.1.2)	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI																												
2		305 Ascorbyl stearate	Y						3	BENZOATES	210 Benzoic acid	Y	Group ADI (0-5mg/kg bw) for benzoic acid and its salts (1996, 46th JECFA)	Group in GSFA Note 13: As benzoic acid.	None	None	None	4	211 Sodium benzoate	Y	5	212 Potassium benzoate	Y	6	213 Calcium benzoate	Y	7	CAROTENOIDS	160e Carotenal, beta-apo-8'-	Y	Group ADI (0-5 mg/kg bw) expressed as the sum of carotenoids including $\beta$ -carotene, $\beta$ -apo-8'-carotenal, and the methyl and ethyl esters of $\beta$ -apo-8'-carotenoic acid (1974, 18th JECFA)	Group in GSFA No note	F2: two group ADIs F4: no note	Revisit after JECFA's actions	Re-evaluation of Group ADI for the sum of the carotenoids: beta-carotene, beta-apo-8'-carotenal and beta-apo-8'-carotenoic acid, methyl and ethyl esters (JECFA87 Call for data)	8
3	BENZOATES	210 Benzoic acid	Y	Group ADI (0-5mg/kg bw) for benzoic acid and its salts (1996, 46th JECFA)	Group in GSFA Note 13: As benzoic acid.	None	None	None																												
4		211 Sodium benzoate	Y																																	
5		212 Potassium benzoate	Y																																	
6		213 Calcium benzoate	Y																																	
7	CAROTENOIDS	160e Carotenal, beta-apo-8'-	Y	Group ADI (0-5 mg/kg bw) expressed as the sum of carotenoids including $\beta$ -carotene, $\beta$ -apo-8'-carotenal, and the methyl and ethyl esters of $\beta$ -apo-8'-carotenoic acid (1974, 18th JECFA)	Group in GSFA No note	F2: two group ADIs F4: no note	Revisit after JECFA's actions	Re-evaluation of Group ADI for the sum of the carotenoids: beta-carotene, beta-apo-8'-carotenal and beta-apo-8'-carotenoic acid, methyl and ethyl esters (JECFA87 Call for data)																												
8		160f Carotenoic acid, ethyl ester, beta-apo-8'-	Y																																	
9		160a(i) beta-Carotenes, synthetic	Y						Group ADI (0-5 mg/kg bw) for beta-carotene																											

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
10		160a(iii) beta-Carotenes, Blakeslea trispora	Y	(synthetic) and beta-carotene from Blakeslea trispora (2001, 57th JECFA)				
11	CHLOROPHYLLS AND CHLOROPHYLLINS, COPPER COMPLEXES	141(i) Chlorophylls, copper complexes	Y	ADI (0-15 mg/kg bw) (1969, 13th JECFA)	Group in GSFA	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
12		141(ii) Chlorophyllins, copper complexes, potassium and sodium salts	Y	ADI (0-15 mg/kg bw) (1978, 22nd JECFA)				
13	CYCLAMATES	952(i) Cyclamic acid	Y	Group ADI ( 0-11 mg/kg bw) for cyclamic acid and its calcium and, sodium salts (as cyclamic acid) (1982, 26th JECFA)	Group in the GSFA Note 17: As cyclamic acid.	F5: 'reporting basis' in the note is not aligned with ADI	Revisit note	None
14		952(ii) Calcium Cyclamate	Y					
15		952(iv) Sodium Cyclamate	Y					
16	ETHYLENE DIAMINE TETRA ACETATES	385 Calcium disodium ethylenediaminetetraacetate	Y	ADI (0-2.5mg/kg bw) for EDTA, disodium and calcium disodium salts (1973, 17th JECFA)	Group in GSFA Note 21: As anhydrous calcium disodium ethylenediaminetetraacetate	F1: Not include the term "group" in their common ADI F5: 'reporting basis' in the note is not aligned with ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
17		386 Disodium ethylenediaminetetraacetate	Y					
18	FERROCYANIDES	535 Sodium ferrocyanide	Y	ADI (0-0.025mg/kg bw) for Calcium, potassium, sodium ferrocyanides, calculated as sodium ferrocyanide	Group in the GSFA Note 24: As anhydrous sodium ferrocyanide.	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
19		536 Potassium ferrocyanide	Y					
20		538 Calcium ferrocyanide	Y					

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
				(1974, 18th JECFA)				
21	HYDROXYBENZ ZOATES, PARA-	214 Ethyl para-hydroxybenzoate	Y	Group ADI (0-10mg/kg bw) as the sum of the ethyl and methyl esters of p-hydroxybenzoic acid (1973, 17th JECFA)	Group in GSFA Note 27: As para-hydroxybenzoic acid.	None	None	None
22		218 Methyl para-hydroxybenzoate	Y					
23	IRON OXIDES	172(i) Iron oxide, black	Y	ADI (0-0.5 mg/kg bw) for iron oxides and hydrated iron oxides (1980. 23th JECFA)	Group in GSFA No note	F1: Not include the term "group" in their common ADI F4: no note	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
24		172(ii) Iron oxide, red	Y					
25		172(iii) Iron oxide, yellow	Y					
26	NITRATES	252 Potassium nitrate	Y	ADI (0-3.7 mg/kg bw), expressed as nitrate ion (or 0-5 mg/kg bw expressed as sodium nitrate), ADI does not apply to infants below the age of 3 months(1995, 44th JECFA)	Group in GSFA No provisions	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
27		251 Sodium nitrate	Y					
28	NITRITES	249 Potassium nitrite	Y	For nitrites, ADI (0-0.07 mg/kg bw) expressed as nitrite ion(2002, 59th JECFA)	Group in GSFA Note 32: As residual NO <sub>2</sub> ion.	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
29		250 Sodium nitrite	Y					
30	ORTHO-PHENYLPHEN OLS	231 ortho-Phenylphenol	Y	ADI (0-0.2mg/kg bw) (1964, 8th JECFA)	Group in GSFA No note	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	Re- evaluate the ADIs Suggest re-evaluating the substances as some studies indicate that the salt might be
31		232 Sodium ortho-phenylphenol	Y					

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
								more toxic for human health than previous estimated.
32	PHOSPHATES	338 Phosphoric acid	Y	Group MTDI (0-70mg/kg bw) expressed as phosphorus for phosphate, polyphosphate salts and phosphoric acid (1982, 26th JECFA)	Group in GSFA Note 33: As phosphorus	None	None	None
33		339(i) Sodium dihydrogen phosphate	Y					
34		339(ii) Disodium hydrogen phosphate	Y					
35		339(iii) Trisodium phosphate	Y					
36		340(i) Potassium dihydrogen phosphate	Y					
37		340(ii) Dipotassium hydrogen phosphate	Y					
38		340(iii) Tripotassium phosphate	Y					
39		341(i) Calcium dihydrogen phosphate	Y					
40		341(ii) Calcium hydrogen phosphate	Y					
41		341(iii) Tricalcium phosphate	Y					
42		342(i) Ammonium dihydrogen phosphate	Y					

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
43		342(ii) Diammonium hydrogen phosphate	Y					
44		343(i) Magnesium dihydrogen phosphate	Y					
45		343(ii) Magnesium hydrogen phosphate	Y					
46		343(iii) Trimagnesium phosphate	Y					
47		450(i) Disodium diphosphate	Y					
48		450(ii) Trisodium diphosphate	Y					
49		450(iii) Tetrasodium diphosphate	Y					
50		450(v) Tetrapotassium diphosphate	Y					
51		450(vi) Dicalcium diphosphate	Y					
52		450(vii) Calcium dihydrogen diphosphate	Y					
53		450(ix) Magnesium dihydrogen diphosphate	Y					
54		451(i) Pentasodium triphosphate	Y					
55		451(ii) Pentapotassium triphosphate	Y					



	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
56		542 Bone phosphate	Y					
57		452(i) Sodium polyphosphate	Y					
58		452(ii) Potassium polyphosphate	Y					
59		452(iii) Sodium calcium polyphosphate	Y					
60		452(iv) Calcium polyphosphate	Y					
61		452(v) Ammonium polyphosphate	Y					
62	POLYOXYETHYLENE STEARATES	430 Polyoxyethylene (8) stearate	Y	Group ADI (0-25mg/kg bw) of total of polyoxyethylene (8) and (40) stearates used in together (1973, 17th JECFA)	Group in GSFA No note	F4: no note	Include note	None
63		431 Polyoxyethylene (40) stearate	Y					
64	POLYSORBATES	432 Polyoxyethylene (20) sorbitan monolaurate	Y	ADI (0-25mg/kg bw) As total polyoxyethylene (20) sorbitan esters (1973, 17th JECFA)	Group in GSFA No note	F1: Not include the term "group" in their common ADI F4: no note	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
65		433 Polyoxyethylene (20) sorbitan monooleate	Y					
66		434 Polyoxyethylene (20) sorbitan monopalmitate	Y					
67		435 Polyoxyethylene	Y					

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
		(20) sorbitan monostearate						
68		436 Polyoxyethylene (20) sorbitan tristearate	Y					
69	QUILLAIA EXTRACTS	999(i) Quillaia extract type I	Y	Group ADI (0-1mg for type-1 and type-2 extract expressed as quillaia saponins) (2005, 65th JECFA)	Group in the GSFA Note 293: On the saponin basis	None	None	None
70		999(ii) Quillaia extract type 2	Y					
71	RIBOFLAVINS	101(i) riboflavin, synthetic	Y	Group ADI(0-0.5 mg/kg bw) for rifiboflavin riboflavin from Bacillus subtilis, synthetic riboflavin and riboflavin-5-phosphate as riboflavin (1998, 51st JECFA)	Group in GSFA No note	F4: no note	Include note	None
72		101(ii) Riboflavin 5'-phosphate sodium	Y					
73		101(iii) Riboflavin from Bacillus subtilis	Y					
74	SACCHARINS	954(i) Saccharin	Y	Group ADI (0-5 mg/kg bw) for saccharin and its Ca, K, Na (1993, 41st JECFA)	Group in the GSFA No Note	F4: no note	Include note	None
75		954(ii) Calcium saccharin	Y					
76		954(iii) Potassium saccharin	Y					
77		954(iv) Sodium saccharin	Y					
78	SODIUM ALUMINIUM PHOSPHATES	541(i) Sodium aluminium phosphate, acidic	Y	PTWI (2 mg/kg bw) for aluminium and its salts,	Group in the GSFA Note 6: As aluminium.	F1: Not include the term "group" in their common PTWI	Revisit after JECFA's actions	General discussion on the use of the term "group" PTWI

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
79		541(ii) Sodium aluminium phosphate, basic	Y	expressed as al, includes food additives uses of aluminium salts (2011, 74th JECFA)		F5: 'reporting basis' in the note is not aligned with ADI		
80	SORBATES	200 Sorbic acid	Y	Group ADI (0-25mg/kg bw) as the sum of sorbic acid and calcium, potassium and sodium sorbates (expressed as sorbic acid) (1973, 17th JECFA)	Group in the GSFA Note 42: As sorbic acid.	None	None	None
81		202 Potassium sorbate	Y					
82		203 Calcium sorbate	Y					
83	SORBITAN ESTERS OF FATTY ACIDS	491 Sorbitan monostearate	Y	Group ADI (0-25 mg/kg bw) as the sum of the sorbitan esters of lauric, oleic, palmitic and stearic acid, (1973, 17th JECFA)	Group in the GSFA No note	F4: no note	Include note	None
84		492 Sorbitan tristearate	Y					
85		493 Sorbitan monolaurate	Y					
86		494 Sorbitan monooleate	Y					
87		495 Sorbitan monopalmitate	Y					
88	STEAROYL LACTYLATES	481(i) Sodium stearyl lactylate	Y	ADI (0-20mg/kg bw) (1973, 17th JECFA)	Group in the GSFA No note	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
89		482(i) Calcium stearyl lactylate	Y					
90	STEVIOL GLYCOSIDE	960a Steviol Glycosides from Stevia rebaudiana Bertoni	Y	ADI (0-4 mg/kg bw) expressed as steviol (2017, 84th JECFA)	Group in GSFA Note 26 As steviol equivalents.	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
91		960b(i) Rebaudioside A	Y					

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
		from multiple gene donors expressed in <i>Yarrowia Lipoytica</i>						
92	SULFITES	220 Sulfur dioxide	Y	Group ADI (0-0.7mg/kg bw), expressed as sulfur dioxide, for calcium hydrogen sulfite, calcium metabisulfite, calcium sulfite, potassium hydrogen sulfite, potassium metabisulfite, potassium sulfite, sodium hydrogen sulfite, sodium metabisulfite, sodium sulfite, sodium thiosulfate, and sulfur dioxide (1998, 51st JECFA)	Group in GSFA Note 44: As residual SO <sub>2</sub> .	None	None	None
93		221 Sodium sulphite	Y					
94		222 Sodium hydrogen sulphite	Y					
95		223 Sodium metabisulfite	Y					
96		224 Potassium metabisulfite	Y					
97		225 Potassium sulphite	Y					
98		539 Sodium thiosulfate	Y					
99	TARTRATES	334 L(+)-Tartaric acid	Y	ADI (0-30 mg/kg bw ) calculated as L(+)- tartaric acid for L(+)-tartaric acid, potassium, sodium and mixed potassium-sodium salts (1973, 17th JECFA)	Group in GSFA Note 45: As tartaric acid.	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
100		335(ii) Sodium L(+)-tartrate	Y					
101		337 Potassium sodium L(+)-tartrate	Y					
102	THIODIPROPIONATES	388 Thiodipropionic acid	Y	ADI (0-3mg/kg bw) of	Group in GSFA			

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
103		389 Dilauryl thiodipropionate	Y	thiodipropionic acid and dilauryl ester, calculated as thiodipropionic acid (1973, 17th JECFA)	Note 46: as thiodipropionic acid	F1: Not include the term "group" in their common ADI	Revisit after JECFA's actions	General discussion on the use of the term "group" ADI
104	TOCOPHEROLS	307a d-alpha-Tocopherol	Y	Group ADI (0.15-2 mg/kg bw) for dl- $\alpha$ -tocopherol and d- $\alpha$ -tocopherol, concentrate, singly or in combination. (1986, 30th JECFA).	Group in GSFA Note 168: Singly or in combination: d-alpha-tocopherol (INS 307a), tocopherol concentrate, mixed (INS 307b) and dl-alpha-tocopherol (INS 307c).	F6: Note 168 is not included in some provisions	Include note	None
105		307b Tocopherol concentrate, mixed	Y					
106		307c dl-alpha-Tocopherol	Y					
107		576 Sodium gluconate	Y	Group ADI (not specified) for gluco delta lactone and gluconates, excluding ferrous gluconate(1998, 51st JECFA)	No Group in GSFA GSFA Table 3	F3: no group heading in GSFA but additives are only included in table three	None	None
108		577 Potassium gluconate	Y					
109		578 Calcium Gluconate	Y					
110		580 Magnesium Gluconate	Y					
111		621 Monosodium Glutamate	Y	Group ADI (not specified) for glutamic acid and its Amonium, Ca, K, Mg & Na salts (1987, 31st JECFA)	No Group in GSFA GSFA Table 3 (INS 622, 624, 625), No GSFA table 3 (INS 621, INS 623)	F3: no group heading in GSFA but additives are only included in table three	None	None
112		622 Monopotassium Glutamate	Y					
113		623 Calcium Glutamate	Y					
114		624 Monoammonium Glutamate	Y					
115		625 Magnesium Glutamate	Y					

	Group additives in GSFA	Specific additives	JECFA Spec.	JECFA Tox	GSFA - Group heading, Note	Inconsistency	Rec.CCFA	Rec.JECFA
116		160d(i) Lycopene, synthetic	Y	Group ADI (not specified) for synthetic lycopene, lycopene derived from the fungus <i>Blakeslea trispora</i> and lycopene extract from tomato (2009, 71th JECFA)	No group in GSFA GSFA Table 3	F3: no group heading in GSFA but additives are only included in table three	None	None
117		160d(ii) Lycopene, tomato	Y					
118		160d(iii) Lycopene, , <i>blakeslea trispora</i>	Y					
119		473 Sucrose esters of fatty acids	Y	Group ADI (0-30mg/kg bw) for sucrose esters of fatty acids, sucroglycerides and SOE type I and type II (2009, 71st JECFA)	No Group in GSFA Note 348 Singly or in combination: Sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474).	F3: no group heading in GSFA, F6: Note 348 is not included in some provisions	Create group heading Include note for some provisions	None
120		473a sucrose oligoesters, type I and type II	Y					
121		474 sucroglycerides	Y					

**Compilation of comments in response to CL 2018/29-FA “Request for comments on the proposed amendments to the descriptors of FCs 14.1.4.2 and 14.1.5”**

Comments submitted by Brazil, Colombia, the European Union, Japan, the United States of America and ICBA

**Brazil**

Brazil highlighted their comments in **bold and underlined font**, in the text below.

14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades:

Include water-based flavoured drinks without added carbon dioxide, fruit and vegetable juice-based drinks (e.g. almond, aniseed, coconut-based drinks, and ginseng drink), fruit flavoured ades (e.g. lemonade, orangeade), squashes (citrus-based soft drinks), capile groselha, lactic acid beverage, ready-to-drink coffee and tea drinks with or without milk or milk (**ready-to-drink iced or chilled products**), and herbal-based drinks (e.g. iced tea, fruit-flavoured iced tea, chilled canned cappuccino drinks) and “sports” drinks containing electrolytes. These beverages may be clear or contain particulated matter (e.g. fruit pieces), and may be unsweetened or sweetened with sugar or a non-nutritive high-intensity sweetener. Includes so-called “energy” drinks that are non-carbonated and contain high levels of nutrients and other ingredients (e.g. caffeine, taurine, carnitine).

14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

Includes the **hot** ready-to-drink products (e.g. canned), and their mixes and concentrates (**hot ready-to-drink beverages or mixes for preparing hot coffee- and tea- based beverages**), **with or without milk**. Examples include: chicory-based hot beverages (postum), rice tea, mate tea, and mixes for hot coffee and tea beverages (e.g. instant coffee, powder for hot cappuccino beverages). Treated coffee beans for the manufacture of coffee products are also included. Ready-to-drink cocoa is included in category 01.1.4, and cocoa mixes in 05.1.1.

**Colombia****COMENTARIO GENERAL**

Colombia entiende la preocupación manifestada por la Secretaría del Codex Alimentarius respecto a las consultas relacionadas con los descriptores de las categorías de 14.1.4.2 y 14.1.5, sin embargo, Colombia considera que las descripciones actuales de las categorías 14.1.4 y 14.1.5 son suficientes para aclarar la consulta respecto a las bebidas de café y/o té que se consumen frías o calientes, por lo que las adiciones propuestas pueden ser redundantes.

Colombia considera, que en caso de querer una mayor aclaración se proponga solo ajustar el descriptor de la categoría 14.1.4.2 para que quede de la siguiente manera: 14.1.4.2 “Bebidas a base de agua aromatizadas sin gas, incluidos los ponches de fruta y las limonadas y bebidas similares **frías**”.

Además, Colombia considera que cualquier cambio en los descriptores de las categorías 14.1.4.2 y 14.1.5 no debe generar efectos sobre los aditivos y coadyuvantes que actualmente se permiten para estas categorías de alimentos en la NGAA.

**GENERAL COMMENT**

Colombia understands the concern expressed by the Codex Alimentarius Secretariat regarding the consultations related to the descriptors of the categories of 14.1.4.2 and 14.1.5, however, Colombia considers that the current descriptions of categories 14.1.4.2 and 14.1.5 are enough to clarify the doubts about coffee and/or tea drinks that are consumed cold or hot, so the proposed additions can be redundant.

Colombia considers that, in case of wanting further clarification, it is proposed only to adjust the descriptor of category 14.1.4.2 so that it is as follows: 14.1.4.2 “*Non-carbonated water-based flavoured **cold** drinks, including punches and ades*”.

In addition, Colombia considers that any change in the descriptors of categories 14.1.4.2 and 14.1.5 should not have effects on the additives and coadjuvants that are currently allowed for these food categories in the GSFA.

### The European Union (EU)

The EU would like to thank the Codex Secretariat for proposing the amendments to FC14.1.4.2 and FC 14.1.5. The EU observes that the proposed amendments could have an impact on the food additive uses related to the products falling within the mentioned categories. The EU notes that “ready-to-drink coffee or tea beverages” are currently referred in both categories. As the first step the EU seeks a clarification as regards the rationale for the scope of the descriptors of those food categories when originally established. This would allow the Committee to take an informed decision on the proposed amendments.

In addition, the EU offers the following points for a consideration:

- The food category 14.1.4.2 refers to ‘flavoured drinks’. Was not the intention to include in this food category only ‘coffee and tea flavoured drinks’ whilst ‘coffee and tea based beverages’ should fall in the food category 14.1.5?
- The title of the food category 14.1.5 includes the word ‘hot’. Does it mean that this food category includes only ‘hot beverages’ (or mixes or concentrates for hot beverages)? Is this the case for ‘the canned ready-to-drink products’ referred in the descriptors of the category 14.1.5 as well?

### Japan

Japan does not support the amendment to categorize products into FC 14.1.4.2 or 14.1.5 according to their temperature for the following reasons:

Para. 5 of the document CX/FA 11/43/11 states, “the food category system is based on the following principles: (1) the similarity of food consumption patterns (i.e., food that is consumed in a similar way or similar quantities); (2) the similarity of food processing (e.g., heat treatment, canning, freezing, drying); and (3) food technology needs”. Regarding canned coffee or tea, a canned product can be sold either in a cold or hot condition. Regardless of the temperature at the time of sale or consumption, a product is manufactured in the same manner and with the same recipe, including food additives. It is against the principles to categorize one product into different categories according to the temperature at sale or consumption. In addition, it is not clear that what temperature is the cut-off to categorize products as cold or hot—is an ambient temperature product classified as cold or hot? So, it may cause confusion to categorize products by the temperature at sale or consumption. Japan proposes to delete “ready-to-drink iced or chilled products” and the words “iced” and “chilled” from FC 14.1.4.2, and “hot ready-to-drink beverages or mixes for preparing hot coffee- and tea- based beverages” and the word “hot” from FC 14.1.5. The examples of canned coffee products are shown in the attached document (Attachment).

It is widely recognized that coffee and tea beverages within FC 14.1.5 are consumed with various amount of milk or without milk and it is mentioned that FC 14.1.4.2 includes ready-to-drink coffee and tea drinks with or without milk. Japan proposes to insert “with or without milk” in FC 14.1.5 to keep consistent with the other.

Coffee and tea beverages need to be categorized based on their ingredients: products mainly containing brewed coffee or tea should be categorized in FC 14.1.5; and products containing higher percentage of other ingredients than coffee or tea, such as a product with natural or artificial flavourings of coffee or tea without real coffee or tea, should be categorized into FC 14.1.4.2.

Japan questions in which category products made from cereal and grain powder are categorized.

Japan proposes the following amendment: new text is presented in **bold and underlined**, and text to be removed is presented in ~~strikethrough~~.

14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades:

Include water-based flavoured drinks without added carbon dioxide, fruit and vegetable juice-based drinks (e.g. almond, aniseed, coconut-based drinks, and ginseng drink), fruit flavoured ades (e.g. lemonade, orangeade), squashes (citrus-based soft drinks), capile groselha, lactic acid beverage, ready-to-drink coffee and tea drinks with or without milk or milk solids (~~ready-to-drink iced or chilled products~~), and herbal-based drinks (e.g. ~~iced~~ tea, fruit-flavoured ~~iced~~ tea, ~~chilled~~ canned cappuccino drinks) and “sports” drinks containing electrolytes. These beverages may be clear or contain particulated matter (e.g. fruit pieces), and may be unsweetened or sweetened with sugar or a non-nutritive high-intensity sweetener. Includes so-called “energy” drinks that are non-carbonated and contain high levels of nutrients and other ingredients (e.g. caffeine, taurine, carnitine).



14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other ~~hot~~ cereal and grain beverages, excluding cocoa

Includes the ready-to-drink products (e.g. canned), and their mixes and concentrates (~~hot ready-to-drink beverages or mixes for preparing hot coffee and tea-based beverages~~). Examples include: chicory-based ~~hot~~ beverages (postum), rice tea, mate tea, and mixes for ~~hot~~ coffee and tea beverages with or without milk (e.g. instant coffee, powder for ~~hot~~ cappuccino beverages). Treated coffee beans for the manufacture of coffee products are also included. Ready-to-drink cocoa is included in category 01.1.4, and cocoa mixes in 05.1.1.

#### The United States of America

The United States supports the amendment of the food category descriptors for food categories 14.1.4.2 and 14.1.5 as described in CF/FA 18/50/2 Appendix I.

It is the understanding of the United States that the intent of the proposed amendments are to provide clarity as to which food category in the GSFA pertains to coffee and tea products that are served chilled, and which food category pertains to coffee and tea products that are served hot.

The United States notes that either the names or the descriptors of both food categories (FC) 14.1.4.2 and 14.1.5 contain “coffee” and “tea”, and that the examples provided in the current descriptor for FC 14.1.4.2 are all “chilled” or “iced” products while the examples provided in the current descriptor for FC 14.1.5 specify that the examples are “hot”. The United States also notes that these examples pertain to all products under the scope of these food categories, not just coffee and tea products. Therefore it is the opinion of the United States that all of the products within the scope of 14.1.4.2 are products that are served “chilled” or “iced”, and all of the products within the scope of 14.1.5 are served “hot”.

The United States notes that in previous discussions in CCFA the Codex Secretariat has consistently provided guidance that products which would be considered iced or chilled tea or coffee beverages belong in food category 14.1.4.2 and that products which would be considered hot tea and coffee beverages fall within food category 14.1.5.

The United States recognizes that there has been perceived duplication in the coffee and tea products across these food categories and supports the revision of the food category descriptors to clarify the scope of each food category. The United States views the proposed changes to the food category descriptors to be strictly editorial in nature with no impact on the use of food additives in the foods covered under each food category. Therefore there is no need for CCFA to reconsider the food additive provisions in these food categories.

The United States notes that at CCFA50 some delegations expressed concern that the proposed change in the descriptors would expand the scope of these food categories, and therefore expand the use of the listed food additive provisions from that considered by CCFA when those provisions were adopted. However, the USA also notes that, if the current scope of FC 14.1.4.2 is not limited to iced/ chilled beverages and 14.1.5 to hot beverages, then the alternative interpretation would be that food categories 14.1.4.2 and 14.1.5 both include iced/ chilled and hot beverages. Under that interpretation, where the revision would be considered a change in the scope of the food categories rather than an editorial clarification to the descriptors, the proposed amendment would in effect restrict the scope of each food category and consequentially limit the use of the food additives with adopted provisions in these food categories, not expand them.

In conclusion, the United States supports the proposed amendments to the descriptors of FCs 14.1.4.2 and 14.1.5 put forth by the Codex Secretariat in CX/FA 18/20/2, and also supports that the amendments are editorial in nature and do not require a new work proposal or a reconsideration by CCFA of the adopted provisions in either food category.

The United States also proposes that the placement of the revisions put forth by the Codex Secretariat for the descriptor to FC 14.1.4.2 be shifted within the descriptor in order to clarify that all of the food products covered by FC 14.1.4.2 are iced/chilled and not just the coffee and tea products (see Annex to this letter).

## Annex

It is the opinion of the United States that all of the products within the scope of 14.1.4.2 are products that are served “chilled” or “iced”, and all of the products within the scope of 14.1.5 are served “hot”. Therefore the United States proposes that the placement of the revisions put forth by the Codex Secretariat for the descriptor to FC 14.1.4.2 be shifted within the descriptor in order to clarify that all of the food products covered by FC 14.1.4.2 are iced/chilled and not just the coffee and tea products.

The proposal of the United States (**bolded and underlined**) in the context of that proposed by the Codex Secretariat ~~bolded and strikethrough~~ are marked below.

### *14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades:*

Include water-based flavoured drinks without added carbon dioxide, fruit and vegetable juice-based drinks (e.g. almond, aniseed, coconut-based drinks, and ginseng drink), fruit flavoured ades (e.g. lemonade, orangeade), squashes (citrus-based soft drinks), capile groselha, lactic acid beverage, ready-to-drink coffee and tea drinks with or without milk or milk solids (~~ready-to-drink iced or chilled products~~), and herbal-based drinks (**ready-to-drink iced or chilled products**, e.g. iced tea, fruit-flavoured iced tea, chilled canned cappuccino drinks) and “sports” drinks containing electrolytes. These beverages may be clear or contain particulated matter (e.g. fruit pieces), and may be unsweetened or sweetened with sugar or a non-nutritive high-intensity sweetener. Includes so-called “energy” drinks that are non-carbonated and contain high levels of nutrients and other ingredients (e.g. caffeine, taurine, carnitine).

## ICBA

The International Council of Beverages Associations (ICBA) represents the interests of the worldwide non-alcoholic beverage industry. ICBA members include national and regional beverage associations and international beverage companies that operate in more than 200 countries and territories and produce, distribute and sell a variety of non-alcoholic sparkling (carbonated) and still (non-carbonated) beverages including soft drinks, sports drinks, energy drinks, bottled waters, flavored and/or enhanced waters, ready-to-drink teas and coffees, 100% fruit or vegetable juices, nectars and juice drinks, and dairy-based beverages.

ICBA thanks the Codex Secretariat for having made proposed clarifying amendments to the existing GSFA descriptors 14.1.4.2 and 14.1.5. ICBA is pleased to submit the below comments for consideration, in response to CL 2018/29-FA, “Request for comments on the proposed amendments to the descriptors of FCs 14.1.4.2 and 14.1.5,” specifically as it relates to paragraph 14 of REP 18/FA:

“The Committee noted the need to clarify the appropriate Food Categories for ready-to-drink coffee and tea beverages and also noted the views that the proposed amendments to FCs 14.1.4.2 and 14.1.5: (i) might impact the food additives permitted in the products, meaning further work should be undertaken; (ii) were consistent with the previous responses provided by the Codex Secretariat; and (iii) reflected disagreement as to whether the proposal would limit or expand the use of the food additives permitted.”

ICBA supports the Codex Secretariat’s view (ii) that their suggested edits are consistent with previous responses by the Codex Secretariat related to scope of products reflected within GSFA beverage categories 14.1.4.2 and 14.1.5. However, the Codex Secretariat suggested edits may be viewed by some as superfluous, possibly confusing, and not necessary as “ready-to-drink”, “iced” and “chilled” are already captured for coffee and tea drinks in FC 14.1.4.2 and “hot” in the title of FC14.1.5.

If the attempt is to better clarify the language within 14.1.4.2. and 14.1.5. to minimize confusion, ICBA alternatively proposes the following clarifying amendments to ensure consistent interpretation of scope of products envisioned for GSFA food categories 14.1.4.2. and 14.1.5. These suggested edits do not alter what is already understood to be captured by these categories.

ICBA suggests the following edits (**bolded and underlined for additions** or ~~strikethrough for deletions of Codex Secretariat suggested bolded text~~):

14.1.4.2 *Non-carbonated water-based flavoured drinks, including punches and ades, **enhanced waters and cereal and grain beverages excluding cocoa**:*

Include water-based flavoured drinks without added carbon dioxide, fruit and vegetable juice-based drinks (e.g. almond, aniseed, coconut-based drinks, and ginseng drink, **enhanced waters that may contain protein isolates, fiber, etc.**), fruit flavoured ades (e.g. lemonade, orangeade), squashes (citrus-based soft drinks), capile groselha, lactic acid beverage, ready-to-drink coffee and tea drinks with or without milk or milk (**ready-to-drink iced or chilled products**), and herbal-based drinks (e.g. iced tea, fruit-flavoured iced tea, chilled canned cappuccino drinks) and “sports” drinks containing electrolytes. These beverages may be clear or contain particulated matter (e.g. fruit pieces), and may be unsweetened or sweetened with sugar or a non-nutritive high-intensity sweetener. Includes so-called “energy” drinks that are non-carbonated and contain high levels of nutrients and other ingredients (e.g. caffeine, taurine, carnitine).

14.1.5 *Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa*

Includes the ready-to-drink products (e.g. canned), and their mixes and concentrates (~~hot ready-to-drink beverages or mixes for preparing hot coffee and tea based beverages~~). Examples include: chicory-based hot beverages (postum), rice tea, mate tea, and mixes for hot coffee and tea beverages **with or without milk** (e.g. instant coffee, powder for hot cappuccino beverages). Treated coffee beans for the manufacture of coffee products are also included. Ready-to-drink cocoa is included in category 01.1.4, and cocoa mixes in 05.1.1.

Relative to the concern expressed in views (i) and (iii), and applicability of existing provisions to the clarified scope of products envisioned, the ICBA suggested clarifying edits to 14.1.4.2 to include ‘enhanced waters and cereal and grain beverages excluding cocoa’ do not expand the existing scope as these types of beverages are identified in the list of examples within FC 14.1.4.2. already. Likewise, ICBA suggested clarification to the title of FC 14.1.4.2. reflects the scope already envisioned by the corresponding descriptor. Additionally, the clarifying amendment to FC 14.1.5. descriptor to include ‘with or without milk’ also encompasses products already captured within FC 14.1.5. As such, existing GSFA beverage additive provisions are already applicable to the scope of products explicitly and implicitly referenced in the existing and slightly amended FC 14.1.4.2. and FC 14.1.5. titles and descriptors, which is not an exhaustive list. Thus, these editorial amendments would not impact, limit or expand the use of food additives currently permitted in either FC 14.1.4.2. or FC 14.1.5. Importantly, any new beverage additive provision proposals within these food categories must follow current practice for inclusion into the Codex Step process as reflected in “Codex Procedures for consideration of entry and review of Food Additive Provisions in the General Standard for Food Additives.” (p.58, 24th edition of the Codex Procedural Manual).