CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 5(a) CRD11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fiftieth Session

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA) ; REPORT OF THE EWG ON THE GSFA & PROVISIONS FOR FOOD ADDITIVES IN FC 01.6.4

Additional comments of India, Indonesia, Japan, Kenya, Malaysia, African union and ICGMA

India

Specific Comments

APPENDIX I: REPLIES OF CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES (CCPFV) AND CODEX COMMITTEE ON FATS AND OILS (CCFO)

1. Food Category No 4.1.2.2 (Dried fruit)

Additive - TOCOPHEROLS
Comment: India supports the use of Tocopherols in food category 04.1.2.2 as an antioxidant which is technologically justified.

2. **Food Category No 4.1.2.3 (Fruit in vinegar, oil or brine)**

Additive - TARTRATES
Comment: India supports the EWG proposal to adopt the use of Tartrates in food category 04.1.2.3 at ML of 1000 mg/kg.

3. Food category 04.1.2.6 (Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5)

Additive – TOCOPHEROLS
Comment: India supports the use of **Tocopherols** (INS 307 a, b, c) in food category 04.1.2.6 as an antioxidant, which is technologically justified. India allows its use at GMP level.

APPENDIX 2: PROPOSED DRAFT PROVISIONS FOR LUTEIN ESTERS FROM TAGETES ERECTA (INS 161B (III)) AND OCTENYL SUCCINIC ACID (OSA)-MODIFIED GUM ARABIC (INS 423) IN TABLE 3

Annex 1 - Part 1 – Table 3 provision for lutein esters from Tagetes erecta (INS 161b (iii))

Proposal 1: India supports EWG Recommendation to add CODEX STAN 117-1981 to Column 5 of Table 3.

Proposal 2: India supports use of Lutein esters as colour in Chocolate and a chocolate product, as India allows use of colours in this food category.

Proposal 3: India supports EWG recommendation not to add Codex Stan 105-1981 or Codex Stan 141-1983 to Table 3 provisions for 161b (iii), as use of colours in this food category is not allowed in India.

ANNEX 2 – EWG CHAIR'S PROPOSAL: PROCEDURES FOR CONSIDERATION OF DRAFT AND PROPOSED DRAFT TABLE 3 PROVISIONS

India appreciates the work done by the EWG Chair.

Recommendation 1 and 2

India supports both the Recommendations 1 and 2**.**

Recommendation 4

India agrees with the suggested text of the footnote on "References to Commodity Standards for GSFA Table 3 Additives", however it is recommended to position the footnote as the main text of the Table 3 of the GSFA, above the Table, as the text is the underlying principle for Table 3 and should form the main description applicable to the provisions of Table 3 rather than being placed as a footnote.

APPENDIX 4: PROVISIONS RELATED TO FC 01.1.1

1. Food Category No. 01.1.1 (Fluid milk (plain)):

Additive – Carragenan
Comment: India doesn't agree with eWG proposal to adopt the use of Carragenan, due to lack of technological justification for its use in this category.

Additive - Gellan Gum
Comment: India doesn't agree with eWG proposal to adopt the use of Gellan Gum, due to lack of technological justification for it's use in this category.

Additive - Guar Gum
Comment: India doesn't agree with eWG proposal to adopt the use of Guar Gum, due to lack of technological justification for it's use in this category

Additive –Microcrystalline cellulose (Cellulose gel)
Comment: India doesn't support the use of Microcrystalline cellulose (Cellulose gel), due to lack of technological justification for it's use in this category.

Additive - Mono and Di-glycerides of fatty acids
Comment: India doesn't agree with eWG proposal to adopt the use of Mono and Di-glycerides of fatty acids, due to lack of technological justification for it's use in this category.

Additive – Polydextroses
Comment: India doesn't support the use of Polydextroses, due to lack of technological justification for it's use in this category.

Additive - Sodium Alginate
Comment: India agrees with the eWG proposal to discontinue the use of Sodium Alginate, due to lack of technological justification for it's use in this category.

Additive - Sodium Carboxymethyl Cellulose (Cellulose Gum)
Comment: India doesn't agree with eWG proposal to adopt the use of sodium carboxymethyl cellulose (cellulose gum), due to lack of technological justification for it's use in this category

APPENDIX 5: PROVISIONS IN TABLE 1 AND 2 OF THE GSFA IN FOOD CATEGORIES 09.0 THROUGH 016.0, WITH THE EXCEPTION OF THOSE ADDITIVES WITH TECHNOLOGICAL FUNCTIONS OF COLOUR OR SWEETENER, ADIPATES, NITRITES AND NITRATES AND THE PROVISIONS RELATED TO FC 14.2.3

1. Food Category No. 12.5 (Soups and broths)

Additive: TARTRATES
Comment: India supports the use of Tartrates as its use is technologically justified in this category, and use of tartaric acid is allowed at GMP level in India.

2. Food Category No. 12.5.1 (Ready-to-eat soups and broths, including canned, bottled, and frozen)

Additive-Nisin
Comment: India supports eWG proposal to adopt the use of Nisin in this food category, based on the fact that commercially sterilized products are not completely free of spores and therefore, addition of Nisin will make the products shelf-stable by inactivating the spores. In addition, it also takes care of inactivation of pathogenic bacteria specially *Listeria monocytogenes, Bacillus cereus, Clostridium botulinum etc.*

4. Food Category No. 12.6.1 Emulsified sauces and dips (e.g. mayonnaise, salad dressing, onion dip)

Additive – TARTRATES
Comment: India supports adoption of tartrates in Food category 12.6.1. India allows use of tartaric acid at GMP level in Parent category 12.6-Sauces and like products.

5. Food Category No. 12.6.2 Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)

Additive – TARTRATES
Comment: India supports adoption of Tartrates in Food category 12.6.2. India allows use of tartaric acid at GMP level in Parent category 12.6-Sauces and like products.

6. Food Category No. 12.6.3 (Mixes for sauces and gravies)

Additive – TARTRATES
Comment: India supports the eWG proposal for adoption of Tartrates in Food category 12.6.3 at 5000 mg/kg. India allows use of tartaric acid at GMP level in Parent category 12.6-Sauces and like products.

7. Food Category No. 12.6.4 Clear sauces (e.g. fish sauce)

Additive – TARTRATES
Comment: India does not support discontinuation of Tartrates in Food category 12.6.4 Clear sauces (e.g. fish sauce). India allows use of tartaric acid at GMP level in Parent category 12.6-Sauces and like products.

8. Food Category No. 13.1.1 Infant formulae

Additive-TOCOPHEROLS
Comment: India supports the proposal of the EWG for adoption of TOCOPHEROLS at 10 mg/kg with Note 72 “on the ready-to eat basis” and new note “excluding INS numbers 307a and 307c” in this food category as it is in line with CODEX STAN 72 1981.

9. Food Category No. 13.1.2 Follow-up formulae

Additive-TOCOPHEROLS
Comment: India supports the proposal of the EWG for adoption of TOCOPHEROLS at 30 mg/kg with note 72 in this food category.

10. Food Category No. 13.2 Complementary foods for infants and young children

Additive- ASCORBYL ESTERS
Comment: India supports the adoption of ASCORBYL ESTERS at 200 mg/kg with Notes 15 “On the fat or oil basis.” and 187 “Ascorbyl palmitate (INS 304) only” as per CS 73 1981 and 74 1981 in this food category. India allows the use of this additive at the level of 200 mg/kg in complementary foods for infants.

Additive- TOCOPHEROLS
Comment: India supports the proposal of the EWG for adoption of TOCOPHEROLS at 300 mg/kg with note 15 in this food category.

11. Food Category No. 14.1.2.2 Vegetable juice

Additive-PHOSPHATES
Comment: India supports adoption of PHOSPHATES in this Food category as it is allowed for use in India at GMP level.

Additive- TARTRATES
Comment: India supports adoption of TARTRATES in this Food category as India allows use of tartaric acid at GMP level in this category.

12. Food Category No. 14.1.3.2 (Vegetable nectar)

Additive- TARTRATES
Comment: India supports adoption of TARTRATES in this Food category as India allows use of tartaric acid at GMP level in this category.

19. Food Category No. 14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades

Additive- Propylene Glycol Alginate
Comment: India supports use of Propylene Glycol Alginate in this Food category as India allows its use at GMP level in this category.

Additive-TARTRATES
Comment: India supports use of TARTRATES in this Food category as India allows use of tartaric acid at GMP level in this category.

20. Food Category No. 14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks

Additive- Propylene Glycol Alginate
Comment: India supports use of Propylene Glycol Alginate in this Food category as India allows its use at GMP level in this category.

Additive-TARTRATES
Comment: India supports use of TARTRATES in this Food category as India allows use of tartaric acid at GMP level in this category.

APPENDIX – 6: PROPOSED DRAFT PROVISIONS RELATED TO FC 01.1.2 (OTHER FLUID MILKS (PLAIN)) WITH THE EXCEPTION OF FOOD ADDITIVES PROVISIONS WITH THE FUNCTION OF COLOUR AND SWEETENER

1. Food Category No. 1.1.2 Other fluid milks (plain)

Additive - Acetic and Fatty Acid Esters of Glycerol (INS 472a)
Comment: India doesn't agree with eWG proposal to adopt the use of Acetic and Fatty Acid Esters of Glycerol, due to lack of technological justification for it's use in this category.

Additive – Ascorbic acid, L (INS 300)
Comment: India doesn't agree with eWG proposal to adopt the use of Ascorbic acid, due to lack of technological justification for it's use in this category.

Additive – Carob Bean Gum (INS 410)
Comment: India doesn't agree with eWG proposal to adopt the use of Carob Bean Gum, due to lack of technological justification for it's use in this category.

Additive – Carrageenan (INS 407)
Comment: India doesn't agree with eWG proposal to adopt the use of Carrageenan, due to lack of technological justification for it's use in this category.

Additive - Citric Acid (INS 330)
Comment: India doesn't agree with eWG proposal to adopt the use of Citric Acid, due to lack of technological justification for it's use in this category.

Additive – Citric and Fatty Acid Esters of Glycerol (INS 472c)
Comment: India supports eWG proposal to adopt the use of Citric and Fatty Acid Esters of Glycerol for its use in this category.

Additive –Diacetyl tartaric And Fatty Acid Esters Of Glycerol (472e)
Comment: India doesn't agree with eWG proposal to adopt the use of Diacetyl tartaric and Fatty Acid Esters of Glycerol, due to lack of technological justification for it's use in this category**.**

Additive –Gellan Gum (INS 418)
Comment: India doesn't agree with eWG proposal to adopt the use of Gellan Gum, due to lack of technological justification for it's use in this category**.**

Additive – Guar Gum (INS 412)
Comment: India doesn't agree with eWG proposal to adopt the use of Guar Gum, due to lack of technological justification for it's use in this category**.**

Additive – Gum Arabic (INS 414)
India doesn't agree with eWG proposal to adopt the use of Gum Arabic, due to lack of technological justification for it's use in this category**.**

Additive – Hydroxypropyl Starch (INS 1440)
India doesn't agree with eWG proposal to adopt the use of Hydroxypropyl Starch, due to lack of technological justification for it's use in this category**.**

Additive – Lactic and Fatty Acid Esters of Glycerol (INS 472b)
Comment: India doesn't agree with eWG proposal to adopt the use of Lactic and Fatty Acid Esters of Glycerol, due to lack of technological justification for it's use in this category**.**

Additive – Lecithin (INS 332(i))
Comment: India supports eWG proposal to adopt the use of Lecithin for its use in this category.

Additive Microcrystalline Cellulose (Cellulose Gel) (INS 460(i))
Comment: India doesn't agree with eWG proposal to adopt the use of Microcrystalline Cellulose (Cellulose Gel), due to lack of technological justification for it's use in this category**.**

Additive – Mono- And Di- Glycerides Of Fatty Acids (INS 471)
Comment: India doesn't agree with eWG proposal to adopt the use Mono- and Di- Glycerides of Fatty Acids, due to lack of technological justification for it's use in this category**.**

Additive – Pectin (INS 440)
Comment: India doesn't agree with eWG proposal to adopt the use of Pectin, due to lack of technological justification for its use in this category**.**

Additive – PHOSPHATES
Comment: India supports adoption of Phosphates in this food category with note 33 and note 227 at the level of 1500 mg/kg, as it is required to prevent curdling in UHT and sterilized milk in this category.

Additive – Polydextrose (INS 1200)
Comment: India doesn't agree with eWG proposal to adopt the use of Polydextrose, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive – Polyglycerol Esters Of Fatty Acids (INS 475)
Comment: India doesn't agree with eWG proposal to adopt the use of Polyglycerol Esters of Fatty Acids, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive- Potassium Carbonate (INS 501(i))
Comment: India doesn't agree with eWG proposal to adopt the use of Potassium Carbonate, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive – Potassium Hydroxide (INS 525)
Comment: India doesn't agree with eWG proposal to adopt the use of Potassium Hydroxide, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive – Propylene Glycol Alginate (INS 405)
Comment: India doesn't agree with eWG proposal to adopt the use of Propylene Glycol Alginate, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive – Sodium Ascorbate (INS 301)
Comment: India doesn't agree with eWG proposal to adopt the use of Sodium Ascorbate, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive – Sodium Carboxymethyl Cellulose (Cellulose Gum) (INS 466)
Comment: India doesn't agree with eWG proposal to adopt the use of Sodium Carboxymethyl Cellulose (Cellulose Gum), as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive – Sucroglycerides (INS 474)
Comment: India doesn't agree with eWG proposal to adopt the use of SUCROGLYCERIDES, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive – Sucrose Esters of Fatty Acids (INS 473)
Comment: India doesn't agree with eWG proposal to adopt the use of Sucrose Esters of Fatty Acids, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive – Sucrose Oligoesters, Type I And II (INS 473a)
Comment: India doesn't agree with eWG proposal to adopt the use of Sucrose Oligoesters, Type I And II, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

Additive–Tocopherols (D-Alpha-Tocopherol, Tocopherol Concentrated, Mixed, Di-Alpha-Tocopherol
Comment: India doesn't agree with eWG proposal to adopt the use of Tocopherols, as India doesn't allow use of this additive due to lack of technological justification for it's use in this category.

Additive – Trisodium Citrate (INS 331(iii))
Comment: India supports the adoption of Trisodium Citrate with note 227 in this food category as it is as it is required to prevent curdling in UHT and sterilized milk in this category.

Additive – Xanthan Gum (INS 415)
Comment: India doesn't agree with eWG proposal to adopt the use of Xanthan Gum as India doesn't allow use of this additive due to lack of technological justification for it's use in this category**.**

CX/FA 18/50/7 Add.1 Provisions for food additives in FC 01.6.4

Appendix 1-

1. Food category No. 1.6.4 Processed cheese

Additive: Dioctyl Sodium Sulfosuccinate (INS 480)
Comment: India supports proposal of e-WG for use of Dioctyl Sodium Sulfosuccinate in this food category, as its use is technologically justified in this food category.

Additive: Nisin (INS 234)
Comment: India supports adoption of NISIN at 12.5 mg/kg in this food category as its use is technologically justified in this category. India allows it at 12.5 mg/kg in sub category 01.6.4.1.

Additive: Polyglycerol Esters of Fatty Acids (INS 475)
Comment: India supports adoption of Polyglycerol Esters of Fatty Acids in this food category as its use is technologically justified in this category.

Additive: Polyglycerol Esters of Interesterified Ricinoleic Acid (INS 476)
Comment: India supports adoption of Polyglycerol Esters of Interesterified Ricinoleic Acid in this food category as its use is technologically justified in this category.

Additive: Propylene Glycol Alginate (INS 405)
Comment: India supports adoption of Propylene Glycol Alginate in this food category as its use is technologically justified in this category.

Additive: Sucrose Esters of Fatty Acids (INS 473)
Comment: India supports adoption of Sucrose Esters of Fatty Acids in this food category as its use is technologically justified in this category.

Additive: Sucrose Oligoesters, Type I and Type II (INS 473a)
Comment: India supports adoption of Sucrose Oligoesters, Type I and Type II in this food category as its use is technologically justified in this category

Additive: TARTRATES (INS 334, 335(ii), 337)
Comment: India supports adoption of TARTRATES in this food category as its use is technologically justified in this category.

Additive: TOCOPHEROLS (INS 307a, b, c)
Comment: India supports adoption of TOCOPHEROLS in this food category as its use is technologically justified in this category.

Indonesia

Appendix 1: Replies of Codex Committee on Processed Fruits and Vegetables (CCPFV) and Codex Committee on Fats and Oils (CCFO)

Food Category No. 02.1.3 Lard, tallow, fish oil, and other animal fats

Horizontal approach (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): acidity regulators/ES&T not horizontally justified
Corresponding commodity standards: 019-1981: Allows specific antioxidants, antioxidant synergists, and anti-foaming agent; **211-1999**: Allows specific colours, antioxidants, and antioxidant synergists

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Technological justification provided by 28th CCPO	eWG comments	eWG Proposal	Indonesia Comments
MONO- AND DIGLYCERIDES OF FATTY ACIDS	471	100000		7	Antifoaming agent, Emulsifier, Stabilizer	May be used as antifoaming agent in oils and fats conforming to Standard for Edible Fats and Oils not Covered by Individual Standards (CODEX STAN 19-1989) for deep frying as an alternative to polydimethylsiloxane (INS 900a), and have been included in the draft standard for fish oil at GMP.	**Indonesia, EU, RU, Malaysia:** Supports adoption with note XS211 and note "for use in fish oil only" and note "for use in oils and fats for deep frying conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981)" **Canada:** Recommend the following changes to the proposal: Change the ML to GMP (ADI being 'not limited', & by the ML proposed in the draft standard for fish oil);	Adopt at GMP with note XS211 and new note "Only for use as an emulsifier in fish oil at GMP, or as an antifoaming agent in oils and fats for deep frying conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981)";	Indonesia supports adoption at GMP with note XS211 and new note "Only for use as an emulsifier in fish oil at GMP.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Technological justification provided by 28th CCPO	eWG comments	eWG Proposal	Indonesia Comments
							Revise the proposed		
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	476	10000		7	Emulsifier	The use of emulsifiers in food category 2.1.3 (excluding fish oils) is not technologically justified.	**Chile:** Supports request for more information **EU**: Supports	Discontinue	Indonesia supports discontinuation.

Food Category No. 04.1.2 Processed Fruit

Corresponding commodity standards: None; Multiple commodity standards correspond to subcategories

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Technological justification provided by 28th CCPO	eWG comments	eWG Proposal	Indonesia Comments
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	Used as antioxidants in FC 04.1.2 in processed fruits, however most commodity standards do not allow them	**EU, RU:** Supports proposal **FoodDrinkEurope:** Supports adoption as listed	Discuss in subcategories (current draft provision is in FC 04.1.2.2, there are adopted provisions in FCs 04.1.2.8 and 04.1.2.9)	Indonesia supports to move to subcategories provision in FC 04.1.2.2.

Food Category No. 04.1.2.1 (Frozen fruit)

Corresponding commodity standards: 52-1981, 69-1981, 75-1981, 76-1981, 103-1981: either no food additives permitted or allow ascorbic and citric acid

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Technological justification provided by 28th CCPO	eWG comments	eWG Proposal	Indonesia Comments
TOCOPHEROLS	**307a, b, c**	**200**			**Antioxidant**	Used as antioxidants in FC 04.1.2 in processed fruits, however most commodity standards do not allow them	**EU, Chile:** Proposes to request more information **RU:** Does not permit use in FC 4.1.2. Proposal not technologically justified	Do not move from FC 04.1.2.2 – no information provided on use	Indonesia supports do not move from FC 04.1.2.2 – no information provided on use

Food Category No. 04.1.2.2 (Dried fruit)

Corresponding commodity standards: 67-1981, 130-1981: allows sorbic acid, sulphur dioxide, mineral oil (67-1981 only); 177-1991: allows antioxidants and preservatives in GSFA FC 04.1.2.2.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Technological justification provided by 28th CCPFV	eWG comments	eWG Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	200		7	Antioxidant	Used as antioxidants in FC 04.1.2 in processed fruits, however most commodity standards do not allow them	**Malaysia, RU, India:** Supports adoption **China:** Does not allow for use in this FC **EU:** Questions if tech justification was provided for non-std products in subcategory **FoodDrinkEurope:** Supports adoption as listed	Adopt with notes XS67, XS130	Indonesia supports adoption with notes XS67, XS130

Food Category No. 04.1.2.3 Fruit in vinegar, oil or brine

Corresponding commodity standards: 260-2007: Lists specific antioxidants, acidity regulators, antifoaming agents, colours, firming agents, flavour enhancers, preservatives, sequesterants, and sweeteners

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Technological justification provided by 28th CCPFV	eWG comments	eWG Proposal	Indonesia Comment
TARTRATES	334, 335(i),(ii), 336(i),(ii), 337	GMP	45	7	Acidity Regulator, Sequesterant, Stabilizer (Flavour enhancer - INS 334 only)	Acidity regulators are allowed in the Standard for Pickled Fruits and Vegetables (CODEX STAN 260-2007) and the use of tartrates in products conforming this Standard is technologically justified	**Brazil:** tartaric acid (INS 334) is allowed as acidulant and as acidity regulator in preserved fruits, with ML of 0.1g /100g (1000mg/kg) under legislation (RDC n. 08/2013) **RU**: Supports use in this category	Adopt at ML of 1000 mg/kg	Indonesia supports adoption at ML of 1000 mg/kg

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Technological justification provided by 28th CCPFV	eWG comments	eWG Proposal	Indonesia Comment
							EU, India: Supports adoption **China:** Does not allow for use in this FC		

Appendix 2: Proposed draft provisions for lutein esters from Tagetes erecta (INS 161b(iii)) and octenyl succinic acid (OSA)-modified gum arabic (INS 423) in Table 3

Annex 2 – EWG Chair's proposal: Procedures for consideration of draft and proposed draft Table 3 provisions

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted/ Year Revised	INS Functional Class	2nd Circular proposal/ eWG comments	eWG Final Proposal	Indonesia Comment
AMARANTH	123	300	22 & XS311	7	Colour	**2nd Circular proposal:** Discontinue; _____ No maximum use level and technological justification provided in reply to 1st Circular **Malaysia:** Supports discontinuation **RU:** amaranth (INS123) not allowed for to use in food industry in Russian Federation	Discontinue; No maximum use level and technological justification provided	Indonesia supports discontinuation
BEET RED	162	GMP	22 & XS311	7	Colour	**2nd Circular proposal:** Discontinue; _____ No maximum use level and technological justification provided in reply to 1st Circular **IACM, NATCOL:** Necessary to provide color to smoked salmon paste to restore the salmon colour lost in processing, to make the products more appealing; Natural alternative to other red colours already listed in GSFA for this application. Already allowed for use in fish paste in EU at quantum satis and already being used by some producers in EU. **RU:** Agrees with 2nd circular proposal low (0-1.5 mg/kg bw)	Retain provision at current step	Indonesia supports adoption at GMP because beet red is natural colouring with ADI not specified. We have the usage data in smoked fish, not in smoked fish paste.

CURCUMIN	100(i)	500	22, XS311 & NN8	7	Colour	**2nd Circular proposal:** Discontinue; No maximum use level and technological justification provided in reply to 1st Circular **RU:** Agrees with proposal in ML=100 mg/kg* because ADI is low (0-3 mg/kg bw)	Discontinue; No maximum use level and technological justification provided	Indonesia does not agree discontinuation. Indonesia proposes curcumin for smoked fish 500 mg/kg (exposure is 17% ADI with food consumption of 25 grams and ADI 3 mg/kg wb/day).

Recommendation 1:
The Chair recommends that the PWG recommend to the Plenary the following criteria for automatic inclusion of a Table 3 provision into the Step Process at step 2.

1. a JECFA ADI of "not specified"; and
2. an INS number and functional class

Comment: Indonesia supports Recommendation 1
Recommendation 2:
In the instance where an additive meets the main criteria discussed in Recommendation 1, the publication of a JECFA ADI of "not specified" in the standing CCFA Agenda Item 3(a) *MATTERS OF INTEREST ARISING FROM FAO/WHO AND FROM THE ## MEETING OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA)* can be considered a circulation of the provision for comment at Step 3. In this manner, CCFA can recommend endorsement of the provision at Step 5/8 at the same session that the Committee considers JECFAS's evaluation of "not specified" for the additive.
Comment: Indonesia supports Recommendation 2

Appendix 3: Provisions for food additives with Note 22 in FC 09.2.5

Food Category No. 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms) Corresponding commodity standards: 167-1989, 189-1993, 222-2001, 236-2003, 244-2004, 311-2013

- **Note 22: For use in smoked fish paste only.**
- **Note XS311: Excluding products conforming to the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013).**
- **Note NN8: For use in dried and/or salted fish only**
- **Russian Federation: *Note: individually or for the combination with maximum individually or for the combination of food colours with combined maximum limit**

e-WG Comments

EU General Comments:

The EU comments applicable to all provisions in Appendix 3: In the absence of the technological justification the EU supports discontinuation of the provisions listed in Appendix 3.

Appendix 5: Provisions in Table 1 and 2 of the GSFA in food categories 09.0 through 016.0, with the exception of those additives with technological functions of colour or sweetener, adipates, nitrites and nitrates and the provisions related to FC 14.2.3

Draft and proposed draft provisions in the GSFA in FC 09.0 to FC 16.0, with the exception of those additives with technological and functions of colour or sweetener, adipates, nitrites and nitrates and the provisions related to FC 14.2.3

Food Category No. 09.1.1 Fresh fish

Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators and ES&T are not justified in this food category on a general basis.

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10,000**			**Emulsifier, Stabilizer**	**2nd Circular Proposal: Do not adopt in in FC 09.1.1 Brazil, Chile, EU, Malaysia, Norway, Singapore, RU:** supports do not adoption in FC 09.1.1	Do not adopt in in FC 09.1.1	Indonesia supports do not adopt in in FC 09.1.1
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.1.1 **Brazil, Chile, EU, Norway, Singapore, RU:** supports do not adoption in FC 09.1.2.	Do not adopt in in FC 09.1.1	Indonesia supports do not adopt in in FC 09.1.1

Food Category No. 09.1.2 Fresh mollusks, crustaceans, and echinoderms

Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators and ES&T are not justified in this food category on a general basis.

Corresponding commodity standards: 292-2008: No additives permitted in Live Bivalve Molluscs, Raw Bivalve Molluscs allows antioxidants from FC 09.1.2 and 09.2.1; 312-2013: No additives permitted; 315-2014: No additives permitted except Phosphates in Quick Frozen Scallop Meat and Quick Frozen Roe-on Scallop Meat Processed With Phosphates

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10,000**			**Emulsifier, Stabilizer**	**2nd Circular Proposal:** Do not adopt in in FC 09.1.2 **Brazil, Chile, EU, Malaysia, Norway, Singapore, RU:** supports do not adoption in FC 09.1.2.	Do not adopt in in FC 09.1.2	Indonesia supports do not adopt in in FC 09.1.2
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.1.2 **Brazil, Chile, EU, Norway, Singapore, RU:** supports do not adoption in FC 09.1.2.	Do not adopt in in FC 09.1.2	Indonesia supports do not adopt in in FC 09.1.2

Food Category No. 09.2 Processed fish and fish products, including mollusks, crustaceans, and echinoderms

Corresponding commodity standards: None; Multiple standards apply to subcategories, some of which do not allow food additives

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
GLYCEROL	422	GMP		4	~~Humectant,~~ Thickener	**2nd Circular Proposal:** Move to FC 09.2.1 only. **Chile, RU:** Agrees with proposal **Norway:** discontinue as acidity regulators and ES&T are not justified in this food category on a general basis.	Move to FC 09.2.1 only	Indonesia supports to move to FC 09.2.1

Food Category No. 09.2.1 Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms

Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators justified on a case-by-case basis, ES&T are justified with Note

29 "For non-standardized food only"
Corresponding commodity standards: 36-1981: Lists specific antioxidants; 92-1981, 95-1981: Lists specific humectants, preservatives and antioxidants; 165-1989: Lists specific humectants, antioxidants, acidity regulators and thickeners; 190-1995: Lists specific humectants and antioxidants; 191-1995: No additives permitted; 292-2008: No additives permitted in Live Bivalve Molluscs, Raw Bivalve Molluscs allows antioxidants from FC 09.1.2 and 09.2.1; 312-2013: No additives permitted; 315-2014: No additives permitted except Phosphates in Quick Frozen Scallop Meat and Quick Frozen Roe-on Scallop Meat Processed With Phosphates

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.1; No comments provided on use **Chile, EU, Norway, RU:** supports do not adoption in FC 09.2.1.	Do not adopt in in FC 09.2.1; No comments provided on use	Indonesia support do not adopt in in FC 09.2.1

Food Category No. 09.2.2 Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms

Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators are justified; ES&T are justified with Note 29 "For non- standardized food only"
Corresponding commodity standards: 166-1989: Lists specific humectants, antioxidants, acidity regulators, thickeners, raising agents, flavour enhancers, colours and emulsifiers

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.2; No comments provided on use **Chile, EU, Norway, RU:** supports do not adoption in FC 09.2.2.	Do not adopt in in FC 09.2.2; No comments provided on use	Indonesia supports do not adopt in in FC 09.2.2

Food Category No. 09.2.3 Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms
Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators are justified; ES&T are justified **Corresponding commodity standards:** None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.3; No comments provided on use	Do not adopt in in FC 09.2.3; No comments provided on use	Indonesia supports do not adopt in in FC 09.2.3

Food Category No. 09.2.4.1 Cooked fish and fish products

Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators are justified; ES&T are justified with the Note 241 “For use in surimi products only”.

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.4.1; No comments provided on use **Chile, EU, Norway, RU:** supports do not adoption in FC 09.2.4.1.	Do not adopt in in FC 09.2.4.1; No comments provided on use	Indonesia supports do not adopt in in FC 09.2.4.1
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Foaming**	**2nd Circular Proposal:** Adopt as listed with Note 348; Add Provisions for INS 473a	Adopt as listed with Notes 348;	Indonesia proposes 4500

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
					agent, Glazing agent, Stabilizer	and 474 **Chile, FoodDrinkEurope:** Supports proposal **EU:** note 241 "For use in surimi products only" should be used **Norway:** Discontinue ES&T are not justified in this food category on a general basis. **Japan:** Sucrose esters of fatty acids are used at up to 10000 mg/kg in cooked surimi product (kamaboko) and tube-shaped surimi product (chikuwa) as stabilizer to prevent retrogradation of the products and to maintain their elasticity. Japan supports adding Note 348 and the provisions for INS 473a and 474 since these additives share the group ADI. **RU:** Does not agree with proposal. ML is so higher. Technological justification has been given only for surimi product.	Add Provisions for INS 473a and 474	mg/kg with note 241 "For use in surimi products only" should be used

Food Category No. 09.2.4.2 Cooked mollusks, crustaceans, and echinoderms
Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators are justified, ES&T are not justified
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10,000**			**Emulsifier, Stabilizer**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.4.2 **Brazil, Chile, EU, Norway, RU:** supports do not adoption in FC	Do not adopt in in FC 09.2.4.2	Indonesia supports do not adopt in in FC 09.2.4.2

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						09.2.4.2.		
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.4.2 **Brazil, Chile, EU, RU:** supports do not adoption in FC 09.2.4.2.	Do not adopt in in FC 09.2.4.2	Indonesia supports do not adopt in in FC 09.2.4.2
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Foaming agent, Glazing agent, Stabilizer**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.4.2; No comments provided on use **EU, RU:** supports do not adoption in FC 09.2.4.2. **Norway:** Discontinue ES&T are not justified in this food category on a general basis.	Do not adopt in in FC 09.2.4.2; No comments provided on use	Indonesia supports do not adopt in in FC 09.2.4.2

Food Category No. 09.2.4.3 Fried fish and fish products, including mollusks, crustaceans, and echinoderms
Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators are justified; ES&T are justified with the Note 41 "For use in breading or batter coatings only".

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.4.3; No comments provided on use **Chile, EU, Norway, RU:** supports do not adoption in FC 09.2.4.3.	Do not adopt in in FC 09.2.4.3; No comments provided on use	Indonesia supports do not adopt in in FC 09.2.4.3
SUCROSE ESTERS OF FATTY ACIDS	**473**	**10000**			**Emulsifier, Foaming agent, Glazing agent, Stabilizer**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.4.3 **EU, Norway, RU:**	Do not adopt in in FC 09.2.4.3	Indonesia supports do not adopt in in FC 09.2.4.3

						supports do not adoption in FC 09.2.4.3.		

Food Category No. 09.2.5 Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms Horizontal Approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): Acidity regulators are justified, with note 267 "Excluding products conforming to the Standard for Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes (CODEX STAN 167-1989), the Standard for Dried Shark Fins (CODEX STAN 189-1993), the Standard for Crackers from marine and Freshwater Fish, Crustaceans and Molluscan Shellfish (CODEX STAN 222-2001) and the Standard for Boiled Dried Salted Anchovies (CODEX STAN 236-2003)"; ES&T justified with the note 300 "For use in salted squid only".

Corresponding commodity standards: 167-1989: Lists Sorbates with the function of preservatives; 189-1993: No additives permitted; 222-2001: Lists specific sequestrants and flavour enhancers; 236-2003: No additives permitted; 244-2004: Lists specific acidity regulators and preservatives; 311-2013: Lists specific acidity regulators, antioxidants, colours, packaging gases and preservatives in Smoked fish and Smoke-flavoured fish, No additives permitted in Smoked-Dried Fish

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10,000**			**Emulsifier, Stabilizer**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.5; No comments provided on use **Chile, EU, Norway, RU:** supports do not adoption in FC 09.2.5.	Do not adopt in in FC 09.2.5; No comments provided on use	Indonesia supports do not adopt in in FC 09.2.5
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.2.5; No comments provided on use **Chile, EU, Norway, RU:** supports do not adoption in FC 09.2.5.	Do not adopt in in FC 09.2.5; No comments provided on use	Indonesia supports do not adopt in in FC 09.2.5
PHOSPHATES	338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); (ii); 343(i)-(iii); 450(i)(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542,	2200	29, 33 & 334	2	Acidity regulator, Emulsifier, Humectant, Preservative, Sequestrant, Stabilizer, Thickener	**2nd Circular Proposal:** Adopt as listed with Notes 33, 334, XS167, XS 189, XS 236, XS244, XS311, 334, and "INS 452(i-v) only in products conforming to the Standard for Crackers From Marine and Freshwater Fish, crustacean and Molluscan Shellfish (CODEX STAN 222-2001)" **CEFIC, IFAC, and ICGMA:** IFAC supports the adoption of these provisions with the addition of Notes 33, 334, XS167, XS189,	Adopt as listed with Notes 33, 334, XS167, XS 189, XS 236, XS244, XS311, 334, and "INS 452(i-v) only in products conforming to the Standard for Crackers From Marine and Freshwater Fish, crustacean and Molluscan Shellfish (CODEX STAN 222-2001)"	Indonesia supports do not adopt in in FC 09.2.5

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						XS236, XS244, XS311, 334 and the proposed note related to CODEX STAN 222-2001. Phosphates can provide acidity regulation and humectant functions in these products. **EU:** the use of phosphates has to be carefully considered to avoid their possible misuse (binding additional water). The EU assumes that this consideration was taken into account by the CCFFP, therefore, all commodity standards falling in this category do not allow phosphates (except one – related to highly processed products such as crackers). From this point of view the EU does not consider the use of phosphates as justified and does not support the adoption.		
						Norway: Discontinue ES&T are not justified in this food category on a general basis. Sequestrants are technological justified in crackers made from Marine and Freshwater Fish, crustacean, Molluscan and Shellfish, **Japan:** proposes following new note: 29 “For use in smoked molluscs and salted molluscs non-standardized food only.”” be added to this provision. Phosphates are used as sequestrant to prevent		

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						discoloration in smoked molluscs. They are also used as sequestrant to prevent fat oxidation in salted molluscs.squid. Smoked molluscs and salted molluscs aresquid is fallen within food category 09.2.5 but not covered by any commodity standards including CODEX STAN 222-2001. . Maximum use level is 700 mg/kg as phosphorus. **RU:** The proposal should be discontinued. There is not technological justification.		

Food Category No. 09.3.1 Fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
LAURIC ARGINATE ETHYL ESTER	243	200		4	Preservative	**2nd Circular Proposal:** Request	Discontinue; no information on technological justification provided	Indonesia supports discontinuation.
						information on technological justification, types of products used in, and use level in this FC **Chile, EU, Norway:** supports to request information on technological justification; types of products used in, and use level in this FC. **RU:** Agrees with discontinuation of		

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						proposal		
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.3.1; No comments provided on use **Chile, EU, RU:** supports do not adoption in FC 09.3.1.	Do not adopt in in FC 09.3.1; No comments provided on use	Indonesia supports do not adopt

Food Category No. 09.3.2 Fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.3.2; No comments provided on use **Chile, EU, RU:** supports do not adoption in FC 09.3.2.	Do not adopt in in FC 09.3.2; No comments provided on use	Indonesia supports do not adopt

Food Category No. 09.3.3 Salmon substitutes, caviar, and other fish roe products
Corresponding commodity standards: 291-2010: Additives permitted except colours and texturizing agents, permit acidity regulators, antioxidants and preservatives listed in Table 3

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10,000**			**Emulsifier, Stabilizer**	**2nd Circular Proposal:** Do not adopt in in FC 09.3.3; No comments provided on use **Chile, EU, RU:** supports	Do not adopt in in FC 09.3.3; No comments provided on use	Indonesia supports do not adopt

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						do not adoption in FC 09.3.3.		
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.3.3; No comments provided on use **Chile, EU, RU:** supports do not adoption in FC 09.3.3.	Do not adopt in in FC 09.3.3; No comments provided on use	Indonesia supports do not adopt

Food Category No. 09.3.4 Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g. fish paste), excluding products of food categories 09.3.1 - 09.3.3

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10,000**			**Emulsifier, Stabilizer**	**2nd Circular Proposal:** Do not adopt in in FC 09.3.4; No comments provided on use **Chile, EU, RU:** supports do not adoption in FC 09.3.4.	Do not adopt in in FC 09.3.4; No comments provided on use	Indonesia supports do not adopt
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.3.4; No comments provided on use **Chile, EU, RU:** supports do not adoption in FC 09.3.4.	Do not adopt in in FC 09.3.4; No comments provided on use	Indonesia supports do not adopt

Food Category No. 09.4 Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms
Corresponding commodity standards: 3-1981: No additives permitted; **37-1981**: Lists specific colours, sequestrants and acidity regulators; **70-1981, 94-1981 and 119-1981**: Lists specific thickeners and gelling agents, modified starches and acidity regulators; **90-1981**: Lists specific acidity regulators, sequestrants and flavour enhancers

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10,000**			**Emulsifier, Stabilizer**	**2nd Circular Proposal:** Do not adopt in in FC 09.4; No comments provided on use **Chile, EU, RU:** supports do not adoption in FC 09.4	Do not adopt in in FC 09.4; No comments provided on use	Indonesia supports do not adopt
POLYGLYCEROL ESTERS OF INTERESTERIFIED	**476**	**5,000**			**Emulsifier**	**2nd Circular Proposal:** Do not adopt in in FC 09.4; No comments provided on use	Do not adopt in in FC 09.4; No comments provided on use	Indonesia supports do not adopt

Food Category No. 10.2 Egg products
Horizontal approach: only subcategories 10.2.1 and 10.2.2 are in Annex to Table 3, acidity regulators and ES&T justified on a general basis
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopt	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	476	5000		7	Emulsifier	**2nd Circular Proposal:** Request information on actual use levels **EU:** info on technological need should be requested. INS 476 does not share the ADI with INS 475 **RU:** Supports adoption at ML 1000 mg/kg singly or in combination with INS 475 **Chile:** supports 2nd circular proposal	Adopt at 1000	Indonesia supports do not adopt at 1000 mg/kg

Food Category No. 10.2.1 Liquid egg products
Horizontal approach: (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators, emulsifiers, stabilizers, and thickeners is justified in this food category on a general basis.
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
ALUMINIUM SULFATE	520	100	6	7	Firming agent	**2nd Circular Proposal:** Request information on actual use level **Brazil, EU, Malaysia Singapore:** Does not support adoption. JECFA has recommended the reduction of aluminium exposure to the extent possible. According to paragraph 21, REP14/FA, "the Committee recalled that JECFA had established a new PTWI of 2 mg/kg body weight for aluminium from all sources and that CCFA had revised the provisions for aluminium-containing food additives in several commodity standards, as well as in the GSFA, in response to the JECFA recommendation to decrease the use of aluminium-containing food additives to the extent possible." **EU:** revised the use of Al-containing additives (including Al lakes of colours and food additive specifications) in 2012 and only two very specific entries for INS 520 were left. One of them was for "liquid egg white for egg foams only" at 25 ppm **RU:** Supports adoption at ML 30 mg/kg **Chile:** supports 2nd circular proposal	Adopt at 30 mg/kg	Indonesia supports do not adopt at 30 mg/kg

Food Category No. 10.2.2 Frozen egg products

Horizontal approach: (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators, emulsifiers, stabilizers, and thickeners is justified in this food category on a general basis. Corresponding commodity standards: **None**

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
ALUMINIUM SULFATE	520	100	6	2	Firming agent	**2nd Circular Proposal:** Request information on actual use levels **Brazil,Chile, EU, Malaysia, Singapore:** Does not support adoption. JECFA has recommended the reduction of aluminium exposure to the extent possible. According to paragraph 21, REP14/FA, "the Committee recalled that JECFA had established a new PTWI of 2 mg/kg body weight for aluminium from all sources and that CCFA had revised the provisions for aluminium-containing food additives in several commodity standards, as well as in the GSFA, in response to the JECFA recommendation to decrease the use of aluminium-containing food additives to the	Discontinue	Indonesia supports discontinuation

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
						RU: The proposal should be discontinued, because JECFA recommendation to decrease the use of aluminium-containing food additives		

Food Category No. 10.4 Egg-based desserts (e.g. custard) Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
TARTRATES	334, 335(ii), 337	2000	45	7	334: Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant 335(ii), 337: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	**2nd Circular proposal:** Request information on technological justification and use level **RU:** Does not support adoption; no tech. justification **EU**: supports the 2nd circular proposal.	Discontinue	Indonesia does not support discontinuation. Indonesia proposes to set ML at 2000 mg/kg.

Food Category No. 11.3 Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3
Horizontal approach: (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators, emulsifiers, stabilizers, and thickeners is **not** justified in this food category on a general basis.
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
INVERTASES	1103	GMP		4	Stabilizer	**2nd Circular proposal:** Discontinue **Chile, EU, RU:** supports discontinue	Discontinue	Indonesia supports discontinuation. Indonesia allowed this substance as processing aid.

Food Category No. 11.4 Other sugars and syrups (e.g. xylose, maple syrup, sugar toppings)
Horizontal approach: (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): The use of acidity regulators, emulsifiers, stabilizers, and thickeners is justified in this **food category on a general basis, with note 258 "Excludingmaple syrup".**

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
INVERTASES	1103	GMP		4	Stabilizer	**2nd Circular proposal:** Discontinue **EU:** Currently there is no provision for INS 1103 in the GSFA. It was assessed by the 57th JECFA (2001) as acceptable as enzyme preparation used in confectionary and pastry applications and if limited by GMP. **EU, RU:** supports the 2nd circular proposal.	Discontinue	Indonesia supports discontinuation. Indonesia allowed this substance as processing aids.

Food Category No. 11.6 Table-top sweeteners, including those containing high-intensity sweeteners
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
PROPYLENE GLYCOL	1520	5000		7	Emulsifier, Glazing Agent, Humectant	**2nd Circular proposal:** Adopt at 3,000 **EU:** INS 1520 is authorized in the EU only as a secondary FA (the ML 500 – 1000 ppm; the level in the final food shall not exceed 3000 ppm in general and 1000 ppm for beverages). EU is asking for the technological justification in table top sweeteners. **RU:** Does not support adoption. There is not technological justification. ML too high	Adopt at 1,000	Indonesia supports adoption ML at 1000 mg/kg
TARTRATES	334, 335(i), 337	GMP	45	7	334: Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant 335(ii), 337: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	**2nd Circular proposal:** Adopt at GMP **Brazil:** supports adoption of a numerical use level, considering that it is an additive with numerical ADI (30mg/kg bw/d). In Brazilian legislation, tartaric acid (INS 334) is allowed as acidulant in liquid table top sweetener, with ML of 0.20 g/100 mL (2000mg/kg). **EU:** supported the 1st circular proposal, i.e. "*Not a Table 3 additive, request information on numerical use level*". The EU could accept the ML proposed by Brazil, i.e. 2000 ppm.	Adopt at 2,000	Indonesia supports adoption ML at 2000 mg/kg

Food Category No. 12.2.1 Herbs and spices

Horizontal approach: (FA/45 CRD2 Appendix FA/46 CRD 2 Appendix V): The use of acidity regulators, emulsifiers, stabilizers, and thickeners is **not** justified in herbs on a general basis.

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
SILICON DIOXIDE, AMORPHOUS	551	GMP	51	4	Anticaking agent, Antifoaming agent, Carrier	**2nd Circular proposal:** Adopt at GMP **Brazil:** Silicon dioxide (INS 551) is allowed as anticaking in herbs and spices at GMP. **India:** Additive not allowed in herbs **EU:** could see the need for certain anticaking agents.However, the EU recommends, in line with the procedures, to consult the active commodity committee (Codex Committee on Spices and Culinary	Adopt at GMP	Indonesia supports adoption at GMP.
SODIUM CARBONATE	500(i)	GMP	51	4	Acidity regulator, Anticaking agent, Raising agent, Stabilizer,	**2nd Circular proposal:** Adopt at GMP **EU Specialty Food Ingredients:** see technical justification above for tocopherol (for food category 12.2) as a whole. The use of sodium ascorbate may be indicated in those cases where the use of ascorbic acid as an antioxidant imparts to much acidity to the product. It might also be indicated for keeping an optimal pH value to use ascorbic acid and sodium ascorbate in combination. **India:** Additive not allowed**:** Foods in General at GMP **EU:** recommends, in line with the procedures, to consult the active commodity committee (Codex Committee on Spices and Culinary Herbs) **FoodDrinkEurope:** Support proposal **RU:** Does not support adoption. Request information on technological function, use in spices and/or herbs	Adopt at GMP	Indonesia supports adoption at GMP

Food Category No. 12.2.2 Seasonings and condiments
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
PROPYLENE GLYCOL	1520	970000		7	Emulsifier, Glazing Agent, Humectant	**2nd Circular proposal:** Adopt at 20,000 **Brazil:** wonders if there is an error on ML, considering that it is too high for these functions. Typical use levels are in the range of 1500mg/kg – 20000mg/kg. Considering an ADI of 70mg/kg bw/d, and the proposed level of 970.000 mg/kg, an adult of 60 kg could consume only 4.32g of seasonings and condiments not to extrapolate ADI. So, the ML should be reduced. **India:** Believes additive is technologically justified for use as emulsifier in seasonings and condiments. Propylene Glycol is commonly used for emulsification in fat and oil based seasonings and condiments. Propylene glycol reacts well with fatty acids while being water soluble at the same time. **EU**: not convinced on the technological need. What are the products for which INS 1520 is needed and why this food additive is necessary? Note: according to the descriptor FC 12.2.2 does not include condiment sauces (emulsified sauces and dips fall under FC 12.6.1). **FoodDrinkEurope, India:** Support proposal **ICGMA**: supports the 2nd circular proposal, and appreciates Brazil's comments regarding the initially proposed ML. We agree with the 2nd circular proposal of 20,000 mg/kg which would be sufficient. Propylene glycol reacts well with fatty acids while also being water soluble. It is commonly used to provide emulsification in seasoning or condiment mixtures that may include multiple components, such as oil and water, that do not traditionally mix **Malaysia:** Support 2nd circular proposal **RU:** Does not support adoption. Request information on technological justification. ML is too high. need. What are the products for which INS 1520 is needed and why	Adopt at 20,000	Indonesia supports adopt at 20000 mg/kg

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
						this food additive is necessary? Note: according to the descriptor FC 12.2.2 does not include condiment sauces (emulsified sauces and dips fall under FC 12.6.1). **FoodDrinkEurope:** Support proposal **RU:** Does not support		
TARTRATES	334, 335(ii), 337	7500	45	7	334: Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant 335(ii), 337: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	**2nd Circular proposal:** Adopt as listed **EU:** has the technological justification been provided to propose the adoption? **FoodDrinkEurope, India:** Support proposal **ICGMA**: supports 2nd circular proposal. Tartrates are added to certain condiments for their dual properties as acidity regulators and flavor enhancers **RU:** Request information on technological justification for certain condiments (which???)	Adopt as listed	Indonesia supports adopt as listed

Food Category No. 12.5.1 Ready-to-eat soups and broths, including canned, bottled, and frozen

Corresponding commodity standards: 117-1981 Acidity regulators, anticaking agents (in dehydrated product only), antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, humectants, packaging gases, preservatives, stabilizers, sweeteners and thickeners used in accordance with Tables 1, 2 and 3 of the GSFA in FC 12.5 and parent and sub-categories. Flavourings should comply with CAC/GL 66-2008.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
NISIN	234	5	233	6	Preservative	**2nd Circular proposal:** Adopt as Listed **Chile, EU:** does not support. INS 234 was not listed in CS 117-1981. The EU is not convinced on the technological need. Canned products are usually sterilized. The EU is concerned if the intention is to reduce time/temperature requirements. As for chilled products – they have usually short shelf life and are intended to be heat treated before consumption – no need for this additive **India, FoodDrinkEurope:** Support proposal **ICGMA, IFAC**: supports 2nd circular proposal. Microbial challenge study data shows that nisin helps retard outgrowth of Bacillus cereus in soups (chicken soup with dumplings and beef noodle soup were	Adopt as listed	Indonesia does not support adoption because there is no technological function.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
						used as model systems). In ready-to-eat pasteurized, refrigerated soups, microbial challenge study data shows that nisin (1) delays outgrowth of Lactic acid spoilage bacteria; when held at 8 degrees C, nisin treated soups maintained keeping quality 11-35 days longer than untreated soups (2) reduced initial Listeria monocytogenes counts by 1 log and treated soups maintained keeping quality 2 additional days compared to untreated controls when held under refrigeration at 8 degrees C. We note the comments of the EU with regard to the alignment work on CS 117-1981. It seems that we are again in a similar situation where a commodity standard allows a functional class of food additives (preservatives), but during the alignment process there was no consideration given to the use of other additives with a preservative function that may have been developed and reviewed by JECFA since the original commodity standard was last updated. We not precedent exists for CCFA to add the use of nisin to commoditized foods when the original commodity standard allowed the use of preservatives and technological justification for the use of nisin is provided. It appears that this precedent would apply in this case and so ICGMA suggests that immediate adoption of this provision. With CCFA's clear mandate to update food additive provisions in commodity standards in the absence of an active commodity committee and the precedent referenced, there is no reason to use CCFA's limited resources to further review this provision. Technological justification exists and the relevant commodity standard provides for the use of preservatives. Nisin is a relatively new preservative, was not considered when the original commodity standard was developed in 1981 (more than 30 years ago), and has clear technological justification and food safety benefits. **India, Malaysia:** Support adoption **RU:** Opposes adoption because nisin – antibiotic. The problem of antibiotic resistance recognized by WHO. **South Africa:** Supports adoption. Use of nisin helps to reduce time/temperature requirements of the heat processing thus helping to maintain the textural and color quality of the canned products. In pasteurized chilled soups, nisin prevents/delays outgrowth of heat		

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
						resistant spores and pathogenic bacteria such as Listeria; nisin helps reduce loss due spoilage and enhance the safety of these products		

Food Category No. 12.6.1 Emulsified sauces and dips (e.g. mayonnaise, salad dressing, onion dip) Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
PROPYLENE GLYCOL	1520	800		7	Emulsifier, Glazing Agent, Humectant	**2nd Circular proposal:** Adopt as listed **ICGMA:** Supports adoption. Propylene glycol reacts well with fatty acids while also being water soluble. It is commonly used to provide emulsification in sauces that may include multiple components, such as oil and water, that do not traditionally mix. We can also confirm that the usage would not be as a secondary additive **EU**: what is emulsified? (the ML is quite low comparing the one proposed in FC 12.2.2 – SFA use?) **FoodDrinkEurope, Malaysia:** Support adoption **RU:** INS1520 could be used only as carrier for FA. There is no technological justification	Adopt as listed	Indonesia proposes ML at 1000 mg/kg
PROPYLENE GLYCOL ALGINATE	405	10000		7	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Stabilizer, Thickener	**2nd Circular proposal:** Adopt at 8000 **ICGMA, IFAC:** Supports adoption. Propylene glycol alginate is commonly used to provide emulsification in sauces that may include multiple components, such as oil and water, that do not traditionally mix. It is also important in salad dressings for its ability to help herbs remain suspended in the mixture **EU**: supports the 2nd circular proposal **FoodDrinkEurope, India, Malaysia:** Support adoption **ICGMA, IFAC:** can support the 2nd circular proposal. We agree with the EU that 8000 mg/kg should provide sufficient technological effect to provide the technological function described in our first circular	Adopt at 8000	Indonesia supports adoption at 8000 mg/kg

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
						comments. **India:** supports adoption as proposed **Japan**: supports the 2nd proposal. Propylene glycol alginate is used in salad dressing to prevent oil separation and thicken the product.		
TARTRATES	334, 335(ii), 337	2860	45	7	334: Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant 335(ii), 337: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	**2nd Circular proposal:** Adopt as listed **Brazil:** ML is unusual, so Brazil is wondering if this number was obtained from conversion. In category 12.6.2 the value is 5000 mg/kg. **Columbia:** used by food industry as acidifier, acidity regulator and acidulant, with DMU of 3g / kg **EU:** has the technological justification been provided? **EWG Chair:** **ML is reflected correctly FoodDrinkEurope:** Support adoption **Indonesia:** proposes ML of 2000 mg/kg	Adopt at 2,000	Indonesia supports adoption at 2000 mg/kg

Food Category No. 12.6.2 Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy) Horizontal approach: Corresponding commodity standards: 306R-2011 specific acidity regulators, antioxidants, colours, preservatives, emulsifiers, sweeteners, stabilizers, and thickeners.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
SORBITAN ESTERS OF FATTY ACIDS	491-495	4000		7	491: Emulsifier 492-494: Emulsifier, Stabilizer 495: Emulsifier	**2nd Circular proposal:** Request information on technological justification for standardized and non-standardised foods **Chile, EU:** supports the 2nd circular proposal **RU:** supports discontinuation because no technological justification provided	Do not adopt	Indonesia supports do not adopt.
STEAROYLLACTYLATES	481(i), 482(i)	2500		7	Emulsifier, Flour treatment agent, Foaming agent, Stabilizer	**2nd Circular proposal:** Request information on technological justification for standardized and non-standardised foods **IFAC:** Supports adoption with Note XS306R **Chile, EU** supports the 2nd circular	Adopt with Note XS 306R Catatan isi Note XS	Indonesia allows the use of this additive for chesse sauce. Propose to delete Note

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
						proposal **RU:** supports discontinuation because no technological justification provided	306: regional standar for chilli sauce	XS 306R.
TARTRATES	334, 335(ii), 337	5000	45	7	334: Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant 335(ii), 337: Acidity regulator, Emulsifying salt, Sequestrant,	**2nd Circular proposal:** Request information on technological justification for standardized and non-standardised foods **Chile, EU**: supports the 2nd circular proposal **RU:** supports discontinuation because not technological justification provided	Do not adopt	Indonesia proposes to adopt at 5000 mg/kg.
TOCOPHEROLS	307a, b, c	600		7	Antioxidant	**2nd Circular proposal:** Adopt as listed **EU:** has the technological justification been provided for non-standardised products? **ICGMA:** Supports adoption. Tocopherols prevent oxidation which can impact the taste and texture of certain sauces, particularly those high in oil or fat content. **FoodDrinkEurope:** Support proposal **RU:** Does not support proposal because there have not technological justification and it is food supplement with established adequate level of consumption. Recommended level of daily intake tocopherols (vit E) – 10 vu/ per person per day. In case of vit E (tocopherols) consumption in quantity more than 360 TE/per day per person (from all sources) could be negative reactions of human organism	Adopt as listed	Indonesia supports to adopt at 600 mg/kg.

Food Category No. 12.8 Yeast and like products
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
SORBITAN ESTERS OF FATTY ACIDS	491-495	15000	104	7	491: Emulsifier 492-494: Emulsifier, Stabilizer 495: Emulsifier	**Initial proposal:** Adopt as listed **ICGMA, IFAC:** Support adoption. Sorbitan esters of fatty acids are used in dry yeast to improve the drying and rehydration properties of yeasts that are dried to very low water content. The material stabilizes the yeast cells during drying and increases the rehydration of the yeast in the dough, resulting in quicker fermentation and better batter properties (emulsification) **EFEMA:** Recommended dosage level is up to 15.000 mg/kg in dry yeast. Regarding Note 104, we consider that it would not be applicable since the sorbitanester is used in yeast, not in bread. The yeast could be used in bread and then a max. limit of 15.000 mg/kg is needed. We would thus suggest removing the Note 104. **FoodDrinkEurope, IFAC:** Supports adoption **ICGMA** supports 2nd circular proposal and notes earlier comments submitted by EFEMA, ICGMA and IFAC in response to the first circular that provide technological justification **Japan** supports 2nd circular proposal. This additive is used in dry yeast to preserve the leaving activity of the yeast by preventing leakage of yeast solids from the cells during rehydration. Max use level is 3,000 mg/kg. **RU:** supports discontinuation because no technological justification provided	Adopt as listed	Indonesia supports adopt as listed

Food Category No. 12.9.2.2 Non-fermented soybean sauce
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Proposal	Indonesia Comment
BENZOATES	210-213	1000	13	3	Preservative	**2nd Circular proposal:** Request further information on exposure in context of JECFA evaluation **Columbia:** used as preservative at	Request further information on exposure in context of JECFA Evaluation	Indonesia proposes ML at 600 mg/kg

						1000 ppm **Chile, EU** supports the 2nd circular proposal. **RU:** Proposal should be clarified in the scope of benzoates consumption from all sources		

Food Category No. 13.1 Infant formulae, follow-up formulae, and formulae for special medical purposes for infants

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators, emulsifiers, stabilizers, and thickeners is on a case-by-case basis

Corresponding commodity standards: None; Multiple commodity standards correspond to subcategories

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
GUM ARABIC (ACACIA GUM)	414	GMP		4	Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener	**2nd Circular Proposal:** Discontinue **EU, Indonesia, RU:** Supports discontinuation **FoodDrinkEurope, ISDI:** Note that INS 414 is permitted by CAC/GL 10-1979 Part D, in nutrient preparations, (max level 10 mg/kg ready to use food for infants and young children)	Discontinue	Indonesia supports discontinuation

Food Category No. 13.1.1 Infant formulae

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): **The use of acidity regulators, emulsifiers, stabilizers, and thickeners is justified on a case-by-case basis**

Corresponding commodity standards: 72-1981: allows specific thickeners, emulsifiers, acidity regulators, antioxidants and packaging gases

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	10	72	7	Antioxidant	**2nd Circular Proposal:** Adopt at 10 mg/kg. Add note "excluding INS numbers 307a and 307c." – aligns with CODEX STAN 72-1981 **Colombia, EU, FoodDrinkEurope, ICGMA, Indonesia, ISDI, Malaysia, RU:** supports the adoption **EU Specialty Food Ingredients:** STAN 72-1981 only permits INS	Adopt at 10 mg/kg with Note 72 "on the ready-to-eat basis" and newnote "excluding INS numbers 307a and 307c."– aligns with CODEX STAN 72-1981	Indonesia supports adoption at 10 mg/kg with Note 72 "on the ready-to- eat basis" and newnote "excluding INS numbers 307a and 307c."

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						307b which explains the limitation to exclude INS 307a and c. **Japan, Switzerland, India:** 2nd Circular Proposal should be revised to 10 mg/L product ready for consumption, per CODEX STAN 72-1981 (1 mg/100mL)		

Food Category No. 13.1.2 Follow-up formulae

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators, emulsifiers, stabilizers, and thickeners is on a case- by-case basis
Corresponding commodity standards: 156-1987: allows specific thickening agents, emulsifiers, pH-adjusting agents, antioxidants and flavours

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	30	72	7	Antioxidant	**2nd Circular Proposal:** Adopt at 30 mg/kg – aligns with CODEX STAN 156-1987 **Colombia, EU, FoodDrinkEurope, ICGMA, ISDI, Malaysia:** Support for proposal alignment with CS **Japan, Switzerland, India:** 2nd Circular Proposal should be revised to 30 mg/L product ready for consumption per CODEX STAN 156-1987. **RU:** Adopt at 10 mg/kg It is food supplement with established adequate level of consumption. Recommended level of daily intake tocopherols (vit E) for children before 3 year – 3-4 mg/ per person per day. RU: Adopt at 10 mg/kg	Adopt at 30 mg/kg with Note 72.	Indonesia supports adoption at 30 mg/kg with Note 72.

Food Category No. 13.1.3 Formulae for special medical purposes for infants

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators, emulsifiers, stabilizers, and thickeners is justified on a case-by-case basis
Corresponding commodity standards: 72-1981: allows specific thickeners, emulsifiers, acidity regulators, antioxidants and packaging gases

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
TOCOPHEROLS	307a, b, c	10	72	7	Antioxidant	**2nd Circular Proposal:** Adopt at 10 mg/kg. Add note "excluding INS numbers 307a and 307c". – aligns with CODEX STAN 72-1981 **EU, FoodDrinkEurope, ICGMA, Indonesia, ISDI, Malaysia, RU:** Supports proposal **EU Specialty Food Ingredients:** a use level of 3 mg/kg is unlikely to show any antioxidant effect in the finished product. STAN 72-1981 only permits INS 307b which explains the limitation to exclude INS 307a and c. **Japan, Switzerland, India:** 2nd Circular Proposal should be revised to 10 mg/L product ready for consumption, per CODEX STAN 72-1981	Adopt at 10 mg/kg with Note 72 and new note "excluding INS numbers 307a and 307c". – aligns with CODEX STAN 72-1981	Indonesia supports adoption at 10 mg/kg with Note 72 and new note "excluding INS numbers 307a and 307c".

Food Category No. 13.3 Dietetic foods intended for special medical purposes (excluding products of food category 13.1)
Corresponding commodity standards: 118-1979 (does not discuss food additives)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
PROPYLENE GLYCOL ALGINATE	405	1200		7	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Stabilizer, Thickener	**2nd Circular Proposal:** Adopt **EU, FoodDrinkEurope, IFAC, RU:** Supports proposal	Adopt	Indonesia proposes ML at 450 mg/kg with exposure below to 50% ADI.

Food Category No. 14.1.2.2 Vegetable juice

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators is justified in this FC on a general basis, emulsifiers, stabilizers, and thickeners are **not** justified in this FC on a general basis

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
TARTRATES	334, 335(ii), 337	4000	45	7	Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant	**2nd Circular Proposal:** Adopt **Colombia:** Additive used in the food industry as an acid, acidity regulator and acidulant, with DMU of 3 g/kg **EU:** for consistency CCPFV should be consulted. **ICBA:** Supports immediate adoption at a Maximum Use Level of 4000 mg/kg Supports the EWG proposal based on the horizontal approach. **ICGMA, India, Indonesia:** supports the adoption **IFU, Poland, RU, Switzerland:** We oppose the use of tartrate in vegetable juice. They are only approved in fruit juices as an acidity regulator for grape juices only. See notes 128 and 129. Tartaric acid is not predominant in vegetable juices therefore we do not see the technological need to adopt the use of tartrates. Approval of this additive contradicts the quality and authenticity requirements set in the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005). We do not think approval at step 7 is correct.	Adopt	Indonesia supports adoption ML at 4000 mg/kg.

Food Category No. 14.1.2.4 Concentrates for vegetable juice

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators is justified in this FC on a general basis. Emulsifiers, stabilizers, and thickeners are **not** justified in this FC on a general basis

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
PHOSPHATES	338; 339(i)-(iii); 340(i)-(iii);	1000	33 & 127	7	Acidity regulator, Antioxidant, Sequestrant	**2nd Circular Proposal:** Adopt **EU:** for consistency CCPFV should be consulted. **Colombia:** Additive used in the food industry as an acid, acidulant and alkalizing regulator by means of GMP.	Adopt	Indonesia supports adoption ML at 1000 mg/kg.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
	341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542					**ICBA:** Supports immediate adoption at a Maximum Use Level of 1000 mg/kg Phosphate ingredients can assist in improving the shelf life of beverages via a sequestration action. Additionally, the acid regulatory function of a number of phosphate ingredients can help provide a crisp sharp taste and assist in retention of intrinsic ascorbic acid. Having multiple options for phosphate ingredients for use in vegetable juices allows for greater flexibility and innovation to meet consumer demands and expectations. The JECFA GROUP MTDI of 70 mg/kg bw (as P) supports the Maximum Use Level of 1000 ppm. ICGMA, IFAC, India PAPA: supports the EWG proposal. IFU, Poland, RU, Switzerland: We opposes this proposal. If the use of phosphate is to enhance the use of benzoates then they are not approved for the use in concentrates for vegetable juice. We therefore oppose the approval of phosphate addition. Approval of this additive contradicts the quality and authenticity requirements set in the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005). We do not think approval at step 7 is correct. Furthermore an addition of phosphates would adulterate the corresponding AIJN Code of Practice reference figure significantly, thus interfering authenticity analysis results.		
TARTRATES	334, 335(ii), 337	4000	45	7	Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant	**2nd Circular Proposal:** Adopt **Colombia:** Additive used by the food industry with the technological functions of acidifier, acidity regulator and acidulant, with DMU of 3g / kg **EU:** for consistency CCPFV should be consulted. **ICBA:** Supports immediate adoption at a Maximum Use Level of 4000 mg/kg ICBA supports the EWG proposal based on the horizontal approach.	Adopt	Indonesia supports adoption ML at 4000 mg/kg.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						ICGMA, India: Supports adoption **IFU, Poland, RU, Switzerland:** We do not understand the recommendation to approve the use of tartrates. They are only approved in fruit juices as an acidity regulator for grape juices only. See notes 128 and 129. Tartaric acid is not predominant in vegetable juices therefore we do not see the technological need to adopt the use of tartrates. Approval of this additive contradicts the quality and authenticity requirements set in the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005). We do not think approval at step 7 is correct.		

Food Category No. 14.1.3.2 Vegetable nectar

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): AR: justified in this FC on a general basis; ES&T: case by case basis

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
PHOSPHATES	338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-	1000	33	7	Acidity regulator, Antioxidant, Sequestrant	**2nd Circular Proposal:** Adopt as per horizontal approach **Colombia:** Additive used in the food industry as an acid, acidulant and alkalizing regulator by means of GMP **EU:** for consistency CCPFV should be consulted. **ICBA:** Supports immediate adoption at a Maximum Use Level of 1000 mg/kg Phosphate ingredients can assist in improving the shelf life of beverages via a sequestration action. Additionally, the acid regulatory function of a number of phosphate ingredients can help provide a crisp sharp taste and assist in retention of intrinsic ascorbic acid. Having multiple options for phosphate ingredients for use in vegetable juices allows for greater flexibility and innovation to meet consumer	Adopt	Indonesia supports adoption ML at 1000 mg/kg.

	(v); 542					demands and expectations. The JECFA GROUP MTDI of 70 mg/kg bw (as P) supports the Maximum Use Level of 1000 ppm. **IFAC, ICGMA, India, PAPA.:** Supports adoption **IFU, Poland, RU, Switzerland:** opposed to the use of phosphates. If the proposal is to enhance the use of benzoates then they are not approved for the use in vegetable nectar. We therefore oppose the approval of phosphate addition. Approval of this additive contradicts the quality and authenticity requirements set in the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005). We do not think approval at step 7 is correct. Furthermore an addition of phosphates would adulterate the corresponding AIJN Code of Practice reference figure significantly, thus interfering authenticity analysis results.		

Food Category No. 14.1.3.4 Concentrates for vegetable nectar

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): AR: justified in this FC on a general basis; ES&T: case by case basis

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
PHOSPHATES	338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-(iii),(v)-	1000	33 & 127	7	Acidity regulator, Antioxidant, Sequestrant	**2nd Circular Proposal:** Adopt **EU:** for consistency CCPFV should be consulted **ICBA:** Supports immediate adoption at a Maximum Use Level of 1000 mg/kg Phosphate ingredients can assist in improving the shelf life of beverages via a sequestration action. Additionally, the acid regulatory function of a number of phosphate ingredients can help provide a crisp sharp taste and assist in retention of intrinsic ascorbic acid. Having multiple options for phosphate ingredients for use in vegetable juices allows for greater flexibility and innovation to meet consumer demands and expectations. The JECFA GROUP MTDI of 70 mg/kg bw (as P) supports the Maximum Use Level of 1000 ppm.	Adopt	Indonesia supports adoption ML at 1000 mg/kg.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
	(vii), (ix); 451(i),(ii) ; 452(i)-(v); 542					**IFAC, ICGMA, PAPA:** Supports adoption. **IFU, Poland, RU, Switzerland:** opposes the proposal to use phosphate. If the use of phosphate is for the intention to support the functionality of benzoates then the notes 33, 40 and 122 should apply. This is in line with approval in food category 14.1.2.1 Fruit juice		
TARTRATES	334, 335(ii), 337	1600	45	7	Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant	**2nd Circular Proposal:** Adopt **EU:** for consistency CCPFV should be consulted. **ICBA:** Supports immediate adoption at a Maximum Use Level of 4000 mg/k Tartrates can provide taste advantages through acid regulation. ICBA supports inclusion of all listed tartrates. Having multiple options for tartrate ingredients for use in concentrates for vegetable nectars allows for greater flexibility and innovation to meet consumer demands and expectations. The JECFA GROUP ADI of 30 mg/kg bw for tartaric acid and its sodium, potassium and potassium sodium salts supports the Maximum Use Level of 4000 ppm. **ICGMA, Indonesia:** Supports adoption. **IFU, Poland, RU, Switzerland:** opposes the proposal. Tartrates are only approved in fruit juices as an acidity regulator for grape juices only. See notes 128 and 129. Tartaric acid is not predominant in vegetable juices therefore we do not see the technological need to adopt the use of tartrates. Approval of this additive contradicts the quality and authenticity requirements set in the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005).	Adopt	Indonesia supports adoption ML at 1600 mg/kg.

Food Category No. 14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
PROPYLENE GLYCOL	1520	200000		7	Emulsifier, Glazing agent, Humectant	**2nd Circular Proposal:** Adopt at 1000 mg/kg **EU:** secondary food additive use? No technological justification was provided. **ICBA:** supports adoption at a Maximum Use Level of 1000 mg/kg based on finished product formulation as consumed. The JECFA GROUP ADI of 0 – 25 mg/kg bw for propylene glycol supports the Maximum Use Level of 3000 ppm. Products may have already been placed in numerous markets with up to 3000 ppm **ICGMA, Indonesia:** Supports adoption **Malaysia:** Support adoption of 1000 mg/kg but with Note 381 (As consumed). mitigate **RU:** Agrees with adopt at 1000 mg/kg. There are not technological justification	Adopt at 1000 mg/kg	Indonesia supports adoption at 1000 mg/kg

Food Category No. 14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): AR and ES&T: justified in this food category on a general basis, with Note 160 “For use in ready-to-drink products and pre-mixes for ready-to-drink products only”

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
SUCROSE ESTERS OF FATTY ACIDS	473	5000		7	Emulsifier, Foaming agent, Glazing agent, Stabilizer	**2nd Circular Proposal:** Adopt with Note 348 (Singly or in combination: sorbitan esters of fatty acids (INS 473), sucrose oligoesters, typeI and type II (INS 473a) and sucroglycerides (INS 474)) **EU:** has exposure concerns on INS 473-474. A 20 kg child reaches the ADI by drinking 120ml. ML and use needs to be restricted. **FoodDrinkEurope, ICGMA, Malaysia:** Supports adoption	Adopt with Note 348 (Singly or in combination: sorbitan esters of fatty acids (INS 473), sucrose oligoesters, typeI and type II (INS 473a) and sucroglycerides (INS 474))	Indonesia proposes ML at 500 mg/kg

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						ICBA: supports adoption at a Maximum Use Level of 5000 mg/kg with Note 348 The emulsification properties of Sucrose Esters of Fatty Acids allow for greater innovation in fruit flavored beverages employing oils for flavoring. The JECFA GROUP ADI of 0 – 30 mg/kg bw for sucrose esters of fatty acids and sucroglycerides supports the Maximum Use Level of 5000 ppm. **Japan:** supports the 2nd circular proposal. used in coffee mixed with cream and black tea mixed with cream to prevent separation of cream. They are also used to prevent oil separation in coffee and tea concentrates. Maximum use level is 5,000 mg/kg. Suggests Japan suggests removing Note 160 "For use in ready-to-drink products and pre-mixes for ready-to-drink products only" since this food additive is used in concentrates fallen within this food category. **RU:** Adopt with ML of 1000 mg/kg because ADI 0-30 mg/kg bw. There are not technological justification		

Food Category No. 14.2.1 Beer and malt beverages
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
TARTRATES	334, 335(ii), 337	2000	45	7	Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant	**2nd Circular Proposal:** Adopt **EU:** has technological justification been provided? **FoodDrinkEurope, Indonesia,** **RU:** Supports adoption	Adopt	Indonesia supports adoption at 2000 mg/kg

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						EU: no technological justification		
TARTRATES	334, 335(ii), 337	2000	45	7	Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant	**2nd Circular Proposal:** Adopt **EU:** no technological justification was provided – discontinue **RU:** Supports adoption	Adopt	Indonesia supports adoption at 2000 mg/kg

Food Category No. 15.0 Ready-to-eat savouries
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	476	1000		7	Emulsifier	**2nd Circular Proposal:** Adopt **EU:** What is specific with the emulsifier that it cannot be addressed by Table 3 additives? **FoodDrinkEurope:** Supports proposal **ICGMA:** Supports adoption. Polyglycerol esters of interesterified ricnoleic acid are used to improve interaction with starch granules in the doughs used to produce savory snacks. They improve dough performance through cooking and allows the snack to retain a desired level of moisture through transportation and storage which contributes to softness of the snack	Discuss use in subcategories	Indonesia supports discussion.
TARTRATES	334, 335(ii), 337	2000	45	4	Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant	**2nd Circular Proposal:** Adopt **EU:** Could accept if tech just has been provided **FoodDrinkEurope, Indonesia:** Supports proposal **ICGMA:** Supports adoption. Tartrates help to adjust the acidity of certain savory snacks while preventing oxidation that can impact taste and quality.	Adopt	Indonesia supports adoptions ML at 2000 mg/kg

Food Category No. 15.1 Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)
Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	**475**	**10000**			**Emulsifier, Stabilizer**	**2nd Circular Proposal: Adopt** **EU:** ML quite high; 20kg child reaches the ADI by eating 50g. What is specific with the emulsifier that it cannot be addressed by Table 3 additives? **FoodDrinkEurope:** Supports proposal **ICGMA:** Supports adoption. Emulsifiers and stabilizers like polyglycerol esters of fatty acids are used to improve interaction with starch granules in the doughs used to produce savory snacks. They improve dough performance through cooking and allows the snack to retain a desired level of moisture through transportation and storage which contributes to softness of the snack. **Japan:** Polyglycerol esters of fatty acids are used in fabricated potato chips, fallen within FC 15.1, to give crispness. The maximum use level is 1000 mg/kg. Japan suggests that this draft provision be moved to FC 15.1 unless any other products covered by other subcategories are specified.	Adopt at 1000 mg/kg	Indonesia supports adoption at 10000 mg/kg
PROPYLENE GLYCOL	1520	300		7	Emulsifier, Glazing agent, Humectant	**2nd Circular Proposal:** Adopt **EU:** Questions tech need, if use as SFA **FoodDrinkEurope, IFAC:** Supports adoption	Adopt	Indonesia supports adoption at 300 mg/kg

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
						ICGMA: Supports adoption. Propylene glycol provides a humectant and emulsifying function in the production of potato or cereal dough used to make extruded chips and other savory snacks. This improves dough performance through cooking and allows the snack to retain a desired level of moisture through transportation and storage.		
PROPYLENE GLYCOL ALGINATE	405	3000		7	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Stabilizer, Thickener	**2nd Circular Proposal:** Adopt **EU:** Questions tech need. Aware of need only for cereal and potato-based snacks **FoodDrinkEurope:** Supports proposal **ICGMA:** Supports adoption. Propylene glycol alginate helps to emulsify dough and interact with starch granules. This provides results in a desirable and consistent product with a softer texture. to emulsify dough and interact with starch granules. This provides results in a desirable and consistent product with a softer texture. **Japan:** supports 2nd circular proposal. Sorbitan esters of fatty acids are used to prevent retrogradation in potato snacks from potato dough. Maximum use level is 300 mg/kg.	Adopt	Indonesia supports adoption at 3000 mg/kg
STEAROYL LACTYLATES	481(i), 482(i)	5000		7	Emulsifier, Flour treatment agent, Foaming	**2nd Circular Proposal:** Adopt **EU:** Questions if tech just has been provided. Not aware of need **FoodDrinkEurope, IFAC:** Supports adoption	Adopt	Indonesia supports adoption ML at 5000 mg/kg

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	2nd Circular Proposal/EWG Comments	EWG Final Proposal	Indonesia Comment
					agent, Stabilizer	**ICGMA:** supports adoption. Stearoyl lactylates form bonds with gluten to improve dough strength for certain cereal based savory snacks that are baked.		
SUCROSE ESTERS OF FATTY ACIDS	473	10000		7	Emulsifier, Foaming agent, Glazing agent, Stabilizer	**2nd Circular Proposal:** Adopt; with Note 348 (Singly or in combination: sorbitan esters of fatty acids (INS 473), sucrose oligoesters, typeI and type II (INS 473a) and sucroglycerides (INS 474)) **EU:** exposure concerns – ML quite high; 20kg child ADI reached by consuming 60g. There are no alternatives? Use should be restricted **FoodDrinkEurope:** Supports proposal **ICGMA:** supports adoption. Sucrose esters of fatty acids helps to emulsify dough and interact with starch granules. This provides results in a desirable and consistent product with a softer texture **Japan:** supports 2nd circular proposal. Sucrose esters of fatty acids are used in rice crackers (senbei) and potato snacks from potato dough to prevent cracking and give crispness. Maximum use level is 10000 mg/kg.	Adopt; with Note 348 (Singly or in combination: sorbitan esters of fatty acids (INS 473), sucrose oligoesters, typeI and type II (INS 473a) and sucroglycerides (INS 474))	Indonesia supports adoption at 10000 mg/kg

Japan

Japan would like to submit the following comments regarding CX/FA 18/50/7 and CX/FA 18/50/7 Add. 1 (Agenda item 5(a)). Addition is in **bold and underlined font** and deletion is in ~~strikethrough font~~.

1. Appendix 5 of CX/FA 18/50/7

Food Category 09.2.3 Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms

Additive	INS	Max Level (mg/kg)	EWG Proposal (including proposed change by Japan)	Japan's comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10,000	Adopt at 5000 mg/kg	Japan would like to withdraw our comment on the use of this food additive in this food category. It was confirmed that INS 475 was used in frozen minced fish products fallen into FC 09.2.1, not FC 09.2.3.

Food Category No. 09.2.4.1 Cooked fish and fish products

Additive	INS	Max Level (mg/kg)	EWG Proposal (including proposed change by Japan)	Japan's comments
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	476	5,000	~~Do not adopt in in FC 09.2.4.2~~ **Adopt at 1,000 mg/kg with new note "For use in fish sausage only."**	Japan proposes adoption at 1,000 mg/kg with New note "For use in fish sausage only." INS 476 is used in fish sausage to prevent its contents from adhering to casing film (outer package) by reducing interfacial tension. The maximum use level is 1,000 mg/kg.
SUCROSE ESTERS OF FATTY ACIDS	473	10,000	Adopt as listed with Note 348 **and Note 241**; Add Provisions for INS 473a and 474	Japan proposes addition of Note 241 "For use in surimi products only." INS 473 is used in surimi products only to prevent retrogradation of the products and to maintain their elasticity.

Food Category No. 12.2.1 Herbs and spices

Additive	INS	Max Level (mg/kg)	EWG Proposal (including proposed change by Japan)	Japan's comments
ASCORBIC ACID, L-	300	GMP	Adopt at GMP	Japan would like to withdraw our comments. FC 12.2.1 Herbs and spices (EXCLUDING SPICES) is listed in Annex to Table 3. Table 3 additives can be used in spice in accordance with GMP.
SILICON DIOXIDE, AMORPHOUS	551	GMP	Adopt at GMP	Japan would like to withdraw our comments. FC 12.2.1 Herbs and spices (EXCLUDING SPICES) is listed in Annex to Table 3. Table 3 additives can be used in spice in accordance with GMP.
SODIUM ASCORBATE	301	GMP	Adopt at GMP	Japan would like to withdraw our comments. FC 12.2.1 Herbs and spices (EXCLUDING SPICES) is listed in Annex to Table 3. Table 3 additives can be used in spice in accordance with GMP.

Food Category No. 15.1 Snacks – potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)

Additive	INS	Max Level (mg/kg)	EWG Proposal (including proposed change by Japan)	Japan's comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10,000	Adopt at ~~1000~~**2,000** mg/kg	Japan would like to correct the maximum use level we provided during the eWG. The correct maximum use level is "2,000" mg/kg. Polyglycerol esters of fatty acids are used in fabricated potato chips to give crispness. Japan would like to propose adoption at 2,000 mg/kg.

2. Appendix 1 of CX/FA 18/50/7 Add. 1

Food Category 01.6.4 Processed cheese

Additive	INS	Max Level (mg/kg)	Notes	EWG Proposal (including proposed change by Japan)	Japan's comments
Sucrose esters of fatty acids	473	10000		Adopt at **3,000**~~2,100~~ mg/kg with corrected note 348 (see Japan comment re. INS 473) Also adopt provision for INS 474 in this FC with note 348	Japan proposes maximum use level be changed to 3,000 mg/kg. Sucrose esters of fatty acids are used in processed cheese for further processing to maintain uniform emulsification. Maximum use level is 3,000 mg/kg.
Sucrose oligoesters, type I and type II	473a	1500		Adopt at **3,000**~~2,100~~ mg/kg with corrected note 348 (see Japan comment re. INS 473) Also adopt provision for INS 474 in this FC with note 348	25th Procedural manual states, "Food additives that share a numerical group ADI will be considered as a group without further restrictions on the use of individual additives in that group." Japan proposes maximum use level be changed to 3,000 mg/kg since INS 473a share a numerical group ADI with INS 473 and 474.

Kenya

General Comment on the agenda:

Issue: Discontinuation of food additives

Comment: Kenya support the eWG on all the recommendations where it had recommended discontinuation of the specific food additives

Justification: In all cases of discontinuation, there was no technical justification for use of the identified food additives in those specific food categories.

Issue: Discuss additives in specific food categories

Comment: Kenya supports the eWG where it has recommended that the food additive be discussed in specific food category or moved from parent food category to the specific food category where the technological justification is provided.

Justification: The use of food additives is specific to food category where technological justifications had been provided and not generalize its use to other similar products whose justification had not been provided.

Issue: Holding to current stage awaiting conclusion of discussion by the specific commodity committee

Comment: Kenya supports the recommendation of the eWG to hold the various food additives at current stage where the commodity committees are still working to submit recommendations to CCFA for consideration.

Specific comments

Issue: Additives for food category 02.1.2: Vegetable oils and fats

Comments: For food additive Lecithin, Tricalcium Citrate and Tripotassium Citrate, Kenya supports their adoption with a unified note reading, '*excluding use in virgin oils and olive oils'* instead of using note XS33

Justification: There is need for consistency of notes and the use proposed note will be user friendly and provide clear information without the need of further interpretation or referencing.

Issue: Recommendation 4 of annex 2 of eWG chair proposal for consideration of drafts for table 3

Comment: While the recommendation of the chair is positive, we suggest that this recommendation be discussed together with the report on alignments related to Table 3.

Justification: This will avoid contradiction and ensuring the work on clarification of table 3 is concluded faster.

Issue: Provision related to food category 01.1.1 Fluid milks

Comment: Kenya does not support the use of thickeners, stabilizers and any other food additives in both fluid milk and UHT milk.

Justification: There is no technological justification and/or function for the use of food additives in both fluid milk and UHT milk. The Ultra Heat Treatment to milk stabilizes the product in such a manner that it remains safe for a considerable period of time. As such there is no further technological need to stabilize already stabilized products as it would not provide any further advantage or add more benefits to the consumers as guided by the preamble of the GSFA.

Issue: Food category 12.2: Herbs, spices, condiments

Comment: Kenya does not support the use of food additives in this food category

Justification: Herb by their nature contains the necessary natural compounds to help in their keeping quality if processed under GMP. Addition of food additives to the herbs does not add any advantage to the product and therefore there is no technological justification for their use.

Malaysia

Appendix 1: Comments from the Codex Committee on Fats and Oils (CCFO) on the use of the food additives in food categories/ Comments from the Codex Committee on Processed Fruits and Vegetables (CCPFV) on the use in food categories:

Food category	Additive	INS	Max Level (mg/kg)	eWG proposal	Malaysia's Position
02.1.2 Vegetable oils and fats	LECITHIN	322 (i)	30000	Adopt with new note "excluding use in virgin oils and olive oils."	Supports adoption
02.1.3 Lard, tallow, fish oil, and other animal fats	MONO- AND DIGLYCERIDES OF FATTY ACIDS	471	100000	Adopt with note XS211 and note "for use in fish oil only" and note "for use in oils and fats for deep frying conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981)"	Supports adoption

Appendix 2: Annex 1 Part 1 – Table 3 provision for lutein esters from Tagetes erecta (INS 161b(iii))

Additive	INS	Acceptable, including foods conforming to the following commodity standards	eWG proposal	Malaysia's Position

Lutein esters from Tagetes Erecta	161b (iii)	Proposal 1: Add CODEX STAN 117-1981 "Bouillon and Consommés"	Adopt with CODEX STAN 117-1981	Supports Proposal 1

Appendix 2: Annex 1 Part 2: – Table 3 provision for Octenyl succinic acid (OSA)-modified gum arabic (INS 423):

Additive	**INS**	**Acceptable, including foods conforming to the following commodity standards**	**eWG chair recommendation**	**Malaysia's Position**
Octenyl succinic acid (OSA)-modified gum arabic	423	Proposal 2: Add CODEX STANs 13-1981, 66-1981, 117-1981, 309R-2011, and 254-2007	Adopt with CODEX STANs 13-1981, 66-1981, 117-1981, 309R-2011, and 254-2007	Supports Proposal 2

Appendix 3: Provisions for food additives with Note 22 in FC 09.2.5

Food category	**Additive**	**INS**	**Max Level (mg/kg)**	**eWG final proposal**	**Malaysia's Position**
09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)	AMARANTH	123	300	Discontinue	Supports discontinuation
	TITANIUM DIOXIDE	171	GMP	Discontinue	Supports discontinuation

Appendix 4: Annex 1 – Stabilizers

Food category	**Additive**	**INS**	**Max Level (mg/kg)**	**eWG proposal**	**Malaysia's Position**
01.1.1 (Fluid milk (plain))	CARRAGEENAN	407	10,000	Adopt at ML 400; add new Note "for use in UHT treated milks only"; new Note "only for uses as emulsifier/stabilizer"	Supports adoption
	GELLAN GUM	418	GMP	Adopt at ML 400; add new Note "for use in UHT treated milks only"; new Note "only for uses as emulsifier/stabilizer"	Supports adoption
	SODIUM ALGINATE	401	GMP	Discontinue; No information on use provided	Discontinue

Appendix 4: Annex 2 - Trisodium citrate (INS 331(iii) in food category 01.1.1

Food category	**Additive**	**INS**	**Max Level (mg/kg)**	**eWG proposal**	**Malaysia's Position**

01.1.1 (Fluid milk (plain))	TRISODIUM CITRATE	331(iii)	GMP	Adopt as GMP; add Note 227 "For use in sterilized and UHT treated milks only"; new Note "only for uses as emulsifier/stabilizer"	Supports adoption

Appendix 5: Provisions in Table 1 and 2 of the GSFA in food categories 09.0 through 016.0, with the exception of those additives with technological functions of colour or sweetener, adipates, nitrites and nitrates and the provisions related to FC 14.2.3

Food category	Additive	INS	Max Level (mg/kg)	eWG proposal	Malaysia's Position
12.6.3 Mixes for sauces and gravies	PPROPYLENE GLYCOL ALGINATE	405	8000	Do not adopt	Support for adoption at 8000 mg/kg. Listed under Malaysian Food Regulations 1985 as thickener and emulsifiers.
13.1.1 Infant formulae	TOCOPHEROLS	307a, b, c	10	Adopt at 10 mg/kg with note 72 "on the ready-to-eat basis" and newnote "excluding INS numbers 307a and 307c." – aligns with CODEX STAN 72-1981	Supports adoption
13.1.2 Follow-up formulae	TOCOPHEROLS	307a, b, c	30	Adopt at 30 mg/kg with note 72.	Supports adoption
13.1.3 Formulae for special medical purposes for infants	TOCOPHEROLS	307a, b, c	10	Adopt at 10 mg/kg with note 72 "on the ready-to-eat basis" and newnote "excluding INS numbers 307a and 307c." – aligns with CODEX STAN 72-1981	Supports adoption

Appendix 6: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the exception of food additives provisions with the function of colour and sweetener

Food category	Additive	INS	Max Level (mg/kg)	eWG proposal	Malaysia's Position
01.1.2 (Other fluid milks (plain))	NITROGEN	941	GMP	Adopt as listed	Supports adoption

African Union

Issue: The AU comments with respect to recommendations by the eWG in relation to:

(i). Replies of CCPFV and CCFO,

(ii). Proposed draft provisions for lutein esters from Tagetes erecta and octenyl succinic acid (OSA)-modified gum Arabic

(iii). Provisions for food additives with Note 22 in FC 09.2.5
(iv). Provision for trisodium citrate in FC 01.1.1
(v). Provisions related to FC 01.1.1
(vi). Draft and proposed draft provisions in the GSFA in FC 09.0 to FC 16.0
(vii). Proposed draft provisions related to FC 01.1.2

APPENDIX 1: Replies of Codex Committee on Processed Fruits and Vegetables (CCPFV) and Codex Committee on Fats and Oils (CCFO)

Food Category No. 02.1.2 Vegetable oils and fats		
Additive	**AU Position**	**Justification**
Adipates	Agrees with eWG recommendation to discontinue	No need for adjustment of acidity in edible oils. CCFO indicated that there is no technological justification for its use in oils of this category.
Lecithin	Agrees with eWG recommendation to adopt with new note	Needed as an anti-oxidant in refining process of oil. Pomace oil is processed oil that may require use of food additives such as lecithin.
Tartrates	Agrees with eWG recommendation to discontinue	No need for adjustment of acidity in edible oils. CCFO indicated that there is no technological justification for its use in oils of this category
Tricalcium citrate	Agree with CCFO except that pomace oil should not be excluded.	Exception should be only on virgin oils.
Tripotassium citrate	Agree with CCFO except that pomace oil should not be excluded.	Exception should be only on virgin oils.
Food Category No. 02.1.3 Lard, tallow, fish oil, and other animal fats		
Adipates	Agrees with eWG recommendation to discontinue	No need for adjustment of acidity in edible oils. CCFO indicated that there is no technological justification for its use in oils of this category.
Lecithin	Agrees with eWG recommendation to adopt.	The technological justification as proposed by CCFO is justified.
Mono-and diglycerides of fatty acids	AU supports proposal of eWG.	AU agrees with technological justification offered by CCFO for use mainly as antifoaming agent in deep frying oils and fats.
• Polyglycerol esters of fatty acids; • polyglycerol esters of interesterified ricinoleic acid; • potassium dihydrogen citrate; • propylene glycol alginate; • sodium alginate;	AU supports discontinuation of work on the food additives as proposed by the eWG	CCFO indicated that there is no technological justification for their use in this food category.

• sodium dihydrogen citrate; • tartrates; • tricalcium citrate; • tripotassium citrate		
Tocopherols in FC, 04.1.2 and sub-FC 04.1.2.1, 04.1.2.2, 04.1.2.3, 04.1.2.4, 04.1.2.5, 04.1.2.6, 04.1.2.7, 04.1.2.10	AU agrees with eWG to discuss in specific subcategories	Clarity on the technological justification by CCPFV is needed because the tocopherols are not adopted in food category 04.1.2 of the GSFA
FC. 04.1.2.3 Fruit in vinegar, oil or brine — Tartrates	AU proposes that we discuss the use in this category	Clarity on the technological justification by CCPFV is needed because the tocopherols are not adopted in category 04.1. in the GSFA and in CS 260-2007.
FC 04.1.2.5 Jams, Jellies and Marmalades: Propylene Glycol Alginate	AU requests further clarification on intended use of the additive before adoption	Clarity on the technological justification that was given by CCPFV, does not provide enough information on the use of the additive. The standard referenced in the technological justification(CS 296-20089). does not contain the provision for propylene glycol aginate
FC 04.1.2.12 (Cooked fruit): Tocopherols	Agrees with eWG recommendation to discontinue	Clarity on the technological justification by CCPFV is needed because the tocopherols are not adopted in category 04.1.2 in the GSFA

APPENDIX 2: Proposed draft provisions for lutein esters from Tagetes erecta (INS 161b(iii)) and octenyl succinic acid (OSA)-modified gum arabic (INS 423) in Table 3

Issues: The 82nd JECFA meeting evaluated the safety of lutein esters from Tagetes erecta (INS 161b(iii)) and octenyl succinic acid (OSA)-modified gum arabic (INS 423). This review resulted in an ADI of "*not specified*" for both food additives. As a result, the 82nd JECFA recommended that CCFA50 include provisions for both food additives in Table 3 of the GSFA and circulate the provisions for comment at Step 3. CCFA49 agreed to include provisions for lutein esters from Tagetes erecta and OSA-modified gum arabic in Table 3 of the GSFA and requested that the eWG on the GSFA to CCFA50 circulate these Table 3 provisions for comment at step 3.

a) Lutein esters from Tagetes erecta (INS 161b(iii))

Issue 1: Proposal 1: The use of Lutein esters from Tagetes erecta (INS 161b(iii)) in CODEX STAN 117-1981 "Bouillon and Consommés"

Position: AU supports this proposal.

Rationale: The color is technologically justifiable to be used in "Bouillon and Consommés" and does not have ADI and hence can be regulated by GMP.

Issue 2: Proposals 2 and 3: The use of the Lutein esters from Tagetes erecta in CODEX STAN 871981 "Chocolate and Chocolate Products"; 105-1981 "Cocoa powders" and 141-1983 "Cocoa mass

Position: AU supports the proposals of the eWG

Rationale: The color of Lutein esters from Tagetes erecta is not compatible and may mislead the consumer and there is no technical justification

b) Octenyl succinic acid (OSA) - modified gum arabic

Issue 3: Use of Octenyl succinic acid (OSA) - modified gum Arabic (as GMP) in Table 3

Position: The AU supports the adoption of a provision for use Octenyl succinic acid (OSA) - modified gum Arabic (as GMP) in Table 3. However, we propose the final decision to be made after conclusion of Agenda 4b (Revision of Table 3)

Rationale: To avoid contradiction after revision of Agenda 4b

Issue 4: Recommendation 1 and 2 related to inclusion of food additives in table 3 of the GSFA

Position: AU supports this recommendation.

Rationale: It will help the CCFA in concluding work on most of the pending additives with ADI-Not Specified.

Issue 5: Recommendation 3: To revise circular letter for new and/or revision of food additive provision of the GSFA.

Position: AU supports this recommendation.

Rationale: It will add clarity to circular letters.

Issue 6: Recommendation 4: To send request to the working group on alignment to consider revising the reference to commodity standards for GSFA table 3 additive section.

Position: AU does not support recommendation 4.

Rationale: Issue is discussed under agenda 4(b).

APPENDIX 3: Provisions for food additives with Note 22 in FC 09.2.5

Issue: Adoption of the provisions of for food additives with Note 22 in FC 09.2.5

Position: AU supports the recommendations of the eWG to discontinue

Rationale: There is no technological justification.

APPENDIX 4: Provisions related to FC 01.1.1

Issue: Adoption for the use of stabilizers in food category 01.1.1 (Fluid milk (plain)) –Carragenan, gelan gum, gua gum, microcrystalline cellulose gel, mono and di-glycerides of fatty acids, sodium alginate, polydextroses and sodium alginate, sodium carboxymethylcellulose gum and use of Trisodium citrate (INS 331(iii)) in UHT and sterilized products conforming to food category 01.1.1;

Position: AU does not support inclusions of the additives listed in above in fluid milk:

Rationale: There is no technological justification to use the additives in milk.

APPENDIX 5: Provisions in Table 1 and 2 of the GSFA in food categories 09.0 through 016.0, with the exception of those additives with technological functions of color or sweetener, adipates, nitrites and nitrates and the provisions related to FC 14.2.3

FC 09.0 Fish and fish products, including mollusks, crustaceans, and echinoderms		
Additive	AU Recommendation	Rationale
Polyglycerol Esters Of Fatty Acids And Polyglycerol Esters Of Interesterified Ricinoleic Acid	AU supports the recommendation of the eWG to discontinue in parent category; but discuss in subcategories	It has no Corresponding commodity standards. Multiple standards apply to subcategories, some of which do not allow food additives
Food Category No. 09.1.1 Fresh fish		
Additive	AU Recommendation	Rationale
Polyglycerol Esters Of Fatty Acids	The AU does not support the adoption of the food additives.	Acidity regulators and ES&T are not justified in this food category on a general basis.
Polyglycerol Esters Of Interesterified Ricinoleic Acid 476	The AU does not support the adoption of the food additives	Acidity regulators and ES&T are not justified in this food category on a general basis.
Food Category No. 09.1.2 Fresh mollusks, crustaceans, and echinoderms		
Polyglycerol Esters of Fatty Acids 475	The AU does not support the adoption of the food additives	Acidity regulators and ES&T are not justified in this food category on a general basis.
Polyglycerol Esters of Interesterified Ricinoleic Acid 476	The AU does not support the adoption of the food additives	Acidity regulators and ES&T are not justified in this food category on a general basis.
Food Category No. 09.2 Processed fish and fish products, including mollusks, crustaceans, and echinoderms		
Glycerol 422	The AU supports moving to FC 09.2.1	Multiple standards apply to subcategories, some of which do not permit the use of food additives
Food Category No. 09.2.1 Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		
Glycerol 422	The AU supports request for further information to be requested on use in 'non-standardized food'.	There is need for clarity on which foods will be considered as 'non-standardized'.

Polyglycerol Esters Of Fatty Acids 475	AU supports adoption at 5000 mg/kg with Note 241 “For use in surimi products only	Information provided for the specific use.
Polyglycerol Esters Of Interesterified Ricinoleic Acid 476	The AU does not the adoption in FC 09.2.1	No information provided on use.
Sucrose Esters Of Fatty Acids	AU supports discontinuation of work	No information on technological justification provided
Food Category No. 09.2.2 Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms		
Polyglycerol Esters Of Fatty Acids 475	The AU does not support the adoption of the food additives in FC 09.2.2	Information not provided on use.
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Tocopherols 307a, B, C	AU supports adoption at 200 mg/kg with Note XS166	CS 166 specifies the only additives to be used.
Food Category No. 09.2.3 Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms		
Polyglycerol Esters Of Fatty Acids 475	AU Supports Adoption at 5000 mg/kg	Information provided on use
Polyglycerol Esters Of Interesterified Ricinoleic Acid	The AU does not support the adoption of the food additives in FC 09.2.3	Information on “use” not provided
Food Category No. 09.2.4 Cooked and/or fried fish and fish products, including mollusks, crustaceans, and echinoderms		
Lauric Arginate Ethyl Ester 243	AU supports discontinuation of work.	No information provided on technological justification.
Sucrose Esters Of Fatty Acids 473	AU supports discontinuation in parent category;	The use of the food additive should be discussed in each of the subcategories taking into account the technological justification in each one of them.
Food Category No. 09.2.4.1 Cooked fish and fish products		
Sodium Diacetate 262(li)	AU supports discontinuation of work	Information on technological justification not provided on request.
Polyglycerol Esters Of Fatty Acids 475	AU supports adoption at 1000 mg/kg with new note "For use in fish sausage only."	Information provided on use in fish sausages.
Polyglycerol Esters Of Interesterified Ricinoleic Acid	The AU does not support the adoption of the food additives in FC 09.2.4.1;	The proposal does not provide the technological justification of its use.
Sucrose Esters Of Fatty Acids 473	AU supports adoption with note 241 “For use in surimi products only’	Information provided only on use in surimi products.
Food Category No. 09.2.4.2 Cooked mollusks, crustaceans, and echinoderms		
Polyglycerol Esters Of Fatty Acids 475	AU supports the recommendation of eWG not to adopt in in FC 09.2.4.2	Emulsifiers, Stabilisers &Thickeners are not justified in this category
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Sucrose Esters Of Fatty Acids	AU supports the recommendation of the eWG not to adopt the food additive	No technological justification has been provided.
Food Category No. 09.2.4.3 Fried fish and fish products, including mollusks, crustaceans, and echinoderms		
Polyglycerol Esters Of Fatty Acids 475	AU supports the adoption of ML of 5000 mg/kg with Note 41 ”For use in breading or batter coatings only’	ET and S justified with note 41.

Polyglycerol Esters of Interesterified Ricinoleic Acid	AU does not support inclusion of this additive in this sub-category	Information on “use” not provided
Sucrose Esters Of Fatty Acids		
Sorbitan Esters ofFatty Acids 491-495	AU supports discontinuation of work	No information on technological justification has been provided
Food Category No. 09.2.5 Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms		
Lauric Arginate Ethyl Ester 243	AU supports discontinuation	No information on technological justification.
Polyglycerol Esters of Fatty Acids 475	AU does not support its inclusion in FC 09.2.	Information on “use” not provided
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
phosphates 338; i)(iii);340(i)(iii); 341(i)(iii); 342(phosphates 338; 339(i)(iii); 340(i)(iii); 341(i)(iii); 342(phosphates 338; 339(i)(iii); 340(i)(iii); 341(i)(iii); 342	AU supports adoption as listed with Notes 33, 334, XS167, XS 189, XS 236, XS244, XS311, 334, and “INS 452(i-v) only in products conforming to the Standard for Crackers From Marine and Freshwater Fish, crustacean and Molluscan Shellfish CS 222-2001	Additives eg sequestrants etc, are not permitted in the excluded food standards.
Sorbitan Esters Of Fatty Acids 491-495	AU supports discontinuation of work on this class of additives	No information on technological justification provided
Sucrose Esters Of Fatty Acids 473		
Food Category No. 09.3.1 Fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly		
Lauric Arginate Ethyl Ester 243	AU supports discontinuation of work on this additive	No information on technological justification provided.
Polyglycerol Esters of Fatty Acids 475	Adopt at 1000 mg/kg with new note "For use in marinated products only."	Information provided on use in marinated products.
Polyglycerol Esters Of Interesterified Ricinoleic Acid 476	AU does not support adoption in FC 09.3.1;	Information on “use” not provided
Food Category No. 09.3.2 Fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine No corresponding commodity standard.		
Lauric Arginate Ethyl Ester243	AU supports discontinuation of work.	No information on technological justification provided on request
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Polyglycerol Esters of Fatty Acids 475	AU supports adoption at 1000 mg/kg with new note "For use in pickled products only."	Used in some countries in pickled products.
Food Category No. 09.3.3 Salmon substitutes, caviar, and other fish roe products		
Lauric Arginate Ethyl Ester 243	Need to request technological justification information	Standard allows use of table preservatives.
Polyglycerol Esters Of Fatty Acids 475	AU does not support adoption in this category	Information on “use” not provided
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Food Category No. 09.3.4 Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g. fish paste), excluding products of food categories 09.3.1 - 09.3.3 No corresponding food standards.		
Lauric Arginate Ethyl Ester 243	AU supports discontinuation of work	No information provided on technological justification.

Polyglycerol Esters Of Fatty Acids 475	AU supports no adoption in this particular category	Information on "use" not provided
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Food Category No. 09.4 Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms.		
Polyglycerol Esters Of Fatty Acids 475	AU does not support adoption in FC 09.4	Information on "use" not provided
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Sucrose Esters Of Fatty Acids 473	AU supports discontinuation of work	No information on technological justification provided on request.
Sucrose Oligoesters, Type I And Type Ii 473a		
Sucroglyceride S 474		
Tartrates334, 335(Ii), 337		
Food Category No. 10.0 Eggs and egg products		
Food Category No. 10.2 Egg products		
Polyglycerol Esters Of Fatty Acids Polyglycerol Esters Of Interesterified Ricinoleic Acid	AU does not support the adoption these additives FC 10.2	More information on technological justification is needed
Sodium Diacetate	AU supports the WG proposal to request information on technological justification	
Food Category No. 10.2.1 Liquid egg products		
Aluminium Sulfate	AU does not support the adoption	There is need to reduce the aluminium-containing food additives as recommended by JECFA. According to paragraph 21, REP14/FA, "the Committee recalled that JECFA had established a new PTWI of 2 mg/kg body weight for aluminium from all sources and that CCFA had revised the provisions for aluminium-containing food additives in several commodity standards, as well as in the GSFA, in response to the JECFA recommendation to decrease the use of aluminium-containing food additives to the extent possible."
Nisin	AU Supports the eWG proposal to adopt as listed	Liquid egg products can carry gram positive bacteria even after pasteurization
Propylene Glycol Alginate Stearoyl Lactylates	AU does not support the adoption	There is need to provide information on technological justification before adoption
Food Category No. 10.2.2 Frozen Egg Products		

Aluminium Sulfate	AU supports the recommendation of the eWG to discontinue work on aluminium sulfate for FC 10.2.2	Reduce the aluminium-containing food additives as recommended by JECFA. According to paragraph 21, REP14/FA, "the Committee recalled that JECFA had established a new PTWI of 2 mg/kg body weight for aluminium from all sources and that CCFA had revised the provisions for aluminium-containing food additives in several commodity standards, as well as in the GSFA, in response to the JECFA recommendation to decrease the use of aluminium-containing food additives to the extent possible."
Dextrins, Roasted Starch	AU Supports the eWG proposal	
Propylene Glycol Alginate Stearoyl Lactylates	AU does not support the adoption	There is need to provide information on technological justification before adoption
Food Category No. 10.2.3 Dried And/Or Heat Coagulated Egg Products		
Stearoyl Lactylates	AU does not support the adoption	There is need to provide information on technological justification before adoption
Food Category No. 10.3 Preserved Eggs, Including Alkaline, Salted, And Canned Eggs		
Sodium Diacetate	AU Supports the eWG proposal	There is need to provide information on technological justification before adoption
Food Category No. 10.4 Egg-Based Desserts (E.G. Custard)		
Polyglycerol Esters Of Fatty Acids	AU could adopt if technical justification has been provided	Technical justification is needed
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Propylene Glycol Alginate		
Sodium Diacetate		
Sorbitan Esters Of Fatty Acids		
Stearoyl Lactylates	AU supports the WG proposal to request technological justification	Request information on technological justification
Sucrose Esters Of Fatty Acids	AU supports the eWG recommendation to discontinue on these additives	Request information on technological justification and use level
Sucrose Oligoesters, Type I And Type Ii		
Sucroglycerides		
Tartrates		
F.C. 11.3 Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3 **F.C. 11.4 Other sugars and syrups (e.g. xylose, maple syrup, sugar toppings)**		
Invertases	AU supports the recommendation of the eWG to discontinue the use of invertases as stabilizer	Invertase has no Corresponding commodity standards. The use of acidity regulators, emulsifiers, stabilizers, and thickeners is not justified in this food category on a

		general basis rather it should be specific to food category.
F.C. 11.4 Other sugars and syrups (e.g. xylose, maple syrup, sugar toppings)		
Propylene Glycol Alginate	AU supports the recommendation of the eWG to adopt ML of 10,000 mg/kg	Codex developed the horizontal approach for use of food additives in Table 3 while those with numerical ADIs are for scenarios where exposure needs to be controlled. Propylene glycol alginate is used in syrups for fine bakery wares and ices (e.g. caramel syrup, flavoured syrups) to achieve consistent viscosity thus use at proposed level of 10,000 mg/kg will achieve this functional use sufficiently without exposing consumers to any adverse effect.
F.C. 11.6 Table-top sweeteners, including those containing high-intensity sweeteners		
Ethyl Maltol	AU supports discontinuation of work on ethyl maltol	No information provided on on actual use level
Tartrates	Adopt at 2,000 mg/kg	Not a GMP, as proposed in the 2nd circular proposal because it has an ADI
F.C. 12.2 Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles) **F.C. 12.2.1 Herbs and spices**		
F.C. 12.2: Tocopherols	AU does not support the proposal by the eWG to adopt a maximum level of 1000mg/kg, for use as antioxidants	There is need to request the relevant commodity committee to provide the technological justification to use food additives in herbs and spices. Naturally, herbs and spices intrinsically contain these proposed additives.
F.C. 12.2.1: Ascorbic Acid, L-	AU does not support the proposal by the eWG to adopt at GMP	
F.C. 12.2.1: Magnesium Stearate	AU does not support the proposal by the eWG to adopt at GMP	AU recommends that the CCSCH should be requested to provide guidance on the technological justification for these.
F.C. 12.2.1: Silicon Dioxide, Amorphous	AU does not support the proposal by the eWG to adopt at ML for silicon dioxide, amorphous at GMP	
F.C. 12.4 Mustards		
Propylene Glycol	AU supports the recommendation of the eWG to discontinue the use of Propylene Glycol as an emulsifier, glazing agent, humectant	There is no information on technological justification

Stearoyl Lactylates	AU does not support the position of the eWG to adopt Stearoyl Lactylates as an emulsifier, flour treatment agent, foaming agent, and stabilizer, but to discontinue the work	There is no information on technological justification
Tartrates	AU supports the recommendation of the eWG to discontinue the use of Tartrates	No technological justification has been provided for use of tartrates in mustards
Tocopherols	AU supports the recommendation of the eWG on the use of tocopherols as antioxidants	The use of tocopherols as an antioxidant will help preserve a favourable taste profile of products in this food category because these products contain ingredients known to be sensitive to oxidation
F.C. 12.5 Soups and broths		
Propylene Glycol Alginate	AU supports discontinuation of work	This food additive is not listed in CS 117-1981, which is already aligned
Sodium Diacetate	AU supports the adoption of ML for sodium diacetate at 500 mg/kg	The additive is technologically justified for use in both standardized and non-standardised foods
Tartrates	AU supports discontinuation of work	There is no technological justification for use in both standardized and non-standardised foods
F. C. 12.5.1 Ready-to-eat soups and broths, including canned, bottled, and frozen **F.C. 12.5.2 Mixes for soups and broths**		
Nisin	AU does not support adoption	The food additive is not listed in CS 117-1981, which is already aligned
Polyglycerol Esters Of Fatty Acids	AU does not support adoption	Polyglycerol esters of fatty acids are not covered by CS 117-1981.
Propylene Glycol Alginate	AU supports discontinuation of work	There is no technological justification for use in both standardized and non-standardized foods
F.C. 12.6 Sauces and like products		
Sucrose Esters of Fatty Acids	AU supports the recommendation of the eWG to adopt a ML of 10,000 mg/kg with Note 348	Sucrose esters of fatty acids prevent separation of oil and fat and provide stable emulsification.
Sucrose Oligoesters, Type I And Type II	AU supports the recommendation of the eWG to adopt with Note 348	Sucrose oligoesters, type I and type II prevent separation of oil and fat and provide stable emulsification.

F.C. 12.6.1 Emulsified sauces and dips (e.g. mayonnaise, salad dressing, onion dip)		
Dioctyl Sodium Sulfosuccinate	AU supports discontinuation of work	Technological justification has not been provided
Polyglycerol Esters of Fatty Acids	AU supports the recommendation of the eWG to adopt ML of polyglycerol esters of fatty acids at ML of 5,000mg/kg as emulsifier and stabilizer	Polyglycerol esters of fatty acids are used in salad dressing to prevent oil separation.
Polyglycerol Esters of Interesterified Ricinoleic Acid	AU supports the recommendation of the eWG to adopt ML at5,000mg/kg as emulsifier	Polyglycerol esters are used to prevent oil separation.
Propylene Glycol Alginate	AU supports the recommendation of the eWG to adopt ML of 8,000mg/kg for Propylene Glycol Alginate	Propylene glycol alginate provides emulsification in sauces that may include multiple components, such as oil and water, that are naturally immiscible.
Sodium Diacetate	AU supports the recommendation of the eWG to adopt sodium diacetate as acidity regulator, preservative, sequestrant	Sodium diacetate dissociates into acetic acid and sodium acetate. This enables it to function both as a buffer/an acidity regulator in the emulsified sauce/dressing as well as an effective antimicrobial agent for inhibiting the growth of yeast & mold and spoilage bacteria.
Sorbitan Esters of Fatty Acids	AU supports the recommendation of the eWG to adopt at 5,000mg/kg	Sorbitan esters of fatty acids are used in dressing to prevent oil separation.
Stearoyl Lactylates	AU supports the recommendation of the eWG to adopt as listed	Stearoyl lactylates are used to provide emulsification in sauces and dressings to help maintain oil and water mixtures
Tartrates	AU does not support adoption of tartrates as emulsifier	No technological justification is provided
Tocopherols	AU supports the recommendation of the eWG to adopt as listed	Tocopherols, as fat soluble antioxidants, are an effective means to retard oxidation and rancidity development.
F.C. 12.6.2 Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)		
Polyglycerol Esters Of Fatty Acids	AU supports the recommendation of the eWG to adopt ML for polyglycerol esters of fatty acids	Polyglycerol esters of fatty acids are used in white

	at 5,000mg/kg	sauce to prevent separation of oil and fat.
Polyglycerol Esters of Interesterified Ricinoleic Acid	AU supports the recommendation of the eWG NOT to adopt this additive	No technological justification provided
Propylene Glycol	AU supports the recommendation of the eWG NOT to adopt this additive	No technological justification provided
Propylene Glycol Alginate	AU supports the recommendation of the eWG to adopt as listed	Propylene glycol alginate is used in cheese sauce to increase viscosity of the product
Sodium Diacetate	AU supports the recommendation of the eWG to adopt ML of sodium diacetate at 2,500mg/kg	Sodium diacetate dissociates into acetic acid and sodium acetate. This enables it to function both as a buffer/an acidity regulator in the emulsified sauce/dressing as well as an effective antimicrobial agent for inhibiting the growth of yeast & mold and spoilage bacteria.
Sorbitan Esters Of Fatty Acids	AU supports the recommendation of the eWG NOT to adopt, but to discontinue work on this additive	No technological justification is provided
Stearoyl Lactylates	AU supports adoption with Note XS306R	Emulsifier, Flour treatment agent, Foaming agent, Stabilizer
Tartrates	AU supports the recommendation of the eWG NOT to adopt	No technological justification provided
Tocopherols	AU supports the recommendation of the eWG to adopt as listed	Tocopherols prevent oxidation which can impact the taste and texture of certain sauces, particularly those high in oil or fat content.
12.6.3 Mixes for sauces and gravies		
Polyglycerol Esters Of Fatty Acids	AU supports the adoption at 5,000 mg/kg.	Used to uniformly disperse oil in finished sauce.
Polyglycerol Esters Of Interesterified Ricinoleic Acid	AU supports adoption of ML for the additives at 5,000 mg/kg.	Polyglycerol esters of interestified ricinoleic acid are used to prevent oil separation.
Propylene Glycol Alginate	AU supports the recommendation of the eWG NOT to adopt	No technological justification provided

Sodium Diacetate	AU supports the recommendation of the eWG to adopt at 2,500mg/kg	Sodium diacetate dissociates into acetic acid and sodium acetate. This enables it to function both as a buffer/an acidity regulator in the emulsified sauce/dressing as well as an effective antimicrobial agent for inhibiting the growth of yeast & mold and spoilage bacteria.
Sorbitan Esters Of Fatty Acids	AU supports the recommendation of the eWG to adopt ML for the additives at 50mg/kg	Sorbitan esters of fatty acids are used to prevent oil separation in dehydrated curry sauce.
Stearoyl Lactylates	AU supports the recommendation of the eWG to discontinue work on stearoyl lactylates	No technological justification provided
Sucrose Oligoesters, Type I And Type Ii	AU supports the recommendation of the eWG to discontinue	No technological justification provided
Tartrates	AU supports the recommendation of the eWG to adopt ML for tartrates at 5,000mg/kg	Tartrates Polyglycerol esters of fatty acids are used as stabilizer in concentrated sauce to uniformly disperse oil in finished sauce.
Tocopherols	AU supports the recommendation of the eWG to adopt as listed	Tocopherols prevent oxidation which can impact the taste and properties of sauces when they are rehydrated
12.6.4 Clear sauces (e.g. fish sauce)		
Polyglycerol Esters Of Fatty Acids	AU supports the recommendation of the eWG to discontinue work on polyglycerol esters of fatty acids	No technological justification provided
Polyglycerol Esters of Interesterified Ricinoleic Acid	AU supports the recommendation of the eWG to discontinue polyglycerol esters of interesterified ricinoleic acid	No technological justification provided
Propylene Glycol Alginate	AU supports adoption with Note XS306R	
Sodium Diacetate	AU supports adoption with Note XS306R	
Stearoyl Lactylates	AU supports the recommendation of the eWG to discontinue work on stearoyl lactylates	No technological justification provided
Tartrates	AU supports the recommendation of the eWG to discontinue on tartrates	No technological justification provided

Tocopherols	AU supports the recommendation of the eWG to discontinue work on tocopherols	No technological justification provided
12.7 Salads (e.g. macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3		
Polyglycerol Esters of Interesterified Ricinoleic Acid	AU supports the recommendation of the eWG to discontinue work on these additives	No technological justification provided
Sodium Diacetate	AU supports adoption of ML for sodium diacetate at 3,000mg/kg	Sodium diacetate is an effective antimicrobial agent for inhibiting the growth of yeast, mold and spoilage bacteria
Tocopherols	AU supports the recommendation of the eWG to discontinue work on tocopherols	No technological justification provided
F.C. 12.8 Yeast and like products		
Sorbitan Esters Of Fatty Acids	AU supports the recommendation of the eWG to adopt as listed	Sorbitan esters of fatty acids are used in dry yeast to improve the drying and rehydration properties of yeasts that are dried to very low water content. The material stabilizes the yeast cells during drying and increases the rehydration of the yeast in the dough, resulting in quicker fermentation and better batter properties (emulsification)
Tocopherols	AU supports the recommendation of the eWG to discontinue	No technological justification provided
F.C. 12.9.1 Fermented soybean paste (e.g., miso)		
Benzoates	AU supports adoption with note excluding INS 213 and for use in foods corresponding to CS 298R-2009 only	
F.C. 12.9.2.1 Fermented soybean sauce		
Benzoates	AU supports the recommendation of the eWG to request further information on exposure in context of JECFA evaluation	No technological justification provided
F.C. 12.9.2.3 Other soybean sauces		
Benzoates	AU supports the recommendation of the eWG to adopt at 1000mg/kg	
• **Food Category No. 13.1.1 Infant Formulae** • **Food Category No. 13.1.3 Formulae For Special Medical Purposes For Infants** • **Food Category No. 13.1.2 Follow-Up Formulae** • **Food Category No. 13.2 Complementary Foods For Infants And Young Children** • **Food Category No. 13.3 Dietetic Foods Intended For Special Medical Purposes (Excluding Products Of Food Category 13.1**)		
Ins 307 A,B,C - Tocopherols	AU Supports adoption at 10 mg/kg with	Codex Stan 72 on follow up formula allows use of the additive thus adoption of the

	Note 72 “on the ready-to eat basis” and new note “excluding INS numbers 307a and 307c.”– aligns with CODEXSTAN 721981	additive will provide for consistency in the codex text.
Food Category No. 13.2 Complementary Foods For Infants And Young Children		
Ins 304 And 305 - Ascorbyl Esters	AU Supports further discussion of the food additive as recommended by the eWG	There is need to provide more justification on the technological need for this food additive in the products.
• Carrageenan (Ins 407) • Propylene • Glycol Alginate (Ins 405) • Sodium • Diacetate (Ins 262ii) • Sucrose Esters • Of Fatty Acids (Ins 473)	AU supports discontinuation of work on the food additives	The additives are not listed in the respective commodity standard thus there is no technological justification for their use.
TARTRATES INS 334, 335(Ii),337	AU Supports the recommendation to adopt the additive	There technological justification to use the additive as Acidity regulator, Emulsifying salt, Sequestrant or Stabilizer in the products
Food Category No. 13.3 Dietetic Foods Intended For Special Medical Purposes (Excluding Products Of Food Category 13.1)		
Polyglycerol Esters Of Fattyacids – Ins 475	AU does not support the eWG recommendation	There is need to request from the responsible committee the technological justification for use of this additive
Polyglycerol Esters Of Interesterified Ricinoleic Acid Ins 476	AU Supports the eWG recommendation to discontinue the additive	There is no technical justification provided for use of this food additive
• Propylene Glycol Alginate Ins 405 • Sorbitan Esters Of Fatty Acids Ins 491 – 495 • Stearoyl Lactylates (Ins 481i, 482i) • Sucrose Esters Of Fatty Acids Ins 473 • Sucrose Oligoesters, Type I And Type Ii Ins 473a	AU Supports the recommendation of eWG group to adopt these food additives at proposed levels	The additives have been evaluated for safety and there is technological justification to use the food additives.
• Sucroglycerides Ins 474 • Tartrates Ins 334, 335(Ii),337	AU Supports discontinuation of work on these additives	There is no technological justification for their use
Food Category No. 13.4 Dietetic Formulae For Slimming Purposes And Weight Reduction		
Polyglycerol Esters Of Fatty Acids Ins 475	AU Supports adoption of ML for the additives at 1000 mg/kg	Its technological justification especially related to protein denaturation is important for these products
Polyglycerol Esters Of Interesterified Ricinoleic Acid Ins 476	AU supports the discontinuation of work on the food additive in this category.	There is no technological justification for its use
• Sucrose Esters Of Fatty Acids Ins 473 • Sucrose Oligoesters, Type I And Type Ii Ins 473 A • Sucroglyceride S Ins 473c	AU supports discontinuation of work on the food additives in this category.	There is no technological justification for their use

• Tartrates		
Food Category No. 13.5 Dietetic foods (e.g. supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6		
• Sorbitan Esters Of Fatty Acids • Tocopherols	AU supports the eWG recommendation to adopt the food additive	There use in the products emulsifiers and stabilizers respectively are technologically justified
Food Category No. 13.6 Food supplements		
All additives listed	AU supports the adoption of the eWG recommendation	The use of the additives in food supplements as stabilizers, glazing agents, humectant. These uses in food supplements due to their nature and size are technologically justified.

Food Category No. 14.2.7 Aromatized alcoholic beverages (e.g. beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)		
Additive	**AU Recommendation**	**Rationale**
Ins 414-Gum Arabic (Acacia Gum)	AU Supports the eWG recommendation to discontinue work on the additive	Safety evaluation has not been done for use of the additive to infants especially those below 12 weeks.
• **Food Category No. 14.1.2.1 Fruit juice** • **Food Category No. 14.1.2.3 Concentrates for fruit juice** • **Food Category No. 14.1.2.4 Concentrates for vegetable juice** • **Food Category No. 14.1.3 Fruit and vegetable nectar** • **Food Category No. 14.1.3.1 Fruit nectar** • **Food Category No. 14.1.3.3 Concentrates for fruit nectar**		
All additives under this category	AU Strongly supports the eWG to hold discussion of the additives pending replies to the CL	The commodity committees should provide the technological justification for use of these food additives and allow time for further discussion in the specific food additives.
Food Category No. 14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks		
• Dioctyl Sodium Sulfosuccinate - Ins 480 • Ethyl Maltol – Ins 637 • Maltol – Ins 636	AU does not support adoption of this food additive as recommended by the eWG	The ADI for these additives as established by JECFA is so low (Maximums of 0.1 mg/kg, 2mg/kg, 2mg/kg respectively) as compared to the proposed levels of additions (10, 200 and 200 mg/kg) and thus need to determine any risk of exposure especially to vulnerable groups before a final decision is done AU therefore proposes that the additive is held at this step further information related to exposure risk is gathered
• Polyglycerol Esters Of Fatty Acids – Ins 475 • Polyglycerol Esters ofInteresterified Ricinoleic Acid - Ins 476 • Propylene Glycol Alginate - Ins 405	AU supports the eWG recommendation to request information on types of products and use levels in subcategories	The ADI established for the additives (0-25 mg/kg bw, 0-7.5 mg/kg bw and 0-70 mg/kg bw) are relatively low and thus there is need to carry out risk assessment before a decision is arrived at.
• Polyoxyethylen Estearates – Ins 430, 431	AU supports the eWG to adopt the proposed level	The level proposed is technologically justifiable

• Sodium Diacetate – Ins 262i • Tartrates – Ins 334, 335(Ii),337		
• Sorbitan Esters Of Fatty Acids Ins 491-495 • Stearoyl Lactylates Ins 481i, 482i	AU supports the eWG recommendation to discuss the use of this food additives in subcategories	There is need to provide the specific technological justification for the specific subcategory where the food additive is intended
Tocopherols ins 307a, b, c	AU supports the eWG recommendation to adopt use at 200mg/kg	Its use as an antioxidant is technological justifiable
Food Category No. 14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades		
Propylene Glycol Ins 1520	AU supports the recommendation of the eWG to adopt at maximum level of 1000 mg/kg	The level proposed is calculated based on JECFA results of evaluation which provided an ADI of 0 – 25 mg/kg bwt
• Polyglycerol Esters Of Fatty Acids – Ins 475 • Polyglycerol Esters Of Interesterified Ricinoleic Acid – Ins 476 • Sorbitan Esters Of Fatty Acids Ins 491 -495 • Stearoyl Lactylates Ins – 481i, 482i • Sucrose Esters Of Fatty Acids – Ins 473 • Sucroseoligoesters, Type I And Type Ii – Ins 473a • Sucroglycerides Ins 474 • Tartrates • Tocopherols 307 A,B,C	AU supports the eWG recommendation to seek further information and discuss the use of these food additives further in future sessions of CCFA	The technological justification as well as the safety aspects of using these food additives is not clear and thus the need to seek more information about the additives.
No. 14.1.4.3 Concentrates (Liquid Or Solid) For Water-Based Flavoured Drinks		
Propylene Glycol Ins 1520	AU supports the recommendation of the eWG to adopt at maximum level of 1000 mg/kg	The level proposed is calculated based on JECFA results of evaluation which provided an ADI of 0 – 25 mg/kg bwt
• Propylene Glycol Alginate – Ins 405 • Polyglycerol Esters Of Fatty Acids – Ins 475 • Polyglycerol Esters Of • Interesterified Ricinoleic Acid – Ins 476 • Sorbitan Esters Of Fatty Acids – Ins 491-495 • Stearoyl Lactylates – Ins 481(I),482(I) • Sucrose Esters Of Fatty Acids – Ins 473 • Sucrose Oligoesters, Type I And Type Ii – Ins 473 A • Sucroglycerides – Ins 474 • Tartrates Tocopherols 307 A,B,C	AU supports the eWG recommendation to seek further information and discuss the use of these food additives further in future sessions of CCFA	The technological justification as well as the safety aspects of using these food additives is not clear and thus need to seek for more information about the additives.
Food Category No. 14.1.5 Coffee, Coffee Substitutes, Tea, Herbal Infusions, And Other Hot Cereal And Grain Beverages, Excluding Cocoa		
Ethyl Maltol – Ins 637	AU does not support the eWG recommendation	There is need to provide the technological justification of the

Maltol – Ins 636	AU Supports the eWG recommendation to discuss further use maltol as flavour enhancer	use of ethyl maltol as a flavour enhancer
• Polyglycerol Esters Of Fatty • Acids – Ins 475 • Polyglycerol Esters Of • Interesterified Ricinoleic Acid – Ins 476 • Propylene Glycol Alginate – Ins 405 • Protease From Aspergillus – Ins 1101i • Stearoyl Lactylates – Ins 481i, 482ii • Sucrose Oligoesters, Type I And Type Ii Ins 473a • Sucroglycerides Ins 474	AU does not support the eWG recommendation to adopt the proposed levels with note 161	The use of note 161 as is the case in previous food additives introduces ambiquity in in trade during the implementation mainly because use of note 161 allows the use of national laws thus negating the very purpose of having harmonized international standards to facilitate international trade. We propose that further discussion on these food additives be opened so as to resolve the various issue that informed the committee to recommend use of note 161 before a final decision is made.
Sucrose Esters Of Fatty Acids Ins 473	AU supports the eWG recommendation to adopt use level with proposed accompanying notes	The use of the food additive is technologically justifiable.
Food Category No. 14.2 Alcoholic Beverages, Including Alcohol-Free And Low-Alcoholic Counterparts		
• Dioctyl Sodium Sulfosuccinate – Ins 480 • Propylene Glycol – Ins 1520	AU supports the eWG recommendation to discontinue the work	There is no technological justification for use of these food additives
Food Category No. 14.2.1 Beer And Malt Beverages		
• Dioctyl Sodium Sulfosuccinate – Ins 480 • Polyglycerol Esters Of Fatty • Acids – Ins 475 • Polyglycerol Esters Of • Interesterified Ricinoleic Acid – Ins 476 Propylene • Glycol – Ins 1520	AU supports the eWG recommendation to discontinue work on these food additives	There is no technological justification for use of these food additives in the said categories.
• Propylene Glycol Alginate - Ins 405 • Tartrates	AU supports the eWG recommendation to adopt the proposed levels	The use of this additives has a technological function in the products
All food additives	AU supports the eWG recommendation for proposed discontinuation of food additives under this sub categories	There is no sufficient technological justification on the use of the food additives
Food Category No. 14.2.7 Aromatized alcoholic beverages (e.g. beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)		
Additive	**AU Recommendation**	**Rationale**
Ins 414-Gum Arabic (Acacia Gum)	AU supports the eWG recommendation to discontinue work on the additive	Safety evaluation has not been done for use of the additive to infants especially those below 12 weeks.
Polyglycerol Esters Of Fatty Acid	AU supports the eWG recommendation	Discussions for use in subcategories are needed for technological justification
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Tartrates	AU does not support the adoption	Request information on technological justification
Food Category No. 15.1 Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)		

Polyglycerol Esters Of Fatty Acids	AU could adopt if technical justification has been provided	Technical justification is needed and also health concern specially for children
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Propylene Glycol		
Propylene Glycol Alginat		
Sodium Diacetat		
Sorbitan Esters Of Fatty Acid		
Stearoyl Lactylates		
Sucrose Esters Of Fatty Acids		
Sucrose Oligoesters, Type I And Type Ii		
Sucroglycerides		
Tocopherols	AU could adopt if technical justification has been provided	Technical justification is needed
Food Category No. 15.2 Processed nuts, including coated nuts and nut mixtures (with e.g. dried fruit)		
Polyglycerol Esters Of Fatty Acids	AU supports the eWG recommendation	Discussions for use in subcategories are needed for technological justification
Polyglycerol Esters Of Interesterified Ricinoleic Acid		
Propylene Glycol	AU could adopt if technical justification has been provided	Technical justification is needed and also health concern regarding accumulation
Tocopherols		
Food Category No. 15.3 Snacks - fish based		
Polyglycerol Esters Of Fatty Acids	AU supports the eWG recommendation	Discussions for use in subcategories are needed for technological justification
Polyglycerol Esters Of Interesterified Ricinoleic Acid		

APPENDIX 6: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the exception of food additives provisions with the function of colour and sweetener

Issue: The use of the following listed food additives in FC 01.1.2 (Other fluid milks (plain)):

Acetic And Fatty Acid Esters Of Glycerol Acetic And Fatty Acid Esters Of Glycerol, Ascorbic Acid, L-, Carob Bean Gum, Carrageenan , Citric Acid, Citric And Fatty Acid Esters Of Glycerol , Diacetyltartari C And Fatty Acid Esters Of Glycerol , Gellam Gum, Guar Gum, Gum Arabic, Hydroxypropyl Starch, Lactic And Fatty Acid Esters Of Glycerol, Lecithin, Microcrystallin E Cellulose (Cellulose Gel), Mono- And Di- Glycerides Of Fatty Acids, Nitrogen, Pectin, Phosphates, Polydextrose, Polyglycerol Esters Of Fatty Acids, Potassium Hydroxide, Potassium Carbonate, Propylene Glycol Alginate, Sodium Ascorbate, Sodium Carboxymethyl Cellulose (Cellulose Gum), Sucroglyceride S, Sucrose Esters Of Fatty Acids , Sucrose Oligoesters, Type I And Ii, Tocopherols (Dalphatocopherol, Tocopherol Concentrated, Mixed, Di-Alphatocopherol , Trisodium Citrate And Xanthan Gum

Position: AU does not support inclusions of the additives listed above in FC 01.1.2 (Other fluid milks (plain)).
Rationale: There is no technological justification to use the additives in FC 01.1.2 and the descriptor of the food category as provided is not clear.

International Council of Grocery Manufacturers Associations (ICGMA)

The International Council of Grocery Manufacturers Associations (ICGMA) is a nongovernmental organization that represents food, beverage and consumer packaged goods manufacturers globally. ICGMA promotes the harmonization of food standards and policies based on science and is a staunch supporter of Codex Alimentarius. ICGMA also works to facilitate international trade of food products by eliminating barriers to trade and believes that global harmonization of science-based food standards is important to achieve that goal.

ICGMA respectfully submits the following conference room document on CCFA Agenda Item 5(a) “General Standard for Food Additives (GSFA): Report of the EWG on the GSFA.” Our comments provide technological justification for use of lauric arginate ethyl ester (INS 243) in Food Categories 09.2.4, 09.2.5, 09.3.1, 09.3.2, 09.3.3 and 09.3.4.

We apologize that this information was not presented to the GSFA electronic working group (eWG), but still believe it will be helpful for consideration at the 50th CCFA. We also acknowledge that due to the absence of comments submitted to the eWG, the eWG has recommended that the provisions for lauric arginate ethyl ester (LAEE) be discontinued in the food categories of interest to ICGMA.

The information provided herein is intended to demonstrate technological justification for the proposed provisions for LAEE in these food categories, and ICGMA respectfully request that this information is taken

into consideration during the review of the proposed provisions firstly by the physical working group on the GSFA, and then subsequently by the plenary session of the committee.

Technological Justification for use of lauric arginate ethyl ester (INS 243) in Food Categories 09.2.4, 09.2.5, 09.3.1, 09.3.2, 09.3.3 and 09.3.4

Lauric arginate ethyl ester (INS 243) is a preservative that was evaluated by JECFA in 2008 where an ADI of 0-4 mg/kg bw/day was adopted. A number of provisions for the additive have already been included in the GSFA at Step 8 and further provisions are due to be considered by the forthcoming meeting of CCFA. Detailed technological justification for the use of the additive in the relevant sub-categories of Food Category 09.0 is set out in Table 1 and information on studies examining the efficacy of LAEE in different fish products is provided in Table 2.

Table 1: Technological justification for use of lauric arginate ethyl ester (LAEE, INS 243) in food categories 09.2.4, 09.2.5, 09.3.1, 09.3.2, 09.3.3 and 09.3.4

LAURIC ARGINATE ETHYL ESTER

INS 243 Lauric arginate ethyl ester Functional class: Preservative

Codex Food cat nº	**Codex Food Category**	Maximum level (mg/kg)	Technological justification
09.2.4	Cooked and / or fried fish and fish products, including mollusks, crustaceans, and echinoderms	200	The GSFA acknowledges that fish products falling under this category have a limited shelf life and as such the use of preservatives is permitted in certain of the sub-categories. Sorbates and benzoates are allowed to be used as preservatives in line with the provisions set out under Food Categories 09.2.4.1 and 09.2.4.2. LAEE provides an effective alternative to benzoates and sorbates as a preservative in products falling under these categories. In terms of Sub-Category 09.2.4.3 (Fried fish and fish products, including mollusks, crustaceans, and echinoderms) the use of LAEE is requested only in products that are ready-to-eat and require refrigeration. In ready-to-eat, refrigerated products falling under sub-category 09.4.2.3, the use of LAEE can help to ensure the product remains safe for consumers in cases where there is disruption to temperature control in the distribution chain or in the domestic setting.
09.2.5	Smoked, dried, fermented, and/or salted fish and fish products, including molluscs, crustaceans, and echinoderms	200	The acceptability of the use of preservatives in this food category is recognized in the GSFA by way of the inclusion of provisions permitting the use of benzoic acid and sorbates. The use of LAEE provides an effective alternative to the use of either benzoates or sorbates in products falling under this category.
09.3.1	Fish and fish products, including molluscs, crustaceans, and echinoderms, marinated and/or in jelly	200	The GSFA acknowledges that fish products in this category have a limited shelf life and the use of preservatives is permitted by way of the adopted provisions in the parent Food Category 09.3 for benzoates, sorbates and para- hydroxybenzoates. LAE provides an effective alternative as a food preservative to the use of benzoates, sorbates and para-hydroxybenzoates in these products.

09.3.2	Fish and fish products, including molluscs, crustaceans and echinoderms, pickled and/or in brine	200	The GSFA acknowledges that fish products in this category have a limited shelf life and the use of preservatives is permitted by way of the adopted provisions in the parent Food Category 09.3 for benzoates, sorbates and para- hydroxybenzoates. LAE provides an effective alternative as a food preservative to the use of benzoates, sorbates and para-hydroxybenzoates in these products.
09.3.3	Salmon substitutes, caviar and other fish roe products	200	The GSFA acknowledges that fish products in this category have a limited shelf life and the use of preservatives is permitted by way of the adopted provisions in the parent Food Category 09.3 for benzoates, sorbates and para- hydroxybenzoates. LAE provides an effective alternative as a food preservative to the use of benzoates, sorbates and para-hydroxybenzoates in these products.
09.3.4	Semi-preserved fish and fish products, including molluscs, crustaceans and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	200	The GSFA acknowledges that fish products in this category have a limited shelf life and the use of preservatives is permitted by way of the adopted provisions in the parent Food Category 09.3 for benzoates, sorbates and para- hydroxybenzoates. LAE provides an effective alternative as a food preservative to the use of benzoates, sorbates and para-hydroxybenzoates in these products.

Table 2: Efficacy data supporting the use of LAEE (INS 243) in fish products

Food Matrix Tested	**Results and Conclusions**
Fish roe products	A reduction in the total viable count for samples of fish roe treated with LAEE was observed for each of the three time points analyzed when stored at 30ºC for up to 9 days. Total viable counts were below the limit of detection on Day 9 in samples treated with 200 ppm LAEE and 7.15 log CFU/g in samples without LAEE (control). For LAEE-treated samples, the *St. aureus* counts decreased progressively from 3.33 log CFU/g on day 0 to less than the limit of detection (<2.00 log CFU/g) on Day 9. For untreated controls, *St. aureus* counts increased from 3.68 log to 6.79 log CFU/g over the same period. Similarly, the *E. coli* counts for LAE treated samples declined progressively from 3.14 log CFU/g at day 0 to 2.04 log CFU/g on Day 9 while the counts for untreated controls increased over the same period. These results demonstrate the antibacterial efficacy of LAEE in fish roe at 200 pm.
Dried salted cod	LAE retarded the microbiological spoilage of dried salted cod, samples stored for 11 days at 4°C. With samples treated with 188 ppm LAEE total viable counts were 5.03 log CFU/g after 11 days, whereas in untreated samples (control) total viable counts were 7.43 log CFU/g. The treatment with LAE inhibited growth of spoilage microorganisms thus improving the microbiological characteristics of the product and also the treatment did not affect the organoleptic properties of the product over time.
Smoked salmon	Samples of smoked salmon were treated with either 200ppm LAEE or untreated (control) and then stored at either 4° or 8°C. On Day 1, there was a 0.8 log reduction in treated samples stored at 4ºC and a 1.3 log reduction in those stored at 8ºC compared to untreated samples. When monitored up to day 6, there was a significant improvement for those samples treated with LAEE at 4ºC and 8ºC versus control with this being as a consequence of the inhibition of microbial growth by LAEE.

Conclusion:

ICGMA appreciates consideration of our comments on the Technological Justification for use of lauric arginate ethyl ester (INS 243) in Food Categories 09.2.4, 09.2.5, 09.3.1, 09.3.2, 09.3.3 and 09.3.4. We stand ready to answer any questions that may arise during the upcoming CCFA.