

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 2, 3a, 3b, 4a, 4b, 5c, 5d, 6, 7 and 8

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Fiftieth Session

#### Comments of African Union

#### Item 2

#### A. Matters Arising From The 40<sup>th</sup> Session of The Codex Alimentarius Commission (CAC40)

##### Matters for action

**Issue:** Standard for Mozzarella (CXS 262-2006)4: CAC40 requested CCFA to address only the technological justification of the use of preservatives and anticaking agents for surface treatment of mozzarella with high moisture content covered by the Standard for Mozzarella (CXS 262-2006) in the framework of the alignment work of food additive provisions of CCMMP standards and those of the GSFA.

**Position:** AU notes the request from CAC 40 and recommends that the ToR of CCFA should be clarified as to whether CCFA could take on work on “technological justification” for commodity committees that are not active.

**Rationale:** The procedural manual is not explicit on the ToR of CCFA regarding the responsibility on development of technological justifications for food additives.

#### B. Matters Arising From Other Subsidiary Bodies

##### Matters for action

**Issue 1:** The CCFFV20 agreed to recommend to CCFA 50 for their inclusion in the GSFA under FC04.1.1.2, “surface treated fresh fruits” FC04.2.1.2 “surface-treated fresh vegetables”. These are mono- and diglycerides of fatty acids (INS 471) and salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium (INS 470 (i)) which extend the postharvest shelf-life as well as maintenance of nutrient levels and organoleptic qualities of fresh fruits and vegetables.

**Position:** AU supports the recommendations of the CCFFV20.

**Rationale:** The additives were evaluated by JECFA and will reduce post-harvest losses for fresh fruits and vegetables destined for local and export markets.

**Issue 2:** JECFA requested CCFA50 to consider editorial amendments to the descriptors of FC 14.1.4.2 and FC 14.1.5 as in Appendix I of CX/FA 18/50/2.

**Position:** AU supports the editorial changes.

**Rationale:** They are necessary to clarify and differentiate the two food categories.

**Issue 3:** Sorbitol syrup (INS 420(ii)) is currently included in the GSFA (Table 3) although it has not been assigned an Acceptable Daily Intake (ADI) or determined, on the basis or other criteria to be safe by JECFA. Sorbitol syrup is also included in the Standard for Instant Noodles (CXS 249-2006). In order to rectify this situation, JECFA will:

- (i). Issue a Circular Letter requesting information on the commercial use of sorbitol syrup (INS 420(ii)), and
- (ii). Based on the information provided, CCFA51 will recommend either its removal from the GSFA and the commodity standard or its inclusion in the priority list for JECFA.

**Position:** AU supports the proposed approach and recommends that the Secretariat also identify any other food additive that may have been included in the GSFA without JECFA’s evaluation for consideration in the CCFA51.

**Rationale:** All food additives should be evaluated by JECFA to assure their safety before inclusion in the GSFA.

**Issue 4:** The Codex Secretariat to undertake a review for carotenoids (INS 160a(i), INS 160a(iii), INS 160e, INS 160f); chlorophylls and chlorophyllins, copper complexes (INS 141(i), INS141(ii)); and polysorbates (INS 432, INS 433, INS 434, INS 435, INS 436) in the GSFA and prepare a more comprehensive document with proposals on how to deal with the issue for consideration at CCFA51.

**Position:** AU supports the proposed approach.

**Rationale:** There is need to distinguish the three food additive groups based on individual ADIs.

### Item 3a

**Issue:** JECFA revised and established the Acceptable Daily Intakes (ADIs) and other toxicological or safety recommendations and dietary exposure information for the food additives in the table below and requested CCFA50 to consider adoption.

INS	Food Additive	Issue	AU Position	Rationale
133	Brilliant Blue	Revision of ADI from 0-12.5mg/kg bw per day to 0-6mg/kg bw per day	AU supports the recommendation to endorse the new ADI and the revision of the provisions in the GSFA	The revision will assure the safety of the use of Brilliant Blue for all age groups
-	$\beta$ -Carotene-rich extract from <i>Dunaliella salina</i>	Safety evaluation of group ADI for the sum of carotenoids.	AU recommends the assignment of INS and re-evaluation of the group ADI of the sum of carotenoids	JECFA re-evaluation will ensure the safety of the use of $\beta$ -Carotene-rich extract from <i>Dunaliella salina</i>
143	Fast Green FCF	Re-evaluation of Fast Green FCF by JECFA using the available data confirmed the earlier ADI of 0–25 mg/kg bw to be safe	AU supports the re-evaluation outcome	This ADI is safe for children and all age groups based on JECFA evaluations
419	Gum ghatti	Evaluation by JECFA concluded that it can be used at ADI "Not Specified"	AU supports Gum ghatti (INS 419) inclusion in table 3 of GSFA.	All food additives whose evaluation are indicated "Not Specified" can be used at GMP because there is no safety concerns based on JECFA evaluation
-	Jagua (Genipin-Glycine) Blue	JECFA was unable to complete the evaluation for Jagua (Genipin-Glycine) Blue and request for additional information on (a) characterization of the low molecular weight components of the "blue polymer" (b) a validated method for the determination of dimers and (c) data on concentrations of	AU supports JECFA recommendation to continue the evaluation process	Full characterization is necessary for safe use of Jagua (Genipin-Glycine) Blue

INS	Food Additive	Issue	AU Position	Rationale
		dimers from five batches of the commercial product		
353	Metatartaric acid	JECFA has provided a tentative specification of group ADI of 0–30 mg/kg bw for L(+)-tartaric acid and its sodium, potassium, potassium–sodium salts, expressed as L(+)-tartaric acid. JECFA has requested for more data to complete the evaluation	AU supports the request for more data in order for JECFA to complete the specification.	There is need for adequate data to enable the full evaluation of the use of metatartaric acid in wine

#### Item 3b

**Issue 1:** JECFA requested CCFA50 to review the specifications designated as “Full” for the food additives listed in Annex 1 of document CX/FA18/50/4 with a view to recommending their adoption by CAC41 as Codex Specifications, taking into account comments received in response to CL 2018/10/OCS-FA

**Position:** AU supports the endorsement of the food additives recommended as “Full” by JECFA.

**Rationale:** Food additives recommended as “Full” by JECFA have undergone a complete safety evaluation process

**Issue 2:** The JECFA secretariat proposed CCFA50 to consider replacing, within the GSFA and CXG 36-1989 for INS 554, the name “sodium aluminosilicate” by the name “sodium aluminium silicate” and to retain the INS number.

**Position:** AU supports the proposal.

**Rationale:** The new name clearly shows the different components of this additive.

#### Item 4a

**Issue1:** The CCFA50 was invited to consider for endorsement the provisions for the following food additives (see Annex 1 of CX/FA 18/50/5) forwarded by the 9th Session of the FAO/WHO Coordinating Committee for the Near East (REP17/NE) related to regional standard for Doogh (adopted by CAC40 at Step 5/8 subject to endorsement of its food labelling and food additive provisions:

##### (a) Brilliant Blue FCF: INS 133

**Position:** AU noted that JECFA84 revised ADI of brilliant blue from 0-12.5 mg/kg bw to 0-6mg/Kg bw/day. There is need to change the ADI in this standard as well as the maximum permissible level of 150mg/kg.

**Rationale:** The maximum permissible level of 150mg/kg was based on the ADI of 0-12.5mg/kg bw whereas JECFA 84<sup>th</sup> established that the ADI of 0-6 mg/kg bw/day was the safe range for all age groups hence the need to change it.

##### (b) Benzoates

**Position:** AU recommends revision of the proposed level of benzoates from 300mg/kg to 250mg/kg.

**Rationale:** This is based on tentative levels permissible as adopted by the CCFA49.

#### Item 4b

**Issue 1:** The CCFA 50 was requested to consider the eWG proposals for the alignment of food additive provisions in the following fourteen (14) standards related to fish and fish products and one related to canned pears, canned mangoes and canned pineapples with GSFA provisions:

- a) Canned Salmon (CXS 3-1981);
- b) Canned Shrimps or Prawns (CXS 37-1991);
- c) Canned Tuna and Bonito (CXS 70-1981);
- d) Canned Crab Meat (CXS 90-1981);

- e) Canned Sardines and Sardine-Type Products (CXS 94-1981);
- f) Canned Finfish (CXS 119-1981).
- g) Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes (CXS 167-1989);
- h) Dried Shark Fins (CXS 189-1993);
- i) Crackers from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish (CXS 222-2001);
- j) Boiled Dried Salted Anchovies (CXS 236-2003);
- k) Salted Atlantic Herring and Salted Sprat (CXS 244-2004);
- l) Sturgeon Caviar (CXS 291-2010);
- m) Fish Sauce (CXS 302-2011) and
- n) Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish (CXS 311-2013).
- o) Standard for Certain Canned Fruits (CXS 319-2015)

**Position:** AU supports the eWG proposals for the alignment of food additive provisions

**Rationale:** All the food additive provisions in all the CODEX commodity standards should always refer to the respective provisions in the GSFA as the single reference source.

**Issue 2:** Proposed revised approach to listing corresponding commodity standards in table 3 of the GSFA

**Position:** AU requests for clarification on the Explanatory Note when determining the Use of Table 3 Additives in foods covered by the commodity standards based on the revised approach.

**Rationale:** The Explanatory Note is very confusing and needs to be made simpler.

**Issue 3:** Proposed draft guidance document (guidance and principles, decision tree and working principles) for commodity committees, to align food additive provisions in Codex Commodity Standards with the General Standard for Food Additives

**Position:** AU supports the proposed guidance document.

p) **Rationale:** The document contains the necessary guidance to assist commodity committees to systematically carry out alignment of their food additive provisions in commodity standards with the GSFA. This will lessen the workload of CCFA.

#### Item 5c

**Issue:** At CCFA48 concerns were raised as to the expression of the maximum use levels for nitrates and nitrites as ingoing amount and/or residual amount, the appropriate maximum use levels, and safety of their use.

**Comment:** To satisfactorily respond to this discussion paper we need specific data related to expression of the MLs, exposure to nitrites and nitrates as well as nitrosomes which is not available at the moment.

#### Item 5d

**Issue:** Recommendation 1: Consider the definitions of unprocessed (food raw materials or fresh food) and minimally processed (plain) foods for inclusion in the General Standard for Food Additives (CXS 192-1995)

**Position:** AU does not support recommendation 1.

**Rationale:** There is no need to define these terms as they are clear in the GSFA as currently published.

**Issue:** Recommendation 2 Consider the provision not to use food additives in unprocessed (food raw materials or fresh food) and to restrict the use of food additives in minimally processed (plain) foods.

**Position:** AU does not support this recommendation.

**Rationale:** Use of food additives in unprocessed foods should be on a case by case basis (As per food category and/or food sub-categories.)

**Issue:** Recommendation 3: To consider the following options to technological justification for the use of a food additive in minimally processed (plain) foods: Option 1 - the decision should be made taking into consideration:(1) the technological necessity, (2) a possible change in the nutritional value of food, (3) the risk of misleading consumers about the organoleptic and physicochemical properties the minimally processed (plain) food; Option 2 - the decision should be made taking into consideration:(1) the technological necessity, (2) the risk of misleading consumers about the organoleptic and physico-chemical properties the minimally

processed (plain) food; Option 3 - the decision should be made taking into consideration:(1) the technological necessity

**Position:** AU does not support this recommendation.

**Rationale:** Based on the rationale on recommendation 1 position above, this recommendation is not supported.

#### Item 6

**Issue:** Recommendations from eWG for CCFA to consider the changes and/or additions to the INS list as presented in table 1 document **CX/FA 18/50/11**.

**Position:** AU supports the recommendations of the electronic working group and amendments in annex 1 on new or additional functional class or technological purpose.

**Rationale:** the proposals are requests from respective commodity committees with the requisite competence.

#### Item 7

**Issue:** Submission for prioritization of various food additives for evaluation by JECFA.

**Position:** AU supports the list submitted except for Gum Arabic for functional class probiotic

**Rationale:** Probiotic is not a functional class of the GSFA.

#### Item 8

### 1. General Standard for Food Additives (GSFA)

a) Principle and Procedure of Reviewing Provisions Currently in the Step Process;

**ISSUE:** *Recommendation 1:* That the Committee utilize a new process by which provisions entered into the Step Process at Step 2 will automatically be circulated for comment at Step 3 by the subsequent GSFA EWG.

**Position:** AU agrees with this recommendation

**Rationale:** This will add efficiency to the work of CCFA

b) Colour and Sweetener Provisions/ Provisions with Note 161

**Issue:** *Recommendation 2:* That the Committee consider the following options to revise Section 3.2 of the GSFA Preamble to facilitate consensus on provisions for colours and sweeteners: Option 1 - Define “advantage” and “does not mislead the consumer”;

Option 2 - Remove “advantage” and “does not mislead the consumer”;

Option 3 - Acknowledge, in a manner that removes the barrier to consensus, that “advantage” and “does not mislead the consumer” are often regionally dependent.

**Position:** AU believes that Option 1 and 2 are not acceptable. Option 3 is a likely feasible option but will require further discussion to be developed into a better compromise.

**Rationale:** Building consensus around option1 and 2 will be a difficult task given that the interpretation of the terms indicated will vary from region to region or even country to country, while option 3 seeks to maintain the terms, it seeks to clarify the use of those terms thus with a potential to eliminate the current barrier caused by the terminologies. However, to achieve this will require further discussions to be rephrased.

### 2. Alignment of Food Additive Provisions in Commodity Standards and GSFA

a) The role of the Commodity Committees;

b) Management of the workload and the backlog

**Issue:** *Recommendation 3:* That the Committee consider the following options to accelerate the alignment of the GSFA and corresponding commodity standards. The options are not exclusive and some or all could be utilized if considered appropriate by the Committee.

Option 1 - Utilize preparatory work undertaken by industry associations;

Option 2 - Involve another country as an additional co-Chair of the WG on alignment;

Option 3 - Partnership approach between CCFA and Commodity Committees

**Position:** AU supports Option 3

**Rationale:** This will accelerate the alignment of the GSFA and corresponding commodity standards

### 3. International Numbering System (INS)

- i. **Issue:** *Recommendation 4:* That the Committee consider the addition of the following bolded text to the Background section of the INS in order to clarify the relationship between the INS and the GSFA:

The International Numbering System for Food Additives (INS) is intended as a harmonized naming system for food additives as an alternative to the use of the specific names, which may be lengthy. Inclusion in the INS does not imply approval by Codex for use as food additives. The list may include those additives that have not been evaluated by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) **or are not included in the General Standard for Food Additives (CODEX STAN 192-1995)**

**Position:** AU agree with this recommendation

**Rationale:** The added text adds clarity to the relationship between INS and GSFA

- ii. **Issue:** *Recommendation 5:* That the Committee consider the addition of the following bolded text to the Annex 1 and Annex 2 of the circular letter “Request for proposals for change and/or addition to Section 3 of the Class Names and International Numbering System for Food Additives (CAC/GL 36-1989)”:

Annex 1, Point 5 “Deletion of an additive from the INS List”:

**Proposals for deletion of INS entries cannot be submitted to this circular letter if there are existing provisions (adopted or in the Step Process) for the additive in the General Standard for Food Additives (CODEX STAN 192-1995). The Codex Committee on Food Additives must first remove those provisions from the GSFA prior to the submission of proposals to delete a corresponding INS entry.**

Proposals for deletion of INS entries should be accompanied by a suitable justification.

Annex 2, “Justification for the requested INS Change in Section 3: deletion of additive”

(Please select only the appropriate option and provide details in the space **below**. **Proposals for deletion of INS entries cannot be submitted to this circular letter if there are existing provisions (adopted or in the Step Process) for the additive in the General Standard for Food Additives (CODEX STAN 192-1995).**)

**Position:** AU supports this recommendation

**Rationale:** The added text provides clarity to the relationship between INS and GSFA

### 4. JECFA Evaluation and Re-evaluation of Food Additives

#### a) Prioritisation of requests to JECFA;

**Issue:** *Recommendation 6:* That the Committee consider the following ranking system to be used for requests for placement on the Priority List for those additives intended for inclusion in the GSFA, in order from highest (1) to lowest (3) priority:

(1) Re-evaluation of an additive, based on an identified safety concern;

(2) Evaluation of a new additive that is intended to be included in the GSFA;

(3) Evaluation of a change to the specifications, including but not limited to the addition of a substance, a new source material, a new chemical form of a substance, a change to an analytical method, a change to a tolerance limit, and a revision of a physicochemical property such as melting point.

**Position:** AU supports this recommendation

**Rationale:** This procedure provides proper guidance in placement of food additives in the priority list

#### b) Requests for substances that are not to be included in the GSFA;

**ISSUE:** *Recommendation 7:* That the Committee consider the following options for the management of requests for placement on the Priority List for food additives that are not intended for inclusion in the GSFA. Respondents are encouraged to provide practical suggestions to implement these options, or propose new options that are both practical and within the scope of the mandate of the Committee.

Option 1 – Food additives that are not intended for inclusion in the GSFA are not assigned a priority ranking;

Option 2 – Food additives that are not intended for inclusion in the GSFA should be assigned a priority ranking in tandem with other additives.

**Position:** AU supports Option 1

**Rationale:** This option provides for evaluation of only food additives intended for GSFA

**c) Information supporting the requests;**

**ISSUE:** *Recommendation 8:* That the Committee forms an electronic working group to explore revisions to Annex 2 of the Circular Letter Requests for information and comments on the priority list of substances proposed for evaluation by JECFA to address the following issues:

Option 1 - Provide guidance in Annex 2 of the Circular Letter on the level of detail necessary to adequately respond to the listed questions;

Option 2 - Revise the questions in Annex 2 of the Circular Letter to address all criteria listed in Annex 1 "Criteria for the Inclusion of Substances in the Priority List"

**Position:** AU supports the formation of eWG

**Rationale:** eWG will explore on the options provided under the recommendation for further discussion

**d) Maintenance re-evaluations of additives in the GSFA.**

**Issue:** *Recommendation 9:* That the Committee, as a future priority not to be completed at this time, consider establishing an overall process for the re-evaluations and re-endorsements of additives currently in the GSFA.

**Position:** AU supports this recommendation

**5. Processing Aids Guidelines vs. Database**

**Issue:** *Recommendation 10:* That the Committee consider the following related options:

Option 1 - Maintain the Processing Aids Database as an up-to-date reference on the use of processing aids;

Option 2 - As a future priority not to be completed at this time, review/amend the Guidelines on Substances used as Processing Aids (CAC/GL 75-2010)

**Position:** AU support these options

**Rationale:** the current processing aids database is still relevant and up to date and thus any amendment should be considered in future when new processing aids are introduced

**6. Prioritisation of CCFA future work**

**Issue:** *Recommendation 11:* That the Committee consider the questions/criteria that could be used to facilitate a systematic approach to the prioritization of its work

**Position:** AU supports this recommendation

**Rationale:** This will facilitate systematic approach to prioritization of CCFA future work.