

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5d

CRD20

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-Ninth Session

Macao SAR, China, 20-24 March 2017

DISCUSSION PAPER ON THE USE OF FOOD ADDITIVES IN THE PRODUCTION OF WINE

Comments of Cameroon, Ghana, India, Russian Federation, African Union and FIVS

Cameroon

Position:

➤ Recommandation 1,

Nous proposons l'option A car la notion de BPF est liée à une toxicité très faible de la substance et son niveau maximal d'emploi est non spécifié.

➤ Recommandation 2, 3, 4, 5 et 6

Nous proposons au CCFA d'approuver ces recommandations.

Ghana

Specific Comments

Ghana does not support the proposal of the EWG: 'establishment of the footnote to the GMP making a reference to the OIV limits'

Rationale: The concern for specific provisions of the use of food additives in FC 14.2.3 is not about the safety and hence managed by GMP. Furthermore reference to Non-Governmental Organization's MLs defeats the purpose of Codex standards as well as that of JECFA.

India

India appreciates the work done by eWG chaired by EU and co-chaired by Australia.

We have specific comments as below:

Recommendation 1: India is of the view that both the footnotes capture the details fairly, however we are not supportive of providing a reference to any Organization outside of Codex framework in Codex GSFA.

Recommendation 2: Recommendation 2 is acceptable to India. However we would like to suggest inclusion of following additives in addition to those already listed, as they are used as acidity regulators in wines, as per OIV standards:

- Meta Tartaric acid (INS 353)
- Calcium Tartrates (INS 354)
- Potassium hydrogen Carbonate (INS 501 (ii))

Along with this, reference to any Organization outside of Codex framework in Codex GSFA should be removed from the notes "XXX"

Recommendation 3, 4, 5 and 6: Recommendations are acceptable to India. However reference to any Organization outside of Codex framework in Codex GSFA should be removed from the notes "XXX"

Russian Federation

According to the Russian State Standard (ГОСТ P 52523-2006) on grape wines, only Tartaric acid L(+)- (INS 334), Citric acid (INS 330) and DL-Malic acid (INS 296) can be used in wines with numerical ML (for natural acids and added acids added individually or in combination) set at 4 g/l. This ML is also viewed as a quality parameter of a wine product.

The Russian Federation considers appropriate to support Recommendation 4: Endorsement by CCFA of the additive for the Food Category No. 14.2.3 Grape wine in the GSFA at step 5/8 as listed below

Additive	INS	Step	Year	Max Level	Notes
TARTRATES	334; 335(i),(ii); 336(i),(ii); 337	5/8		GMP	128, xxx

Note xxx: *“The Maximum level of the additive in grape wine set as Good Manufacturing Practice must not result in (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine [and should be consistent with those of the International Organisation for Vine and Wine (OIV)] / [This maximum level may be further specified to be consistent with those of the International Organisation for Vine and Wine (OIV).]”*

African Union

Issue: The 47th CCFA noted that the concern for specific provisions of food category 14.2.3 was not about the safety, rather the technological justification of the provisions. The 47th CCFA established an eWG, to provide clarity and specificity on the general concerns of wine identity, wine stability, global applicability of limitations for the use of food additives in wine and innovation in wine production and to perform an examination on the effect of expressing a maximum use of additives in wine. Considering the recommendation of the EWG, to set the maximum use level of wine additives having ADIs "not specified" at GMP with an appropriate footnote, the 48th CCFA generally agreed that "The Maximum level of the additive in grape wine set as 'Good Manufacturing Practice' must not result in the modification of the natural and essential characteristics of the wine, and a substantial change in the composition of the wine.

The EWG focused on the following points:

- GMP + footnote for the maximum use level for additives with an Acceptable Daily Intake "not specified" or "not limited".
- Possible additives in food category 14.2.3 and its subcategories

The eWG recommended the establishment of the footnote to the GMP making a reference to the OIV limits.

Position: AU does not support the proposal to reference OIV limits.

Rationale: The concern for specific provisions of the use of food additives in FC 14.2.3 is not about the safety and must therefore be managed by GMP. Furthermore reference to Non-Governmental Organization's MLs should be done in accordance with the Procedural Manual.

Fédération internationale des vins et spiritueux (FIVS)

This paper presents the consensus view of the members of FIVS¹ regarding the Electronic Working Group report, particularly in relation to paragraph 15 under the section headed, **“GMP + footnote for the wine additives with an ADI "not specified" / "not limited"”**.

FIVS is grateful to the European Union and to the government of Australia for their diligent work to find an agreement in this difficult area. The resolution of this issue is of critical importance for international trade in wine, and FIVS strongly urges the members of the CCFA to arrive at an outcome that is acceptable to all parties during the meeting in Macao.

In an attempt to facilitate this process, FIVS has collated and reflected upon the views of its members (often informed by the opinions and concerns of their governments) regarding the two options for a footnote that are presented in paragraph 15 of the eWG report. Our conclusion is that the best possibility for a solution lies in returning to a consideration of the draft footnote that seemed to offer the potential for agreement from all parties in the margins of the 48th CCFA meeting last year:

¹ FIVS is an international federation serving trade associations and companies in the alcohol beverage industry from around the world. It provides a forum for its members to work collaboratively on legal and policy issues and communicates Federation views to national governments and international organisations.

- *For the additives for which the Joint FAO/WHO Expert Committee on Food Additives (JECFA) has not established a numerical Acceptable Daily Intake (ADI) value:*
- *The maximum level of the additive in grape wine set as good manufacturing practice must prevent (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine;*
- *If countries decide to set a Numerical Limit, it should be set with reference to the recommendations of OIV or other international intergovernmental organisations with recognised expertise in the field of vitiviniculture.*

This text is fully consistent with previous consensus positions that FIVS has reported to the CCFA and represents a pragmatic compromise that paves the way to the reduction and even elimination of significant trade barriers for wine in coming years.