CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fiftieth Session

PROPOSED DRAFT AMENDMENTS TO THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CXG 36-1989)

Comments of Philippines

Philippines

Comments:

The Philippines supports the proposal of ICBA to include to the priority list of substances proposed for evaluation by JECFA to re-evaluate the safety and dietary intake of benzoates based on new data: 1) the outcome of the planned extended one-generational reproduction toxicity study (OECD 443); 2) the published findings relative to benzoate's chemical-specific adjustment factors and default uncertainty factors; and 3) the published findings on new more refined dietary intake assessments.

Rationale:

As concluded at CCFA49, the International Council of Beverages Associations (ICBA) is pleased to present its research plan to fulfill CCFA's request. "[A]t CCFA50, industry would confirm their commitment and indicate the deadline for the submission of the data to JECFA… Committee agreed to keep the maximum level of benzoate in FC 14.1.4 at 250 mg/kg with Note 13 and to revise the Note 301 to read "interim maximum level until CCFA50". (para. 72, REP17/FA) "The JECFA Secretariat further clarified that … the industry sector (shall) provide general input on additional toxicological testing, taking animal health and welfare and other relevant issues into account." (para. 68, REP17/FA) ICBA's research proposal along with recently completed research applicable to the safe use of benzoate food additives.

The need for benzoates is determined by beverage matrix, processing, packaging and storage conditions and the ubiquitous microflora of the environment, containers and ingredients. As pH increases, the amount of benzoic acid (i.e., the active form of benzoates) in beverages decreases resulting in higher minimum inhibitory concentrations (MIC) to achieve the same functionality. A beverage with pH 4.3 and 500 ppm of benzoic acid has approximately the same amount of undissociated benzoic acid (active form) as a beverage at pH 3.5 with 250 ppm of benzoic acid.