

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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Agenda Item 8

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Fiftieth Session

### DISCUSSION PAPER ON "FUTURE STRATEGIES FOR CCFA"

#### Comments from IOFI

#### International Organization of the Flavor Industry (IOFI)

IOFI comments regarding recommendations 4 and 7 of the Discussion Paper on Future Strategies for CCFA (CX/FA 18/50/13Rev1)

1. Regarding section III. International Numbering System, IOFI wishes to draw attention to the fact that flavouring substances are not included in the General Standard on Food Additives (GSFA), as they are covered by the Guidelines for the Use of Flavourings (CAC/GL 66-2008). Moreover, as stated in the Background section of CAC/GL 36-1989– Class Names and the International Numbering System (INS) for Food Additives: "*The INS does not include flavourings, which have a JECFA number as identifier, [...]*".
2. Recommendation 4 under Section III. International Numbering System (INS) suggests that the Committee consider the addition of text to the Background section of the CAC/GL 36-1989 to further clarify the relationship between the INS and the GSFA. IOFI suggests a further helpful clarification could be added to the Background section that would add a reference to the Guidelines for the Use of Flavourings (CAC/GL 66-2008) (proposed addition in bold): "*The INS does not include flavourings, which have a JECFA number as identifier **and are covered by the Guidelines for the Use of Flavourings (CAC/GL 66-2008), [...]***"
3. Regarding section IV. JECFA Evaluation and Re-evaluation of Food Additives "Requests for substances that are not to be included in the GSFA," IOFI wishes to make the following observations: During the Priority List Working Group meetings that occur at each CCFA meeting, flavourings are currently given a priority ranking alongside other food additives. However, JECFA currently schedules flavouring evaluations every other year, effectively "(de-)prioritizing" them relative to other food additives that are given the same priority ranking and that are not currently restricted to biennial JECFA evaluation possibilities.
4. Throughout the world flavouring regulations are increasingly referring to the JECFA evaluations, and these JECFA evaluations provide a critical second evaluation to that of a national or regional body. From that perspective, IOFI estimates that there are currently 100+ flavourings that have been evaluated by one or more national or regional authoritative bodies that have not yet been evaluated by JECFA. Of these, IOFI is aware that some but not all are in global use/trade. As is stated in CX/FA 18/50/13Rev1, priority-setting exercises offer no authority on the order in which JECFA chooses to evaluate substances, but IOFI suggests that it is critical that JECFA continues to give the highest consideration for continued assessment of flavouring substances, particularly those in global use/trade, and this would include the opportunity for annual evaluations.
5. IOFI recommends that CCFA consider additional emphasis/priority to substances that are in broad global use, including a stated need for re-evaluations by JECFA of previously evaluated flavourings to maintain the existing JECFA flavouring safety evaluations in an up-to-date manner. **Therefore, IOFI strongly supports Option 2 of recommendation 7, i.e. to also assign a priority ranking to those substances that are not intended for inclusion in the GSFA.**
6. From a practical perspective, implementation of Option 2 of Recommendation 7 could also involve a ranking system, similar to that for additives that are intended for inclusion into the GSFA as described in Recommendation 6. IOFI's proposal for this would be:
  - (1) Re-evaluation of a non-GSFA incorporated additive, based on an identified potential safety concern;

(2) Evaluation of a new additive that is not intended to be included in the GSFA with highest priority given to food additives that are globally relevant and whose JECFA evaluation would reduce the possibility of trade distortion;

(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.

IOFI requests that CCFA consider the importance of largely 'completing' JECFA evaluations of food additives, including flavorings, that are in global trade. The flavorings in current global use could possibly be evaluated within a small number of annual JECFA meetings, and perhaps similar considerations for other food additives already in global commerce could be made. Regular JECFA evaluations of flavourings that will in the future be globally relevant could then be made within the context of additions to the flavouring groups that would undergo re-evaluation in an annual program.