

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 2, 4a, and 5a

CRD21

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fourth Session

Comments of India

Agenda item 2: MATTERS ARISING FROM THE 46TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION (CAC46) AND THE 85TH SESSION OF THE EXECUTIVE COMMITTEE OF THE CODEX ALIMENTARIUS COMMISSION (CCEXEC85)

B. MATTERS ARISING FROM OTHER SUBSIDIARY BODIES AND OTHERS

53rd Session of the Codex Committee on Food Additives (CCFA53)

RIBOFLAVINS

Comments: India supports recommendations for RIBOFLAVINS are provided in Appendix I, and recommendations for carotene-related food additives are provided in Appendix II.

Agenda item 4a: ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS

CCSCH

STANDARD FOR DRIED OR DEHYDRATED ROOTS, RHIZOMES AND BULBS – TURMERIC (for adoption by CAC47 at Step 5/8)

Comment: India supports CCSCH proposal for endorsement regarding anticaking agents listed in Table 3 of the General Standard for Food Additives (CXS 192-1995) for use in ground/powdered form of product conforming to this standard.

Agenda item 5a: GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE ELECTRONIC WORKING GROUP

Appendix 1: Remaining draft and proposed draft provisions for sweeteners in the GSFA and adopted sweetener provisions with Note 161

Discussion by eWG Members on the Horizontal Approach for the use of sweeteners in FC 07.1:

Recommended Alternative Note for Consideration by GSFA PWG

Comments: India supports Chair's proposed recommended alternative note "**Revised Option 2 Note:** Some Codex Members allow use of additives with sweetener and colour function in this Food Category while others consider that this Food Category includes only "plain products". For the purpose of this Food Category, "plain" refers to products without additives that have sweetener or colour functions."

Category No. 07.1 (Bread and ordinary bakery wares)

Corresponding commodity standards: None

1. **Additive: Acesulfame potassium** - India supports adoption of ACESULFAME POTASSIUM at level of 1000 mg/kg with note 188, removal of note 161 and new "Alternative Note" (Revised Option 2 Note).
2. **Additive: Aspartame** - India supports adoption of ASPARTAME at level of 4000 mg/kg with note 191, removal of note 161 and new "Alternative Note" (Revised Option 2 Note).

3. **Additive: Neotame** - India supports adoption of Neotame at level of 70 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note).
4. **Additive: Sucralose** - India supports adoption of Sucralose at level of 650 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note).

Category No. 12.2.2 (Seasonings and condiments)

Corresponding commodity standards: None

1. **Additive: Saccharins** - India supports adoption of Saccharins at level of 1500 mg/kg, replace note 161 with note 477.

Appendix 2: Draft and proposed draft provisions for colours in FCs 07.0, 12.0, 13.0 and 15.0 and their subcategories as well as adopted provisions for colours with Note 161 in FCs 07.0, 12.0, 13.0 and 15.0 and their subcategories

Discussion by eWG Members on the Horizontal Approach for the use of colours in subcategories of FC 07.1:

Recommended Alternative Note for Consideration by GSFA PWG

Comments: India supports Chair's proposed recommended alternative note "**Revised Option 2 Note:** Some Codex Members allow use of additives with sweetener and colour function in this Food Category while others consider that this Food Category includes only "plain products". For the purpose of this Food Category, "plain" refers to products without additives that have sweetener or colour functions."

Category No. 07.1.1.1 (Yeast-leavened breads and specialty breads)

Corresponding commodity standards: None

1. **Additive: Brilliant Blue** - India supports adoption of Brilliant Blue at level of 100 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note) as India permits use of this additive in parent category 7.1.

Category No. 07.1.2 (Crackers, excluding sweet crackers)

Corresponding commodity standards: None

1. **Additive: Allura red** - India supports adoption of Allura red at level of 100 mg/kg, removal of note 161.
2. **Additive: Brilliant Blue** - India supports adoption of Brilliant Blue at level of 100 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note) as India permits use of this additive in parent category 7.1.
3. **Additive: CAMEL III - AMMONIA CAMEL**- India supports adoption of CAMEL III - AMMONIA CAMEL at level of 50,000 mg/kg, removal of note 161 and as India permits use of this additive in food category 7.1.2 at 50,000 mg/kg.
4. **Additive: CAMEL IV - SULFITE AMMONIA CAMEL** - India supports adoption of CAMEL IV - SULFITE AMMONIA CAMEL at level of 50,000 mg/kg, removal of note 161 and as India permits use of this additive in food category 7.1.2 at 50,000 mg/kg.
5. **Additive: FAST GREEN FCF** - India supports adoption of Fast Green FCF at level of 100 mg/kg as India permits use of this food additive at 100 mg/kg in parent Food Category 7.0.
6. **Additive: Curcumin** - India supports adoption of curcumin at level of 200 mg/kg, as India permits use of this additive in parent category 7.1 at GMP.

Category No. 07.1.3 (Other ordinary bakery products (e.g. bagels, pita, English muffins))

Corresponding commodity standards: None

1. **Additive: Allura red** - India supports adoption of Allura red at level of 100 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note).
2. **Additive: Brilliant Blue** - India supports adoption of Brilliant Blue at level of 100 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note) as India permits use of this additive in parent category 7.1.

3. **Additive: CARAMEL III - AMMONIA CARAMEL-** India supports adoption of CARAMEL III - AMMONIA CARAMEL at level of 50,000 mg/kg, removal of note 161 as India permits use of this additive in food category 7.1.3 at 50,000 mg/kg.
4. **Additive: CARAMEL IV - SULFITE AMMONIA CARAMEL -** India supports adoption of CARAMEL IV - SULFITE AMMONIA CARAMEL at level of 50,000 mg/kg, removal of note 161 as India permits use of this additive in food category 7.1.3 at 50,000 mg/kg.
5. **Additive: FAST GREEN FCF -** India supports adoption of Fast Green FCF at level of 100 mg/kg and new "Alternative Note" (Revised Option 2 Note). India permits use of this food additive at 100 mg/kg in parent Food Category 7.0.
6. **Additive: Curcumin -** India supports adoption of curcumin at level of 200 mg/kg and new "Alternative Note" (Revised Option 2 Note). India permits use of this additive in parent category 7.1 at GMP.

Category No. 07.1.4 (Bread-type products, including bread stuffing and bread crumbs)

Corresponding commodity standards: None

1. **Additive: Brilliant Blue -** India supports adoption of Brilliant Blue at level of 100 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note) as India permits use of this additive in parent category 7.1.
2. **Additive: CARAMEL III - AMMONIA CARAMEL-** India supports adoption of CARAMEL III - AMMONIA CARAMEL at level of 50,000 mg/kg, removal of note 161 as India permits use of this additive in food category 7.1.4 at 50,000 mg/kg.
3. **Additive: CHLOROPHYLLS AND CHLOROPHYLLINS, COPPER COMPLEXES -** India supports adoption of CHLOROPHYLLS AND CHLOROPHYLLINS, COPPER COMPLEXES with Note 62 at level of 6 mg/kg and new "Alternative Note" (Revised Option 2 Note). India permits use of this additive in food category 7.1.4 at 6 mg/kg.
4. **Additive: Curcumin -** India supports adoption of curcumin at level of 500 mg/kg and new "Alternative Note" (Revised Option 2 Note). India permits use of this additive in parent category 7.1 at GMP.
5. **Additive: FAST GREEN FCF -** India supports adoption of Fast Green FCF at level of 100 mg/kg and new "Alternative Note" (Revised Option 2 Note). India permits use of this food additive at 100 mg/kg in parent Food Category 7.0.

Category No. 07.1.5 (Steamed breads and buns)

Corresponding commodity standards: None

1. **Additive: Brilliant Blue -** India supports adoption of Brilliant Blue at level of 100 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note) as India permits use of this additive in parent category 7.1.
2. **Additive: CARAMEL III - AMMONIA CARAMEL-** India supports adoption of CARAMEL III - AMMONIA CARAMEL at level of 50,000 mg/kg, removal of note 161 as India permits use of this additive in food category 7.1.5 at 50,000 mg/kg.
3. **Additive: Curcumin -** India supports adoption of curcumin at level of 500 mg/kg and new "Alternative Note" (Revised Option 2 Note). India permits use of this additive in parent category 7.1 at GMP.
4. **Additive: FAST GREEN FCF -** India supports adoption of Fast Green FCF at level of 100 mg/kg and new "Alternative Note" (Revised Option 2 Note). India permits use of this food additive at 100 mg/kg in parent Food Category 7.0.

Category No. 07.1.6 (Mixes for bread and ordinary bakery wares)

Corresponding commodity standards: None

1. **Additive: Brilliant Blue -** India supports adoption of Brilliant Blue at level of 100 mg/kg, removal of note 161 and new "Alternative Note" (Revised Option 2 Note) as India permits use of this additive in parent category 7.1.

2. **Additive: CARAMEL III - AMMONIA CARAMEL-** India supports adoption of CARAMEL III - AMMONIA CARAMEL at level of 50,000 mg/kg, removal of note 161 as India permits use of this additive in food category 7.1.6 at 50,000 mg/kg.
3. **Additive: Curcumin** - India supports adoption of curcumin at level of 500 mg/kg and new “Alternative Note” (Revised Option 2 Note). India permits use of this additive in parent category 7.1 at GMP.
4. **Additive: FAST GREEN FCF** - India supports adoption of Fast Green FCF at level of 100 mg/kg and new “Alternative Note” (Revised Option 2 Note). India permits use of this food additive at 100 mg/kg in parent Food Category 7.0.

Category No. 07.2 (Fine bakery wares (sweet, salty, savoury) and mixes)

Corresponding commodity standards: None

1. **Additive: Allura red** - India supports adoption of Allura red at level of 100 mg/kg, removal of note 161. India permits use of allura red at 100 mg/kg in all sub categories of FC 7.2.
2. **Additive: Brilliant Blue** - India does not support adoption of Brilliant Blue at level of 200 mg/kg in parent category FC 07.2 but supports adoption in sub categories. India permits use of this additive in food category 7.2.1 at 100 mg/kg and in FC 07.2.2. & 07.2.3 at 200 mg/kg.
3. **Additive: CARAMEL III - AMMONIA CARAMEL-** India supports adoption of CARAMEL III - AMMONIA CARAMEL at level of 50,000 mg/kg, removal of note 161 as India permits use of this additive in food categories 7.2.1, 7.2.2 and 7.2.3 at 50,000 mg/kg.
4. **Additive: FAST GREEN FCF** - India supports adoption of Fast Green FCF at level of 100 mg/kg and new “Alternative Note” (Revised Option 2 Note). India permits use of this food additive at 100 mg/kg in parent Food Category 7.0.
5. **Additive: INDIGOTINE (INDIGO CARMINE)** - India does not support adoption of INDIGOTINE (INDIGO CARMINE) at level of 200 mg/kg in parent category FC 07.2 but supports adoption in sub categories. India permits use of this additive in sub category 7.2.1 at 100 mg/kg and in FC 07.2.2. & 07.2.1 at 200 mg/kg.

Category No. 07.2.1 (Cakes, cookies and pies (e.g. fruit-filled or custard types))

Corresponding commodity standards: None

1. **Additive: ANNATTO EXTRACTS, BIXIN-BASED** - India supports adoption of ANNATTO EXTRACTS, BIXIN-BASED at level of 100 mg/kg, with note 8. India permits use of ANNATTO EXTRACTS, BIXIN-BASED at GMP.
2. **Additive: ANNATTO EXTRACTS, NORBIXIN-BASED** - India supports adoption of ANNATTO EXTRACTS, NORBIXIN-BASED at level of 100 mg/kg, with note 185. India permits use of ANNATTO EXTRACTS, NORBIXIN-BASED at GMP. Industry had reported use levels of upto 100 mg/kg to achieve desired colour. The level of 50 mg/kg may not be sufficient to sustain colour during high temperature processing to maintain the desired intensity of colour and shade in the final products.

Category No. 12.1.2 (Salt Substitutes)

Corresponding commodity standards: CODEX STAN 53-1981: Specifies composition of salt substitutes. Does not mention food additives

1. **Additive: CARAMEL I - PLAIN CARAMEL** - India supports discontinuation of CARAMEL I - PLAIN CARAMEL in this food category.

Category No. 12.2 (Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles))

Corresponding commodity standards – specific to FC 12.2.1 only: CODEX STAN 326-2017: Lists specific preservatives are used green peppers only; CODEX STAN 327-2017, 328-2017, 342-2021, 343-2021, 344-2021, 345-2021, and 347-2019: in powdered form only - Anticaking agents as listed in Table 3 of the GSFA

1. **Additive: ANNATTO EXTRACTS, BIXIN-BASED** - India supports discontinuation of ANNATTO EXTRACTS, BIXIN-BASED in this food category as India does not permit use of this additive in this food category.

2. **Additive: ANNATTO EXTRACTS, NORBIXIN-BASED** - India supports discontinuation of ANNATTO EXTRACTS, NORBIXIN-BASED in this food category as India does not permit use of this additive in this food category.
3. **Additive: CAMEL II - SULFITE CAMEL** - India supports discontinuation of CAMEL II – SULFITE CAMEL in this food category as India does not permit use of this additive in this food category.
4. **Additive: CAMEL IV - SULFITE AMMONIA CAMEL** - India supports discontinuation of CAMEL IV - SULFITE AMMONIA CAMEL in this food category as India does not permit use of this additive in this food category.

Food Category No. 12.2.1 (Herbs and spices)

Corresponding commodity standards: CODEX STAN 326-2017: Lists specific preservatives are used green peppers only; CODEX STAN 327-2017, 328-2017, 342-2021, 343-2021, 344-2021, 345-2021, and 347-2019: in powdered form only - Anticaking agents as listed in Table 3 of the GSFA.

1. **Additive: ANNATTO EXTRACTS, BIXIN-BASED** - India does not permit use of this additive in this food category and consider this additive in 12.2.2.
2. **Additive: ANNATTO EXTRACTS, NORBIXIN-BASED** - India does not permit use of this additive in this food category and consider this additive in 12.2.2.
3. **Additive: CAMEL I – PLAIN CAMEL** - India supports discontinuation of CAMEL I – PLAIN CAMEL in this food category as India does not permit use of this additive in this food category.
4. **Additive: CAMEL II - SULFITE CAMEL** - India does not permit use of this additive in this food category and consider this additive in 12.2.2.
5. **Additive: CAMEL IV - SULFITE AMMONIA CAMEL** - India does not permit use of this additive in this food category and consider this additive in 12.2.2.
6. **Additive: LYCOPENE, TOMATO** - India supports discontinuation of LYCOPENE, TOMATO in this food category as India does not permit use of this additive in this food category.
7. **Additive: PAPRIKA EXTRACT**- India supports discontinuation of PAPRIKA EXTRACT in this food category as India does not permit use of this additive in this food category.
8. **Additive: TARTRAZINE**- India does not support adoption of tartrazine in this food category as India does not permit use of this additive in this food category.

Food Category No. 12.2.2 (Seasonings and condiments)

Corresponding commodity standards: None

1. **Additive: CAMEL IV - SULFITE AMMONIA CAMEL** - India supports adoption of CAMEL IV - SULFITE AMMONIA CAMEL at level of 10,000 mg/kg without notes. India permits use of CAMEL IV - SULFITE AMMONIA CAMEL at 10,000 mg/kg in this food category.
2. **Additive: PAPRIKA EXTRACT** – India permits the levels of PAPRIKA EXTRACT at GMP in this food category.

Food Category No. 12.5 (Soups and broths)

Corresponding commodity standards: Standard for Bouillons and Consommés (CXS 117-1981). Chair's Note: There are multiple adopted provisions for colours in this FC.

1. **Additive: Allura red** - India supports adoption of Allura red at level of 100 mg/kg with note 337, removal of note 161. India permits use of allura red at 100 mg/kg in this food category.

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

Corresponding commodity standards: None.

1. **Additive: Allura red** - India supports adoption of Allura red at level of 100 mg/kg, removal of note 161 as India permits use of allura red at 100 mg/kg in this food category.

2. **Additive: Curcumin** - India supports adoption of Curcumin in this food category at 300 mg/kg as India permits use of this additive in this food category at GMP and the industries reported actual use level up to 300 mg/kg.
3. **Additive: PAPRIKA EXTRACT**- India supports adoption of PAPRIKA EXTRACT in this food category at 250 mg/kg with Note 39 as India permits use of this additive in this food category at GMP and the industries reported actual use level up to 250 mg/kg on a total carotenoid basis.

Appendix 5: All remaining draft and proposed draft provisions in the GSFA with the exception of: colours not addressed in parts ii and iii, and provisions for which CCFA is awaiting guidance from other Codex Alimentarius Committees or JECFA

Category Nos. 14.1.4 (Water-based flavoured drinks, including “sport”, “energy”, or “electrolyte” drinks and particulated drinks);

14.1.4.1 (Carbonated water-based flavoured drinks);

14.1.4.2 (Non-carbonated water-based flavoured drinks, including punches and ades), and

14.1.4.3 (Concentrates (liquid or solid) for water-based flavoured drinks)

Corresponding commodity standards: None

Comments: India proposes to retain proposed provisions in parent categories 14.1.4 at 3000 mg/kg with note 127 and note 131. India further requests JECFA to update its safety assessment and intake estimates