



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD ADDITIVES
Forty-Sixth Session

Hong Kong, China, 17-21 March 2014

**REVISION OF THE GUIDELINES FOR THE SIMPLE EVALUATION OF FOOD ADDITIVE INTAKES
(CAC/GL 3-1989) (N08-2013)**

Comments at Step 3 of Costa Rica, El Salvador, Peru and CCC

COSTA RICA

Costa Rica supports in general the submitted document and wants to thank Brazil for its work.

EL SALVADOR

General country comments:

1. El Salvador would like to thank the electronic Working Group led by Brazil for the preparation of the document. We support the progress in the revision of "the Guidelines for the Simple Evaluation of Food Additive Intakes" CAC/CL 3-1989, as they provide accessible indications that facilitate the dietary exposure assessment of food additives.
2. We agree that the revision of "the Guidelines for the Simple Evaluation of Food Additive Intakes" is based on the FAO/WHO "Principles and Methods for the Risk Assessment of Chemicals in Food (EHC 240)". It explicitly points out that this monograph provides a descriptive guide for JECFA to continue ensuring a transparent scientific data evaluation, established and performed by experts, in the risk assessment of chemicals in foods, and provides information to the users of JECFA products, as the risk manager, and other bodies and authorities concerned with risk assessment in the Member Countries.
3. Include a text in the document reflecting the need of risk analysis in all its phases for certain additives, specifically for those associated with respiratory diseases and cancer, as for instance colours, nitrate and sodium nitrite, because of the significance generated by the risk/benefit analysis.

Specific country comments:

4. We support the inclusion of paragraph 3.1.1 Regulation of use of food additives, because it states the need of specific data and additive use in the food industry and of assigning a numerical value to certain additives in order to substitute: Good Manufacturing Practices (GMP).
5. In paragraph 29, add to the title of Table 1: Approaches for Determining Food Consumption Data, the word "processed" because these foods are the ones where food additives are used.

Table 1: Approaches for Determining **Processed** Food Consumption Data.

6. In paragraph 38:

B.2 Check the actual levels of use:

Determine whether the additive is used at the maximum authorized level for all the foods, or only for some subcategories. Use actual maximum reported levels of use of the additive obtained from the food industry and/or determined from the analysis of foods, **especially in additives with a low ADI value** (see example in the Annex), as appropriate.

7. In El Salvador we have RTCA 67.04.54: 10 (Central American Technical Regulation) PROCESSED FOODS AND BEVERAGES. FOOD ADDITIVES, which regulates regionally produced and imported foods; this is useful when performing a study of the additive intake although there are financial and methodological limitations in obtaining updated consumption data.

PERU**GENERAL COMMENTS:**

The Technical Committee on Food Additives took note; we will not give any opinion on this matter because we do not have any scientific evidence or support that allows us to comment on the matter.

It has requested to reserve its opinion until the videoconference.

SPECIFIC COMMENTS: None.

CALORIE CONTROL COUNCIL (CCC)

The Calorie Control Council (CCC) appreciates the opportunity to provide comments on the CX/FA 14/46/6 document, Revision of the Guidelines for the Simple Evaluation of Food Additive Intake (CAC/GL 3-1989). We support the efforts of this eWG and were an active participant in the eWG. In our comments on the first circular of this eWG, we addressed a concern regarding an example of calculation of intake which was based on data obtained from only one country. We have noticed that our comments were not addressed in CX/FA 14/46/6 document, as this example is still present. We feel that it is inappropriate to use data from a single country as the basis of an international regulatory document. We respectfully request that this be removed from the draft.