CODEX ALIMENTARIUS COMMISSION ${f E}$







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Agenda Item 6

CX/FA 14/46/16 November 2013

JOINT FAO/WHO FOOD STANDARDS PROGRAMME **CODEX COMMITTEE ON FOOD ADDITIVES**

Forty-Sixth Session

Hong Kong, China, 17-21 March 2014

PROPOSALS FOR CHANGES AND/OR ADDITION TO THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CAC/GL 36-1989)

(prepared by an electronic Working Group led by Iran)

Governments and international organizations in Observer status with the Codex Alimentarius Commission wishing to submit comments at Step 3 on the proposed changes and/or addition to the International Numbering System for Food Additives (Annex 1) are invited to do so no later than 31 January 2014 as follows: Secretariat, Codex Committee on Food Additives, China National Center for Food Safety Risk Assessment (CFSA), Building 2, No. 37 Guangqu Road, Chaoyang District, Beijing 100022, China, (E-mail: secretariat@ccfa.cc), with a copy to the Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, Viale delle Terme di Caracalla, 00153 Rome, Italy (E-mail: Codex@fao.org).

Format for submitting comments: In order to facilitate the compilation of comments and prepare a more useful comments document, Members and Observers, which are not yet doing so, are requested to provide their comments in the format outlined in the Annex 2 to this document.

Background

- In March 2013 the 45th CCFA agreed to establish an electronic working group (eWG) open to all members and observers and hosted by Iran. In April 2013 the Codex Secretariat distributed CL 2013/13-FA inviting, by 15 September 2013 proposals for changes, addition (and deletion) to the INS list.
- The Codex Secretariat distributed on 14 May 2013 a kick-off message to the eWG containing an invitation to members and observers to sign up for the eWG by 15 June 2013. It was mentioned that the eWG will be working in English only. The terms of reference of the eWG as decided by the 45th CCFA were:
 - i) To consider the replies to the CL 2013/13-FA requesting proposals for changes/additions to the INS list and prepare a proposal for circulation for comment at Step 3;
 - ii) To discuss the proposed changes to technological purposes that due to time constraints could not be considered by the in-session working group meeting during the 45th Session of the Committee.
- The Circular Letter (CL 2013/13-FA), requesting for comments to the INS, set 15 September 2013 as the deadline for submission of comments.

The Electronic Working Group

- In April 2013, the Codex Secretariat distributed an invitation to Codex members and observers to express interest in participation in the eWG by 15 June 2013. This invitation contained the terms of reference of the eWG, a general outline of the work of the eWG, and the expected outcome of the work, namely a proposal for changes to the INS list.
- By 19 June 2013 nine countries, one member organization and observers from thirteen international organizations had signed up and expressed interest in participation in the eWG; Argentina, Brazil, European Union, Iran, Japan, Korea, New Zealand, Mexico, Peru, United States of America, FAO JECFA Secretariat, CCC, ELC, IADSA, IOFI, IFT, IACM, ICGA, IDF, ICGMA, IFAC, NATCOL, OIV and USP.
- 6. All the observers are recognized as Codex International Non-Governmental Organizations.

7. An outline of the work of the eWG was distributed to the eWG on 20 June 2013. The deadline for submitting information and comments was the same as that of to the CL, 15 September 2013.

- 8. On 30 September 2013 a compilation of the proposals received was sent to the eWG members for comments by 31 October 2013.
- 9. The proposal for changes and/or additions to the INS list is presented in **Table I and Table II** of the Annex, and they are based on the replies to CL 2013/13-FA.
- 10. The comments are included in the two tables with Table 1 which includes modification of an existing INS name or new INS number and purpose; and Table 2 which includes proposal for additional technological purposes.
- 11. The submission of INS changes are based on comments received from the following members of the eWG, Brazil, New Zealand, USA, Iran, EU, NATCOL, and IACM. All of the comments from members were supplemented with proper justifications, which is highly apperciated.

Annex I

PROPOSED DRAFT CHANGES AND/OR ADDITIONS TO THE INS (At Step 3)

International Numbering System for Food Additives, List in numerical order

The INS list in numerical order is proposed to be updated for some food additives as listed in the Tables below.

Comments:

- The changes are **bold/underlined font**.
- An attempt has been made to include all proposed changes, especially as regards the Technological Purposes in order to list all the Technological Purposes for which the additive is used according to comments received.
- In order to clarify the tables, additional notes are also included for each table. These additional notes explains the technological and general justification.
- Additional comment was provided for inclusion of emulsifying salts for some food additives with this functional class

Table 1: modification of an existing INS name or new INS number purpose

INS No.	Name of Food Additive in INS	Name of Food Additive in JECFA	Technological Purpose	<u>Notes</u>
<u>105</u>	<u>Carthamus yellow</u>	Carthamus yellow	<u>Colour</u>	See Note 1
163 (vi)	Black carrot extract		Colour	See Note 1
<u>176</u>	Potassium aluminium silicate-based pearlescent pigments (PAS-BPP)	Potassium aluminium silicate- based pearlescent pigments (PAS-BPP)		See Note 2
<u>176(i)</u>	Potassium aluminium silicate-based pearlescent pigments coated with titanium dioxide Type I	Potassium aluminium silicate- based pearlescent pigments coated with titanium dioxide Type I	Colour	
<u>176(ii)</u>	Potassium aluminium silicate-based pearlescent pigments coated with iron oxide Type II	Potassium aluminium silicate- based pearlescent pigments coated with iron oxide Type II	Colour	
<u>176(iii)</u>	Potassium aluminium silicate-based pearlescent pigments coated with titanium dioxide and iron oxide Type III	Potassium aluminium silicate- based pearlescent pigments coated with titanium dioxide and iron oxide	Colour	
499	Stigmasterol-rich plant sterols		<u>Stabiliser</u>	See Note 3
1100 (i)	alpha-Amylase from Aspergillus oryzae var.	alpha-Amylase from Aspergillus oryzae var.	Flour treatment agent	See Note 4
1100 (ii)	Carbohydrase from Bacillus licheniformis from Bacillus licheniformis	Carbohydrase from Bacillus licheniformis from Bacillus licheniformis	Flour treatment agent	See Note 4
1100 (iii)	alpha-Amylase from Bacillus megaterium expressed in Bacillus subtilis	alpha-Amylase from Bacillus megaterium expressed in Bacillus subtilis	Flour treatment agent	See Note 4
1100 (iv)	alpha-Amylase from Bacillus stearothermophilus expressed in Bacillus subtilis	alpha-Amylase from Bacillus stearothermophilus expressed in Bacillus subtilis	Flour treatment agent	See Note 4
1100 (v)	alpha-Amylase from Bacillus stearothermophilus	alpha-Amylase from Bacillus stearothermophilus	Flour treatment agent	See Note 4
1100 (vi)	alpha-Amylase from Bacillus subtilis	alpha-Amylase from Bacillus subtilis	Flour treatment agent	See Note 4
<u>1205</u>	Basic methacrylate copolymer		Glazing agent	See Notes 2 and 5
<u>1206</u>	Neutral methacrylate copolymer		Glazing agent	See Note 5

INS No.	Name of Food Additive in	Name of Food Additive in	Technological	<u>Notes</u>
	INS	JECFA	Purpose	
1207	Anionic methacrylate		Glazing agent	See Note 5
	<u>copolymer</u>			

Additional Note for Table 1:

- **Note 1:** The justification of addition of Carthamus yellow to the INS is because it has been reviewed by JECFA, and is approved for use in many countries, including Korea, China and Japan. The justification of addition of black carrot extract in the INS is because this colour is an anthocyanin, and is allowed for use in many countries, including the US and the EU.
- **Note 2:** It is based on the CCFA's decision to generally not list functional classes and technological purposes for "Parent" additives in the INS (CX/FA 11/43/16 and REP 11/FA, para. 145). Therefore, it is recommended to list the "Parent" additive in bold font in the INS without a functional class or technological purpose.
- **Note 3:** The functionality of Stigmasterol-rich plant sterols as stabiliser was questioned. The EU confirmed Stigmasterol-rich plant sterols were authorised as a new food additive in the EU in 2013. The technological need and function was scrutinised. Stigmasterol- rich plant sterols act as a stabiliser, ice nucleating agent, to generate and maintain the presence of ice dispersions within a range of ready-to-freeze alcoholic cocktails. The reason for assigning INS 499 not 497 to this additive is to ensure avoiding confusion with E 497 which does exist with the name Polyoxypropylene-polyoxyethylene polymers.
- **Note 4:** It was proposed to ensure harmonization between the names and functional classes used in the INS and the GSFA that six amylases with unique names in Table 3 of the GSFA are all associated with the same name (Amylases) and same INS number (INS 1100) in the INS. It has been proposed by USA the more specific names for the amylases used in the GSFA should be incorporated into the INS to allow for harmonization with the GSFA. Therefore, the Roman subclasses were chosen to identify the six amylases.
- **Note 5:** It was proposed to use Roman suffixes for "methacrylate copolymer" entities. However in order to avoid confusion with E number 205-206-207 which are assigned to Basic methacrylate copolymer, Netural methacrylate copolymer, Anionic methacrylate copolymer in sequence the same INS numbers were choosen; however it is up to CCFA to decide on this approach.

Table 2: Proposal for additional technological purposes (Requested for new technological purposes for one additive with following justification). The new technological purpose are presented in **bold/underlined font**)

INS#	Food Additive	CAC/GL 36-1989		Notes
INO#		INS Functional Class	Technological Purpose	notes
243	Lauric arginate ethyl ester	Preservative	preservative antimicrobial preservative	(Evidence that the compound has been or is capable of being used effectively for the technological purpose proposed) Note 6
290	Carbon dioxide	Carbonating agent Foaming agent Packaging gas Preservative Propellant	carbonating agent foaming agent packaging gas preservative propellant	Note 7
325	Sodium lactate	Acidity regulator Antioxidant Bulking agent Emulsifier Emulsifying salt Humectant Thickener	acidity regulator antioxidant synergist bulking agent emulsifier emulsifying salt humectant bodying agent	Note 9
327	Calcium lactate	Acidity regulator Emulsifying salt Firming agent Flour treatment agent	acidity regulator emulsifying salt firming agent flour treatment agent	Note 9
331(i)	Sodium dihydrogen citrate	Acidity regulator Emulsifier Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifier emulsifying salt sequestrant stabilizer	Note 9
331(ii)	Disodium monohydrogen citrate	Acidity regulator Emulsifier Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifier emulsifying salt sequestrant stabilizer	Note 9
331(iii)	Trisodium citrate	Acidity regulator Emulsifier Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifier emulsifying salt sequestrant stabilizer	Note 9
332(i)	Potassium dihydrogen citrate	Acidity regulator Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifying salt sequestrant stabilizer	Note 9
332(ii)	Tripotassium citrate	Acidity regulator Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifying salt sequestrant stabilizer	Note 9
333(i)	Monocalcium citrate	Acidity regulator Firming agent Emulsifying salt Sequestrant Stabilizer	acidity regulator firming agent emulsifying salt sequestrant stabilizer	Note 9

INS#	Food Additive	CAC/GL 36-1989		Notes
INO#	Food Additive	INS Functional Class	Technological Purpose	Notes
333(ii)	Dicalcium citrate	Acidity regulator Firming agent Emulsifying salt Sequestrant Stabilizer	acidity regulator firming agent emulsifying salt sequestrant stabilizer	Note 9
333(iii)	Tricalcium citrate	Acidity regulator Firming agent Emulsifying salt Sequestrant Stabilizer	acidity regulator firming agent emulsifying salt sequestrant stabilizer	Note 9
334	Tartaric acid (L(+)-)	Acidity regulator Antioxidant Emulsifying salt Flavour enhancer Sequestrant	acidity regulator antioxidant synergist emulsifying salt flavour synergist sequestrant	Note 9
335(i)	Monosodium tartrate	Acidity regulator Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifying salt sequestrant stabilizer	Note 9
335(ii)	Sodium L(+)-tartrate	Acidity regulator Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifying salt sequestrant stabilizer	Note 9
336(i)	Monopotassium tartrate;	Acidity regulator Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifying salt sequestrant stabilizer	Note 9
336(ii)	Dipotassium tartrate	Acidity regulator Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifying salt sequestrant stabilizer	Note 9
337	Potassium sodium L(+)-tartrate	Acidity regulator Emulsifying salt Sequestrant Stabilizer	acidity regulator emulsifying salt sequestrant stabilizer	Note 9
339(i)	Sodium dihydrogen phosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator/buffer emulsifier emulsifying salt humectant/moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9
339(ii)	Disodium hydrogen phosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Sequestrant Stabilizer Thickener	acidity regulator/buffer emulsifier emulsifying salt humectant/moisture-retention agent sequestrant stabilizer texturizing agent	Note 9
339(iii)	Trisodium phosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Preservative Sequestrant Stabilizer Thickener	acidity regulator emulsifier emulsifying salt humectant/moisture-retention agent antimicrobial synergist sequestrant stabilizer texturizing agent	Note 9

INS#	Food Additive	CAC/GL 36-1989		Notes
INS#	Food Additive	INS Functional Class	Technological Purpose	Notes
340(i)	Potassium dihydrogen	Acidity regulator	acidity regulator/buffer	Note 9
	phosphate	Emulsifier	emulsifier	
		Emulsifying salt	emulsifying salt	
		Humectant	humectant/moisture-retention agent	
		Sequestrant	sequestrant	
		Stabilizer	stabilizer	
		Thickener	texturizing agent	1
340(ii)	Dipotassium hydrogen	Acidity regulator	acidity regulator/buffer	Note 9
	phosphate	Emulsifier	emulsifier	
		Emulsifying salt	emulsifying salt	
		Humectant	humectant/moisture-retention agent	
		Sequestrant	sequestrant	
		Stabilizer	stabilizer	
0.40(***)	 	Thickener	texturizing agent	N O
340(iii)	Tripotassium	Acidity regulator	acidity regulator/buffer	Note 9
	phosphate	Emulsifier	emulsifier	
		Emulsifying salt	emulsifying salt	
		Humectant	humectant/moisture-retention agent	
		Sequestrant	sequestrant	
		Stabilizer	stabilizer	
0.4473	Coloium dit i	Thickener	texturizing agent	Net- 2
341(i)	Calcium dihydrogen	Acidity regulator	acidity regulator	Note 9
	phosphate	Anticaking agent	anticaking agent	
		Emulsifying salt	emulsifying salt	
		Firming agent	firming agent	
		Flour treatment agent	dough conditioner/flour treatment	
		Humectant	agent	
		Raising agent	humectant/moisture retention agent	
		Sequestrant	raising agent	
		Stabilizer	sequestrant	
		Thickener	stabilizer	
0.44 (::\	0-1-:	A = : -1:4: 4	texturizing agent	Note 0
341(ii)	Calcium hydrogen	Acidity regulator	acidity regulator	Note 9
	phosphate	Anticaking agent	anticaking agent	
		Emulsifying salt	emulsifying salt	
		Firming agent	firming agent	
		Flour treatment agent	dough conditioner/flour treatment	
		Humectant	agent humectant/moisture-retention agent	
		Raising agent Stabilizer		
		Thickener	raising agent stabilizer	
		THICKEHEI	texturizing agent	
341(iii)	Tricalcium phosphate	Acidity regulator	acidity regulator/buffer	Note 9
J4 I (III)	meaicium phosphate	Acidity regulator	acidity regulator/buller anticaking agent	NOIE 9
		Anticaking agent Emulsifier	clouding agent	
		Emulsifying salt	emulsifying salt	
		Firming agent Flour treatment agent	firming agent flour treatment agent	
		Humectant	humectant/moisture-retention agent	
		Raising agent	9	
		Stabilizer	raising agent stabilizer	
		Thickener		
242(:)	Ammonium		texturizing agent	Note 7
342(i)	Ammonium	Acidity regulator	acidity regulator	Note 7
	dihydrogen phosphate	Flour treatment agent	flour treatment agent	
		Stabiliser Thickener	stabiliser	
0.40(::)	Diamenanium	Thickener	thickener	Not- 7
342(ii)	Diammonium	Acidity regulator	acidity regulator	Note 7
0 12(11)	les relaciones en la	[[[]]] [] [] [] [] [] [] []		
012(11)	hydrogen phosphate	Flour treatment agent Stabilizer	flour treatment agent stabilizer	

INIC #	Food Additive	CAC/GL 36-1989		Notes
INS#	Food Additive	INS Functional Class	Technological Purpose	Notes
343(i)	Monomagnesium phosphate	Acidity regulator Emulsifying salt Flour treatment agent Stabilizer Thickener	acidity regulator emulsifying salt flour treatment agent stabilizer thickener	Notes 7 and 9
343(ii)	Magnesium hydrogen phosphate	Acidity regulator Emulsifying salt Flour treatment agent Stabilizer Thickener	acidity regulator emulsifying salt flour treatment agent stabilizer thickener	Notes 7 and 9
343(iii)	Trimagnesium phosphate	Acidity regulator Flour treatment agent Stabilizer Thickener	acidity regulator flour treatment agent stabilizer thickener	Note 7
450(i)	Disodium diphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator/buffering agent emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9
450(ii)	Trisodium diphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9
450(iii)	Tetrasodium diphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator/buffering agent emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9
450(iv)	Dipotassium diphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer	acidity regulator/ emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer	Note 9
450(v)	Tetrapotassium diphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9
450(vi)	Dicalcium diphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator/buffering agent emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9

INIO #	Food Addition	CAC/GL 36-1989		Netss
INS#	Food Additive	INS Functional Class	Technological Purpose	Notes
450(vii)	Calcium dihydrogen diphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer	acidity regulator emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer	Note 9
450(ix)	Magnesiumdihydrogen	Acidity regulator	acidity regulator	Note 7
451(i)	diphosphate Pentasodium triphosphate	Raising agent Acidity regulator Emulsifier Emulsifying salt Humectant Sequestrant Stabilizer Thickener	raising agent acidity regulator emulsifier emulsifying salt moisture-retention agent sequestrant stabilizer texturizing agent	Note 9
451(ii)	Pentapotassium triphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Sequestrant Stabilizer Thickener	acidity regulator emulsifier emulsifying salt moisture-retention agent sequestrant stabilizer texturizing agent	Note 9
452(i)	Sodium polyphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator emulsifying salt moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9
452(ii)	Potassium polyphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9
452(iv)	Calcium polyphosphate	Acidity regulator Emulsifier Emulsifying salt Humectant Raising agent Sequestrant Stabilizer Thickener	acidity regulator emulsifier emulsifying salt moisture-retention agent raising agent sequestrant stabilizer texturizing agent	Note 9
452(v)	Ammonium polyphosphate	Acidity regulator Emulsifier Humectant Sequestrant Stabilizer Thickener	acidity regulator emulsifier moisture-retention agent sequestrant stabilizer texturizing agent	Note 7
500(i)	Sodium carbonate	Acidity regulator Anticaking agent Raising agent <u>Stabilizer</u> <u>Thickener</u>	acidity regulator anticaking agent raising agent stabilizer thickener	Note 7
500(ii)	Sodium hydrogen carbonate	Acidity regulator Anticaking agent Raising agent Stabilizer Thickener	acidity regulator anticaking agent raising agent stabilizer thickener	Note 7

INS#	Food Additive	CAC/GL 36-1989		Notes
		INS Functional Class	Technological Purpose	Notes
508	Potassium chloride	Firming agent	firming agent	Note 8
		Flavour enhancer	flavour enhancers	
		Stabiliser	stabiliser synergist	
		Thickener	thickener sysnergist	
509	Calcium chloride	Firming agent	firming agent	Note 7
		Stabiliser	stabiliser synergist	
		Thickener	thickener sysnergist	
542	Bone phosphate	Anticaking agent	anticaking agent	Note 7
		Emulsifier	emulsifier	
		Humectant	moisture-retention agent	
		<u>Stabilizer</u>	<u>stabilizer</u>	
		<u>Thickener</u>	<u>thickener</u>	
941	Nitrogen	Foaming agent	foaming agent	Note 7
		Packaging gas	packaging gas	
		Propellant	propellant	
1442	Hydroxypropyldistarch	Anticaking agent	anticaking agent	Note 7
	phosphate	Emulsifier	emulsifier	
		Stabilizer	stabilizer	
		Thickener	binder/thickener	

Additional Note for Table 2:

Note 6: This additive "Lauric arginate ethyl ester" is used as antimicrobial preservative in USA.

Note 7: In order to compare and align functional class of some additives of INS with those listed in the Milk Product Commodity Standards, IDF has carried out an analysis and comparison of the food additive functional classes included in Class names of INS and those listed in the corresponding food additive provisions in the 34 Milk Product Commodity Standards as contained in Milk and Milk Products 2nd Edition (2011) and on the Codex Alimentarius website. The above additional requested functional classes is to align the food additive classes with those justified for 14 food additives during the revision and updating of existing standards and the elaboration of new commodity standards by CCMMP completed and adopted by the Commission in 2010.

Note 8: A proposal was made during 45th CCFA to replace the functional classes of stabilizer and thickener by firming agent for INS 508 Potassium chloride and INS 509 Calcium chloride. It was indicated at that time that the removal of these functions from the two additives would have implications and create problems for the Codex *Standard for Fermented Milks* (CODEX STAN 243-2003), which does not include firming agent among the classes of food additives that can be used. To address this, a proposal was made that the technological purpose of these two food additives is to act as "stabilizer synergists" or "thickener synergists, which are not currently listed in Section 2 of CAC/GL 36-1989). It is recommended that the 46th CCFA considers this proposal, which was not discussed by the eWG.

Note 9: It was advised by IDF that the functional category of Emulsifying Salts is not assigned for any food additive with this functional class. It was reminded that Emulsifying salts are necessary and widely used in the manufacture of processed cheese, processed cheese preparations and related products and the absence of food additives in this functional class in CAC/GL 36-1989 may lead to problems in international¹.

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¹ This list is based mainly on that in the Report of the Physical Working Group on the proposed draft standard for Processed Cheese to the 9th Session of CCMMP in 2010 – the specific names of the individual food additives and their respective INS numbers are those in GL-36. However the sodium aluminium phosphates (INS 541i, ii) have been added based on the decision of CCFA 2013 to retain these food additives, with the new footnote "For use in processed American cheese only"

Annex 2

GENERAL GUIDANCE FOR THE PROVISION OF COMMENTS

In order to facilitate the compilation and prepare a more useful comments' document, Members and Observers, which are not yet doing so, are requested to provide their comments under the following headings:

- (i) General Comments
- (ii) Specific Comments

Specific comments should include a reference to the relevant section and/or paragraph of the document that the comments refer to.

When changes are proposed to specific paragraphs, Members and Observers are requested to provide their proposal for amendments accompanied by the related rationale. New texts should be presented in <u>underlined/bold font</u> and deletion in <u>strikethrough font</u>.

In order to facilitate the work of the Secretariats to compile comments, Members and Observers are requested to refrain from using colour font/shading as documents are printed in black and white and from using track change mode, which might be lost when comments are copied / pasted into a consolidated document.

In order to reduce the translation work and save paper, Members and Observers are requested not to reproduce the complete document but only those parts of the texts for which any change and/or amendments is proposed.