

# 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

#### Fifty-Fourth Session

### DISCUSSION PAPER ON DIVERGENCE BETWEEN THE *GENERAL STANDARD FOR FOOD ADDITIVES* (GSFA), CODEX COMMODITY STANDARDS AND OTHER TEXTS –

#### IDENTIFICATION OF OUTSTANDING ISSUES

(Comments of Canada, Kenya, Senegal, Thailand)

#### Canada

Canada appreciated working with China as author and the European Union as fellow co-chair on the “Discussion paper on divergence between the General Standard for Food Additives (GSFA), Codex commodity standards and other texts”. Canada fully supports efforts to prevent Divergence and efforts to recognize CCFA as the single reference point for food additives in the Procedural Manual.

**Position:** Canada prefers option 2 presented in the discussion paper as having the most impact on the prevention of future divergence and formalizing the recognition of CCFA as the single reference point for food additives in the Procedural Manual without undo resource requirements. Canada would also be supportive of a modified Option 2 in which reference to the “Guideline on avoiding future divergence of food additive provisions in the GSFA with commodity standards” and the “Guidance to commodity committee on the alignment of food additive provisions” were not added to the Procedural Manual.

At this time, Canada feels it would be premature to implement Option 3 as a holistic assessment of updates to the Procedural Manual will be required at the completion of the Alignment exercise.

#### Kenya

Kenya thanks China, Canada, and the European Union for preparing this Discussion paper and recognizes the need to protect the work that has already been undertaken considering the time and resources invested. Additionally, alignment work is still ongoing, and more lessons may be learned as work progresses. It is premature at this point to undertake a holistic revision of the procedural manual, especially considering that CCFA has previously recognized the complex nature of alignment. It would be appropriate to consider minor amendments as proposed in option 2 of strengthening reference to GSFA by commodity committees as well as eliminating any provision that negates the principle of having GSFA as the single most authoritative document. Upon completion of alignment work, then a comprehensive revision of the procedural manual may be considered.

#### Senegal

**Contexte :** Le Comité du Codex sur les additifs alimentaires (CCFA) travaille depuis sa 42<sup>ème</sup> session en 2010 sur la réalisation de l'alignement complet de la Norme générale pour les additifs alimentaires (CXS 192-1995), ci-après dénommée NGAA, sur les dispositions relatives aux additifs alimentaires contenues dans les normes de produits du Codex. Les travaux d'alignement ont pour but d'aligner systématiquement les dispositions relatives aux additifs alimentaires des normes de produits sur celles de la NGAA, conformément au principe fondamental qui fixe la NGAA comme point de référence unique pour les additifs alimentaires dans le Codex Alimentarius et doivent par conséquent prendre en compte toute disposition relative aux additifs alimentaires dans les normes de produits.

Pour s'assurer que de nouvelles divergences entre la NGAA et les normes de produits sur les dispositions relatives aux additifs alimentaires ne surviennent, le CCFA52 est convenu d'établir un groupe électronique de travail (GTE) sur l'alignement pour examiner, conformément à l'un des articles de son mandat: si l'information dans le Manuel

de procédure est suffisante ou si des amendements sont nécessaires pour s'assurer que des divergences futures ne surviennent, en tenant compte du document sur les Directives pour prévenir toute divergence future entre la NGAA et les normes de produits sur les dispositions relatives aux additifs alimentaires.

Le CCFA53 est convenu de préparer un document de discussion pour identifier les questions en suspens afin de prévenir les divergences futures entre la NGAA, les normes de produits et d'autres textes, le document de discussion identifiera spécifiquement les questions en suspens afin de prévenir les divergences futures entre la NGAA, les normes de produits et d'autres textes.

**Position :** sur les trois options proposées pour prévenir les divergences futures entre les dispositions relatives aux additifs alimentaires de la NGAA et des normes de produits, le Sénégal soutient l'option 2.

**Justification :** L'option 2 permet de renforcer la NGAA en tant que point de référence unique pour les additifs alimentaires et supprime le paragraphe qui est considéré comme incompatible avec les objectifs des principes régissant l'alignement.

### Thailand

Thailand appreciates the work done by China, Canada, and the European Union in accomplishing the task on preparing the Discussion paper on divergence between the GSFA, Codex commodity standards and other texts.

Regarding the possible ways to avoid future divergence of food additive provisions in the GSFA with Codex Commodity Standards, Thailand prefers Option 2 (except for item ii "To remove paragraph 60, which is counter to the premise of Alignment").

From our point of view, the amendments of the Procedural Manual should be done only to the extent reasonably necessary. We are of the opinion that the addition of the statement that the GSFA is the single reference point for food additives, and the reference to the guidance and the guideline in the Procedural Manual will provide a clearer understanding. The information in Procedural Manual is sufficient when used in conjunction with the guidance and the guideline to avoid future divergence.

We, therefore, believe that Option 2 is suitable for the current situation. However, we propose that the removing of paragraph 60 should be postponed and will be reconsidered once the current work plan for Alignment is completed.