



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
FAO/WHO COORDINATING COMMITTEE FOR THE NEAR EAST

Tenth Session

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FOOD ADDITIVE PROVISIONS FOR THE REGIONAL STANDARD FOR DOUGH

(Prepared by the Islamic Republic of Iran)

1. BACKGROUND

1.1. The FAO/WHO Coordinating Committee for the Near East at its 9th Session¹ (CCNE9) agreed to forward the proposed draft Regional Standard for Doogh to the 40th Session of the Codex Alimentarius Commission (CAC40) for adoption at Step 5/8 and to send the sections on food additives and labelling to the relevant committees for endorsement.

1.2. The labelling provisions were endorsed by the Codex Committee on Food Labelling (CCFL). However, the food additives provisions were not endorsed by the 50th session of the Codex Committee on Food Additives (CCFA50) and the report of CCFA50² noted that:

- (i) all except two of the food-additives provisions were identical to those in the *Standard for Fermented Milks* (CXS 243-2003) i.e. nisin and magnesium dihydrogen diphosphate;
- (ii) there were transcription errors in the draft Regional Standard for Doogh, including in table 4.1 between heat-treated doogh and unheated doogh;
- (iii) the footnote (a) to the table in section 4.1, referring to national legislation, was not appropriate; and
- (iv) no justification was provided for the deviation from the requirements of the Procedural Manual, Section II: Elaboration of Codex texts, Relations between commodity committees and General Subject Committees (pp. 50-51 and 57-58), as to why the GSFA was not referenced in this commodity standard.

1.3. In this context, CCFA 50 agreed to request that CCNE:

- (i) consider whether a general reference to the *General Standard for Food Additives* (GSFA, CXS192-1995) was possible in place food-additive provisions in the draft Regional Standard and if not to provide a justification;
- (ii) assess the detailed comments provided in [CCFA50/CRD31](#); and
- (iii) reconsider reference to footnote (a) in the Table of Section 4.1.

1.4. In the meantime CAC40 agreed to adopt the draft Regional Standard for Doogh at Step 5/8 but the standard was not published as there was outstanding work to be done in relation to endorsement of its food labelling and food additive provisions.³

1.5. CAC41 although aware that the food-additive provisions in the draft Regional Standard for Doogh had not been endorsed by CCFA50 but agreed to publish the Regional Standard for Doogh, noting its provisions on food additives would be subject to further development.⁴

1.6. Thus while the regional standard is now available it does not currently contain any food additive provisions⁵.

¹ REP17/NE

² REP18/FA paras. 32 and 33

³ REP17/CAC, para. 63

⁴ REP18/CAC, para. 95

⁵ See CXS 332R-2018

2. ALIGNMENT WITH THE GENERAL STANDARD FOR FOOD ADDITIVES

2.1. CCFA, together with respective commodity committees, has been working for a number of years to achieve full alignment between the General Standard for Food Additives (GSFA) and the food additive provisions in Codex commodity standards. In the schedule for alignment, work to align the food additive provisions with the *Standard for Fermented Milks* (CXS 243-2003) is scheduled to be completed by 2021⁶.

2.2. The proposed food additive provisions in the Standard for Doogh agreed at CCNE9 were very similar to the food additive provisions in the *Standard for Fermented Milks* (CXS 243-2003). The proposal also included a footnote referring to national legislation, similar to that in the *Standard for Fermented Milks* (CXS 243-2003).

3. CONCLUSIONS AND RECOMMENDATIONS

3.1. Considering the feedback from CCFA50 and the ongoing work on alignment of food additives with the CCFA, the inclusion of a specific list of food additives for Doogh would require the provision of a sufficient justification for their consideration by CCFA. Further, considering the ongoing work to align the food additive provisions in the *Standard for Fermented Milks* with the GSFA, development of the list based on that standard may be premature.

3.2. CCNE is reminded to note the following:

- (i) Based on the descriptors of food categories in the GSFA, Doogh (plain, not heat treated) is under FC 01.2.1.1, Doogh (Regional Standard) (plain, heat treated) is under FC 01.2.1.2 and Doogh (flavoured, heat treated and not heat treated) is under FC 01.1.4.
- (ii) FC 01.2 is listed in the annex to table three which means the use of the food additives in this food category is governed by the provisions in Tables One and Two; however, as indicated in the footnote in the annex, acidity regulators, packaging gases, stabilizers and thickeners listed in Table 3 are acceptable for use in fermented milks, heat treated after fermentation, as defined in the Standard for Fermented Milks (CXS 243-2004) that correspond to food category 01.2.1.2 "Fermented milks (plain), heat treated after fermentation".
- (iv) FC 01.1.4 is not listed in the annex to table three which means the use of additives listed in Table Three in the food category is not only governed by the provisions in Tables One and Two but also by Table Three.

3.3. In this context it is proposed that CCNE consider the following options:

(i) Make a general reference to the GSFA as follows:

"Acidity regulators, carbonating agents, colours, emulsifiers, preservatives, stabilizers, sweeteners, and thickeners used in accordance with Tables 1 and 2 of the General Standard of Food Additives (CXS 192-1995) in food categories 01.1.4 (Flavoured fluid milk drinks), 01.2.1.1 (Fermented milks (plain), not heat-treated after fermentation) and 01.2.1.2 (Fermented milks (plain), heat-treated after fermentation) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.

Flavorings

The flavorings used in products covered by this standard should comply with the Guidelines for the Use of Flavorings (CXG 66-2008).

(ii) Since the permitted food additives may vary according to the end product (heat-treated or non-heat treated, plain or flavoured) a table of the permitted food additives by product type and accompanying text is included as follows:

Only those additives classes indicates as justified in the table below may be used for the product categories specified. *Acidity regulators, carbonating agents, colours, emulsifiers, flavour enhancers, preservatives, stabilizers, sweeteners, and thickeners used in accordance with Tables 1 and 2 of the General Standard of Food Additives (CXS 192-1995) in food categories 01.1.4 (Flavoured fluid milk drinks), 01.2.1.1 (Fermented milks (plain), not heat-treated after fermentation) and 01.2.1.2 (Fermented milks (plain), heat-treated after fermentation) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.*

⁶ See CCFA Information Document "Guidance to commodity committees on the alignment of food additive provisions" available under: http://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CCFA_e_01.pdf

Flavorings

The flavorings used in products covered by this standard should comply with the Guidelines for the Use of Flavorings (CXG 66-2008).

Additive class	Heat treated doogh		Un-heat treated doogh	
	Plain	Flavoured	Plain	Flavoured
Acidity Regulators	X	X	-	X
Carbonating agents	X	X	X	X
Colours	-	X	-	X
Emulsifiers	-	X	-	X
Preservatives	-	X	-	-
Stabilizers	X	X	X ^(a)	X
Sweeteners	-	X	-	X
Thickeners	X	X	X ^(a)	X

X The use of additives belonging to the class is technologically justified. In the case of flavoured products, the additives are technologically justified in the dairy portion.

-The use of additives belonging to the class is not technologically justified.

(a) Use is restricted to reconstitution and recombination and if permitted by national legislation in the country of sale to the final consumer.

For this option, as indicated by CCFA50, the appropriateness of the footnote (a) should be re-considered.

Or

- (iii) Further work on the food additive provisions for Doogh be undertaken but only after the completion of the alignment of the food additive provisions for the *Standard for Fermented Milks* (CXS 243-2003) with the GSFA (i.e. after 2021).