



**Food and Agriculture
Organization of
the United Nations**



**World Health
Organization**

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Agenda Item 4b

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

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DISCUSSION PAPER ON THE ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF THE STANDARDS FOR MEAT PRODUCTS AND RELEVANT PROVISIONS OF THE GSFA

(Report of the electronic working group on harmonisation of meat standards with the GSFA led by Australia with the assistance of Argentina, Brazil, Costa Rica, Cuba, Denmark, Dominican Republic, EU, France, Ghana, Indonesia, Iran, Japan, Malaysia, Mexico, New Zealand, Norway, Thailand, United Kingdom, United States of America, CEFIC, ICGMA, IDF, IOFI and Marinalg International)

1. Introduction

1. The 42nd Session of the Codex Committee on Food Additives (CCFA) agreed to establish an electronic Working Group (e-WG), led by Australia, working in English, to prepare a discussion paper with a proposal for the alignment of the food additive provisions of the five Codex standards for meat products with the relevant adopted GSFA food additive standards, and to provide an analysis of the problems and solutions identified in carrying out this work.

2. The 43rd CCFA noted the following recommendations of the e-WG:

Recommendation I

CCFA noted that the e-WG was able to reach consensus on:

- On a decision tree approach to harmonising food additive permissions in Commodity Standards with the GSFA.
- On the need for the food additives to be technologically justified and safe for use.

Recommendation II

CCFA noted that consensus was not reached on:

- Which standards to use as the default, the commodity standard or the GSFA.
- Whether additives should be considered by additive class or additive by additive.

Recommendation III

It was recommended that the e-WG continue to progress this issue to resolve issues associated with the harmonisation of meat Commodity Standards with the GSFA and present a further paper for agreement at the 44th CCFA meeting in 2012.

3. The 43rd CCFA agreed that the e-WG should continue with this work, led by Australia. The Chair suggested that the working group, while elaborating on proposals agreed so far, should ensure that the final format is not too complicated. In addition, the Committee agreed that as the meat commodity committee is no longer operational, the working group should also review food additive provisions currently applying in the five meat standards.

2. Summary of Progress since First Draft

4. In circulating the proposed approach to the e-WG report for comment, the Chair of the working group requested comments and additions to a summary of the advantages and disadvantages of the two options that had been presented to the 43rd CCFA.

5. The Chair of the e-WG also requested comments on an alternate approach, which attempted to combine the advantages of both original approaches, which was put forward as a proposed compromise for a balanced position for consideration.
6. The Chair also requested comments on the decision tree developed using this alternative approach, and finally requested comments on the use of the revised decision tree as applied to the Codex Meat Commodity Standards.
7. Responses on the first draft were received from the Delegations of Costa Rica, European Union, Japan, New Zealand, South Africa, United Kingdom, United States of America and from ICGMA, IDF, IOFI, and Marinalg.
8. The general thrust of the responses was positive towards the proposed compromise approach.
9. The Chair of the e-WG has considered the helpful comments and suggestions for amendments by the members of the e-WG on the first draft of the paper.
10. The discussion and recommendations of the e-WG, together with the proposed approach by the e-WG chair, are detailed under Sections 3 and 4 of this report. The chair's proposed approach has taken into consideration what seemed to be common views from the e-WG, and some judgement.
11. While there is general agreement in many areas, there continues to be no agreement on the approach to additives that are permitted in the Commodity Standards and in the GSFA Table 3.
12. In section 4 the amended proposed approach has been transformed into an amended Decision Tree: Revised Recommended Approach to the Alignment of the GSFA and Commodity Standards Food Additive Provisions.
13. Using the amended decision tree, the required changes to GSFA Food Category 08.2.2 Food Additive Provisions to include the commodity standards *Cooked Cured Ham* (CODEX STAN 96-1981) and *Cooked Cured Pork Shoulder* (CODEX STAN 97-1981) and to Food Category 08.3.2 Food Additive Provisions to include the commodity standards *Corned Beef* (CODEX STAN 88-1981), *Luncheon Meat* (CODEX STAN 89-1981) and *Cooked Cured Chopped Meat* (CODEX STAN 98-1981) were identified. See section 5 of this Report.
14. Section 6 summarises the individual comments on the first draft of the paper from the e-WG participants for transparency.
15. The Chair of the e-WG would like to sincerely thank the participants of the e-SWG for their helpful input into the discussion.

3. General Approach Recommended

3.1 Use of a 'compromise' approach to reconciling food additive permissions in commodity standards and the GSFA.

16. The 'compromise approach' in relation to food additive permissions was to respect that commodity standards had legitimate technical reasons for a reduced set of additive permissions, but also to recognise that where possible the equivalent permissions in the relevant GSFA standards be used.

3.2 Use of a Decision Tree approach in deciding specific additive permissions

17. An improved decision tree was developed by the e-WG and tested on the meat commodity standards. It is recommended that this decision tree be used in aligning commodity standard and GSFA additive permissions and limits. The decision tree is detailed in the following section of this report.

18. It is recommended the amended Decision Tree be discussed at the 44th CCFA in China.

3.3 Reconciling additive permissions, which have limits in commodity standards but are GMP in the GSFA (i.e., Table 3)

19. There was general agreement that GMP should be the default, but it is recommended that a process be established for commodity standards without a current Committee to conclude whether or not a particular Table 3 additive should have its level of use restricted, on the basis of a query/submission.

3.4 Use of all Table 3 additives in commodity standards where the relevant GSFA food group allows Table 3 additives

20. There was general consensus that it is inappropriate to be able to automatically allow the addition of all Table 3 additives to commodity standards. However the degree of acceptance of permitting these additives was still not agreed by the e-WG.

21. There appear to be two potential ‘middle ground’ options:

1. Allow all Table 3 additives currently listed in the commodity standard to be added at GMP (unless restricted, as above) through the GSFA.
2. Allow all Table 3 additives in the functional classes defined in the commodity standard to be used.

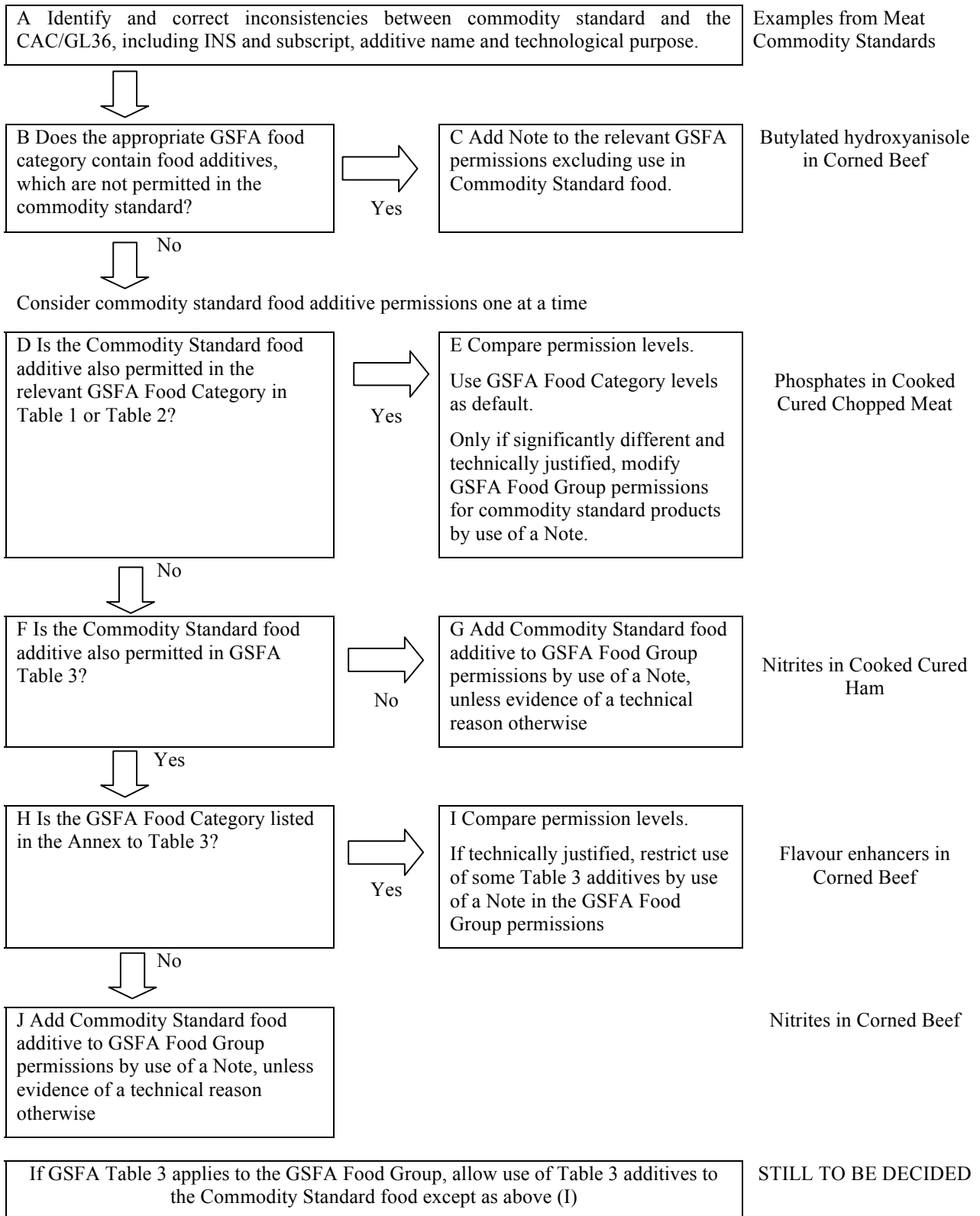
22. Both of these options may require a degree of restructuring of the GSFA food category.

23. It is recommended that this issue be discussed at the 44th CCFA in China.

4. Recommended Decision Tree

24. The e-WG has further modified the decision tree presented at the 43rd CCFA, as follows.

Recommended Approach to Alignment of the GSFA and Commodity Standards Food Additive Provisions



5. Use of the decision tree with meat commodity standards

25. The decision tree above was used in assessing how the additive permissions for the various meat standards could be incorporated into the relevant GSFA Food Groups (summarised using online format).

5.1 Updated Proposed GSFA Food Category 08.2.2 Food Additive Provisions Including Commodity Standards *Cooked Cured Ham* (CODEX STAN 96-1981) and *Cooked Cured Pork Shoulder* (CODEX STAN 97-1981)

Basis: GSFA Online, Updated up to the 43rd Session of the Codex Alimentarius Commission (2011)

FOOD CATEGORY DETAILS

Heat-treated processed meat, poultry, and game products in whole pieces or cuts (08.2.2)

Description:

Includes cooked (including cured and cooked, and dried and cooked), heat-treated (including sterilized) and canned meat cuts. Examples include: cured, cooked ham; cured, cooked pork shoulder; canned chicken meat; and meat pieces boiled in soy sauce (tsukudani).

This page provides information on the food additive provisions that are acceptable for use in foods conforming to the food category

INS No.	Food Additive or Group	Max Level	Notes	Defined In
133	Brilliant blue FCF	100 mg/kg	Note 16 Note 4 Note New X1	08.0
320	Butylated hydroxyanisole	200 mg/kg	Note 130 Note 15 Note New X1	08.2
321	Butylated hydroxytoluene	100 mg/kg	Note 167 Note 130 Note 15 Note New X1	08.2
150c	Caramel III - ammonia caramel	GMP	Note 16 Note 4 Note 3 Note New X1	08.0
150d	Caramel IV - sulfite ammonia caramel	GMP	Note 16 Note 4 Note 3 Note New X1	08.0
120	Carmines	500 mg/kg	Note 16 Note New X1	08.2
160a(ii)	beta-Carotenes (vegetable)	5,000 mg/kg	Note 16 Note New X1	08.2
127	Erythrosine	30 mg/kg	Note 16 Note 4 Note New X1	08.2
143	Fast green FCF	100 mg/kg	Note 4 Note 3 Note New X1	08.2
163(ii)	Grape skin extract	5,000 mg/kg	Note 16 Note New X1	08.2
	POLYSORBATES	5,000 mg/kg	Note New X1	08.2
310	Propyl gallate	200 mg/kg	Note 130 Note 15 Note New X1	08.2
	RIBOFLAVINS	1,000 mg/kg	Note 16 Note New X1	08.2
	SACCHARINS	500 mg/kg	Note 161 Note New X1	08.2.2
474	Sucroglycerides	5,000 mg/kg	Note 15 Note New X1	08.2.2
110	Sunset yellow FCF	300 mg/kg	Note 16 Note New X1	08.2

INS No.	Food Additive or Group	Max Level	Notes	Defined In
319	Tertiary butylhydroquinone	100 mg/kg	Note 167 Note 130 Note 15 Note New X1	08.2
	NITRITES	85mg/kg as NO ₂ ion	Note New X2	08.2.2
	PHOSPHATES (added)	1320mg/kg as P ₂	Note New X2	08.2.2
	TABLE 3 ADDITIVES (to be determined)			

Items in uppercase (e.g. PHOSPHATES) refer to food additive groups.

Notes (proposed new notes would be issued appropriate numbers)

- Note 3: Surface treatment.
- Note 4: For decoration, stamping, marking or branding the product.
- Note 15: Fat or oil basis.
- Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.
- Note 130: Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylated hydroquinone (INS 319), and propyl gallate (INS 310).
- Note 161: Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
- Note 167: For dehydrated products only.
- New Note X1** **Not permitted** for *Cooked Cured Ham* (CODEX STAN 96-1981) or *Cooked Cured Pork Shoulder* (CODEX STAN 97-1981)
- New Note X2:** **Only permitted** for *Cooked Cured Ham* (CODEX STAN 96-1981) or *Cooked Cured Pork Shoulder* (CODEX STAN 97-1981)

5.2 Updated Proposed GSFA Food Category 08.3.2 Food Additive Provisions Including Commodity Standards

Basis: GSFA Online, Updated up to the 43rd Session of the Codex Alimentarius Commission (2011)

FOOD CATEGORY DETAILS

Heat-treated processed comminuted meat, poultry, and game products (08.3.2)

Description:

Includes cooked (including cured and cooked, and dried and cooked), heat-treated (including sterilized) and canned comminuted products. Examples include: pre-grilled beef patties; foie gras and pates; brawn and head cheese; cooked, cured chopped meat; chopped meat boiled in soy sauce (tsukudani); canned corned beef; luncheon meats; meat pastes; cooked meat patties; cooked salami-type products; cooked meatballs; sausices de strasbourg; breakfast sausages; brown-and-serve sausages; and terrines (a cooked chopped meat mixture).

This page provides information on the food additive provisions that are acceptable for use in foods conforming to the food category.

INS No.	Food Additive or Group	Max Level	Notes	Defined In
129	Allura red AC	25 mg/kg	Note 161 Note New X1 Note New X2	08.3.2
133	Brilliant blue FCF	100 mg/kg	Note 16 Note 4 Note New X1 Note New X2	08.0
320	Butylated hydroxyanisole	200 mg/kg	Note 130 Note 15 Note New X1 Note New X2	08.3

INS No.	Food Additive or Group	Max Level	Notes	Defined In
321	Butylated hydroxytoluene	100 mg/kg	Note 162 Note 130 Note 15 Note New X1 Note New X2	08.3
	CAROTENOIDS	20 mg/kg	Note 16 Note New X1 Note New X2	08.3.2
150c	Caramel III - ammonia caramel	GMP	Note 16 Note 4 Note 3 Note New X1 Note New X2	08.0
150d	Caramel IV - sulfite ammonia caramel	GMP	Note 16 Note 4 Note 3 Note New X1 Note New X2	08.0
120	Carmines	100 mg/kg	Note New X1 Note New X2	08.3.2
160a(ii)	beta-Carotenes (vegetable)	20 mg/kg	Note New X1 Note New X2	08.3.2
	ETHYLENE DIAMINE TETRA ACETATES	35 mg/kg	Note 21 Note New X1 Note New X2	08.3.2
163(ii)	Grape skin extract	5,000 mg/kg	Note 16 Note New X1 Note New X2	08.3
	PHOSPHATES Except: Luncheon Meat (89-1981) and Cooked Cured Chopped Meat (98-1981)	2,200 mg/kg 1320 mg/kg	Note 33 Note New X1	08.3
	POLYSORBATES	5,000 mg/kg	Note New X1 Note New X2	08.3
310	Propyl gallate	200 mg/kg	Note 130 Note 15 Note New X1 Note New X2	08.3
	RIBOFLAVINS	1,000 mg/kg	Note 16 Note New X1 Note New X2	08.3
	SACCHARINS	500 mg/kg	Note 161 Note New X1 Note New X2	08.3.2
960	Steviol glycosides	100 mg/kg	Note 202 Note 26 Note New X1 Note New X2	08.3.2
474	Sucroglycerides	5,000 mg/kg	Note 15 Note New X1 Note New X2	08.3.2
110	Sunset yellow FCF	300 mg/kg	Note 16 Note New X1 Note New X2	08.3.2
319	Tertiary butylhydroquinone	100 mg/kg	Note 162 Note 130 Note 15 Note New X1 Note New X2	08.3
127	Erythrosine	15 mg/kg (to replace loss of colour for products with binder only)	Note New X4	08.3.2
	NITRITES	50mg/kg as NO ₂ ion 125mg/kg as NO ₂ ion	Note New X3 Note New X4	08.3.2

INS No.	Food Additive or Group	Max Level	Notes	Defined In
627 631 575 621 331(i) 331(iii)	Disodium 5'-guanylate Disodium 5'-inosinate Glucono delta-lactone Monosodium L-glutamate Sodium dihydrogen citrate Trisodium citrate	GMP	Note New X1	Table 3
	TABLE 3 ADDITIVES (to be determined)			

Items in uppercase (e.g. **PHOSPHATES**) refer to food additive groups.

Notes (proposed new notes would be issued appropriate numbers)

- Note 3: Surface treatment.
- Note 4: For decoration, stamping, marking or branding the product.
- Note 15: Fat or oil basis.
- Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.
- Note 21: As anhydrous calcium disodium ethylenediaminetetraacetate.
- Note 33: As phosphorus.
- Note 130: Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylated hydroquinone (INS 319), and propyl gallate (INS 310).
- Note 161: Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
- Note 162: For use in dehydrated products and salami-type products only.
- New Note X1:** **Not permitted** in *Corned Beef* (CODEX STAN 88-1981)
- New Note X2:** **Not permitted** in *Luncheon Meat* (CODEX STAN 89-1981) or *Cooked Cured Chopped Meat* (CODEX STAN 98-1981)
- New Note X3:** **Only permitted** in *Corned Beef* (CODEX STAN 88-1981)
- New Note X4:** **Only permitted** in *Luncheon Meat* (CODEX STAN 89-1981) and *Cooked Cured Chopped Meat* (CODEX STAN 98-1981)

6. Details of e-WG Considerations

26. The details of the e-WG deliberations are attached in Annex I: Summary of Feedback from Participants regarding Proposed Approach and Resulting Issues from Draft Paper.

Annex I: Summary of Feedback from Participants regarding Proposed Approach and Resulting Issues from Draft Paper

Proposal or issue circulated with respect to aligning commodity standard can commodity standard additive permissions	Comments from Participants	Discussion and Recommendation
GENERAL APPROACH – MAJOR PRICIPLES		
Use of a ‘compromise’ approach to reconciling food additive permissions in commodity standards and the GSFA.	Members of the e-WG generally supported the “compromise” approach and made specific comments for consideration	The chair of the e-WG considered that the main thrust from the e-WG members was in agreement with the compromise approach and tried to incorporate amendments into the process on the basis of perceived consensus and judgement. For example, there was consensus that the first draft suggested approach regarding Table 3 would be problematic for the commodity standards, and so this position was taken up by the chair of the e-WG and amendments made on that basis.
Use of a decision tree	There was ongoing general support for the use of a decision tree approach, with many participants providing feedback on further improvements possible.	The revised decision tree takes into account a number of these suggested improvements to the decision tree.
<p>Maximum use level of additives permitted in the both commodity standard and GSFA Table 3, where there is a numerical maximum level in the commodity standard.</p> <p>Table 3 additives are those that do not have an ADI and are listed for use at GMP.</p>	<p>Some participants agreed with the original recommendation that unless there was a technical issue these additives could be added at GMP. However, if technically justified, it would be possible to restrict the use of some Table 3 additives by use of a Note in the GSFA food category.</p> <p>Others are concerned that the maximum levels in the commodity standards were arrived at by taking quality as well as safety into account.</p>	<p>The Chair believes that the use of the majority of these additives at GMP is appropriate, and notes that for some commodity standards it is a long time since they were reconsidered.</p> <p>It is recommended that a process be established for commodity standards without a current Committee to conclude whether or not a particular Table 3 additive should have its level of use restricted, on the basis of a query/submission.</p>
Use of GSFA Table 3 additives for commodity standards	<p>There is general consensus that it is inappropriate to be able to automatically allow the addition of all Table 3 additives to commodity standards.</p> <p>However the degree of acceptance of permitting these additives is still very different.</p>	<p>There appear to be two potential ‘middle ground’ options:</p> <ol style="list-style-type: none"> 1. Allow all Table 3 additives currently listed in the commodity standard to be added at GMP (unless restricted, as above) through the GSFA. 2. Allow all Table 3 additives in the functional classes defined in the commodity standard to be used. <p>Both of these options may require a degree of restructuring of the GSFA food category.</p>
GENERAL APPROACH – OTHER ISSUES		
Introducing limits for additives into the GSFA from commodity standards.	Where introducing limits, use the form used for the ADI, e.g., nitrite ion and phosphorous.	Where introducing limits, use the form used for the ADI.