CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 5(a) **CX/FA 14/46/8**

December 2013

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-sixth Session

Hong Kong, China, 17-21 March 2014

PROVISIONS IN TABLES 1 AND 2 OF TABLE 3 FOOD ADDITIVES WITH "EMULSIFIER, STABILIZER AND THICKENER" FUNCTION AND HORIZONTAL APPROACH - OUTSTANDING FROM 45TH CCFA

Prepared by the Codex Secretariat

Background

1. The 45th CCFA considered the provisions in Table 1 and 2 of the General Standard for Food Additives (GSFA) for those food additives in Table 3 with the function "acidity regulators" or "emulsifiers, stabilizers, thickeners" presented in CX/FA 13/45/7 by using an horizontal approach, i.e. to identify those food categories in the Annex to Table 3 in which the use of "acidity regulators" or "emulsifiers, stabilizers, thickeners" was technologically justified and those food categories in which it was not.

2. The 45th CCFA completed consideration food additives in Table 3 with the function "acidity regulators," but due to time constraints, was only able to consider food additives in Table 3 with the function "emulsifiers, stabilizers, thickeners" and developing the horizontal approach for food categories up to 06.1 "Whole, broken or flaked grain, including rice". Therefore, the 45th CCFA agreed to request the 46th CCFA physical Working Group (p-WG) on the GSFA, to consider the remaining parts of the document i.e. from food category 06.2 "Flours and starches (including soybean powder)" up to and including food category 14.1.5 "Coffee, coffee substitutes, tea, herbal infusion, and other hot cereal and grain beverages, excluding cocoa". [1]

3. With regard to the horizontal approach, the 45th CCFA could not come to an agreement on whether food additives with a function of "stabilizer" or "thickener" were justified for use in surface-treated vegetables in food category 04.2.1.2 "Surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans) and aloe vera), seaweeds and nuts and seeds", and agreed to request the 46th CCFA p-WG on the GSFA, to reconsider the horizontal approach for this food category along with food category 04.1.1.2 "Surface treated fresh fruit", where the use of these additives had been previously determined by the Committee to be justified for use in glazes, coatings and decorations.[2]

4. The 45th CCFA also agreed that the provisions regarding food category 14.2.3 "Grape wines" and its subcategories would be considered by an electronic Working Group (e-WG) led by France,[3] and that the provisions regarding food categories 01.1.1 "Milk and buttermilk (plain)", 01.1.1.1 "Milk (plain)", 01.1.1.2 "Buttermilk (plain)" and 01.1.2 "Dairy-based drinks, flavoured and/or fermented (e.g. chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drink)" would be considered by an e-WG led by New Zealand.[4] The reports of the two e-WGs are presented in CX/FA 14/46/10 (Agenda Item 5(c)) and CX/FA 14/46/11 (Agenda Item 5(d)).

Provisions for consideration by the 46th CCFA

5. Appendix 1 of this document compiles the provisions in Tables 1 and 2 of Table 3 food additives with "emulsifier, stabilizer and thickener" function that are outstanding from the 45th CCFA (with the exception of those provisions that have been considered by the two eWGs mentioned above), and describes the horizontal approach for the justification of the use of the additives in each food category.

6. Appendix 2 presents the technological justification for the use of emulsifiers, stabilizers and thickeners in food categories contained in the Annex to Table 3 for the food categories that have been discussed at the 45th CCFA.

---

[1] REP13/FA, para. 85.
[2] REP13/FA, paras. 82-83.
[3] REP13/FA, para. 76.
[4] REP13/FA, para. 77.

7. Appendix 3 presents the "Working Principles for Consideration of Table 3 Food Additives with Emulsifier, Stabilizer and Thickener function," which was agreed to by the 45th CCFA, to facilitate the discussion of the Committee.

Appendix 1: Emulsifiers, Stabilizers and Thickeners

Food Category No. 04.1.1.2 (Surface treated fresh fruit)

Corresponding commodity standards: 143-1985: allows only glycerol and sorbitol (INS 420) at GMP (Standard does not address coatings)

eWG Proposal for Horizontal Classification of Food Category: Justified only with Note 16 "For use in glaze, coatings or decorations for fruit, vegetables, meat or fish." **Justification for proposal**: Comments by eWG members. Corresponding commodity standard does not address coatings.	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Emulsifiers are used in wax coatings for citrus and other fruit **Brazil:** Case-by-Case **EU** - the use of additives should be limited in fresh fruit; the EU wonders whether the justification is relevant for all the provisions listed **Spain:** glazing agents of carriers are different functional classes from ES&T and not subject of WG discussion. **UK:** is the use of an emulsifier on the surface of fresh-fruit a Codex additive function? It may be a carrier, or an additive in an additive, but neither of these appear to set a precedent for emulsifiers in this FC.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	16[5]	7	adopt with Note 16	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		**ICGMA:** adopt with note “for use as emulsifier”
AGAR	406	GMP		7		
ALGINIC ACID	400	GMP		7		
AMMONIUM ALGINATE	403	GMP		7		
CALCIUM ALGINATE	404	GMP		7		
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	407	GMP		7		
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7		
GELLAN GUM	417	GMP		7		
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP	16	7		**AIDGUM:** supports proposal
HYDROXYPROPYL CELLULOSE	463	GMP	16	7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	16	7		
HYDROXYPROPYL STARCH	1440	GMP	16	7		**ICGMA:** adopt with note “for use as emulsifier”
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7		

[5] **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

LECITHIN	322(i)	GMP	16	7		**Brazil:** adopt with note "for use as emulsifier"
MAGNESIUM CHLORIDE	511	GMP	16	7		
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP	16	7		
METHYL ETHYL CELLULOSE	465	GMP	16	7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP	16	7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP	16	7		
OXIDIZED STARCH	1404	GMP	16	7		**ICGMA:** adopt with note "for use as emulsifier"
PECTINS	440	GMP		7		
POTASSIUM ALGINATE	402	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		7		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71[6]	7		**Brazil:** adopt with note "for use as emulsifier"
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7		**Brazil:** adopt with note "for use as emulsifier"
SODIUM ALGINATE	401	GMP		7		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	16	7		
TARA GUM	417	GMP		7		
TRAGACANTH GUM	413	GMP	16	7		**AIDGUM:** supports proposal
XANTHAN GUM	413	GMP		7		

Food Category <u>No. 04.2.1.2 (Surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified only with note 3 "surface treatment" **<u>Justification for proposal</u>**: no corresponding commodity standards, Comments in CX/FA12/44/9 Add. 2 from ICGMA: ES&T are technologically justified in FC 04.2.1.2 are used to thicken & stabilize the film forming mixture in order that it adheres to the surface of the fresh fruit/veg.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Costa Rica, ICGMA:** Stabilizers are technologically justified for use in surface-treated vegetables. Modified food starches are typically used with components such as organic acids (lemon juice, citric, etc) and coating agents in spray applications to thicken and stabilize the film forming mixture in order that it adhere to the surface of the fresh fruits and vegetables. **Brazil:** Case-by-Case **EU:** case-by-case; the category 04.2.1.2 limits the use of glazing agents to nuts only (note 79);

[6] **Note 71:** Calcium, potassium and sodium salts only.

					it should be reflected when considering the provisions below; the provisions not related to nuts should be disregarded **UK**: agrees with proposal	
Additive	**INS**	**Max Level (mg/kg)**	**Notes**	**Step / Adopted**	**eWG proposal**	**Comments by eWG members on proposal**
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	16	7	Adopt with note 16 & 3	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		
AGAR	406	GMP		7	Adopt with note 3	**ICGMA:** accept proposal
ALGINIC ACID	400	GMP		7		
AMMONIUM ALGINATE	403	GMP		7		
CALCIUM ALGINATE	404	GMP		7		
CALCIUM CARBONATE	170(i)	GMP	4[7] & 16	7	Adopt with note 4, 16 & 3	
CALCIUM CHLORIDE	509	800	58[8]	7	Adopt with note 3 & 58	**Brazil:** supports proposal
CALCIUM SULFATE	516	800	58	7		**Brazil:** supports proposal
CAROB BEAN GUM	410	GMP		7	Adopt with note 3	
CARRAGEENAN	407	GMP		7		
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7	Adopt with note 16 & 3	
GELLAN GUM	418	GMP		7	Adopt with note 3	
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	**414**	**83000**	**79**		Adopt with note 79 & 3	**AIDGUM:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	16	7	Adopt with note 16 & 3	
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	16	7		
HYDROXYPROPYL STARCH	1440	GMP	16	7		**ICGMA:** accept proposal
KARAYA GUM	416	GMP		7	Adopt with note 3	
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7	Adopt with note 16 & 3	
LECITHIN	322(i)	GMP	16	7		
MAGNESIUM CHLORIDE	511	GMP	16	7		
MANNITOL	421	GMP		4	Adopt with note 3	
METHYL CELLULOSE	461	GMP	16	7	Adopt with note 16 & 3	
METHYL ETHYL CELLULOSE	465	GMP	16	7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP	16	7		
MONO- AND DI-GLYCERIDES	471	GMP	16	7		

[7] **Note 4:** For decoration, stamping, marking or branding the product.
[8] **Note 58:** As calcium.

OF FATTY ACIDS						
OXIDIZED STARCH	1404	GMP	16	7		**ICGMA:** accept proposal
PECTINS	440	GMP		7	Adopt with note 3	
POTASSIUM ALGINATE	402	GMP		7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	16	7	Adopt with note 16 & 3	
POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		7	Adopt with note 3	
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7	Adopt with note 16, 71 & 3	
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7	Adopt with note 16 & 3	
SODIUM ALGINATE	401	GMP		7	Adopt with note 3	
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	16	7	Adopt with note 16 & 3	
SODIUM DIHYDROGEN CITRATE	**331(i)**	**GMP**			Adopt with note 3	
TARA GUM	417	GMP		7	Adopt with note 3	
TRAGACANTH GUM	413	GMP	16	7	Adopt with note 16 & 3	**AIDGUM:** supports adoption
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7		
XANTHAN GUM	415	GMP		7	Adopt with note 3	
CALCIUM GLUCONATE	578	800	58	7	Adopt with note 3 & 58	
CALCIUM HYDROXIDE	526	800	58	7		
MAGNESIUM CARBONATE	504(i)	GMP	16	7	Adopt with note 16 & 3	
MAGNESIUM HYDROXIDE	528	GMP	16	7		
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	GMP	16	7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	16	7		
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7		
TRISODIUM CITRATE	**331(iii)**	**2000**			Adopt with note 3	

Food Category No. 06.2 (Flours and starches (including soybean powder))

Corresponding commodity standards: None; subcategory 06.2.1 has corresponding commodity standards

eWG Proposal for Horizontal Classification of Food Category: Not Justified - Move all provisions to FC 06.2.1 with Note 186[9] "for use in flours with additives only"
Justification for proposal: No provisions in FC 06.2.2 for ES&T.

Comments by eWG on horizontal classification proposal:
Brazil, Spain: Supports proposal, move to subcategory 06.2.1 with Note 186 Emulsifiers and stabilizers are needed for flours in general.
EU, UK: not justified

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	10000	58	~~4~~	Discontinue, keep GMP provision in 06.2.1 add note 186	
~~LECITHIN~~	~~322(i)~~	~~5000~~		~~7~~	Discontinue, adopt in 06.2.1 at 2000 mg/kg with note 186 - allowed in wheat flour at 2000 mg/kg in CODEX STAN 152-1985	I**CGMA**: soy flour requires lecithin as emulsifier
~~TRISODIUM CITRATE~~	~~331(iii)~~	~~GMP~~		~~4~~	Discontinue, adopt in 06.2.1 with new note 186	

Food Category No. 06.2.1 (Flours)

Corresponding commodity standards: 301R-2011: references FC 06.2.1 Tables 1 & 2; 176-1989, 154-1985, 173-1989, 170-1989, 178-1991, 155-1985: do not discuss food additives; 152-1985: only lists enzymes and flour treatment agents

eWG Proposal for Horizontal Classification of Food Category: Justified only with Note 186 "for use in flours with additives"
Justification for proposal: Comments from Brazil

Comments by eWG on horizontal classification proposal:
Brazil: Supports proposal, Emulsifiers and stabilizers are needed for flours in general.
EU, UK: questions technological need
Spain: use of additives as flour treatment agents is not an ES&T function

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	GMP	57[10]	7	Adopt with notes 57 and 186	
CALCIUM SULFATE	516	GMP	57	7		**USA:** calcium sulfate is allowed in flour as a bleaching agent up to 60000 mg/kg **EU:** bleaching agent is not a ES&T function
LECITHIN	**322(i)**	**5000**			Adopt at 2000 mg/kg with note 186 - allowed in wheat flour at 2000 mg/kg in CODEX STAN	I**CGMA**: soy flour requires lecithin as emulsifier, add note "for use in soy flour"

[9] **Note 186:** For use in flours with additives only.
[10] **Note 57:** GMP is 1 part benzoyl peroxide and not more than 6 parts of the subject additive by weight.

					152-1985	
TRISODIUM CITRATE	**331(iii)**	**GMP**			Adopt with note 186	

Food Category No. 06.2.2 (Starches)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: No provisions for ES&T listed in GSFA	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain:** Supports proposal

Food Category No. 06.4.1 (Fresh pastas and noodles and like products)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: comments by eWG and in CX/FA 12/44/9 Add 2. - Emulsifiers, thickeners, and stabilizers are commonly used in fresh pasta to improve binding and reduce cooking loss	**Comments by eWG on horizontal classification proposal:** **Brazil, Costa Rica, IFAC, ICGMA:** supports proposal, emulsifiers and stabilizers are used for binding **EU**: Case-by-Case; does not object to the use in noodles, however, for pastas the EU supports only INS 322(i) Lecithin and INS 471 'MONO- AND DI-GLYCERIDES OF FATTY ACIDS **Spain**: Case-by-Case: some EST are justified for fresh pastas, such as INS 322 or 471 but it should not be assumed that the use of all ESTs is justified. INS 415, 466, 472a, 472b, 472c were requested only in noodles and INS 1414, 1420 and 1422 are used only as T. Only a few uses for a few products have been requested. In EU legislation only INS 322 and 471 are allowed in "fresh pasta". Consider use of Note 211[11] "for use in noodles only"

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		4	Adopt	**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 12000 mg/kg to improve elasticity
ALGINIC ACID	400	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 10000 mg/kg to improve elasticity
CALCIUM CARBONATE	170(i)	10000	58	4		**EU**: restrict to noodles
CAROB BEAN GUM	410	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 10000 mg/kg to improve elasticity
CARRAGEENAN	407	GMP		4		**EU**: restrict to noodles **Japan**: used in noodles as stabilizer up to 30000 mg/kg to improve elasticity
CURDLAN	424	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 10000 mg/kg to improve

[11] **Note 211:** For use in noodles only.

						elasticity
DISTARCH PHOSPHATE	1412	200		4		**EU**: restrict to noodles
GELLAN GUM	418	GMP		4		**EU**: restrict to noodles **Japan**: used in noodles as stabilizer up to 16000 mg/kg to improve elasticity
GUAR GUM	412	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 10000 mg/kg to improve elasticity
GUM ARABIC (ACACIA GUM)	414	GMP		4		**EU:** restrict to noodles **Japan**: used in noodles as stabilizer up to 5000 mg/kg to improve elasticity **AIDGUM** supports adoption
KARAYA GUM	416	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 8000 mg/kg to improve elasticity
KONJAC FLOUR	425	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 16000 mg/kg to improve elasticity
LECITHIN	322(i)	GMP		4		**EU:** supports adopt **Japan:** used in noodles as stabilizer up to 8000 mg/kg to improve elasticity
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		4		**EU**: restrict to noodles
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP		4		**EU, EFEMA, ELC:** accepts proposal **Japan:** used in noodles as emulsifer up to 2200 mg/kg to avoid retrogradation of starch.
PECTINS	440	GMP		4		**EU**: restrict to noodles
PHOSPHATED DISTARCH PHOSPHATE	1413	200		4		**EU**: restrict to noodles
POTASSIUM CARBONATE	501(i)	GMP		4		**EU**: restrict to noodles
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		**EU**: restrict to noodles
SODIUM ALGINATE	401	GMP		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 20000 mg/kg to improve elasticity
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	50000		4		**EU**: restrict to noodles **Japan:** used in noodles as stabilizer up to 20000 mg/kg to improve elasticity **Bioploymer:** adopt at 10,000 mg/kg
TRAGACANTH GUM	413	GMP		4		**EU**: restrict to noodles **Japan**: used in noodles as stabilizer up to 5000 mg/kg to improve elasticity
XANTHAN GUM	415	10000		4		**EU**: restrict to noodles

						Japan: used in noodles as stabilizer up to 10000 mg/kg to improve elasticity

Food Category No. 06.4.2 (Dried pastas and noodles and like products)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: comments by eWG and in CX/FA 12/44/9 Add 2. by Brazil - stabilizers are necessary to prevent changes on the structure of dried pastas due to heat treatment	**Comments by eWG on horizontal classification proposal:** **Brazil, Costa Rica, IFAC, ICGMA:** supports proposal, emulsifiers and stabilizers are used for binding **EU**: does not object to the use in noodles, however, for pastas the EU in only gluten free pasta and pasta intended for hypoproteic diets **Spain**: add note 122 "for use in noodles only". INS 1414, 1420 and 1422 are used only as T and 1400 as E/S by the industry. We would like to know if in Brazil these additives are used in all kinds of dried pastas since in the EU legislation additives are only allowed in "gluten free and/or pasta intended for hypoproteic diets"

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		7		
ALGINIC ACID	400	GMP		7		
AMMONIUM ALGINATE	403	GMP		7		
CALCIUM ALGINATE	404	GMP		7		
CALCIUM CARBONATE	170(i)	10000	58	4		
CALCIUM SULFATE	516	5000		7		
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	407	8330	37[12]	7		
DISTARCH PHOSPHATE	1412	200		4		
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP		7	Adopt	**AIDGUM:** supports adoption
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	10000		7		
LECITHIN	322(i)	5000		7		
MANNITOL	421	GMP		7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	30000		7		**EFEMA, ELC:** accepts proposal
PECTINS	440	GMP		7		
PHOSPHATED DISTARCH PHOSPHATE	1413	200		4		

[12] **Note 37:** As weight of nonfat milk solids.

POTASSIUM ALGINATE	402	GMP		7		
POTASSIUM CARBONATE	501(i)	2600		7		
POTASSIUM CHLORIDE	508	GMP		4		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	8330	37	7		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7		
SODIUM ALGINATE	401	GMP		7		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	50000		4		
SODIUM GLUCONATE	576	GMP		4		
TARA GUM	417	GMP		7		
TRAGACANTH GUM	413	GMP		7		
XANTHAN GUM	415	10000		4		

Food Category <u>No. 08.1 (Fresh meat, poultry, and game)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified - move to FC 08.1.1 with Note 16 and FC 08.1.2 without adding Note 16
<u>Justification for proposal</u>: No consensus in comments to eWG; in CX/FA 12/44/9 Add 2. - Brazil: No food additives should be allowed in Food Category 08.1, except colors with Note 4 and 16

<u>Comments by eWG on horizontal classification proposal</u>:
Costa Rica, ICGMA: some are used to manage water holding and for texture-thickening
Brazil, EU, Spain, UK: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~AGAR~~	~~406~~	~~GMP~~		7	Discontinue - move to FC 08.1.1 with Note 16 and FC 08.1.2 without adding note	
~~CARRAGEENAN~~	~~407~~	~~GMP~~		7		**Costa Rica, ICGMA:** used to manage water holding and texture-thickener
~~GELLAN GUM~~	~~418~~	~~GMP~~		7		
~~KARAYA GUM~~	~~416~~	~~GMP~~		7		
~~KONJAC FLOUR~~	~~425~~	~~GMP~~		7		**ICGMA:** supports adoption
~~MANNITOL~~	~~421~~	~~GMP~~		4		**ICGMA:** supports adoption
~~PECTINS~~	~~440~~	~~GMP~~		7		**ICGMA:** supports adoption
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~GMP~~		4		**ICGMA:** supports adoption
~~TARA GUM~~	~~417~~	~~GMP~~		7		
~~XANTHAN GUM~~	~~415~~	~~GMP~~		7		

Food Category No. 08.1.1 (Fresh meat, poultry, and game, whole pieces or cuts)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with Note 16 "For use in glaze, coatings or decorations for fruit, vegetables, meat or fish" **Justification for proposal**: most provisions and eWG comments in favor of use involve use of ES&T in glazes (Note 16 “For use in glaze, coatings or decorations for fruit, vegetables, meat or fish”)	**Comments by eWG on horizontal classification proposal:** **Brazil:** use not justified **Costa Rica, ICGMA:** some are used to manage water holding and for texture-thickening **EU**: the use of additives in fresh meat should be limited to colours for health marking; the EU opposes to any other uses; it should be discussed at Codex level how to deal with food additives needed in this food category **Spain**: use of additives as glazing agents or carriers is not ES&T function **UK**: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	16	7	Adopt as listed with Note 16	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		
AGAR	**406**	**GMP**				
CALCIUM CARBONATE	170(i)	GMP	4[13] & 16	7		
CALCIUM CHLORIDE	509	15000		7		
CARRAGEENAN	**407**	**GMP**				**Costa Rica, ICGMA:** used to manage water holding and texture-thickener
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7		**ICGMA:** supports adoption
GELLAN GUM	**418**	**GMP**				
GUM ARABIC (ACACIA GUM)	414	GMP	16	7		**ICGMA, AIDGUM:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	16	7		**ICGMA:** supports adoption
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	16	7		**ICGMA:** supports adoption
HYDROXYPROPYL STARCH	1440	GMP	16	7		**ICGMA:** supports adoption
KARAYA GUM	**416**	**GMP**				**AIDGUM:** supports adoption
KONJAC FLOUR	**425**	**GMP**				**ICGMA:** supports adoption
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7		
LECITHIN	322(i)	GMP	16	7		**ICGMA:** supports adoption
MAGNESIUM CHLORIDE	511	2260		7		
MANNITOL	**421**	**GMP**				**ICGMA:** supports adoption
METHYL CELLULOSE	461	GMP	16	7		**ICGMA:** supports adoption
METHYL ETHYL CELLULOSE	465	GMP	16	7		**ICGMA:** supports adoption

[13] **Note 4:** For decoration, stamping, marking or branding the product.

MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP	16	7		**ICGMA:** supports adoption
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP	16	7		**ICGMA:** supports adoption
OXIDIZED STARCH	1404	GMP	16	7		
PECTINS	**440**	**GMP**				**ICGMA:** supports adoption
POTASSIUM CHLORIDE	508	GMP		7		**ICGMA:** supports adoption
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	16	7		**ICGMA:** supports adoption
POWDERED CELLULOSE	460(ii)	GMP	16	7		**ICGMA:** supports adoption
PROCESSED EUCHEUMA SEAWEED (PES)	**407a**	**GMP**				**ICGMA:** supports adoption
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7		
SODIUM ALGINATE	401	15000		7		**Costa Rica, ICGMA:** used to manage water holding and texture-thickener **USA**: sodium alginate is allowed for use in the US as a film forming agent in freshly dressed meat carcarses up to 15000 mg/kg of the carcass weight (9CFR 424.21(c))
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	15000		7		**USA**: sodium carboxymethyl cellulose is allowed for use in the US as a film forming agent in freshly dressed meat carcarses up to 15000 mg/kg of the carcass weight (9CFR 424.21(c)). **ICGMA:** supports adoption
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	16	7	Adopt at 500 mg/kg with Note 16 and new note "for use as a color retention agent"	**USA:** sodium citrate is allowed for use in the USA on fresh meat cuts as a color retention agent up to 500 mg/kg **ICGMA:** supports adoption at GMP with note 16
TARA GUM	**417**	**GMP**			Adopt as listed with Note 16	
TRAGACANTH GUM	413	GMP	16	7		**AIDGUM supports adoption**
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7		**ICGMA:** supports adoption
TRISODIUM CITRATE	331(iii)	5000		7	Adopt at 500 mg/kg with Note 16 and new note "for use as a color retention agent"	**USA:** sodium citrate is allowed for use in the USA on fresh meat cuts as a color retention agent up to 500 mg/kg **ICGMA:** supports adoption as listed with Note 16
XANTHAN GUM	**415**	**GMP**			Adopt as listed with Note 16	

Food Category No. 08.1.2 (Fresh meat, poultry, and game, comminuted)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: comments by some eWG members indicate that ES&T are used in this food category, CX/FA 12/44/9 Add 1 recommends use of ES&T generally justified in FC 08.1.2, technological justification cited	**Comments by eWG on horizontal classification proposal:** **Brazil:** ES&T not justified in fresh products **Costa Rica. ICGMA**: some ES&T are used to manage water holding and for texture-thickening **EU:** the use of additives in fresh meat should be limited to colours for health marking; the EU opposes to any other uses; no justification provided for this category **Spain, UK:** requests further information on use **ELC:** This category according to the FC descriptor, is eligible for certain food additives only: marking/branding (colors) and in glazings; waterbinding etc. is according to our understanding an extended product which would belong to FC 8.2 subcategories. **ICGMA:** modified food starch is used as a thickener in injected and tumbled poultry and in sausage-type products

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	adopt as listed	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		**ICGMA:** supports adoption
AGAR	**406**	**GMP**				
CALCIUM CARBONATE	170(i)	1500	4 & 16	7		
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	**407**	**GMP**				**Costa Rica, ICGMA:** used to manage water holding and texture-thickener
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7		**ICGMA:** supports adoption
GELLAN GUM	**418**	**GMP**				
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP		7		**AIDGUM, ICGMA:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP		7		**ICGMA:** supports adoption
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		**ICGMA:** supports adoption
HYDROXYPROPYL STARCH	1440	GMP		7		
KARAYA GUM	**416**	**GMP**				
KONJAC FLOUR	**425**	**GMP**				**ICGMA:** supports adoption
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7		**ICGMA:** supports adoption
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7		**ICGMA:** supports adoption
MANNITOL	**421**	**GMP**				**ICGMA:** supports adoption
METHYL CELLULOSE	461	GMP		7		**ICGMA:** supports adoption

METHYL ETHYL CELLULOSE	465	GMP		7		**ICGMA:** supports adoption
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		**ICGMA:** supports adoption
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP		7		
OXIDIZED STARCH	1404	GMP		7		**ICGMA:** supports adoption
PECTINS	**440**	**GMP**				**ICGMA:** supports adoption
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		**ICGMA:** supports adoption
POWDERED CELLULOSE	460(ii)	GMP		7		
PROCESSED EUCHEUMA SEAWEED (PES)	**407a**	**GMP**				**ICGMA:** supports adoption
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	71	7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7		
SODIUM ALGINATE	401	8000		7		**Costa Rica, ICGMA:** used to manage water holding and texture-thickener **USA**: sodium alginate is allowed in ground and formed raw poultry pieces in the US as a binder and extender up to 12400 mg/kg
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		7		**ICGMA:** supports adoption
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		**ICGMA:** supports adoption
TARA GUM	**417**	**GMP**				
TRAGACANTH GUM	413	GMP		7		
TRICALCIUM CITRATE	333(iii)	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		**ICGMA:** supports adoption
TRISODIUM CITRATE	331(iii)	GMP		7		**ICGMA:** supports adoption
XANTHAN GUM	**415**	**GMP**				

Food Category No. 09.1 (Fresh fish and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: None; 292-2008 corresponds to subcategory 09.1.2

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: No information supporting use provided in eWG

Comments by eWG on horizontal classification proposal:
EU: not appropriate at this parental food category. Moreover, additives are generally not permitted in CS 292-2008. The glazing therein refers to applying a protective coating of ice (ice glaze) to frozen seafood products. If additives were used in this process they would have been mentioned in the standard.
Spain: glazing agents or carriers are not an ES&T function
UK: provisions in parent category should be discontinued as may conflict with subcategories
ELC: humectants are technologically justified in frozen and deep-frozen fish only to avoid thawing losses. Labeling of non-prepackaged food is subject to national legislation. However this document is restricted to deal with emulsifiers, stabilizers and thickeners only.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	16	7		
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		
CARRAGEENAN	407	GMP		4		
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7		
GELLAN GUM	418	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP	16	7		**AIDGUM** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	16	7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	16	7		
HYDROXYPROPYL STARCH	1440	GMP	16	7		
KONJAC FLOUR	425	GMP		4	Discontinue	
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7		
LECITHIN	322(i)	GMP	16	7		
MAGNESIUM CHLORIDE	511	GMP	16	7		
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP	16	7		
METHYL ETHYL CELLULOSE	465	GMP	16	7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP	16	7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP	16	7		
OXIDIZED STARCH	1404	GMP	16	7		
POTASSIUM DIHYDROGEN	332(i)	GMP		7		

CITRATE						
POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	4466	GMP	16	7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Refer to discussion on Appendix 2, possibly used as Acidity Regulator, if not Discontinue	
SODIUM GLUCONATE	576	GMP		4	Discontinue	
TRAGACANTH GUM	413	GMP	16	7		**AIDGUM** supports adoption
TRICALCIUM CITRATE	333(iii)	GMP		7	Refer to discussion on Appendix 2, possibly used as Acidity Regulator, if not Discontinue	
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		

Food Category <u>No. 09.1.1 (Fresh fish)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified **<u>Justification for proposal:</u>** No information supporting use provided in eWG	**<u>Comments by eWG on horizontal classification proposal</u>:** **EU:** does not support **Spain:** use discussed (glazing agents, carriers or water retention agents) are not ES&T functions, may mislead consumers **ELC:** humectants are technologically justified in frozen and deep-frozen fish only to avoid thawing losses. Labelling of non-prepackaged food is subject to national legislation. However this document is restricted to deal with emulsifiers, stabilizers and thickeners only.

Food Category No. 09.1.2 (Fresh mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: 292-2008: food additives not allowed in live bivalve molluscs, only antioxidants allowed in raw bivalve molluscs (chilled shucked molluscs) as per provisions in FC 09.1.2

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal:** No technological justification supporting use provided in eWG	**Comments by eWG on horizontal classification proposal:** **EU**: additives are generally not permitted in CS 292-2008. The glazing therein refers to applying a protective coating of ice (ice glaze) to frozen seafood products. If additives were used in this process they would have been mentioned in the standard. **Spain:** glazing agents, carriers or water retention agents are not an ES&T function, may mislead consumers **ELC:** humectants are technologically justified in frozen and deep-frozen fish only to avoid thawing losses. Labeling of non-prepackaged food is subject to national legislation. However this document is restricted to deal with emulsifiers, stabilizers and thickeners only.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	GMP	4 & 16	7	Discontinue	**IFAC:** adopt as listed

Food Category No. 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: None; subcategories have corresponding commodity standards

eWG Proposal for Horizontal Classification of Food Category: Not Justified - discontinue provisions and move to subcategories **Justification for proposal:** several subcategories require notes specific to those subcategories or the use of ES&T is not justified	**Comments by eWG on horizontal classification proposal:** **EU, Spain**: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~ALGINIC ACID~~	~~400~~	~~GMP~~		~~4~~	Discontinue - move to appropriate subcategories	
~~CALCIUM CARBONATE~~	~~170(i)~~	~~10000~~	~~58~~	~~4~~		
~~CALCIUM CHLORIDE~~	~~509~~	~~10000~~	~~58~~	~~4~~		
~~CAROB BEAN GUM~~	~~410~~	~~GMP~~		~~7~~		
~~DEXTRINS, ROASTED STARCH~~	~~1400~~	~~GMP~~		~~4~~		
~~GELLAN GUM~~	~~418~~	~~GMP~~		~~7~~		
~~GUAR GUM~~	~~412~~	~~GMP~~		~~4~~		
~~KARAYA GUM~~	~~416~~	~~GMP~~		~~7~~		
~~KONJAC FLOUR~~	~~425~~	~~GMP~~		~~7~~		
~~MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)~~	~~460(i)~~	~~10000~~		~~7~~		
~~MONO- AND DI-GLYCERIDES OF FATTY ACIDS~~	~~471~~	~~10000~~		~~7~~		
~~POTASSIUM CARBONATE~~	~~501(i)~~	~~GMP~~		~~4~~		
~~POTASSIUM CHLORIDE~~	~~508~~	~~GMP~~		~~4~~		
~~SODIUM GLUCONATE~~	~~576~~	~~GMP~~		~~4~~		

Food Category No. 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: Frozen 092-1981, 95-1981, 190-1995: does not allow ES&T; 165-1989: allows INS 401 as water retention agent in all fish products, in minced fish only allows thickeners (INS 412, 410, 440, 466, 415, 407, 407a, 461 @ GMP) and INS 331 & 332 as acidity regulators; 36-1981: allows specific antioxidants; 191-1995: does not allow food additives; 292-2008: food additives not allowed in live bivalve molluscs, only antioxidants allowed in raw bivalve molluscs (raw frozen molluscs) as per provisions in FC 09.2.1. - None of these standards discuss glazing ingredients

eWG Proposal for Horizontal Classification of Food Category: Justified, when used in fish meat requires note "for use as texturizing agent" **Justification for proposal**: Although the CODEX STANs which correspond to this FC only allow ES&Ts in very limited products (minced fish), comments from the eWG on specific food additive provisions indicate that ES&Ts are used in this FC by several Codex Members	**Comments by eWG on horizontal classification proposal:** **Brazil:** does not support the use of emulsifiers, stabilizers and thickeners in this food category. The use of such food additives as water retention agents may lead to fraud and misleading of the consumers. The justification provided is for battered products, therefore the corresponding provisions should be discussed under subcategory 09.2.2. **EU:** does not support. The textural properties of fish relate to its freshness. The use of "texturizing agents" in whole fish would therefore mislead the consumer. Furthemore, there is a conflict with several CSs **UK:** accept all initial proposals **IFAC:** Thickeners and stabilizers are used in this FC to protect the product from structure changes during the freeze-thaw cycles during handling and storage, by decreasing the freezing point depression

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Adopt with new note "for use as texturizing agent"	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
AGAR	406	20000	3[14] & 53[15]	7	Adopt as listed	
ALGINIC ACID	400	5000		7	Adopt at 7500 mg/kg with new note ""for use as texturizing agent"	**IFAC:** 7500 mg/kg needed to protect from structure changes during freeze/thaw **Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
ALGINIC ACID	**400**	**GMP**			Adopt with new note "for use as texturizing agent"	
AMMONIUM ALGINATE	403	5000		7	Adopt at 7500 mg/kg with new note ""for use as texturizing agent"	**IFAC:** 7500 mg/kg needed to protect from structure changes during freeze/thaw **Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
CALCIUM ALGINATE	404	5000		7	Adopt at 7500 mg/kg with new note ""for use as	**IFAC:** 7500 mg/kg needed to protect from structure changes during freeze/thaw

[14] **Note 3:** Surface treatment.
[15] **Note 53**: For use in coatings only.

					texturizing agent"	**Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
CALCIUM CARBONATE	170(i)	GMP	95[16]	7	Adopt as listed - note 95 excludes use from products covered by commodity standards which do not allow ES&T	
CALCIUM CHLORIDE	**509**	**10000**	**58**		Adopt as listed with new note "for use as texturizing agent"	
CAROB BEAN GUM	**410**	**GMP**			Adopt with note 61 - corresponds to Codex STAN 165-1989	
CARRAGEENAN	407	5000	61[17]	7	Adopt at GMP with new note "for use as texturizing agent" (no Note 61) - GMP & Note 61 Corresponds to CODE STAN 165-1989, but Note 61 would restrict note to minced fish only which does not cover use from Marinalg comment	**IFAC:** GMP with Note 61 corresponds to codex stan 165-1989 **Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7	Adopt with new note "for use as texturizing agent"	
DEXTRINS, ROASTED STARCH	1400	20000	3 & 53	7	Adopt as listed	
GELLAN GUM	**418**	**GMP**			Adopt with new note "for use as texturizing agent"	
GUAR GUM	412	GMP	61 & 73[18]	7	Adopt with Note 61 and new note "as glaze thickener for frozen crab" - see comments from Japan, Note 61 Corresponds to CODE STAN 165-1989, Note 73 not necessary	**Japan:** supports proposal - added to improve adhesion of glaze to crab, CODEX STAN 165-1989 does not cover frozen crab.
GUM ARABIC (ACACIA GUM)	414	GMP		7	Adopt with new note "for	**AIDGUM** supports adoption

[16] **Note 95:** For use in surimi and fish roe products only.
[17] **Note 61:** For use in minced fish only.
[18] **Note 73:** Except whole fish.

HYDROXYPROPYL CELLULOSE	463	GMP		7	use as texturizing agent"	
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		
KARAYA GUM	**416**	**GMP**				**AIDGUM** supports adoption
KONJAC FLOUR	**425**	**GMP**				
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7		
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7		
MANNITOL	421	GMP		7		
METHYL CELLULOSE	461	GMP	61	7	Adopt as listed - Corresponds to CODE STAN 165-1989	
METHYL ETHYL CELLULOSE	465	GMP		7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	**460(i)**	**10000**			Adopt with new note "for use as texturizing agent"	
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	**471**	**10000**				
OXIDIZED STARCH	1404	GMP		7		
PECTINS	440	20000	16	7	Adopt at GMP with note 61 - GMP and note 61 corresponds to CODEX STAN 165-1989	**IFAC:** GMP with note 61 corresponds to Codex Stan 165-1989
POLYDEXTROSES	1200	GMP		7	Adopt with new note "for use as texturizing agent"	
POTASSIUM ALGINATE	402	5000		7	Adopt at 7500 mg/kg with new note ""for use as texturizing agent"	**Marinalg, IFAC**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
POTASSIUM CARBONATE	**501(i)**	**GMP**			Adopt with new note "for use as texturizing agent"	
POTASSIUM CHLORIDE	508	30000		7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	61	7	Adopt with note 61 - corresponds to Codex STAN 165-1989	
POWDERED CELLULOSE	460(ii)	GMP		7	Adopt with new note "for use as texturizing agent"	
PROCESSED EUCHEUMA SEAWEED (PES)	407a	5000		7	Adopt at GMP with new note "for use as texturizing agent" - GMP with note 61 corresponds to CODEX STAN 165-1989 but Note 61 does not address Marinalg's	**IFAC:** GMP with note 61 corresponds to Codex Stan 165-1989 **Marinalg**: GMP needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,

					use in all fish	
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	71	7	Adopt with note 71 & new note "for use as texturizing agent"	
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7	Adopt with new note "for use as texturizing agent"	
SODIUM ALGINATE	401	5000		7	Adopt at GMP - corresponds to CODEX STAN 165-1989	**IFAC:** GMP corresponds to Codex Stan 165-1989 **Marinalg**: GMP or 7500 mg/kg needed; decreases freezing point depression, protects structure during freeze-thaw cycles during handling & storage,
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		7	Adopt with note 61 - corresponds to Codex STAN 165-1989	
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Adopt with note 61 - corresponds to Codex STAN 165-1989	
SODIUM GLUCONATE	**576**	**GMP**			Adopt with new note "for use as texturizing agent"	
TARA GUM	417	GMP	73	7	Adopt as listed	
TRAGACANTH GUM	413	GMP		7	Adopt with new note "for use as texturizing agent"	**AIDGUM** supports adoption
TRICALCIUM CITRATE	333(iii)	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	Adopt with note 61 - corresponds to Codex STAN 165-1989	
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	160		7	Adopt at GMP with Note 61 and new note "as glaze thickener for frozen crab" - see comments from Japan, Note 61 Corresponds to CODE STAN 165-1989	**Japan:** supports proposal - added to improve adhesion of glaze to crab, CODEX STAN 165-1989 does not cover frozen crab. **Biopolymer, IFAC**: adopt at GMP with note 61 to align with Codex Stan 165-1989

Food Category No. 09.2.2 (Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: 166-1989: allows specific additives in coatings: (Thickeners: INS 401, 412, 410, 440, 466, 415, 407, 407a, 461, 463, 464, 465 @ GMP), INS 471 & 322 as emulsifiers, INS 501 as leavening agent, and modified starches (INS 1401, 1402, 1404, 1410, 1412, 1414, 1413, 1420, 1421, 1422, 1440, 1442) 166-1989: allows INS 401 as water retention agent in fish fillets and minced fish, in minced fish only allows thickeners (INS 412, 410, 440, 466, 415, 407, 407a, 461 @ GMP) and INS 331 & 332 as acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Justified with Note 41[19] "Use in breading or batter coatings only" **Justification for proposal**: CODEX STAN 166 allow use of specific thickeners in batter.	**Comments by eWG on horizontal classification proposal:** **comments in CX/FA 12/44/9 add 2 for FC 09.2** - Thickeners and stabilizers are used in batters to improve adhesion, reduce fat uptake during frying and improve the crispiness of the batter. They also protect the product from structure changes during the freeze-thaw cycles during handling and storage, by decreasing the freezing point depression. **EU:** supports use only in batter coatings **UK:** accepts all initial proposals **ICGMA:** modified food starches are used in breadings and batters as stabilizers **IFAC:** supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
ACETYLATED DISTARCH ADIPATE	1422	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	41	7		
ACID TREATED STARCH	1401	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
AGAR	406	GMP		7	Adopt with note 53 (limited in 9.2.1 to coatings only)	
ALGINIC ACID	**400**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
ALKALINE TREATED STARCH	1402	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
CALCIUM CARBONATE	170(i)	GMP	16	7	Adopt as listed (also	

[19] **Note 41:** Use in breading or batter coatings only.

					listed in 09.2.1 with Note 95)	
CALCIUM CHLORIDE	**509**	**10000**	**58**		Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
CAROB BEAN GUM	**410**	**GMP**			Adopt with notes 41 & 61 - in CODEX STAN 166-1981 allowed in batter for all fish products & in minced fish meat	
CARRAGEENAN	407	GMP	41 & 61	7	Adopt with notes 41 & 61 - in CODEX STAN 166-1981 allowed in batter for all fish products & in minced fish meat (also in 09.2.1 for use in all fish meat)	
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
DEXTRINS, ROASTED STARCH	1400	GMP	41	7	Adopt as listed (also listed in 09.2.1 for use in coatings only)	
DISTARCH PHOSPHATE	1412	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981	
GELLAN GUM	**418**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in coatings only)	
GUAR GUM	412	2000		7	Adopt at GMP with notes 41 & 61 - in CODEX STAN 166-1981 allowed in batter for all fish products & in minced fish meat	I**FAC:** GMP with note 61 corresponds to codex stan 166-1989
GUM ARABIC (ACACIA GUM)	414	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	**AIDGUM:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	

HYDROXYPROPYL DISTARCH PHOSPHATE	1442	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981	
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
HYDROXYPROPYL STARCH	1440	GMP	41	7		
KARAYA GUM	**416**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in all fish meat)	**AIDGUM:** supports adoption
KONJAC FLOUR	**425**	**GMP**				
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7		
LECITHIN	322(i)	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
MAGNESIUM CHLORIDE	511	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP	41 & 61	7	Adopt as listed - corresponds to CODEX STAN 166-1981	
METHYL ETHYL CELLULOSE	465	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	**460(i)**	**10000**			Adopt as listed (listed in 09.2.1 for use in all fish meat)	
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	**471**	**10000**			Adopt at GMP with note 41 - Corresponds to CODEX STAN 166-1981 (also listed in 09.2.1 for use in all fish meat)	
MONOSTARCH PHOSPHATE	1410	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
OXIDIZED STARCH	1404	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989 (also listed in 09.2.1 for use in	

					all fish meat)	
PECTINS	440	GMP	41 & 61	7	Adopt as listed - corresponds to CODEX STAN 166-1981	
PHOSPHATED DISTARCH PHOSPHATE	1413	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
POTASSIUM CARBONATE	501(i)	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989 (also listed in 09.2.1 for use in all fish meat)	
POTASSIUM CHLORIDE	**508**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in fish all meat)	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	61	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP	41	7	Adopt as listed - corresponds to CODEX STAN 166-1989	
POWDERED CELLULOSE	460(ii)	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
PROCESSED EUCHEUMA SEAWEED (PES)	407a	5000		7	Adopt at GMP with notes 41 & 61 - in CODEX STAN 166-1981 allowed in batter for all fish products & in minced fish meat (also listed in 09.2.1 for use in all fish meat)	**IFAC:** GMP with note 61 corresponds to codex stan 166-1989
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7		
SODIUM ALGINATE	401	GMP	41 & 99	7	Adopt as listed - complies with CODEX STAN 166-1981	
SODIUM CARBOXYMETHYL	466	GMP	41 &	7	Adopt as listed -	

CELLULOSE (CELLULOSE GUM)			61		complies with CODEX STAN 166-1981	
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	61	7		
SODIUM GLUCONATE	**576**	**GMP**			Adopt as listed (also listed in 09.2.1 for use in all fish meat)	
STARCH ACETATE	1420	GMP	41	7	Adopt as listed - complies with CODEX STAN 166-1981	
TARA GUM	417	GMP	73	7	Adopt as listed (also listed in 09.2.1 with note 73)	
TRAGACANTH GUM	413	GMP	16	7	Adopt as listed (also listed in 09.2.1 for use in all fish meat)	**AIDGUM:** supports adoption
TRIPOTASSIUM CITRATE	332(ii)	GMP	61	7	Adopt as listed - complies with CODEX STAN 166-1981	
TRISODIUM CITRATE	331(iii)	GMP	61	7		
XANTHAN GUM	415	GMP	41 & 61	7	Adopt as listed - complies with CODEX STAN 166-1981	

Food Category <u>No. 09.2.3 (Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: no corresponding commodity standard	**<u>Comments by eWG on horizontal classification proposal</u>:** **UK:** unclear how glazes are used on minced fish products (note 16) **ICGMA:** modified food starch used in creamed products as stabilizers

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	16	7	Adopt as listed	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	16	7		
AGAR	406	GMP		7		
ALGINIC ACID	**400**	**GMP**				
CALCIUM CARBONATE	170(i)	GMP	16	7	Refer to discussion in Appendix 2 – possibly used as AR	
CALCIUM CHLORIDE	**509**	**10000**	**58**		Adopt as listed	
CARRAGEENAN	407	GMP		7		
CAROB BEAN GUM	**410**	**GMP**				

CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	16	7		
DEXTRINS, ROASTED STARCH	**1400**	**GMP**				
GELLAN GUM	**418**	**GMP**				
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP	16	7		**AIDGUM:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP	16	7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	16	7		
HYDROXYPROPYL STARCH	1440	GMP	16	7		
KARAYA GUM	**416**	**GMP**				
KONJAC FLOUR	**425**	**GMP**				
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP	16	7		
LECITHIN	322(i)	GMP	16	7		
MAGNESIUM CHLORIDE	511	GMP	16	7		
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP	16	7		
METHYL ETHYL CELLULOSE	465	GMP	16	7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	**460(i)**	**10000**				
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	**471**	**10000**				
OXIDIZED STARCH	1404	GMP	16	7		
PECTINS	440	GMP		7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	16	7	Refer to discussion in Appendix 2 – possibly used as AR (adopt with note 16)	
POTASSIUM CARBONATE	**501(i)**	**GMP**				
POTASSIUM CHLORIDE	**508**	**GMP**			Adopt as listed	
POWDERED CELLULOSE	460(ii)	GMP	16	7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		7		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	16 & 71	7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP	16	7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	16	7		

SODIUM DIHYDROGEN CITRATE	331(i)	GMP	16	7	Refer to discussion in Appendix 2 – possibly used as AR	
SODIUM GLUCONATE	**576**	**GMP**				
TARA GUM	417	GMP		7	Adopt as listed	
TRAGACANTH GUM	413	GMP	16	7		
TRIPOTASSIUM CITRATE	332(ii)	GMP	16	7	Refer to discussion in Appendix 2 – possibly used as AR	
TRISODIUM CITRATE	331(iii)	GMP	16	7		
XANTHAN GUM	415	GMP		7	Adopt as listed	

Food Category No. 09.2.4 (Cooked and/or fried fish and fish products, including molluscs, crustaceans, and echinoderms)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with notes 41 "Use in breading or batter coatings only." and 16 "For use in glaze, coatings or decorations for fruit, vegetables, meat or fish."
Justification for proposal: no corresponding commodity standard, technological justification provided in comments by eWG (general to FC and for specific provisions) address use in coatings/glaze only

Comments by eWG on horizontal classification proposal:
Brazil: no technological justification provided
Costa Rica: modified starch in batters and breadings are used as stabilizers.
Spain: use as glazing agent or carrier not an ES&T function. No tech justification provided.
ICGMA: modified food starch are used as thickeners in this food category

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Adopt at GMP with new note “for use in summi products only”	**Japan**: add new note "for use in surimi products only" - additive is used to blend fish paste with seasonings entirely for keeping the quality uniform. Neither Note 16 nor Note 41 covers the use in fish paste since fish paste is mixed with seasoning during processing of surimi products.
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7	Adopt at GMP with notes 16 & 41	**Japan:** supports proposal, use improves viscosity for adhesion of seasoning to fish
AGAR	406	GMP		7		
ALGINIC ACID	**400**	**GMP**				
CALCIUM CARBONATE	**170(i)**	**10000**	**58**		Adopt as listed - used as AR- see Appendix 2	
CALCIUM CHLORIDE	**509**	**10000**	**58**		Adopt at GMP with notes 16 & 41	
CAROB BEAN GUM	**410**	**GMP**				
CARRAGEENAN	407	GMP		7	Adopt at GMP with new note “for use in summi products only”	**Japan**: add new note "for use in surimi products only" - additive is used to maintain texture by retnetion of air in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with carrageenan during processing of surimi products.
CITRIC AND FATTY ACID	472c	GMP		7	Adopt at GMP with notes	

ESTERS OF GLYCEROL					16 & 41	
DEXTRINS, ROASTED STARCH	**1400**	**GMP**				
GELLAN GUM	**418**	**GMP**				
GUAR GUM	412	GMP		7	Adopt at GMP with new note “for use in summi products only”	**Japan**: add new note "for use in surimi products only" - additive is used to maintain texture by retention of air in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with guar gum during processing of surimi products.
GUM ARABIC (ACACIA GUM)	414	GMP		7	Adopt at GMP with new note “for use in summi products only”	**Japan**: add new note "for use in surimi products only" - additive is used to make texture smooth by keeping moisture in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with gum arabic during processing of surimi products. **AIDGUM** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP		7	Adopt at GMP with notes 16 & 41	
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		**Costa Rica:** modified starch is used as a stabilizer in batters and breadings
KARAYA GUM	**416**	**GMP**				**AIDGUM** supports adoption
KONJAC FLOUR	**425**	**GMP**				
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7	Adopt at GMP with new note “for use in summi products only”	**Japan:** add new note "for use in surimi products only" - additive is used to blend fish paste with seasonings entirely for keeping the quality uniform. Neither Note 16 nor Note 41 covers the use in fish paste since fish paste is mixed with seasoning during processing of surimi products.
LECITHIN	322(i)	GMP		7	Adopt at GMP with notes 16 & 41	
MAGNESIUM CHLORIDE	511	GMP		7		
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP		7		
METHYL ETHYL CELLULOSE	465	GMP		7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	**460(i)**	**10000**				
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	**471**	**10000**				
OXIDIZED STARCH	1404	GMP		7		**Costa Rica:** modified starch is used as a stabilizer in batters and breadings
PECTINS	440	GMP		7	Adopt at GMP with new note “for use in summi products only”	**Japan**: add new note "for use in surimi products only" - additive is used to maintain texture by retnetion of air in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with pectin during processing of surimi products.

POLYDEXTROSES	1200	GMP		7	Adopt at GMP with notes 16 & 41	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	Adopt as listed - used as AR - see Appendix 2	
POTASSIUM CARBONATE	**501(i)**	**GMP**				
POTASSIUM CHLORIDE	**508**	**GMP**			Adopt at GMP with notes 16 & 41	
POWDERED CELLULOSE	460(ii)	GMP		7		
PROCESSED EUCHEUMA SEAWEED (PES)	**407a**	**GMP**				
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		7	Adopt at GMP with new note “for use in summi products only”	**Japan**: add new note "for use in surimi products only" - additive is used to make texture smooth by keeping moisture in surimi products. Neither Note 16 nor Note 41 covers the use in surimi products since fish paste is mixed with additive during processing of surimi products.
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	Adopt - used as AR, see Appendix 2	
SODIUM GLUCONATE	**576**	**GMP**			Adopt at GMP with notes 16 & 41	
TARA GUM	417	GMP		7		
TRAGACANTH GUM	413	GMP		7		**AIDGUM:** supports adoption
TRICALCIUM CITRATE	333(iii)	GMP		7	Adopt - used as AR, see Appendix 2	
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	GMP		7	Adopt at GMP with notes 16 & 41	**Japan:** supports proposal, additive improves viscosity for adhesion of seasoning sauce to fish

Food Category No. 09.2.4.1 (Cooked fish and fish products)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with notes 41 and 16 **Justification for proposal**: no corresponding commodity standard, technological justification provided in comments in parent category address use in coatings/glaze only.	**Comments by eWG on horizontal classification proposal:** **Brazil:** no technological justification provided **Costa Rica, ICGMA:** modified starch is used as a thickener. **Spain:** use as glazing agent or carrier not an ES&T function. No tech justification provided. **UK:** accept proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~CALCIUM CARBONATE~~	~~170(i)~~	~~GMP~~		~~7~~	Discontinue, adopt in parent FC 09.2.4 at GMP with Notes 41, 16 - similar provision in all subcategories	
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~5000~~		~~7~~		

Food Category No. 09.2.4.2 (Cooked mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with notes 41 and 16 **Justification for proposal**: no corresponding commodity standard, technological justification provided in comments in parent category address use in coatings/glaze only.	**Comments by eWG on horizontal classification proposal:** **Brazil:** no technological justification provided **Costa Rica, ICGMA:** modified starch is used as a thickener. **Spain:** use as glazing agent or carrier not an ES&T function. No tech justification provided. **UK:** accept proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~CALCIUM CARBONATE~~	~~170(i)~~	~~GMP~~		~~7~~	Discontinue, adopt in parent FC 09.2.4 at GMP with Notes 41, 16 - similar provision in all subcategories	
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~GMP~~		~~4~~		

Food Category No. 09.2.4.3 (Fried fish and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with notes 41 and 16 **Justification for proposal**: no corresponding commodity standard, technological justification provided in comments in parent category address use in coatings/glaze only.	**Comments by eWG on horizontal classification proposal:** **Brazil:** no technological justification provided **Spain:** use as glazing agent or carrier not an ES&T function. No tech justification provided. **UK:** accept proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~CALCIUM CARBONATE~~	~~170(i)~~	~~GMP~~	16	~~7~~	Discontinue, adopt in parent FC 09.2.4 at GMP with Notes 41, 16 - similar provision in all subcategories	
~~PROCESSED EUCHEUMA SEAWEED (PES)~~	~~407a~~	~~GMP~~		~~4~~		

Food Category No. 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: 244-2004, 167-1989, 222-2001: do not list ES&T; 189-1993, 236-2003: food additives are not permitted

eWG Proposal for Horizontal Classification of Food Category: Not Justified – discontinue all provisions for ES&Ts in this food category **Justification for proposal**: No information provided supporting use with exception of comment by Japan for Xantham gum - water retention would not appear to be necessary for foods covered by this FC	**Comments by eWG on horizontal classification proposal:** **Brazil:** no technological justification provided for use of ES&T in this food category **Spain:** supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Discontinue	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
AGAR	406	GMP		7		
CALCIUM CARBONATE	170(i)	GMP		7	used as AR, refer to discussion in Appendix 2 - adopt with new note "except for use in foods covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001" and "not for use in salted atlantic herring and sprat"	
CARRAGEENAN	407	GMP		7	Discontinue	

CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7		
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP		7		
HYDROXYPROPYL CELLULOSE	463	GMP		7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7		
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7		
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP		7		
METHYL ETHYL CELLULOSE	465	GMP		7		
OXIDIZED STARCH	1404	GMP		7		
PECTINS	440	GMP		7		
POTASSIUM CARBONATE	**501(i)**	**GMP**			used as AR - refer to discussion in Appendix 2 - adopt with new note "except for use in foods covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001" and "not for use in salted atlantic herring and sprat"	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP		7	Discontinue	
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7	used as AR - refer to discussion in Appendix 2 - adopt with new note	

					"except for use in foods covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001" and "not for use in salted atlantic herring and sprat"	
TARA GUM	417	GMP		7	Discontinue	
TRAGACANTH GUM	413	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7	used as AR, refer to discussion in Appendix 2 - adopt with new note "except for use in foods covered by the following standards: 189-1993, 236-2003, 167-1989, 222-2001" and "not for use in salted atlantic herring and sprat"	
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	GMP		7	Discontinue	**Japan:** add new note as "for use as stabilizer or texturizing agent". Xanthan gum is used to prevent separation of seasoning sauce and food by increasing adhesivness of the sauce, or to maintain texture by retaining water of the fish. Therefore, the term "stabilizer" should be added to new note.

Food Category <u>No. 10.1 (Fresh eggs)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified **<u>Justification for proposal</u>**: No information provided supporting use of ES&T in this category	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Spain:** supports proposal

Food Category <u>No. 10.2.1 (Liquid egg products)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified **<u>Justification for proposal</u>**: comments by eWG and in CX/FA 12/44/9 add 2: Thickeners and stabilizers are used to restore the viscosity that is typically lost through pasteurisation of liquid egg products	**<u>Comments by eWG on horizontal classification proposal</u>:** **EU, UK, ICGMA, IFAC:** supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		7	Adopt at GMP	

CALCIUM ALGINATE	404	6000		7		**USA**: calcium alginate is allowed for use in egg products as a stabilizer/thickener up to 6000 mg/kg **Marlinga, IFAC:** GMP for EU alignment
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	407	GMP		7		**ICGMA:**used to control viscosity
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		**Japan:** agree, prevents coagulation of protein during pasteurization **ICGMA**: used to control viscosity
GUM ARABIC (ACACIA GUM)	414	GMP		7		**AIDGUM:** supports adoption
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	GMP		7		
LECITHIN	322(i)	GMP		7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		**ELC:** accepts proposal
PECTINS	440	GMP		7		**Japan:** agree, prevents coagulation of protein during pasteurization
POLYDEXTROSES	1200	GMP		7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		4		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
TARA GUM	417	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	GMP		7		**Japan:** agree, prevents coagulation of protein during pasteurization **ICGMA:** used to control viscosity

Food Category <u>No. 10.2.2 (Frozen egg products)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Justified
<u>Justification for proposal</u>: comments by eWG and in CX/FA 12/44/9 add 2: Thickeners and stabilizers are needed to provide freeze-thaw stability and restore lost viscosity that is typically lost through pasteurisation.

<u>Comments by eWG on horizontal classification proposal</u>:
EU, UK, ICGMA, IFAC: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
AGAR	406	GMP		7	Adopt at GMP	

CALCIUM ALGINATE	404	6000		7		**USA:** calcium alginate is allowed for use in egg products as a stabilizer/thickener up to 6000 mg/kg **IFAC**, **Marlinga:** GMP for EU alignment
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	407	GMP		7		
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		**Japan:** agree, prevents protein denatuation caused by freezing **ICGMA:** to control viscosity
GUM ARABIC (ACACIA GUM)	414	GMP		7		**AIDGUM:** supports adoption
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	GMP		7		
LECITHIN	322(i)	GMP		7		
MANNITOL	421	GMP		4		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP		7		**EFEMA:** adopt at GMP
PECTINS	440	GMP		7		**Japan:** agree, prevents protein denatuation caused by freezing
POLYDEXTROSES	1200	GMP		7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		4		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
TARA GUM	417	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	GMP		7		**Japan:** agree, prevents protein denaturation caused by freezing **ICGMA:** to control viscosity

Food Category No. 11.1 (Refined and raw sugars)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners; commodity standards for subcategories do not allow ES&T

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal

Food Category No. 11.1.1 (White sugar, dextrose anhydrous, dextrose monohydrate, fructose)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal

Food Category No. 11.1.2 (Powdered sugar, powdered dextrose)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: ODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal **ICGMA:** modified food starch is used in this category

Food Category No. 11.1.3 (Soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **EU, Iran, Spain, CEFS:** supports proposal

Food Category No. 11.1.3.1 (Dried glucose syrup used to manufacture sugar confectionery)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal

Food Category No. 11.1.3.2 (Glucose syrup used to manufacture sugar confectionery)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Iran, Spain, CEFS:** supports proposal

Food Category No. 11.1.4 (Lactose)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **EU, Iran, Spain, CEFS:** supports proposal

Food Category No. 11.1.5 (Plantation or mill white sugar)

Corresponding commodity standards: 212-1999: does not permit emulsifiers, stabilizers or thickeners

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: CODEX STAN 212-1999 does not permit emulsifiers, stabilizers or thickeners.	**Comments by eWG on horizontal classification proposal:** **EU, Iran, Spain, CEFS:** supports proposal

Food Category No. 11.2 (Brown sugar, excluding products of food category 11.1.3 (soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar))

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: comments to eWG that ES&T are not needed in this food category.	**Comments by eWG on horizontal classification proposal:** **EU, Spain, UK, CEFS:** supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		4	Discontinue	**UK, CEFS:** discontinue - technological need questioned
POLYDEXTROSES	1200	GMP		7		**UK, CEFS:** discontinue - technological need questioned

Food Category No. 11.3 (Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3 (soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar))

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Not Justified
Justification for proposal: comments to eWG that ES&T are not needed in this food category.

Comments by eWG on horizontal classification proposal:
EU, Spain, UK, CEFS: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
GELLAN GUM	418	500		7	Discontinue	**UK, CEFS:** discontinue - technological need questioned
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		4		**UK, CEFS:** discontinue - technological need questioned
POLYDEXTROSES	1200	GMP		7		**UK, CEFS:** discontinue - technological need questioned

Food Category No. 11.4 (Other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified
Justification for proposal: comments by eWG members and recommendation in CX/FA 12/44/9 Add 1

Comments by eWG on horizontal classification proposal:
EU, UK: Supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Adopt as listed	**EFEMA, ELC:** accepts proposal
ACETYLATED DISTARCH ADIPATE	1422	10000		7		
ACETYLATED DISTARCH PHOSPHATE	1414	10000		7		
ACID TREATED STARCH	1401	10000		7		
AGAR	406	GMP		7		
ALGINIC ACID	400	10000		7		
ALKALINE TREATED STARCH	1402	10000		7		
AMMONIUM ALGINATE	403	10000		7		
BLEACHED STARCH	1403	10000		7		
CALCIUM ACETATE	263	1500		7		**USA**: calcium acetate is allowed in the USA for use in toppings and syrups as a thickener at levels up to 0.15% (1500 mg/kg)
CALCIUM ALGINATE	404	10000		7		
CAROB BEAN GUM	410	5000		7		
CARRAGEENAN	407	5000		7		
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7		**EFEMA, ELC:** accepts proposal
DISTARCH PHOSPHATE	1412	10000		7		

GELLAN GUM	418	500		7		
GUAR GUM	412	10000		7		**IFAC:** adopt at GMP
GUM ARABIC (ACACIA GUM)	414	GMP		7		**AIDGUM:** supports adoption
HYDROXYPROPYL CELLULOSE	463	GMP		7		
HYDROXYPROPYL DISTARCH PHOSPHATE	1442	10000		7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	10000		7		
KARAYA GUM	416	GMP		7		**AIDGUM:** supports adoption
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7		**EFEMA, ELC:** accepts proposal
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7		
MANNITOL	421	GMP		4		
METHYL CELLULOSE	461	GMP		7		
METHYL ETHYL CELLULOSE	465	GMP		7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	6000		7		**EFEMA, ELC:** accepts proposal
MONOSTARCH PHOSPHATE	1410	10000		7		
OXIDIZED STARCH	1404	10000		7		
PECTINS	440	GMP		7		
PHOSPHATED DISTARCH PHOSPHATE	1413	10000		7		
POLYDEXTROSES	1200	GMP		7		
POTASSIUM ALGINATE	402	10000		7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP		7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	71	7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7		
SODIUM ALGINATE	401	10000		7		
SODIUM CARBOXYMETHYL	466	5000		7		

CELLULOSE (CELLULOSE GUM)						
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
STARCHES, ENZYME TREATED	1405	10000		7		
TRAGACANTH GUM	413	GMP		7		**AIDGUM:** supports adoption
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	5000		7		

Food Category No. 11.5 (Honey)

Corresponding commodity standards: 012-1981: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. 2 that emulsifiers, stabilizers & thickeners are not justified in FC 11.5	**Comments by eWG on horizontal classification proposal:** **Brazil, EU, Spain:** supports proposal

Food Category No. 12.1 (Salt and salt substitutes)

Corresponding commodity standards: None; subcategories have corresponding commodity standards which do not exclude ES&Ts

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Comments to eWG that Technical function of ES&T not needed in salt; adopted provisions for food additives with ES&T function in subcategory 12.1.1 (Salt) are for their use as anticaking agents, not as ES&T	**Comments by eWG on horizontal classification proposal:** **EU, Spain, UK:** supports proposal

Food Category No. 12.1.1 (Salt)

Corresponding commodity standards: 150-1985: allows food additives as per FC 12.1.1 Tables 1 & 2

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Comments to eWG that Technical function of ES&T not needed in salt; adopted provisions for food additives with ES&T function in this food are for their use as anticaking agents, not as ES&T	**Comments by eWG on horizontal classification proposal:** **EU, Spain, UK:** supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
CALCIUM CARBONATE	170(i)	GMP		Adopted	Retain Adopted	**UK:** retain adopted - used as anti-caking agents not as ES&T
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	71	Adopted		**UK:** retain adopted - used as anti-caking agents not as ES&T

Food Category No. 12.1.2 (Salt substitutes)

Corresponding commodity standards: 053-1981: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Justified **Justification for proposal**: Comments by eWG members and in CX/FA 12/44/9 Add 2. - stabilizers used to cause different salt substitute ingredients to adhere to each other so that when they reach the tongue the synergistic effect of the compounds in creating a salty taste remains intact.	**Comments by eWG on horizontal classification proposal:** **UK:** accepts proposal **ICGMA -** Modified Food Starches would be used as stabilizers to cause different salt substitute ingredients to adhere to each other so that when they reach the tongue the synergistic effect of the compounds in creating a salty taste remains intact. Without something to hold the ingredients together they would separate and the perceived salty taste could be lost.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	5000		7	Adopt as listed	**EFEMA, ELC:** accepts proposal
ACETYLATED DISTARCH PHOSPHATE	1414	GMP		7		
AGAR	406	GMP		7		
ALGINIC ACID	400	GMP		4		
CALCIUM CARBONATE	170(i)	10000	58	4		
CALCIUM CHLORIDE	509	10000	58	4		
CARRAGEENAN	407	GMP		7		
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7		**EFEMA, ELC:** accepts proposal
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP		7		**USA:** accept proposal **AIDGUM:** supports adoption **CCC, Tate & Lyle:** adopt at GMP, used to stabilize smaller salt crystals to allow same salt taste on tongue in reduced sodium products
HYDROXYPROPYL CELLULOSE	463	GMP		7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	GMP		7		
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	5000		7		**EFEMA, ELC:** accepts proposal
LECITHIN	322(i)	GMP		7		
MAGNESIUM CHLORIDE	511	GMP		7		
MANNITOL	421	60000		4		
METHYL CELLULOSE	461	GMP		7		
METHYL ETHYL CELLULOSE	465	GMP		7		

MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	22000		7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	5000		7		**EFEMA, ELC:** accepts proposal
OXIDIZED STARCH	1404	GMP		7		
PECTINS	440	GMP		7		
POTASSIUM CHLORIDE	508	GMP		4		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP		7		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
SODIUM GLUCONATE	576	GMP		4		
TRAGACANTH GUM	413	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	GMP		7		

Food Category <u>No. 12.2.1 (Herbs and spices)</u>

Corresponding commodity standards: None

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Not Justified
<u>Justification for proposal</u>: Comments by eWG members and in CX/FA 12/44/9 Add 2. - ES&T not needed in this FC

<u>Comments by eWG on horizontal classification proposal</u>:
Brazil, EU, Spain, UK, ICGMA: supports proposal

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	5000	51[20]	7	Discontinue	
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	51	7		
AGAR	406	GMP	51	7		

[20] **Note 51:** For use in herbs only.

ALGINIC ACID	400	GMP	51	4		
CALCIUM CARBONATE	170(i)	10000	51& 58	4		
CALCIUM CHLORIDE	509	10000	51 & 58	4		
CAROB BEAN GUM	410	GMP	51	7		
CARRAGEENAN	407	GMP	51	7		
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP	51	7		
GELLAN GUM	418	GMP	51	7		
GUAR GUM	412	GMP	51	7		
GUM ARABIC (ACACIA GUM)	414	GMP	51	7		
HYDROXYPROPYL CELLULOSE	463	GMP	51	7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP	51	7		
HYDROXYPROPYL STARCH	1440	GMP	51	7		
KARAYA GUM	416	GMP	51	7		
KONJAC FLOUR	425	GMP	51	7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	5000	51	7		
LECITHIN	322(i)	GMP	51	7		
MAGNESIUM CHLORIDE	511	GMP	51	7		
MANNITOL	421	60000	51	4		
METHYL CELLULOSE	461	GMP	51	7		
METHYL ETHYL CELLULOSE	465	GMP	51	7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP	51	7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	5000	51	7		
OXIDIZED STARCH	1404	GMP	51	7		
PECTINS	440	GMP	51	7		
POLYDEXTROSES	1200	GMP	51	7		
POTASSIUM CHLORIDE	508	GMP	51	4		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	51	7		
POWDERED CELLULOSE	460(ii)	GMP	51	7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP	51	7		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP	51	7		
SALTS OF OLEIC ACID WITH	470(ii)	GMP	51	7		

CALCIUM, POTASSIUM AND SODIUM						
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP	51	7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	51	7		
SODIUM GLUCONATE	576	GMP	51	4		
TARA GUM	417	GMP	51	7		
TRAGACANTH GUM	413	GMP	51	7		
TRICALCIUM CITRATE	333(iii)	GMP	51	7		

Food Category <u>No. 13.1 (Infant formulae, follow-up formulae, and formulae for special medical purposes for infants)</u>

Corresponding commodity standards: 150-1985: allows food additives as per FC 12.1.1 Tables 1 & 2

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-by-Case **<u>Justification for proposal</u>**: Comments to eWG that the use of all additives in subcategories should be specifically evaluated for use in that food category.	**<u>Comments by eWG on horizontal classification proposal</u>:** **Brazil, EU, Spain, UK:** supports proposal **ICGMA:** Thickeners help suspend nutrients, particularly insoluble minerals, preserving the nutritional quality of the food (specifically nutrient delivery to the infant). Emulsifiers provide aid in the manufacture of formulas to prevent separation of the macronutrient entities, which enhances the keeping quality or stability of the formula and helps ensure even distribution of nutrients

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
~~GUM ARABIC (ACACIA GUM)~~	~~414~~	~~GMP~~		~~4~~	Discontinue and move to FC 13.1.1 & 13.1.3 - although not included in adopted 072-1981, CCNFSDU has proposed it for adoption in that standard (see Alinorm 07/30/26 Appendix III). It has not been proposed for addition to 156-1987	**UK:** accept proposal to adopt in FC 13.1

Food Category No. 13.1.1 (Infant formulae)

Corresponding commodity standards: 072-1981: allows thickeners (INS 412. 410. 1412, 1414, 1413, 1440, 407) and emulsifiers (INS 322, 471); also allows INS 501, 332 and 331 as acidity regulators

eWG Proposal for Horizontal Classification of Food Category: Case-By-Case **Justification for proposal:** Comments to eWG that the use of additives in this FC should be specifically evaluated for use in that food category	**Comments by eWG on horizontal classification proposal:** **Spain:** supports proposal **UK**: accept proposals only in accordance with Codex Standards in this sentitive food category **ICGMA**: Thickeners help suspend nutrients, particularly insoluble minerals, preserving the nutritional quality of the food (specifically nutrient delivery to the infant). Emulsifiers provide aid in the manufacture of formulas to prevent separation of the macronutrient entities, which enhances the keeping quality or stability of the formula and helps ensure even distribution of nutrients

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETYLATED DISTARCH PHOSPHATE	1414	5000	72[21] & 150[22]	7	Adopt as listed - corresponds to CODEX STAN 072-1981	
CAROB BEAN GUM	410	1000	72	7		
DISTARCH PHOSPHATE	1412	5000	72 & 150	7		
GUAR GUM	412	1000	14[23] & 72	7		
GUM ARABIC (ACACIA GUM)	**414**	**GMP**			Adopt - corresponds to proposal by CCNFSDU (see Alinorm 07/30/26 Appendix III)	**AIDGUM** supports adoption
HYDROXYPROPYL STARCH	1440	5000	72 & 150	7	Adopt as listed - corresponds to CODEX STAN 072-1981	
LECITHIN	322(i)	5000	72	7		**Japan:** agree, used for uniform emulsion
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	4000	72	7		**EFEMA, ELC:** accepts the proposal
PHOSPHATED DISTARCH PHOSPHATE	1413	5000	72 & 150	7		
POTASSIUM CARBONATE	501(i)	2000	55[24] & 72	7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	72	7		
POTASSIUM HYDROGEN CARBONATE	501(ii)	2000	55 & 72	7		

[21] **Note 72:** Ready-to-eat basis.
[22] **Note 150:** Use level for soy-based formula; 25 000 mg/kg for hydrolyzed protein and/or amino acid-based formula.
[23] **Note 14:** For use in hydrolyzed protein liquid formula only.
[24] **Note 55:** Singly or in combination, within the limits for sodium, calcium, and potassium specified in the commodity standard.

SODIUM DIHYDROGEN CITRATE	331(i)	GMP	72	4		
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7		**Japan:** chelating effect of citrate prevents sedimentation of minerals such as calcium
TRISODIUM CITRATE	331(iii)	GMP	72	7		

Food Category <u>No. 13.1.2 (Follow-up formulae)</u>

Corresponding commodity standards: 156-1987: allows thickeners (INS 412, 410, 1412, 1414, 1413, 1422, 407, 440) and emulsifiers (INS 322i, 471), and INS 332i-ii, 501i-ii, 331iii, & 331i as acidity regulators

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-By-Case **<u>Justification for proposal:</u>** Comments to eWG that the use of additives in this FC should be specifically evaluated for use in that food category	**<u>Comments by eWG on horizontal classification proposal</u>:** **Spain:** supports proposal **UK**: accept proposals only in accordance with Codex Standards in this sentitive food category **ICGMA**: Thickeners help suspend nutrients, particularly insoluble minerals, preserving the nutritional quality of the food (specifically nutrient delivery to the infant). Emulsifiers provide aid in the manufacture of formulas to prevent separation of the macronutrient entities, which enhances the keeping quality or stability of the formula and helps ensure even distribution of nutrients

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETYLATED DISTARCH ADIPATE	1422	5000	72 & 150	7	Adopt as listed - corresponds to CODEX STAN 072-1981	
ACETYLATED DISTARCH PHOSPHATE	1414	5000	72 & 150	7		
CAROB BEAN GUM	410	1000	72	7		
CARRAGEENAN	407	300	72 & 151[25]	7		
DISTARCH PHOSPHATE	1412	5000	72 & 150	7		
GUAR GUM	412	1000	72	7		
LECITHIN	322(i)	5000	72	7		**Japan:** agree, used for uniform emulsion
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	4000	72	7		**EFEMA, ELC:** accepts the proposal
PECTINS	440	10000	72	7		
PHOSPHATED DISTARCH PHOSPHATE	1413	5000	72 & 150	7		
POTASSIUM CARBONATE	501(i)	GMP	72	7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	72	4		
POTASSIUM HYDROGEN	501(ii)	GMP	72	7		

[25] **Note 151:** Use level for soy-based formula; 1 000 mg/kg for hydrolyzed protein and/or amino acid-based formula.

CARBONATE						
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	72	4		
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7		
TRISODIUM CITRATE	331(iii)	GMP	72	7		

Food Category <u>No. 13.1.3 (Formulae for special medical purposes for infants)</u>

Corresponding commodity standards: 072-1981: allows thickeners (INS 412. 410. 1412, 1414, 1413, 1440, 407) and emulsifiers (INS 322, 471); also allows INS 501, 332 and 331 as acidity regulators

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-By-Case **<u>Justification for proposal:</u>** Comments to eWG that the use of additives in this FC should be specifically evaluated for use in that food category	**<u>Comments by eWG on horizontal classification proposal</u>:** **Spain:** supports proposal **UK**: accept proposals only in accordance with Codex Standards in this sentitive food category **ICGMA**: Thickeners help suspend nutrients, particularly insoluble minerals, preserving the nutritional quality of the food (specifically nutrient delivery to the infant). Emulsifiers provide aid in the manufacture of formulas to prevent separation of the macronutrient entities, which enhances the keeping quality or stability of the formula and helps ensure even distribution of nutrients

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETYLATED DISTARCH PHOSPHATE	1414	5000	72 & 150	7	Adopt as listed - corresponds to CODEX STAN 072-1981	
CAROB BEAN GUM	410	1000	72	7		
DISTARCH PHOSPHATE	1412	5000	72 & 150	7		
GUAR GUM	412	1000	14 & 72	7		
GUM ARABIC (ACACIA GUM)	**414**	**GMP**			Adopt - corresponds to proposal by CCNFSDU (see Alinorm 07/30/26 Appendix III)	**AIDGUM** supports adoption
HYDROXYPROPYL STARCH	1440	5000	72 & 150	7	Adopt as listed - corresponds to CODEX STAN 072-1981	
LECITHIN	322(i)	5000	72	7		**Japan:** agree, prevents fat separation
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	4000	72	7		**Japan:** agree, prevents fat separation **EFEMA, ELC:** accepts the proposal
PHOSPHATED DISTARCH PHOSPHATE	1413	5000	72 & 150	7		
POTASSIUM CARBONATE	501(i)	2000	55 & 72	7		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP	72	7		

POTASSIUM HYDROGEN CARBONATE	501(ii)	2000	55 & 72	7		
SODIUM DIHYDROGEN CITRATE	331(i)	GMP	72	4		
TRIPOTASSIUM CITRATE	332(ii)	GMP	72	7		**Japan:** chelating effect of citrate prevents sedimentation of minerals such as calcium
TRISODIUM CITRATE	331(iii)	GMP	72	7		

Food Category <u>No. 13.2 (Complementary foods for infants and young children)</u>

Corresponding commodity standards: 073-1981: allows thickeners (INS 412, 410, 1412, 1422, 1413, 1440, 1414, 440) and emulsifiers (INS 322, 471), also allows INS 501i-ii, 333iii, 331i & 170i as acidity regulators; 074-1981: allows thickener (INS 410, 412,414, 415, 440, 1404, 1410, 1412, 1413, 1414, 1420, 1450, 1451) and emulsifiers (INS 322, 471, 472a, 472b, 472c), also allows INS 501i-ii, 263, 331i-ii, 332i, iii, 333 (only 333iii in GSFA) as acidity regulators

<u>eWG Proposal for Horizontal Classification of Food Category</u>: Case-By-Case **<u>Justification for proposal:</u>** Comments to eWG that the use of additives in this FC should be specifically evaluated for use in that food category	**<u>Comments by eWG on horizontal classification proposal</u>:** **Spain:** supports proposal **UK**: accept proposals only in accordance with Codex Standards in this sensitive food category **ELC:** 074-1981 (CODEX STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN) includes several provisions for PHOSPHATES (@440mg/kg as P, for pH-adjustment only). These provisions should be taken up **ICGMA**: modified food starch is used as a general thickener and stabilizer in this category

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	5000		7	Adopt as listed with new note "singly or in combination with INS 471, 472a, 472b, & 472c" - corresponds to CODEX STAN 74-1981	**UK:** accept proposal
ACETYLATED DISTARCH ADIPATE	1422	60000		7	Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per CODEX STAN 74-1981) & "60000 mg/kg in canned baby food only" (as per CODEX STAN 73-1981)	**UK:** accept proposal
ACETYLATED DISTARCH PHOSPHATE	1414	60000		7		**UK:** accept proposal
ACETYLATED OXIDIZED STARCH	1451	5000	72	4		**UK:** accept proposal
AGAR	406	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
ALGINIC ACID	400	5000		7		
AMMONIUM ALGINATE	403	5000		7		
CALCIUM ACETATE	263	GMP		7	Adopt as listed - corresponds to CODEX STAN 74-1981	**UK:** accept proposal

CALCIUM ALGINATE	404	5000		7	Adopt - corresponding commodity standards allow ES&T	
CALCIUM CARBONATE	170(i)	GMP		7	Adopt as listed - corresponds to CODEX STAN 74-1981; 73-1981	**UK:** accept proposal
CAROB BEAN GUM	410	20000		7	Adopt at 10000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440" & "20000 mg/kg in gluten-free cereal-based foods only" (both notes as per CODEX STAN 74-1981)	**UK:** accept proposal
CARRAGEENAN	407	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	5000		7	Adopt at 5000 mg/kg with new note "singly or in combination with INS 471, 472a, 472b, & 472c" (as per CODEX STAN 74-1981)	**UK, EFEMA, ELC:** accept proposal
DISTARCH PHOSPHATE	1412	60000		7	Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per CODEX STAN 74-1981), "60000 mg/kg in canned baby foods only" (as per CODEX STAN 73-1981)	**UK:** accept proposal
GELLAN GUM	418	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
GUAR GUM	412	20000		7	Adopt at 10000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440" (as per CODEX STAN 74-1981), "20000 mg/kg in gluten-free cereal-based foods only"	**UK:** accept proposal

					& "2000 mg/kg in canned baby foods only" (as per CODEX STAN 73-1981)	
GUM ARABIC (ACACIA GUM)	414	20000		7	Adopt at 10000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440" & "20000 mg/kg in gluten-free cereal-based foods only" (both notes as per CODEX STAN 74-1981)	**UK:** accept proposal **AIDGUM:** supports adoption
GUM ARABIC (ACACIA GUM)	414	GMP		4	Discontinue	**UK:** accept proposal
HYDROXYPROPYL STARCH	1440	60000		7	Adopt - corresponding commodity standards allow some ES&T	
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	5000		7	Adopt with new note "singly or in combination with INS 471, 472a, 472b, & 472c" (as per CODEX STAN 74-1981)	**UK:** accept proposal
LECITHIN	322(i)	15000		7	Adopt at 5000 mg/kg (as per CODEX STAN 73-1981) with note "15000 mg/kg in processed cereal-based foods for infants and young children" (as per CODEX STAN 74-1981)	**UK:** accept proposal
MANNITOL	421	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	5000		7	Adopt with new note "singly or in combination with INS 471, 472a, 472b, & 472c" (as per CODEX STAN 74-1981) and "1500 mg/kg for use in canned baby foods" (as per 73-1981)	**UK, EFEMA, ELC:** accept proposal
MONOSTARCH PHOSPHATE	1410	50000		7	Adopt with new note "singly or in combination with other starch	
OXIDIZED STARCH	1404	50000		7		**UK:** accept proposal

					thickeners" (as per 74-1981)	
PECTINS	440	20000		7	Adopt at 10000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440" & "20000 mg/kg in gluten-free cereal-based foods only" (as per 74-1981) & "in canned fruit-based baby foods only" (as per 73-1981)	**UK:** accept proposal
PHOSPHATED DISTARCH PHOSPHATE	1413	60000		7	Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per 74-1981) & "60000 mg/kg in caned baby food only" (as per 73-1981)	**UK:** accept proposal
POTASSIUM ALGINATE	402	5000		7	Discontinue - not allowed in corresponding commodity standards	
POTASSIUM CARBONATE	501(i)	GMP		7	Adopt - potassium hydrogen carbonate and acidity regulators allowed in both corresponding commodity standards	
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7	Adopt as listed - corresponds to CODEX STAN 74-1981	**UK:** accept proposal
POTASSIUM HYDROGEN CARBONATE	501(ii)	GMP		7		**UK:** accept proposal
POWDERED CELLULOSE	460(ii)	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		4		
SODIUM ALGINATE	401	5000		7		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		4		
SODIUM DIHYDROGEN CITRATE	331(i)	5000		4	Adopt at GMP with new note "5000 mg/kg in canned baby foods"	5000 mg/kg Corresponds to CODEX STAN 073-1981, GMP to 74-1981
STARCH ACETATE	1420	50000		7	Adopt at 50000 mg/kg with new note "singly or	**UK:** accept proposal

					in combination with other starch thickeners" (as per CODEX STAN 74-1981)	
STARCH SODIUM OCTENYL SUCCINATE	1450	50000		7	Adopt at 50000 mg/kg with new note "singly or in combination with other starch thickeners" (as per CODEX STAN 74-1981)	**UK:** accept proposal
TARA GUM	417	GMP		7	Adopt - corresponding commodity standards allow some ES&T	
TRICALCIUM CITRATE	333(iii)	GMP		7	Adopt as listed - corresponds to CODEX STAN 74-1981	**UK:** accept proposal
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		**UK:** accept proposal
TRISODIUM CITRATE	331(iii)	5000		7		**UK:** accept proposal
XANTHAN GUM	415	20000		7	Adopt at 10000 mg/kg with notes "singly or in combination with INS 410, 412, 414, 415, and 440" & "20000 mg/kg in gluten-free cereal-based foods only" (as per CODEX STAN 74-1981)	**UK:** accept proposal

Food Category No. 14.1.1 (Waters)

Corresponding commodity standards: None, 108-1981 corresponds to subcategory 14.1.1.1 & 227-2001 corresponds to 14.1.1.2

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of additives in this food category is not justified	**Comments by eWG on horizontal classification proposal:** **EU, Iran, Spain, UK:** supports proposal

Food Category No. 14.1.1.1 (Natural mineral waters and source waters)

Corresponding commodity standards: 108-1981: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of additives in this food category is not justified	**Comments by eWG on horizontal classification proposal:** **EU, Iran, Spain, UK:** supports proposal

Food Category No. 14.1.1.2 (Table waters and soda waters)

Corresponding commodity standards: 227-2001: does not discuss food additives

eWG Proposal for Horizontal Classification of Food Category: Not Justified **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of additives in this food category is not justified	**Comments by eWG on horizontal classification proposal:** **EU, Spain, UK:** supports proposal

Food Category No. 14.1.2 (Fruit and vegetable juices)

Corresponding commodity standards: None, 247-2005 corresponds to most subcategories and allows food additives as per Tables 1 & 2

eWG Proposal for Horizontal Classification of Food Category: Justified only with note 35 "for use in cloudy juices only" **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. **EU:** use should be restricted as outlined in CTS 247-2005 **UK:** does not support since CX standard 247-2005 restricts ESTs to only those that are components of foods e.g. Pectins**.**

Food Category No. 14.1.2.1 (Fruit juice)

Corresponding commodity standards: 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

eWG Proposal for Horizontal Classification of Food Category: Justified only with note 35[26] "for use in cloudy juices only" **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. **EU:** use should be restricted as outlined in CTS 247-2005 **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **UK:** does not support since CX standard 247-2005 restricts ESTs to only those that are components of foods e.g. Pectins**.** **IFU:** use pectin in cloudy juices

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	GMP	35	Adopted	Retain Adopted as listed	**Japan, IFU:** agree, prevents nectar precipitation

[26] **Note 35:** For use in cloudy juices only.

Food Category No. 14.1.2.2 (Vegetable juice)

Corresponding commodity standards: none

eWG Proposal for Horizontal Classification of Food Category: Justified only with note 35 "for use in cloudy juices only" **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. **EU:** use should be restricted as outlined in CTS 247-2005 **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **UK:** does not support since CX standard 247-2005 restricts ESTs to only those that are components of foods e.g. Pectins. **IFU:** use pectin in cloudy juices

Food Category No. 14.1.2.3 (Concentrates for fruit juice)

Corresponding commodity standards: 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

eWG Proposal for Horizontal Classification of Food Category: Justified only with note 35 "for use in cloudy juices only" **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. **EU:** use should be restricted as outlined in CTS 247-2005 **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **UK:** does not support since CX standard 247-2005 restricts ESTs to only those that are components of foods e.g. Pectins.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	GMP	35 & 127[27]	Adopted	Retain Adopted as listed	**IFU:** agree

Food Category No. 14.1.2.4 (Concentrates for vegetable juice)

Corresponding commodity standards: none

eWG Proposal for Horizontal Classification of Food Category: Justified only with note 35 "for use in cloudy juices only" **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **UK:** does not support since CX standard 247-2005 restricts ESTs to only those that are components of foods e.g. Pectins. **IFU:** use pectin in cloudy juices

[27] **Note 127:** As served to the consumer.

Food Category No. 14.1.3 (Fruit and vegetable nectars)

Corresponding commodity standards: None, 247-2005: allows food additives listed in Tables 1 & 2 in subcategories 14.1.3.1, & 14.1.3.3

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "for use in cloudy nectars only" **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. **EU:** use should be restricted as outlined in CTS 247-2005 **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match **UK:** does not support since CX standard 247-2005 restricts ESTs to only those that are components of foods e.g. Pectins. **IFU:** use pectin in cloudy juices

Food Category No. 14.1.3.1 (Fruit nectar)

Corresponding commodity standards: None, 247-2005: allows food additives listed in Tables 1 & 2 in 14.1.3.1, & 14.1.3.3

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "for use in cloudy nectars only" **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. **EU:** use should be restricted as outlined in CTS 247-2005

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	GMP		Adopted	Retain Adopted at GMP but with new note “for use in cloudy nectars only”	**Japan:** agree, prevents nectar separation **UK, IFU:** accepts proposal

Food Category No. 14.1.3.2 (Vegetable nectar)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "for use in cloudy nectars only" **Justification for proposal**: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform	**Comments by eWG on horizontal classification proposal:** **Costa Rica, ICGMA:** Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids. **Iran:** supports proposal, but the standard CX standard 247-2005 must be amended to match

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	3000		4	Adopt as listed with note "for use in cloudy nectars only"	**UK, IFU:** accepts proposal

Food Category No. 14.1.3.3 (Concentrates for fruit nectar)

Corresponding commodity standards: None, 247-2005: allows food additives listed in Tables 1 & 2 in FCs 14.1.2.1, 14.1.2.3, 14.1.3.1, & 14.1.3.3

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "for use in cloudy nectars only"
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform

Comments by eWG on horizontal classification proposal:
Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids.
EU: use should be restricted as outlined in CTS 247-2005

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	GMP	127	Adopted	Retain Adopted but with new note “for use in cloudy nectars only”	**Iran, UK, IDF:** accepts proposal

Food Category No. 14.1.3.4 (Concentrates for vegetable nectar)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified only with note "for use in cloudy nectars only"
Justification for proposal: Comments to eWG and in CX/FA 12/44/9 Add. that the use of stabilizers are necessary in pulpy juices and nectars. Highly pulpy products may present decantation of insoluble solids during shelf life. The use of stabilizers is justified to keep the products uniform

Comments by eWG on horizontal classification proposal:
Costa Rica, ICGMA: Gums and thickeners are used to thicken and adjust mouth feel and to stabilize e.g., pectin, xanthum, maltodextrin, other hydrocolloids.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
PECTINS	440	3000		4	Adopt with note "for use in cloudy nectars only"	**UK, IFU:** accepts proposal

Food Category No. 14.1.5 (Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa)

Corresponding commodity standards: None

eWG Proposal for Horizontal Classification of Food Category: Justified
Justification for proposal: No corresponding Commodity Standard, Comments to 1st Circular by Codex Members that ES&T are used in all products in this category.

Comments by eWG on horizontal classification proposal:
EU: not justified in coffee and unflavoured tea
UK: add footnote 142 "Excluding coffee and tea" to all proposed provisions
ICGMA: multiple emulsifiers and thickeners utilized in this category

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	eWG proposal	Comments by eWG members on proposal
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP		7	Adopt as listed	
ACETYLATED DISTARCH	1422	10000		7		

ADIPATE						
ACETYLATED DISTARCH PHOSPHATE	1414	10000		7		
ACID TREATED STARCH	1401	10000		7		
AGAR	406	GMP		7		
ALGINIC ACID	400	GMP		4		
ALKALINE TREATED STARCH	1402	10000		7		
BLEACHED STARCH	1403	10000		7		
CALCIUM CARBONATE	170(i)	10000	58 & 160[28]	4		
CALCIUM CHLORIDE	509	10000	58	4		**USA**: calcium carbonate allowed for use in the USA in coffee and tea as a stabilizer/thickener up to 3200 mg/kg
CAROB BEAN GUM	410	GMP		7		
CARRAGEENAN	407	GMP		7		**Japan:** supports proposal. Carageenan is used to prevent separation of oil included in coffee bean. Carrageenan is used to prevent separation of milk fat in canned tea with milk and canned coffee with milk. Reported from industry, these kind of drinks are produced in Japan and part of Asian countries. According to the Food Category Descriptors of GSFA, ready-to-drink products (including canned products) are included in this food category.
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	GMP		7		
DEXTRINS, ROASTED STARCH	1400	GMP	90[29]	7		
DISTARCH PHOSPHATE	1412	10000		7		
GELLAN GUM	418	GMP		7		
GUAR GUM	412	GMP		7		
GUM ARABIC (ACACIA GUM)	414	GMP		7		**AIDGUM, ICGMA:** used in coffee drinks and substitutes
HYDROXYPROPYL CELLULOSE	463	GMP		7		
HYDROXYPROPYL DISTARCH PHOSPHATE	1442	10000		7		
HYDROXYPROPYL METHYL CELLULOSE	464	GMP		7		
HYDROXYPROPYL STARCH	1440	10000		7		
KARAYA GUM	416	GMP		7		
KONJAC FLOUR	425	GMP		7		
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	472b	GMP		7		
LECITHIN	322(i)	GMP		7		**Japan:** supports proposal. Lecithin is used to prevent separation of milk fat in canned tea with milk and canned coffee with milk. Reported from industry, these kind of drinks are produced in Japan

[28] **Note 160:** For use in ready-to-drink products and pre-mixes for ready-to-drink products only.
[29] **Note 90:** For use in milk-sucrose mixtures used in the finished product.

						and part of Asian countries. According to the Food Category Descriptors of GSFA, ready-to-drink products (including canned products) are included in this food category **USA:** Lecithin is allowed for use in the USA in powdered beverages up to 20 mg/"serving"
MAGNESIUM CHLORIDE	511	GMP		7		
METHYL CELLULOSE	461	GMP		7		
METHYL ETHYL CELLULOSE	465	GMP		7		
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	460(i)	GMP		7		
MONO- AND DI-GLYCERIDES OF FATTY ACIDS	471	GMP		7		**Japan:** supports proposal. additive is used to prevent separation of milk fat in canned tea with milk and canned coffee with milk. Reported from industry, these kind of drinks are produced in Japan and part of Asian countries. According to the Food Category Descriptors of GSFA, ready-to-drink products (including canned products) are included in this food category.
MONOSTARCH PHOSPHATE	1410	10000		7		
OXIDIZED STARCH	1404	10000		7		
PECTINS	440	GMP		7		**ICGMA:** used in coffee drinks and substitutes
PHOSPHATED DISTARCH PHOSPHATE	1413	10000		7		
POTASSIUM CARBONATE	501(i)	GMP		4		
POTASSIUM CHLORIDE	508	GMP		4		
POTASSIUM DIHYDROGEN CITRATE	332(i)	GMP		7		
POWDERED CELLULOSE	460(ii)	GMP		7		
PROCESSED EUCHEUMA SEAWEED (PES)	407a	GMP		7		
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	470(i)	GMP		7		
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	470(ii)	GMP		7		
SODIUM ALGINATE	401	GMP		4		
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		7		**Japan:** supports proposal. Additive is used to prevent separation of oil included in coffee bean. In addition, Sodium carboxymethyl cellulose is used to prevent separation of milk fat in canned tea with milk and anned coffee with milk. Reported from industry, these kind of drinks are produced in Japan and part of Asian countries. According to the Food Category Descriptors of GSFA, ready-to-drink products (including canned products) are included in this food

						category
SODIUM DIHYDROGEN CITRATE	331(i)	GMP		7		
SODIUM GLUCONATE	576	GMP		4		
STARCHES, ENZYME TREATED	1405	10000		7		
TARA GUM	417	GMP		7		
TRAGACANTH GUM	413	GMP		7		
TRIPOTASSIUM CITRATE	332(ii)	GMP		7		
TRISODIUM CITRATE	331(iii)	GMP		7		
XANTHAN GUM	415	GMP		7		

Appendix 2

DETERMINATION OF TECHNOLOGICAL JUSTIFICATION FOR THE USE OF EMUSIFIERS STABILIZERS THICKENERS IN FOOD CATEGORIES CONTAINED IN THE ANNEX TO TABLES 1 & 2

Food Category Number	Food Category Description[30]	Recommendation of physical working group
01.1.1	Milk and buttermilk (plain)	No decision
01.1.1.1	Milk (plain)	No decision
01.1.1.2	Buttermilk (plain)	No decision
01.2	Fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy-based drinks)	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis.
01.2.1	Fermented milks (plain)	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
01.2.1.1	Fermented milks (plain), not heat-treated after fermentation	The use of emulsifiers, stabilizers and thickeners is justified in this food category on a general basis, with notes “For use as stabilizer or thickener only” and “Use restricted to reconstitution and recombination only”.
01.2.1.2	Fermented milks (plain), heat-treated after fermentation	The use of emulsifiers, stabilizers and thickeners is justified in this food category on a general basis.
01.2.2	Renneted milk (plain)	The use of emulsifiers, stabilizers and thickeners is justified in this food category on a general basis.
01.4.1	Pasteurized cream (plain)	The use of emulsifiers, stabilizers and thickeners is justified in this food category on a general basis, with note “Excluding products conforming to the Standard for Cream and Prepared Creams (reconstituted creams, prepackaged liquid cream) (CODEX STAN 288-1976)”.
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	The use of emulsifiers, stabilizers and thickeners is justified in this food category on a general basis.
01.6.3	Whey cheese	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
01.6.6	Whey protein cheese	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
01.8.2	Dried whey and whey products, excluding whey cheeses	Case-by-case basis
02.1	Fats and oils essentially free from water	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
02.1.1	Butter oil, anhydrous milkfat, ghee	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis

[30] Food categories shaded in gray are listed in the Annex to Table 3 in CODEX STAN 192-1995. Food categories that are not shaded are covered by the Annex to Table 3 by means of the hierarchical nature of the GSFA food category system.

Food Category Number	Food Category Description[30]	Recommendation of physical working group
02.1.2	Vegetable oils and fats	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
02.1.3	Lard, tallow, fish oil, and other animal fats	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
02.2.1	Butter	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
04.1.1	Fresh fruit	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
04.1.1.1	Untreated fresh fruit	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
04.1.1.2	Surface treated fresh fruit	The 45th CCFA agreed to request the 46th CCFA pWG on GSFA to reconsider the horizontal approach for this food category
04.1.1.3	Peeled or cut fresh fruit	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
04.2.1	Fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes and aloe vera), seaweeds, and nuts and seed	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
04.2.1.1	Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds, and nuts and seed	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
04.2.1.2	Surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans) and aloe vera), seaweeds and nuts and seeds	The 45th CCFA could not come to an agreement (to be discussed by the 46th CCFA pWG on GSFA)
4.2.1.3	Peeled, cut or shredded fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds and nuts and seeds	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
4.2.2.1	Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds and nuts and seeds	The use of emulsifiers, stabilizers and thickeners is **not** justified in this food category on a general basis
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3)	The use of emulsifiers, stabilizers and thickeners is justified in this food category on a general basis.

Appendix 3

WORKING PRINCIPLES FOR CONSIDERATION OF TABLE 3 FOOD ADDITIVES WITH EMULSIFIER, STABILIZER AND THICKENER FUNCTION

These principles apply only to the work of pWG on the GSFA for the 45th CCFA on its discussion on the Table 3 food additives with emulsifier, stabilizer, thickener function as listed in CX/FA 13/45/7, Appendix 3.

Case 1: When emulsifier, stabilizer, thickener are horizontally justified in a food category

The WG recommendation will be based on the recommendation of the eWG, as proposed in Appendix 3 of document CX/FA 13/45/7. All provisions recommended for adoption by the eWG will be adopted at GMP level except those specifically noted by the pWG.

Case 2: When emulsifier, stabilizer, thickener are not horizontally justified in a food category

The WG recommendation will be to discontinue the provisions for the food additives with only emulsifier, stabilizer, thickener function (as listed Table1 in the working document with the addition of gellan gum (INS 418)) and to hold the other provisions for all other additives at their current step in the GSFA for future consideration and not considered for addition to the subcategories.

Consequential effects on the sub-categories:

Case a: when emulsifier, stabilizer, thickener are not justified in the parent category but are justified in the sub-categories, the provisions for emulsifier, stabilizer, thickener from the parent category will be adopted in the sub-category.

Case b: when emulsifier, stabilizer, thickener are not justified in the parent category and are not justified in the sub-categories, the provisions for the emulsifier, stabilizer, thickener will be discontinued in the parent category and removed/discontinued from the sub-categories.

Case 3: When emulsifier, stabilizer, thickener are not horizontally justified in a food category for food additives with functional class of acidity regulators and emulsifier, and/or stabilizer and/or thickener (as listed Table 2 in working document).

The WG will refer to its decision regarding the provision for the use of this additive as an acidity regulator in this food category.

Table 1 - Table 3 Food additives with functional class: emulsifier, stabilizer, thickener only

Food Additive	INS	Functional class
Acetylated distarch adipate	1422	Emulsifier, stabilizer, thickener
Acetylated distarch phosphate	1414	
Acetylated oxidized starch	1451	
Acid treated starch	1401	
Alkaline treated starch	1402	
Bleached starch	1403	
Carob bean gum	410	
Dextrins, roasted starch	1400	
Distarch phosphate	1412	
Hydroxypropyl distarch phosphate	1442	
Hydroxypropyl starch	1440	
Karaya gum	416	
Monostarch phosphate	1410	
Oxidized starch	1404	
Phosphated distarch phosphate	1413	
Starch acetate	1420	

Food Additive	INS	Functional class
Starch sodium octenyl succinate	1450	
Starches, enzyme treated	1405	
Tragacanth gum	413	
Gellan gum	418	Stabilizer, Thickener

Table 2 – Table 3 Food additives with functional class: acidity regulator and emulsifier, and/or stabilizer and/or thickener

Food Additive	INS	Functional class
Calcium acetate	263	Acidity regulator, Preservative, Stabilizer
Glucono delta-lactone	575	Acidity regulator, Raising agent, Stabilizer
Potassium acetates	261	Acidity regulator, Raising agent, Stabilizer
Potassium carbonate	501(i)	Acidity regulator, Stabilizer
Potassium dihydrogen citrate	332(ii)	Acidity regulator, Sequestrant, Stabilizer
Potassium gluconate	577	Acidity regulator, Stabilizer
Potassium hydrogen carbonate	501(i)	Acidity regulator, Raising agent, Stabilizer
Sodium dihydrogen citrate	331(i)	Acidity regulator, Emulsifier; Sequestrant, Thickener
Sodium lactate	325	Acidity regulator, Antioxidant, Bulking agent, Humectant, Thickener
Tricalcium citrate	333(iii)	Acidity regulator, Firming agent, Sequestrant, Stabilizer
Tripotassium citrate	332(ii)	Acidity regulator, Sequestrant, Stabilizer
Trisodium citrate	331(iii)	Acidity regulator, Emulsifier, Sequestrant, Stabilizer