

## GUIDANCE TO COMMODITY COMMITTEES ON THE ALIGNMENT OF FOOD ADDITIVE PROVISIONS

### Background

1. The CCFA has worked since its 42<sup>nd</sup> session<sup>1</sup> in 2010 (CCFA42) to achieve full alignment between the General Standard for Food Additives (GSFA; CODEX STAN 192-1995) and the food additive provisions contained in the Codex Commodity Standards.
2. The aim of the alignment work is to systematically align the additives provisions of the Commodity Standards with those of the GSFA, with the overarching principle that the GSFA be the single reference point for food additives in the Codex Alimentarius and should therefore take account of any food additive provisions in the Commodity Standards.
3. The GSFA has now been aligned with a number of Commodity Standards but there is still a considerable backlog of commodity standards that are awaiting consideration for alignment. Recent CCFA discussions on reducing the backlog have focused on approaches to make the alignment of commodity standards for adjourned Committees more efficient, and to clarify the role of active Commodity Committees in the alignment process.

### Role of Commodity Committees in Alignment

4. CCFA48 confirmed that it is the primary responsibility of the active Commodity Committees<sup>2</sup>, including CCNFSDU, CCFFV, CCFO, CCPFV, and CCCSH, to progress the work on food additive alignment for commodities within their mandate. However, it was recognised that Commodity Committees have only limited experience in this activity. Accordingly, the CCFA49 asked its Alignment eWG<sup>3</sup> to finalise guidance for Commodity Committees on the alignment of food additive provisions of Commodity Standards with the GSFA.
5. However, recent experience with the alignment work that was referred back to the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) is that the Commodity Committees have only limited competence to undertake this work. Whilst the provision of guidance to the Commodity Committees would assist, it may be unrealistic to expect the Commodity Committees to undertake all of the alignment work for the commodity standards for which they have responsibility. On the other hand, it is the Commodity Committees that understand the technological function of additives needed for standardized products, and whether it is appropriate to list specific food additives or allow all additives of a relevant functional class in these products.
6. In addition to active Commodity Committees (with physical meetings), there are also adjourned Commodity Committees and active Commodity Committees (working by correspondence only). The role of these other Commodity Committees can be classified as follows:
  - (i) Adjourned Committees: The EWG on Alignment provides recommendations to CCFA for the alignment of food additive provisions in the commodity standards of adjourned Commodity Committees.
  - (iii) Active Commodity Committees (*working by correspondence only*): Commodity Committees working by correspondence currently only work on a specific task (e.g. development of a standard).
7. This Guidance document is written primarily for active Commodity Committees (with physical meetings). However, it is recognised that others, such as industry associations assisting with alignment, may find the document a useful reference document.
8. This Guidance document establishes a minimum expectation for active Commodity Committees (with physical meetings) but also provides more comprehensive guidance for those Commodity Committees that are able to do some/all of the actual alignment using the decision tree developed by the CCFA.
9. Whatever the extent of the alignment activity undertaken by the Commodity Committees, the overall objective is to move towards the GSFA being the sole authoritative source of Codex food additive provisions.

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<sup>1</sup> CX/FA 10/42/17 and ALINORM 10/33/12, paras. 151-164

<sup>2</sup> Reference to "Commodity Committees" also includes "General Subject Committees", such as the Codex Committee on Nutrition and Foods for Special Dietary Uses, which develop Commodity Standards.

<sup>3</sup> REP17/FA, para 53 and para. 55(ii), point d.

### Updating food additive provisions – *minimum* requirements for alignment

10. The minimum expectation of the active Commodity Committees (with physical meetings) is to update the food additive provisions contained in the Commodity Standard(s) for which they have responsibility. It is also recognised that the Codex Commodity Committees have the responsibility<sup>4</sup> and expertise to appraise and justify the technological need for the use of additives in foods subject to a commodity standard.

11. Updating of the food additive provisions, to be undertaken by the Commodity Committees (with physical meetings), comprises the following steps:

#### *Name of the food additives*

- (i) The checking, and where necessary the correction, of the names of each food additive.

#### *INS numbers*

- (ii) The checking of International Numbering System (INS) numbers associated with each food additive(s). This may require the amendment of, or the inclusion of, the INS number.

#### *Technological need*

- (iii) Confirmation, and where necessary, clarification of the technological function(s) undertaken by each food additive(s). This will contribute to an understanding of the nature/purpose of the provisions.

#### *Food categories*

- (iv) Provide advice on the specific Food Categories for which the use of the additive is needed in the context of the scope of each relevant Commodity Standard.

12. Where the Commodity Committee has only undertaken the minimum required, in accordance with the steps above, then the CCFA would then proceed to undertake the alignment exercise based on the updated information.

### Additional alignment activity that may be undertaken

13. Commodity Committees (with physical meetings) are encouraged to consider undertaking some or all of the detailed alignment work using the decision tree developed by the CCFA. Detailed guidance and principles on undertaking alignment is provided, at Attachments 1-3, to assist Commodity Committees that wish to go beyond the updating exercise to undertake the detailed alignment work.

### Resources available to assist Commodity Committees

14. A database of food additive specifications with their current ADI status, the year of their most recent JECFA evaluation, their assigned INS numbers, etc. are available in English at the JECFA website at FAO <http://www.fao.org/food/food-safety-quality/scientific-advice/jecfa/jecfa-additives/en/>. The database has a query page and background information in English, French, Spanish, Arabic and Chinese.

15. The FAO also host a searchable GSFA database through the Codex Alimentarius website at <http://www.fao.org/gsfonline/index.html>. The database has a query page and is researchable in English, French and Spanish.

16. The Food Category System for food additives is hierarchical and is at Annex B of the GSFA (CODEX STAN 192-1995) and is also accessible through the GSFA database listed above.

### Attachments

1. Detailed guidance and principles to align food additive provisions in Codex Commodity Standards with the General Standard for Food Additives (GSFA).
2. Decision tree for the recommended approach to alignment of the GSFA and Commodity Standards food additive provisions.
3. Working Principles for alignment work.

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<sup>4</sup> CODEX STAN 192-1995, para. 1.2

**Attachment 1****DETAILED GUIDANCE AND PRINCIPLES TO ALIGN FOOD ADDITIVE PROVISIONS IN CODEX COMMODITY STANDARDS WITH THE GENERAL STANDARD FOR FOOD ADDITIVES****Scope**

This guideline provides the principles and general approach of how to align the food additive provisions in Codex commodity standards with those of the General Standard for Food Additives (GSFA). The intention is that this guideline will facilitate the alignment work by the Commodity Committees who wish to go beyond the updating exercise to undertake the detailed alignment work. It is recognised that the assistance of the CCFA may be required.

**General Approach**

Consistent with the principle that the GSFA is the single authoritative reference for the use of food additives, alignment results in the removal of food additive provisions from the Codex commodity standards while ensuring that they are reflected by adding or amending existing provisions in the GSFA. Such amendments to the GSFA are made to the food additive list (Table 1) and the relevant food category list (Table 2), and if appropriate, to the list of the additives permitted for use in accordance with good manufacturing practices (GMP)<sup>5</sup> (Table 3). This task requires cross-checking the food additive provisions in Codex commodity standards with those in the GSFA and making appropriate amendments to the GSFA food additive provisions, usually by adding appropriate notes.

A Decision Tree and Working Principles have been developed to assist in this work.

In addition to making revisions to the GSFA, the current sections (usually Section 4) of the Codex commodity standards relating to food additives are amended, usually by removing the specific food additive provisions and adding text that explains where the appropriate food additive provisions for products conforming to the Codex commodity standard can be found in the GSFA.

**Principles underpinning the work on alignment**

The primary principle for performing the alignment work is that GSFA 'should be the single authoritative reference point for food additives'<sup>6</sup> and should therefore take into account any food additive provisions in the Codex commodity standards.

The following are secondary principles that underpin the alignment work:

- There is a need for the food additive to be technologically justified and safe for use.
- It is recognised that Codex commodity standards have had legitimate technical reasons for including a limited set of food additive provisions in Codex commodity standards whilst also recognising that, where possible, the provisions of the GSFA should be used as a default.
- A decision tree approach should be used to harmonise food additive provisions in Codex commodity standards with the GSFA.
- The decision tree is a tool for CCFA to align food additive provisions in the Codex commodity standards with the GSFA. However, it is recognised that there may be cases where the results of its application are not consistent with the intention of the commodity committee, or not consistent with the general principles for entry into the GSFA. In these cases, entries should be considered on a case-by-case basis.
- If a Codex commodity standard lists specific Table 3 additives with a certain functional class, only those specific additives are included in Table 3 of the GSFA. It is not appropriate to automatically expand the additives with the functional class to include all Table 3 additives, since the Commodity Committee may have had a technological justification for limiting the use to the Table 3 additives that are listed in the Codex commodity standard.

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<sup>5</sup> GMP is defined in Section 3.3 of the Preamble to the GSFA.

<sup>6</sup> Section 1.2 of the Preamble to the GSFA.

- When it is clear that the intention of the relevant Commodity Committee was to list all food additives belonging to a certain functional class, inclusion of all Table 3 food additives belonging to that functional class in the GSFA is appropriate. This approach is consistent with the Codex Procedural Manual regarding the format of the Food Additives Section of Codex commodity standards<sup>37</sup>. Namely, a reference to the associated functional class and GSFA food category is appropriate, except when a list of specific additives is technologically justified for a product that is the subject of the Codex commodity standard.
- If a Commodity Standard falls within a GSFA food category that is included in the Annex to Table 3, then Table 3 does not apply to the commodity standard, and any Table 3 additives included in the standard need to be listed in Tables 1 and 2 of the GSFA.

### Understanding the GSFA for alignment purposes

This section explains the format of the GSFA (see Section 6 of the Preamble to the GSFA). The GSFA contains three tables that are amended due to the alignment work.

Table 1 (*Additives permitted for use under specified conditions in certain food categories or individual food items*) is an alphabetical list of food additives, including the International Numbering System (INS) number and functional class. Each food additive entry lists the individual food categories which have a provision for that food additive. The maximum use level, any notes linked to the provision, step, and year adopted are detailed for each provision.

Table 2 (*Food categories or individual food items in which food additives are permitted*) is a numerical list of food categories. Each food category entry lists the food additives that have provisions for the food category in alphabetical order. The INS number for the food additive, and the maximum use level, notes, step and year adopted are also listed. The information in Table 2 is the same as in Table 1, just in a different format.

Table 3 (*Additives permitted for use in food in general, unless otherwise specified, in accordance with GMP*) contains a list of food additives that may be used in food in general at GMP unless specifically excluded. The Annex to Table 3 provides a list of specific food categories or individual food items that are excluded from the general conditions of Table 3, in which case the provision is listed in Tables 1 and 2. Table 3 lists the food additives in alphabetical order, along with their INS number, the functional class, the year adopted and some specific Codex commodity standards to which it is acceptable.

The alignment work needs to address the requirements in all three Tables and make appropriate amendments to each as required.

### Specific Approach: questions to be addressed

Some general questions need to be asked for each of the food additives listed in the Codex commodity standard before they can be added into the GSFA. These questions have been answered in the positive for food additives listed in the GSFA. These questions are articulated further in Section 3 of the Preamble to the GSFA. They are also summarised in the *Guidelines for inclusion of specific provisions in Codex standards and related texts: Procedures for consideration of the entry and review of food additive provisions in the General Standard for Food Additives* of the Codex Alimentarius Commission Procedural Manual<sup>8</sup>. In summary, the questions are:

- Has JECFA completed a safety evaluation (i.e., assigned a full acceptable daily intake (ADI)) and concluded the food additive is safe for the proposed purpose?
- Is there a JECFA specification for the food additive?
- Is the technological need/justification for use of the food additive accepted by the Codex Commodity Committee, and does it meet one or more of the need/justifications listed in section 3.2 (a)-(d) of the GSFA preamble?
- Does the food additive have an INS name, number and functional class listed in the *Class Names and International Numbering System for Food Additives* (CAC/GL 36-1989)?
- Is the functional class for use of the food additive for the food category in the GSFA agreed by the Commodity Committee?

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<sup>7</sup> Codex Procedure Manual (25<sup>th</sup> edition, 2016), section II: Elaboration of Codex texts, Format for Codex Commodity Standards, pp 57-58.

<sup>8</sup> Codex Procedural Manual (25<sup>th</sup> edition, 2016), section II: Elaboration of Codex texts, pp 62-63.

Another question that needs to be considered is whether the Codex commodity standard has a 1:1 relationship to the relevant GSFA food category. A 1:1 relationship means that all foods that comply with a Codex commodity standard are the only foods that are included in the relevant GSFA food category. For example, there is a 1:1 relationship between CODEX STAN 87-1981 and food category 05.1.4 in the GSFA; all products that are captured by 05.1.4 comply with CODEX STAND 87-1981. Commodity Committees may need to address whether there is a 1:1 relationship between the Codex commodity standard and the GSFA food category, as they have the best understanding of the relevant Codex commodity standard and foods captured by the commodity standard.

However, there are other GSFA food categories that do not have a 1:1 correspondence with a Codex commodity standard. Foods that comply with a Codex commodity standard are termed 'standardized foods'. There may be other foods that are included in a GSFA food category that do not comply with a Codex commodity standard. These are termed 'non-standardized foods.' Food categories that do not have a 1:1 relationship between the Codex commodity standard and the GSFA food category include both standardized food and non-standardized foods.

Information on the food category system of the GSFA is provided in Annex B of the GSFA, especially Part II (Food Category Descriptors). Annex C (*Cross-reference of Codex standardised foods with the food category system used for the elaboration of the GSFA*) of the GSFA provides a list of Codex commodity standards and the relevant GSFA food category number, so is a very valuable resource to assist with this work.

Whether a 1:1 relationship between a Codex commodity standard and a GSFA food category will determine how the alignment is accomplished, especially whether specific notes are needed for the GSFA provisions to address non-standardized foods.

### **Specific Approach: summary of process to be undertaken**

It is easiest to align the food additive provisions in Codex commodity standards and the GSFA by first revising Table 2 of the GSFA, and then ensure that the same changes are made to Table 1. This is because Table 2 is organized by food categories which link directly to the Codex commodity standards. If the Codex commodity standard includes Table 3 additives, any relevant changes to Table 3 also need to be made.

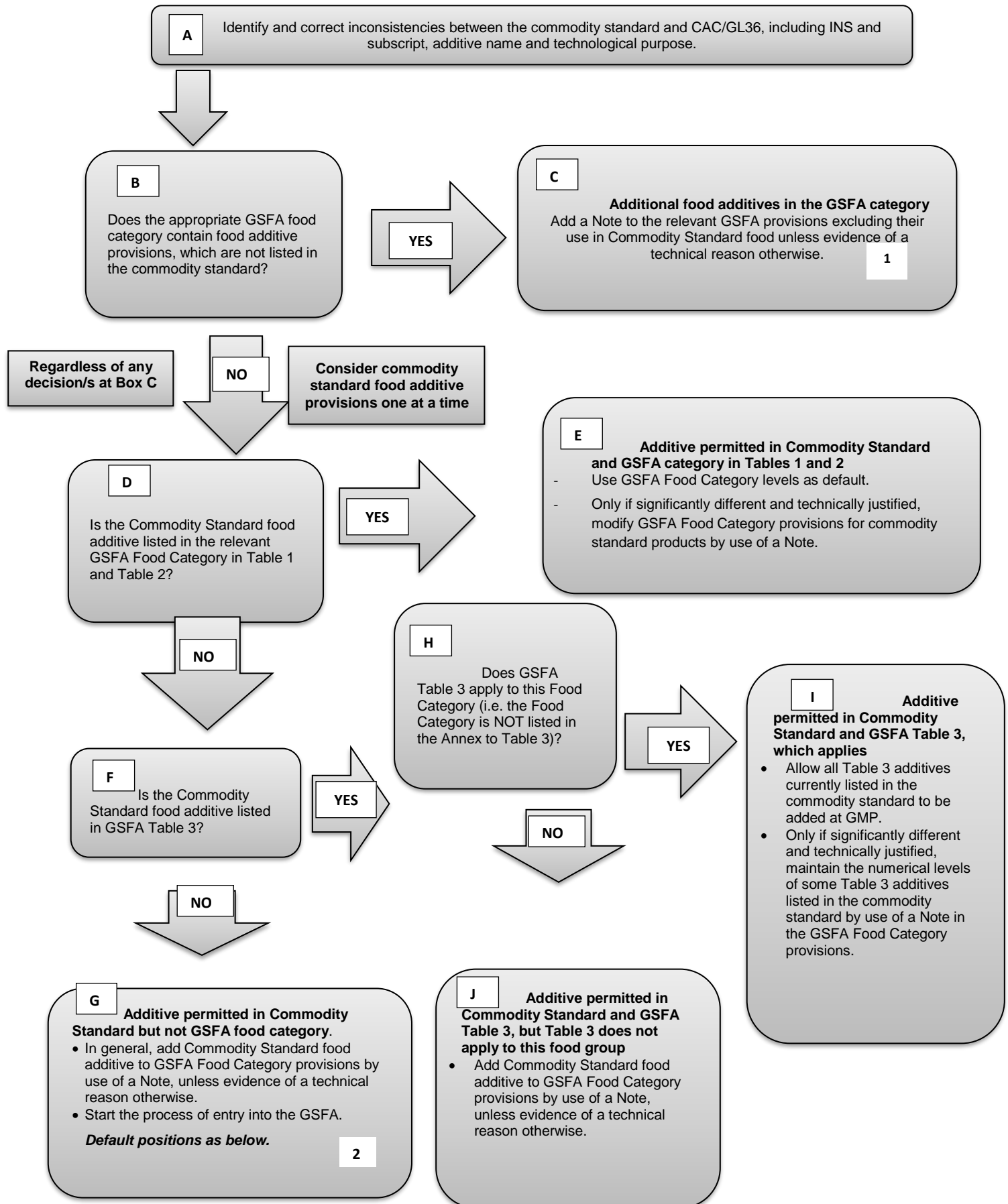
The Decision Tree (Attachment 2) and Working Principles (Attachment 3) are used to decide the appropriate approach to include each food additive provision in a Codex commodity standard into the GSFA.

The outcome of the alignment work leads to the development of recommended changes to be made to the food additive sections of the Codex commodity standards, and to Table 1, Table 2 and, if required, Table 3 of the GSFA.

Examples of documents reporting the alignment work are provided in the agenda of the CCFA meetings (e.g., Agenda item 4b, CX/FA 17/49/6 for CCFA49) and the changes proposed for adoption by the Codex Alimentarius Commission (CAC) are provided in the report of the CCFA meeting (e.g., REP17/FA, paras. 45-55 and relevant appendices for CCFA49).

**Attachment 2**

**DECISION TREE FOR THE RECOMMENDED APPROACH TO ALIGNMENT OF THE GSFA AND COMMODITY STANDARDS FOOD ADDITIVE PROVISIONS**



1. **C:** *Technological justification is to be determined by the relevant commodity committee, where an active commodity committee exists, or by the CCFA, where the relevant commodity committee has been adjourned/abolished.*
2. **G1:** *Additive in Table 1 for other GSFA food categories. Add Commodity Standard food additive to GSFA Food Category provisions by use of a Note. Start the process of entry into the GSFA*
2. **G2:** *Additive does not have any provision in the GSFA, however has been assessed by JECFA and has been included in the CAC/GL 36-1989. Add to GSFA but only for relevant Commodity Standard products. Start the process of entry into the GSFA.*
2. **G3:** *Additive is not listed in the GSFA. Remove from commodity standards.*

In applying the decision tree, it is preferable to consider both the adopted (Step 8) GSFA provisions and the draft and proposed draft GSFA provisions. This would ensure that all provisions in the food category relevant to the commodity standard are considered together in a consistent manner. An appropriate note could be applied to the draft GSFA provision to indicate the relevance to the commodity standard, until such time as the draft GSFA provision is discussed by the Committee.

### **Principles established that have guided the direction and development of the Decision Tree**

- There is a need for the food additive to be technologically justified and safe for use.
- The GSFA is being developed to be the single reference point for food additives within Codex Alimentarius and should therefore take into account any food additive provisions in the commodity standards.
- It is recognised that commodity standards have legitimate technical reasons for a reduced set of food additive permissions whilst also recognising that where possible the provisions of the GSFA should be used as a default.
- It has been agreed that a decision tree approach to harmonising food additive permissions in commodity standards with the GSFA be used.
- The decision tree is a tool for CCFA to align commodity standards with the GSFA. However, it is recognised that there may be cases where the results of its application are not consistent with the intention of the commodity committee, or not consistent with the general principles for entry into the GSFA. In these cases, entries should be considered on a case-by-case basis.
- It is not considered appropriate to automatically allow the addition of all food additives in Table 3 of the GSFA to commodity standards, but to allow for all Table 3 additives that are currently listed in a particular commodity standard to be added at GMP through the GSFA unless it is technologically justified to restrict their use for that commodity.
- When it is clear that the intention of the relevant commodity committee was to list all food additives belonging to a certain functional class, permission of all Table 3 food additives belonging to such a class is appropriate. This approach is consistent with the Codex Procedural Manual regarding the format of the Food Additives Section of commodity standards<sup>8</sup>. Namely, a reference to the associated functional class and GSFA food category is appropriate, except when a list of specific additives is technologically justified for a product that is the subject of the commodity standard.

**WORKING PRINCIPLES FOR ALIGNMENT WORK**

The general reference to the GSFA that is to be included in the commodity standard (as noted in the Procedural Manual<sup>8</sup>) needs to take into account the fact that there are limitations due to the listing of specific additives in the commodity standard. Therefore, when applying the provisions in the commodity standard to the GSFA for alignment:

- A new provision for an additive is added to the GSFA only if there is a provision for that additive in the commodity standard, but currently no provision for that additive in the GSFA in the relevant food category. According to Box G of the Decision Tree a provision is added by use of a Note to limit the use of products conforming to the commodity standard unless evidence of a technical reason otherwise (i.e. evidence justifying the need for non-standardised products).
- Only adopted GSFA additive provisions are considered for alignment with the commodity standards at this time. However, draft and proposed draft GSFA additive provisions can be considered if:
  - The commodity standard is revised to include only a general reference to the GSFA, and the use of these additives listed in the standardized food would not be recorded elsewhere.
  - The GSFA food additive provision needs to be revised to include appropriate note(s) to describe the use of the additive in the relevant commodity standard(s) (e.g., to exclude food products subject to the relevant commodity standard, to indicate a different use level in food products subject to the relevant commodity standard). The rationale for this is the following: Some GSFA food categories that include the relevant commodity standard(s) also include non-standardized food products. Therefore, CCFA still needs to discuss the use of these food additives in non-standardized foods. As such, these draft and proposed draft food additive provisions are maintained at their current step. The new note(s) associated with these draft and proposed draft food additive provisions address the alignment with the relevant commodity standard(s), and will be retained when CCFA discusses the food additive provisions in the future.
- Draft and proposed draft GSFA additive provisions need to be clearly labelled as such in the reports as they cannot be included in any final document containing proposed changes to the GSFA (see final paragraph).
- An appropriate note is associated with the relevant GSFA additive provision to include a limitation from the commodity standard. For example, the “XS###” Notes are used to denote the exclusion of the commodity standard from the GSFA provision (i.e., there is a provision in the GSFA for the additive, but the additive is not listed in the commodity standard).
- Food additive provisions in the commodity standards are removed when they have been aligned with the appropriate food category in the GSFA (Table 2 and subsequent amendments to Table 1 (and Table 3 if required)). The replacement wording in the food additive section of the commodity standard is as stated under Food Additives, within Section II (Elaboration of Codex texts); Format for Codex Commodity Standards in the Procedural Manual<sup>8</sup>. This wording is:

*“[Food Additive functional class] used in accordance with Tables 1 and 2 of the General Standard of Food Additives in food category x.x.x.x [food category name] or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.”*
- In some cases, depending upon the particular commodity standard that is being aligned with the GSFA, the general reference text to the GSFA provided in the Procedural Manual may need to be modified. Two examples of modified text are shown, below. In the Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981), the text regarding Table 3 was changed to indicate that only certain Table 3 additives are permitted. In the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter (CODEX STAN 166-1989), no Table 3 text was needed (because the standard fell under a food category in the Annex to Table 3), and the Table 1 and 2 text was expanded to take into account the different use of additives in the different types of food covered by the standard.
- **Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981):**

Acidity regulators, antioxidants, bulking agents, colours (for surface decoration purposes only), emulsifiers, glazing agents and sweeteners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CODEX STAN 192-1995) in food category 05.1.4 (Chocolate and chocolate products) and its parent food categories are acceptable for use in foods conforming to this Standard. Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to this Standard.



- **Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter (CODEX STAN 166-1989):**

Antioxidants and humectants (for use in all products conforming to CODEX STAN 166-1989); acidity regulators and thickeners (for minced fish flesh only); and colours, emulsifiers, flavour enhancers, raising agents, and thickeners (for breaded or batter coatings) used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CODEX STAN 192-1995) in food category 09.2.2 (Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

- If a commodity standard lists an individual additive that is included under a “group” additive in the GSFA (e.g., sulfites, ascorbyl esters), and the individual additives in the group that have the same functional class(es) as the additive listed in the relevant commodity standard are expected to be appropriate for the use specified in the relevant commodity standard, then the alignment should include all the individual additives with the appropriate functional class(es) in the group.
- There are three types of restrictions for Table 3 food additives in the commodity standards. These restrictions are described in Table 3 of the GSFA and in Section 2 to the Annex to Table 3 of the GSFA.

A. The first is the restriction to a certain functional class. In this case, all Table 3 additives with that functional class are acceptable. An example of the entry for a particular food category and commodity standard in Section 2 of the Annex to Table 3 is shown below.

<b>12.5</b>	<b>Soups and broths</b>
	Acidity regulators, anticaking agents (in dehydrated product only), antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, humectants, packaging gases, preservatives, stabilizers, sweeteners and thickeners listed in Table 3 are acceptable for use in foods conforming to the standard.
<b>Codex standards</b>	Bouillon and Consommés (CODEX STAN 117-1981)

B. The second type of the restriction is when the commodity standard lists individual food additives and therefore, the use of only certain Table 3 additives with that functional class are acceptable. An example of the entry in Section 2 of the Annex to Table 3 is shown below.

<b>08.2.2</b>	<b>Heat-treated processed meat, poultry, and game products in whole pieces or cuts</b>
	Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards.
<b>Codex standards</b>	Cooked cured ham (CODEX STAN 96-1981) and Cooked cured pork shoulder (CODEX STAN 97-1981)

C. For those commodity standards for which it is acceptable to use all Table 3 additives of a certain functional class, and only certain Table 3 additives of another functional class, a combination of the options A and B, above, is appropriate. An example of the entry in Section 2 of the Annex to Table 3 is shown below.

<b>04.2.2.4</b>	<b>Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds</b>
	All firming agents listed in Table 3 and certain other Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to the standards.
<b>Codex standards</b>	Standard for Preserved Tomatoes (CODEX STAN 13-1981)

The recommendations for alignment should be to amend the GSFA provisions in Tables 1 and 2, rather than *add* provisions (the latter applies only to the situation described in the first bullet point). There can only be one provision in the GSFA for a given food category for an additive. Therefore, the recommendations are to amend (revise) existing GSFA provisions to take into account the provisions in the commodity standard. As such, the recommendations with the proposed revisions to the GSFA are presented in a single table, with the same data each in Table 1 and Table 2 format (and the same notes) and only of adopted provisions. This presentation would eliminate any confusion or misinterpretation as to the final provision in the GSFA.

New text is indicated in **bold/underline**. Text to be removed is indicated in ~~strikethrough~~.

Workplan for the future alignment of the food additive provisions of commodity standards

<b>Codex Standards (CS) numbers</b>	<b>Commodity Committee</b>	<b>Number of Stds<sup>a</sup></b>	<b>CCFA50 2018</b>	<b>CCFA51 &amp; 52 2019 – 20<sup>c</sup></b>	<b>CCFA53 2021</b>	<b>CCFA54 2022</b>	<b>CCFA55 2023</b>
3, 37, 70, 90, 94, 119, 167, 189, 222, 236, 244, 291, 302, 311 & 319.	CCFFP <sup>1</sup> & CCPFV <sup>1</sup>	14 + 1	✓				
12(X), 212	CCS <sup>4</sup>	2(1)		✓			
326, 327, 328	CCSCH <sup>1</sup>	3		✓			
152, 202(X), 249	CCCPL <sup>4</sup>	3(1)		✓			
108(X), 227(X)	CCMMW <sup>2</sup>	2(2)		✓			
163(X), 174, 175	CCVP <sup>2</sup>	3(2?)		✓			
19, 33, 210, 211, 256, 329	CCFO <sup>1</sup>	6		✓			
143	CCPFV <sup>1</sup>	1		✓			
207, 208, 221, 243, 250, 251, 252, 253, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 278(X), 281, 282, 283, 288, 290	CCMMP <sup>2</sup>	30(1)		✓ 13 Ripened Cheese 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 274, 276 277	✓ 7 Other cheese 208, 221, 262, 273, 275, 278(X), 283	✓ 7 milks 207, 243, 250, 251, 252, 281, 282,	✓ 3 Remaining 253, 288, 290 (or other appropriate split)
17, 60, 62, 78, 99, 145, 241, 242, 297, 318  (Canned) 38, 52, 67, 115, 130, 160, 177, 223, 240, 296 (the rest)  [X (no f.a.):	CCPFV <sup>1</sup>	27(7)  [5, already aligned]		✓ 10 canned17, 60, 62, 78, 99, 145, 241, 242, 297, 318	✓ 10 The rest 38, 52, 67, 115, 130, 160, 177, 223, 240, 296	✓ 7 [X (no f.a.): 39, 69, 75, 76, 103, 131, 321]	Any remaining?

Codex Standards (CS) numbers	Commodity Committee	Number of Stds <sup>a</sup>	CCFA50 2018	CCFA51 & 52 2019 – 20 <sup>c</sup>	CCFA53 2021	CCFA54 2022	CCFA55 2023
39, 69, 75, 76, 103, 131, 321] [Already aligned: 66, 254, 260, 320, 321]							
72, 73, 74, 156, 181(X), 203(X)	CCNFSDU <sup>1</sup>	6(2 require advice from CCNFSDU <sup>b</sup> )			✓ 4 72, 73, 74, 156	✓ 2? remaining 181, 203	
Any unfinished still to be completed						As required	As required
All regional CS	CCAFRICA <sup>1</sup> CCASIA <sup>1</sup> CCNEA <sup>1</sup> CCLAC <sup>1</sup>	1(1) 7(1) 5(2) 1				As required	As required

**Notes**

- X means they are in the FA/INF02 December 2017 but no food additives are permitted, so limited alignment needed; no changes to GSFA but changes needed to individual CS
- 1 Active committee
- 2 Adjourned *sine die*
- 3 Abolished or dissolved
- 4 Working by correspondence
- a Number listed are the total number of CS that require alignment while the numbers in brackets are the numbers of CS designated with an X (requiring no changes to GSFA, just to the CS itself)
- b CS 181 and 203 require advice from CCNFSDU on exactly what food additive provisions are required since none are listed
- c The work programme for CCFA51 & CCFA52 is presented as being *combined* because the exact work programme will be dependent on the consideration by the Committee to the 'work-sharing' proposals outlined in recommendation 3 of the "Discussion paper on Future Strategies for CCFA" under agenda item 8 (CX/FA 18/50/13). It is also dependent on progress with the consideration of the 14 fish and fish product commodity standards at the 50<sup>th</sup> session of the CCFA.