

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4(a) and 4(b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-third Session

(Comments of Burundi, Dominican Republic, Ghana and Russian Federation)

Part A: Comments to Agenda Item 4a

Burundi

Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards CX/FA 23/53/5

Comment: Burundi supports the endorsement submission as submitted by various Committees.

Dominican Republic

República Dominicana, apoya la ratificación de las disposiciones sobre aditivos alimentarios contenidas en el Anexo 1 y que detalla las aprobaciones en trámite 5/8 y trámite 5, realizadas en la CAC45, a partir de los reportes provenientes de las reuniones de los comités del Codex correspondientes:

- 22.^a reunión del Comité del Codex sobre Frutas y Hortalizas Frescas (REP22/FFV);
- 24.^a reunión del Comité Coordinador FAO/OMS para África (REP22/AFRICA);
- 6.^a reunión del Comité del Codex sobre Especies y Hierbas Culinarias (REP22/SCH);
- 22.^a reunión del Comité Coordinador FAO/OMS para Asia (REP23/ASIA); y
- 22.^a reunión del Comité Coordinador FAO/OMS para América Latina y el Caribe (REP23/LAC)

Ghana

Position: Ghana supports the endorsement of the food additives.

Rationale: The texts are aligned with provisions of the Procedural Manual.

Part B: Comments to agenda item 4b

Burundi

Alignment of the food additive provisions of commodity standards: Report of the EWG on Alignment CX/FA 23/53/6

Key issues and questions requiring consideration by the Committee:

Issue 1: To expand the general USA proposal of Table 3 notes to also consider them to identify the specific function class consistent with aligning the provision in the commodity standard. However, this would only be on a case-by-case basis if there are a variety of possible functional classes and if justified and supported.

Comment: Burundi does not support the general inclusion of the footnotes and proposes the inclusion of the notes to be on a case-by-case basis, based on the commodity, intended use, and intended outcome.

Justification: Alignment is a continuous process, and each entry should be considered individually.

Issue 2: The Alignment EWG recommendations to amend the names and descriptors of FC 01.4, and subcategories 01.4.1, 01.4.2 and 01.4.3 as proposed be brought to the CCFA for broader consideration and possibly new work.

Comment: Burundi supports that the amendments of names and descriptors should be presented as a new work item.

Issue 3: What MLs for INS 405 (propylene glycol alginate), INS 636 (maltol) and INS 637 (ethyl maltol) are appropriate to align CXS 243 with the GSFA? Is this outside the scope of Alignment, like the consideration of ML for curcumin (INS 100(i)), but needs to be considered by another process?

Comment: Burundi agrees that this work is outside the TOR of this committee.

Issue 4: Food additive adipates (INS 355) should be changed to adipic acid since there is not a group of adipates.

Comment: Burundi agrees and supports the change of name of this additive as proposed.

Issue 5: Appropriateness for Alignment to recommend the removal of provisions for food additives in the relevant foodcategories in the GSFA when there are only XS notes.

Comment: Burundi agrees and supports the removal of a provisions for food additives in the relevant food categories in the GSFA when there are only XS notes.

Issue 7: It is suggested that EWG on Alignment pass the question of whether the food additive sodium sesquicarbonate(INS 500(iii)) has the functional class of stabiliser and thickener, for which it is listed in CXS 253-2006, but not in CXG 36-1989, to the EWG on INS

Comment: Burundi agrees with the conclusion of the EWG and supports that it is outside the scope of the committee and needs be sent to the INS

Issue 8: A minor suggested amendment is that the Standard for Mozzarella is listed in the tables to Annex C in theGSFA as Codex Standard 262-2007, but it should be corrected to Codex Standard 262-2006.

Comment: Burundi supports the proposal by the secretariat

Issue: Appendices 3,4,5,7,9,10

Comment: Burundi supports the proposed changes in appendices 3,4,5,7,9,10 as they are fully aligned.

Ghana

Issue 1: Proposal of Table 3 notes to also consider them to identify the specific function class consistent with aligning the provision in the commodity standard.

Position: Ghana does not to support this approach.

Rationale: This is introducing a new approach to the inclusion of function class to GSFA contrary to the current procedure (Section II, Codex Procedural Manual). A new work project targeting revision of the procedure needs to be initiated for consideration. In addition, this is beyond the mandate and ToR of Alignment EWG.

Issue 2: Alignment EWG recommendations to amend the names and descriptors of FC 01.4, and subcategories 01.4.1, 01.4.2 and 01.4.3 as proposed be brought to the CCFA for broader consideration and possibly new work.

Position: Ghana supports the amendment. However, we would like to seek clarification on the procedure for undertaking this amendment.

Rationale: Changing the FC has implications on the products and application of GSFA in general hence the need to involve the Committee.

Issue 4: Changing the name of adipates to adipic acid.

Recommended Position: Ghana supports the proposed change of name.

Rationale: While changing names is outside the mandate of EWG, given that there are no subgroups for adipates, changing the name will allow for consistency in the Codex Standards.

Issue 5: Is it appropriate for EWG on Alignment to recommend the removal of provisions for food additives in the relevant food categories in the GSFA when there are only XS notes.

Position: Ghana does not to support this approach. The EWG should identify such scenarios and inform the plenary to make a decision on whether or not to remove.

Rationale: Removal or inclusion of food additives in GSFA requires involvement of CCFA as a Committee and not only a part of the Committee such as a working group.

b) APPENDIX 3 (proposed amendments to the food additive provisions of the codex commodity standards for milk and milk products (CCMMP) due to alignment with the GSFA), **APPENDIX 4** (proposed amendments to tables 1, 2 and 3 of the GSFA relating to the alignment of the codex commodity standards for milk and milk products (CCMMP), **APPENDIX 5** (full list of amendments to GSFA due to introduction of Table 3 notes

arising from CCFA51, CCFA52 and proposed CCFA53 CCMMP alignment).

Position: Ghana supports the adoption of the proposed alignments contained in Appendices 3, 4, 5, 7, 9 and 10 of EWG report.

Russian Federation

Alignment of the food additive provisions of commodity standards: Report of the EWG on alignment

The Russian Federation requests that the following comments be considered in connection with the work on alignment of the food additive provisions of commodity standards with the GSFA:

FC 01.5.1 Milk powder and cream powder (plain)

We consider unacceptable the MLs of 4400 mg/kg for phosphates (*INS 338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii), 450(i)-(iii),(v)-(vii),(ix), 451(i),(ii), 452(i)-(v), 542*) in this food category.

We propose to set the MLs of phosphates in the category No.01.5.1 = **2500 mg/kg**.

01.2.1.2 Fermented milks (plain), heat-treated after fermentation

We are of the opinion that no sweeteners can be used in this food category. The ready-to-eat product should taste like plain fermented milk. The use of sweeteners in plain fermented milk will mislead consumers about its organoleptic properties.

The following items should be excluded: Isomalt (Hydrogenated Isomaltulose) INS 953; Sorbitol INS 420(i); Sorbitol Syrup INS 420(ii); Xylitol INS 967.

01.7 Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)

We consider the proposed ML level =50,000 mg/kg unreasonably high for Caramel II – sulfite caramel INS 150b as a food additive.

01.4.1 Pasteurized cream (plain)

No colours or sweeteners can be used in this food category. The ready-to-eat product should taste like plain milk. The use of colours and sweeteners in this food category will mislead consumers about their organoleptic properties.

The following items should be excluded: Beet Red INS 162; Caramel I - plain caramel INS 150a; Chlorophylls INS 140; Erythritol INS 968; Lactitol INS 966; Maltitol INS 965(i); Maltitol Syrup INS 965(ii); Sorbitol AINS 420(i); Sorbitol Syrup INS 420(ii); Titanium Dioxide INS 171; Xylitol INS 967.

01.4.2 Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)

No colours or sweeteners can be used in Sterilized and UHT creams (plain) category. The ready-to-eat product should taste like plain cream. The use of colours and sweeteners in this food category will mislead consumers about their properties.

Regarding the use of colours (Beet Red INS 162; Caramel I - plain caramel INS 150a; Chlorophylls INS 140; Erythritol INS 968; Lactitol INS 966; Lycopene, tomato INS 160d(i); Maltitol INS 965(i); Maltitol syrup INS 965(ii); Sorbitol INS 420(i); Sorbitol Syrup INS 420(ii); Titanium Dioxide INS 171; Xylitol INS 967) in sterilized and UHT cream (plain) we propose to provide the following note "Except for sterilized and UHT cream" .

In addition, the MLs for INS 968, INS 966, INS 965(i), INS 965(ii), INS 420(i), INS 420(ii) are unreasonably high for all products in FC 01.4.2. For instance, the proposed ML for Erythritol (INS 968) = 600,000 mg/kg; ML for Lactitol (INS 966) = 30,000 mg/kg; ML for Maltitol (INS 965(i)) = 300,000 mg/kg; ML for Maltitol syrup (INS 965(ii)) = 300,000 mg/kg; ML for Sorbitol (INS 420(i)) = 200,000 mg/kg; ML for Sorbitol syrup (INS 420(ii)) = 200,000 mg/kg.

01.8.2 Dried whey and whey products, excluding whey cheeses

Regarding the use of colours: annatto extracts, bixin-based INS 160b(i), annatto extracts, norbixin-based INS 160b(ii), Calcium carbonate INS 170(i) in dried whey the Russian Federation considers it necessary to provide the following note "except for dried whey".