

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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Organization

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Agenda Item 3a

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Fifty-Fourth Session

#### MATTERS OF INTEREST ARISING FROM FAO/WHO AND FROM THE 96TH AND 97TH MEETINGS OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA) RESPECTIVELY

(Comments of Canada, Kenya, Philippines, Senegal, the United States of America, Joint FAO/WHO Expert Committee on Food Additives (JECFA))

#### Canada

##### Azodicarbonamide

Canada requests clarification from the JECFA secretariat on the withdrawal of the ADI for azodicarbonamide, as described in the [WHO evaluation summary](#): "As safety concern has been raised on the safe use of azodicarbonamide and no support was found to provide data for a re-evaluation the CCFA53 withdrew the ADI."

It is Canada's understanding that, while the CCFA can apply risk-management measures for additives, it hasn't the authority to withdraw an ADI established by JECFA. Canada requests clarification on the process undertaken that lead from the withdrawal of the substance from the List of Substances Proposed for Evaluation by JECFA to the revocation of the ADI.

#### Kenya

Kenya agrees with the deletion of azodicarbonamide (INS 927a) from the GSFA.

#### Philippines

Position:

The Philippines supports the proposal to delete the provision for azodicarbonamide (INS 927a) from the General Standard for Food Additives (CXS 192-1995).

Reason:

Safety concerns regarding the use of Azodicarbonamide (INS 927a) was not addressed as it was excluded from the Priority List of Substances Proposed for Evaluation by JECFA due to lack of support in providing data for its re-evaluation.

Furthermore, use of Azodicarbonamide in the country was not evident based on gathered information from local bread manufacturers citing usage of other food additive alternatives that can achieve the desired technological effect as a flour treatment agent.

#### Senegal

- **Actions requises à la suite de modifications du statut de la dose journalière admissible (DJA) et d'autres recommandations toxicologiques du JECFA**

**Contexte :**

- Lors de sa 96ème réunion, le JECFA a évalué la sécurité d'un additif alimentaire, révisé les normes de trois additifs alimentaires, évalué la sécurité de deux groupes d'agents aromatisants et révisé les normes de huit agents aromatisants. Les recommandations toxicologiques ou autres avis scientifiques concernant ces additifs alimentaires figurent à l'annexe 1 du document CX/FA 24/54/3. Pour les normes nouvelles et révisées sont disponibles dans le document de travail (CX/FA 24/54/4, Annexe 1).

Le CCFA54 est invité à examiner les actions recommandées qui pourraient être nécessaires à la suite des évaluations de ces additifs alimentaires.

- Lors de sa 97<sup>ème</sup> réunion, le JECFA a évalué la sécurité d'un additif alimentaire, y compris la révision de ses normes, et a évalué la sécurité de trois groupes d'agents aromatisants. Les recommandations toxicologiques ou autres avis scientifiques concernant ces additifs alimentaires figurent à l'annexe 2 du document CX/FA 24/54/3 et . Pour les normes nouvelles et révisées, elles figurent dans le document (CX/FA 24/54/4, annexe 2).

Le CCFA54 est invité à examiner les actions recommandées qui pourraient être nécessaires à la suite des évaluations de ces additifs alimentaires.

Des recommandations spécifiques pour les trois différents groupes d'agents aromatisants évalués lors de la 97<sup>ème</sup> réunion du JECFA ont été fournies.

Le CCFA54 est invité à examiner les actions recommandées émises par les 96<sup>ième</sup> et 97<sup>ième</sup> réunion du JECFA à la suite des évaluations de ces additifs alimentaires et agents aromatisants.

- Lors de sa 97<sup>ème</sup> réunion, le JECFA a recommandé que pour les alcools, aldéhydes et acides primaires linéaires acycliques aliphatiques saturés, l'utilisation de l'acétaldéhyde (n° 80) en tant qu'analogue structurel dans l'évaluation de la sécurité des substances aromatisantes nécessite une évaluation plus approfondie. En outre, le JECFA a conclu que l'utilisation de l'acétaldéhyde (n° 80) en tant qu'agent aromatisant nécessite une réévaluation. Le JECFA demande que des données d'exposition actualisées (y compris les valeurs MSDI et SPET) soient fournies pour les agents aromatisants acétaldéhyde (n° 80), alcool butylique (n° 85), butyraldéhyde (n° 86), acide hexanoïque (n° 93) et aldéhyde laurique (n° 110) dans un délai de 2 ans (c'est-à-dire d'ici décembre 2025) afin qu'une réévaluation de ces composés précédemment évalués puisse être achevée.

**Position :** Le Sénégal félicite le JECFA pour les travaux effectués et soutient les actions recommandées lors des 96<sup>ème</sup> et 97<sup>ème</sup> réunions, y compris la nécessité de disposer de données d'exposition pour réévaluer ces arômes.

**Justification :** Les travaux du JECFA sont basés sur des données scientifiques.

#### the United States of America

The United States would like to submit the following comments regarding Agenda Item 3(a) pertaining to Matters Related to Azodicarbonamide (INS 927a) (CX/FA 24/54/3 Add. 1) for consideration at the forthcoming 54th Session of the Codex Committee on Food Additives (CCFA).

Procedurally, the United States would like to seek clarification regarding the procedure taken to withdraw the JECFA acceptable daily intake (ADI) for azodicarbonamide (INS 927a). Paragraph 5 of CX/FA 24/54/3 Add. 1 indicates that, "due to safety concerns regarding the safe use of azodicarbonamide (INS 927a) and a lack of support in providing data for re-evaluation, the ADI for azodicarbonamide (INS 927a) has been withdrawn." It then refers to a footnote (footnote 5 WHO | JECFA) citing the WHO JECFA database which indicates that the ADI for azodicarbonamide was withdrawn at CCFA53. However, a search of the report of CCFA53 (REP23/FA) does not contain any discussion regarding the withdrawal of the JECFA ADI for azodicarbonamide. In addition, procedurally, we seek clarification as to whether JECFA must first make a recommendation to CCFA on the withdrawal of the ADI before CCFA takes further action on the ADI or removal of the provision for azodicarbonamide in the GSFA.

#### Joint FAO/WHO Expert Committee on Food Additives (JECFA)

The joint FAO/WHO JECFA Secretariat would like to add the following comments to the comments submitted regarding Agenda Item 3(a) pertaining to Matters Related to Azodicarbonamide (INS 927a) (CX/FA 24/54/3 Add. 1) for consideration at the forthcoming 54th Session of the Codex Committee on Food Additives (CCFA).

The JECFA Secretariat had raised at CCFA51 concerns about the lacking adequacy of the safety evaluation for azodicarbonamide (INS 927a) due to the fact that at the time of the original JECFA evaluation in 1965, not all endpoint that are of relevance today had been sufficiently evaluated. CCFA has added azodicarbonamide (INS 927a) on the JECFA priority list at CCFA51 (CX/FA/19). No member or observers has since come forward as data sponsor or supported the continued use of this substance as a food additive and CCFA53 has subsequently withdrawn the request for a JECFA evaluation.

Given the age of the previous evaluation, the lack of any interest from members or observers to support a JECFA re-evaluation, the JECFA Secretariat, as the sole custodian of the work of JECFA and thus also the health-based

guidance values of JECFA, has decided that it cannot continue to support the previously set ADIs for azodicarbonamide (INS 927a).

It's the opinion of the JECFA Secretariat that it is not appropriate for JECFA to maintain a health-based guidance value when there are concerns with regard to the suitable health-protective nature of this health-based guidance value and when there are no indications available for support by any stakeholder for a re-evaluation by JECFA noted by CCFA. Should a desire arise later to reintroduce azodicarbonamide as a food additive it should be considered as a new food additive that would need a full JECFA assessment before being introduced to the global market.