Reflections on Alignment – New Notes and the Structure of the GSFA

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Overview

1. Introduction to use of notes in the GSFA.
2. The approach to Alignment
3. How XS notes and other notes are used, and why they are important.
4. Explanation on Table 3, incl. footnote 1, the Annex and the Reference table.
5. Proposal to add Table 3 Notes
6. Summary

PREAMBLE

ANNEX A - GUIDELINES FOR THE DEVELOPMENT OF MAXIMUM LEVELS FOR THE USE OF FOOD ADDITIVES WITH NUMERICAL ACCEPTABLE DAILY INTAKES

ANNEX B - FOOD CATEGORY SYSTEM

• PART I: Food Category System
• 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

• Annex C sorted by GSFA Food Category Number

TABLE ONE - Additives Permitted for Use Under Specified Conditions in Certain Food Categories or Individual Food Items

• Notes to the Comments for the Revised General Standard for Food Additives

TABLE TWO - Food Categories or Individual Food Items in Which Food Additives are Permitted

• Notes to the General Standard for Food Additives

TABLE THREE - Additives Permitted for Use in Food in General, Unless Otherwise Specified, in Accordance with GMP

• Annex to Table 3 - Food Categories or Individual Food Items Excluded from the General Conditions of Table Three
• References to Commodity Standards for GSFA Table 3 Additives
GFSA Notes

- There are currently over 600 Notes listed at the end of both Table One and Table Two (duplicated)

Notes to the General Standard for Food Additives

- Note 1: As adipic acid.
- Note 2: On the dry ingredient, dry weight, dry mix or concentrate basis.
- Note 3: For use in surface treatment only.
- Note 4: For use in decoration, stamping, marking or branding the product only.
- Note 6: As aluminium.
- Note 7: For use in coffee substitutes only.
- Note 8: As bioin.
- Note 9: Except for use in ready-to-drink coffee products at 10 000 mg/kg.
- Note 10: As ascorbyl stearate.
- Note 11: On the flour basis.
- Note 12: As a result of carryover from flavouring substances.
- Note 13: As benzoic acid.
- Note 14: For use in hydrolyzed protein liquid formula only.
- Note 15: On the fat or oil basis.
- Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only.
- Note 17: As cyclaminic acid.
- Note 18: As added level; residue not detected in ready-to-eat food.
- Note 19: For use in products conforming to the Standard for Quick Frozen Shrimps and Prawns (CODEX STAN 92-1981) and the Standard for Quick Frozen Lobsters (CODEX STAN 95-1981): sulfur dioxide (INS 220), sodium sulfit (INS221), sodium hydrogen sulfite (INS 222), sodium metabisulfite (INS 223), Potassium metabisulfite (INS 224), potassium sulfite (INS 225) as preservatives at 100 mg/kg in the edible.
The approach to Alignment

• Historically food additive provisions included in both GSFA & individual Commodity Standards (CSs).

• CCFA - goal of the GSFA being the single Codex reference point for food additives

• Food additive provisions in the CSs are transferred into the GSFA, through Alignment.

• Consideration of Alignment started in 2010 (CCFA42) with eWG to prepare a discussion paper. Development of a decision tree approach

• Five meat Commodity Standards, Bouillons and Consommés, Cocoa and Cocoa Products..... etc. More recently, milk and milk products CSs.

• The aligned commodity standards now include a general reference to the GSFA with respect to food additive provisions.

General reference
“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.

Note: Some modification may be required.

- Alignment undertaken in accordance with Decision Tree (Appendix 2 of the Information Paper).

- At several points in the Decision Tree the use of notes is required (as indicated by the red circles).
Principles of Alignment

• The GSFA to be the single reference point for food additives within Codex Alimentarius and should therefore incorporate any food additive provisions in the commodity standards.

• To the extent possible alignment should not change the level or scope of food additive provisions ie. essentially a transcription exercise.
  - For example, introducing notes to ensure that the conditions that are in the Commodity Standards are captured in the GSFA, and not lost.

• 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)
  - For example; to exclude food products subject to the relevant commodity standard; or to indicate a different use level in food products subject to the relevant commodity standard, etc.
Consideration of food products during Alignment

1 to 1 food product relationship?

- A key question that needs to be considered is whether the Codex commodity standard has a 1:1 relationship to the relevant GSFA food category.

- All products that are in 5.1.4 Cocoa and Chocolate products in the GFSA, were captured by the Commodity Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981). Therefore considered to have 1:1 relationship and no exclusion notes were necessary.

- However, commonly there is not a 1 to 1 food product relationship.
Consideration of food additives during Alignment – XS Notes

**Question**
But what happens when there are additional foods additives in the GSFA food category than in the CS(s)?

**Answer**
XS notes are added to the relevant GFSA provisions in the food category excluding their use in the CS food products. This ensures that the scope of these specific additive provisions are not extended to the food products covered in the CS.

- Notes are also used to ensure that the conditions that are in the Commodity Standards are captured in the GSFA and are not lost
- Without exclusion notes, the scope of the provisions would be unintentionally broadened in the GSFA.
Table 3 lists additives with Not Specified or Not Limited JECFA ADIs that are acceptable for use in foods in general when used at *quantum satis* levels and in accordance with the principles of good manufacturing practice described in Section 3.3 of this Preamble.

<table>
<thead>
<tr>
<th>INS No</th>
<th>Additive</th>
<th>Functional Class</th>
<th>Year Adopted</th>
<th>Specific allowance in the following commodity standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>1451</td>
<td>Acetylated oxidized starch</td>
<td>Emulsifier, Stabilizer, Thickener</td>
<td>2005</td>
<td>CS 249-2006</td>
</tr>
</tbody>
</table>
At the bottom of Table 3 there is an important Explanatory Note.

The Annex to Table 3 lists food categories and individual food items excluded from the general conditions of Table 3.

The provisions in Tables 1 and 2 govern the use of additives in the food categories listed in the Annex to Table 3.
This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis or based on functional class, that information is contained in the "References to Commodity Standards for GSFA Table 3 Additives".

So the References to Commodity Standards for GSFA lists those CSs that allow Table 3 additives on a general basis or based on functional class, not those that allow specific Table 3 additives which are listed in the fifth column of Table 3.

[Ref. CX/FA 18/50/6; Appendix 5 – Revised approach to listing corresponding Commodity Standards in Table 3 of the GSFA]
Development of Table 3 notes

- CCFA53 agreed to the development of Tables 3 notes with the features listed in document CX/FA 23/53/6 (front of Appendix 4; page 167), noting that the development of Table 3 notes also depended on when the Codex Secretariat was able to make changes to the online version.

- The introduction of Table 3 notes is necessary to facilitate interpretation of the GFSA following the transfer of some CS restrictions during the alignment exercise. These restrictions would otherwise have been lost.

- It was proposed that a 6th column in Table 3 to be created to add such T3 notes.

Ref. REP23/FA para 43-44.

Other identified issue associated with GFSA Notes

- Some inconsistencies in the wording and format of Notes has ‘crept in’ over the years eg. in the use of the word “only”. This may require future work by the CCFA.
At this session of the CCFA (CCFA54), the pWG on Alignment (CRD3) has recommended that:

- the Committee ‘pause’ work on the Table 3 notes to the GSFA until the functionality of the new GSFA database is better understood.

- until the functionality of the GFSA Database will allow the incorporation of Table 3 notes, that the Alignment WG maintains a running list of Table 3 additives that should subsequently be migrated from Tables 1 and 2.
Summary

• GSFA Notes required in order to set conditions on the food additive provisions eg. Note 3 - for use in Surface Treatment Only.

• The aim is for the GSFA to be a single reference point for food additive provisions within the Codex Alimentarius.

• Alignment brings the food additive provisions that have historically being included in the individual CSs into the GFSA.

• Notes are used to ensure the scope, levels, conditions or restrictions of the existing provisions do not change to the extent possible eg. CS conditions are not lost.

• XS notes ensure there is no unintentional broadening of the scope of provisions to other food products eg. Note XS263 - Excluding products conforming to Standard for Cheddar (CXS 263-1966).

• The introduction of Table 3 Notes is necessary to facilitate interpretation of the GFSA and ensure conditions are captured, but is dependent on changes to the online version.

• The Online Database is VERY useful tool that facilitates transparency, clarity and accessibility of the GFSA provisions.
THANK YOU FOR YOUR ATTENTION

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