

CCFA54

54th Session of the Codex Committee on Food Additives

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





Structure of the General Standard for Food Additives (CODEX STAN 192-1995)

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

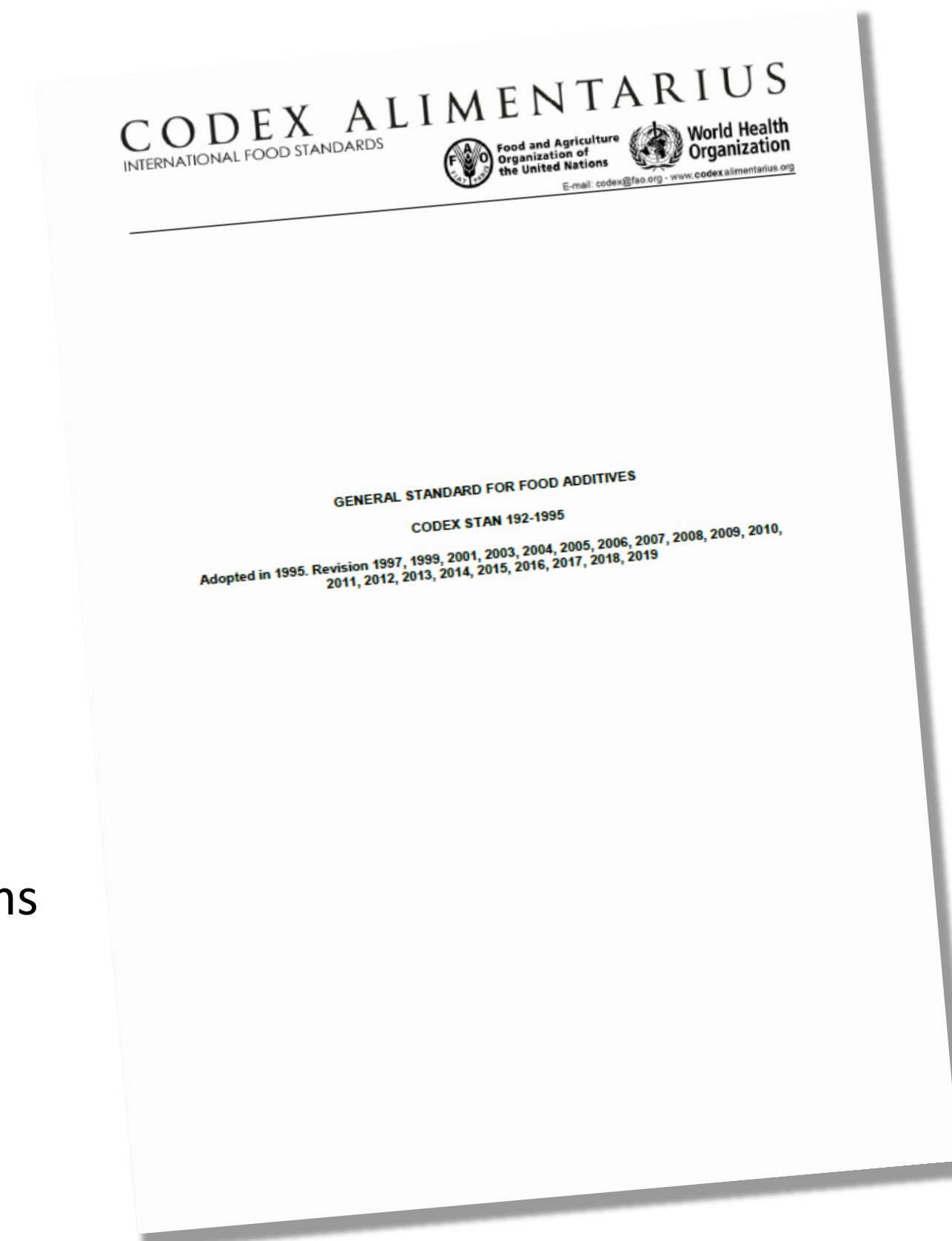
- Notes to the Comments for the Revised General Standard for Food Additives

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)

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Table Two

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 5	Excluding products conforming to the Standard for Jams, Jellies and Marmalades (CODEX STAN 296-2009).
Note 6	As aluminium.
Note 7	For use in coffee substitutes only.
Note 8	As bixin.
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 cyclamic 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 sulfite (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

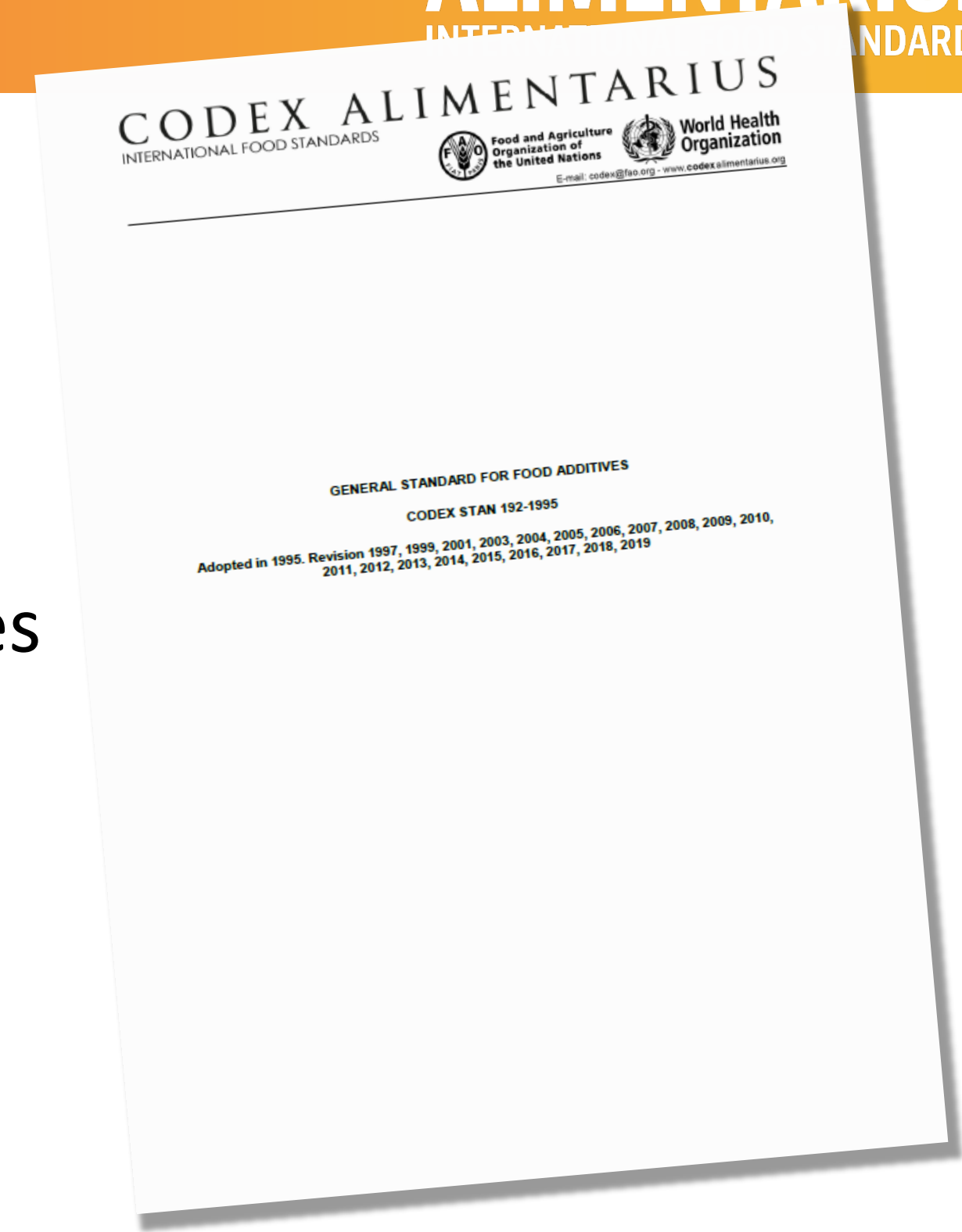
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Table Two

Note XS250	Excluding products conforming to the Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat (CODEX STAN 250-2006).
Note XS251	Excluding products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CODEX STAN 251-2006).
Note XS252	Excluding products conforming to the Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat (CODEX STAN 252-2006).
Note XS253	Excluding products conforming to the Standard for Dairy Fat Spreads (CODEX STAN 253-2006).
Note XS257R	Excluding products conforming to the Codex Regional Standard for Canned Humus with Tehena (CODEX STAN 257R-2007).
Note XS259R	Excluding products conforming to the Codex Regional Standard for Tehena (CODEX STAN 259R-2007).
Note XS260	Excluding products conforming to the Standard for Pickled Fruits and Vegetables (CODEX STAN 260-2007).
Note XS262	Excluding products conforming to the Standard for Mozzarella (CODEX STAN 262-2007).
Note XS292	Excluding products conforming to the Standard for Live and Raw Bivalve Molluscs (CODEX STAN 292-2008).
Note XS297	Excluding products conforming to the Standard for Certain Canned Vegetables (CODEX STAN 297-2009).
Note XS309R	Excluding products conforming to the Codex Regional Standard for Halawa Tehenia (CODEX STAN 309R-211).
Note XS311	Excluding products conforming to the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013).
Note XS312	Excluding products conforming to the Standard for Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing (CODEX STAN 312-2013).
Note XS314R	Excluding products conforming to the Standard for Date Paste (CODEX STAN 314R-2013).

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.



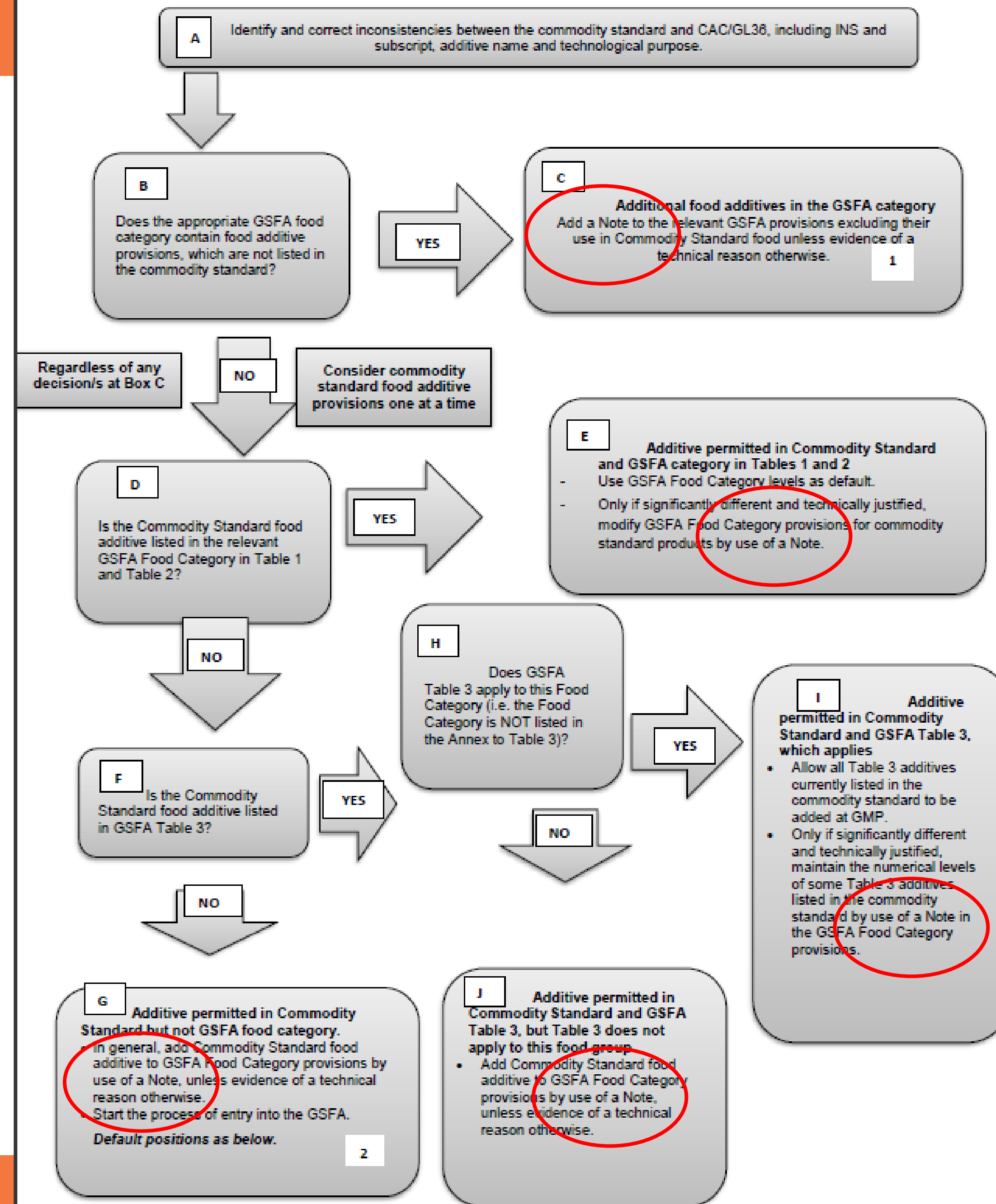
General reference

“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.

- Information Paper - Guidance to Commodity Committees on the Alignment of Food Additive Provisions (www.fao.org/fao-who-codexalimentarius/resources/inf-doc/en/)
- 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**).

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



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 GSFA, 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 food additives in the GSFA food category than in the CS(s)?

Answer

XS notes are added to the relevant GSFA 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 THREE

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

INS No	Additive	Functional Class	Year Adopted	Specific allowance in the following commodity standards ¹
260	Acetic acid, glacial	Acidity regulator, Preservative	1999	CS 70-1981, CS 94-1981, CS 119-1981, CS 302-2011, CS 249-2006
472a	Acetic and fatty acid esters of glycerol	Emulsifier, Sequestrant, Stabilizer	1999	
1422	Acetylated distarch adipate	Emulsifier, Stabilizer, Thickener	1999	CS 70-1981, CS 94-1981, CS 119-1981, CS 249-2006
1414	Acetylated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	CS 70-1981, CS 94-1981, CS 119-1981, CS 249-2006
1451	Acetylated oxidized starch	Emulsifier, Stabilizer, Thickener	2005	CS 249-2006
1401	Acid-treated starch	Emulsifier, Stabilizer, Thickener	1999	CS 105-1981, CS 70-1981, CS 94-1981, CS 119-1981, CS 249-2006
406	Agar	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	CS 96-1981, CS 97-1981, CS 70-1981 (for use in packing media only), CS 94-1981 (for use in packing media only), CS 119-1981 (for use in packing media only), CS 249-2006
400	Alginic acid	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	CS 105-1981, CS 70-1981 (for use in packing media only), CS 94-1981 (for use in packing media only), CS 119-1981 (for use in packing media only), CS 249-2006

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.



*The amount which is enough

Explanatory Note: Determining the Use of Table 3 Additives in Foods Covered by Commodity Standards based on the Revised Approach

- If a commodity standard covers the use of foods in food categories that are contained in the Annex to Table 3, then Table 3 does not apply to the commodity standard.
- All food additive permissions for foods covered by food categories listed in the Annex to Table 3 must be listed in Tables 1 and 2 of the GSFA.
- If a commodity standard covers a food category that is not listed in the Annex to Table 3, then the user should refer to the "References to Commodity Standards for GSFA Table 3 Additives" section of Table 3.
- If the section specific to the commodity standard indicates that all Table 3 additives are permitted for use in foods covered by the standard, then any food additives listed in Table 3 may be used in foods covered by the standard.
- If the text indicates that only Table 3 additives with specific functional classes may be used (e.g. acidity regulator), then any Table 3 additive listing the noted functional class in column 3 of Table 3 may be used in foods covered by the commodity standard.
- If the text indicates that "only certain Table 3 food additives (as indicated in Table 3)" are permitted for use in foods covered by the commodity standard, then the user may refer to column 5 of Table 3 where the commodity standard number will be listed for the particular Table 3 food additives that are permitted for use in the commodity standard.

- 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.

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ANNEX TO TABLE THREE

Food Categories or Individual Food Items Excluded from the General Conditions of Table Three

The use of additives listed in Table Three in the following foods is governed by the provisions in Tables One and Two.

Category Number	Food Category
01.1.1	Fluid milk (plain)
01.1.2	Other fluid milk (plain)
01.1.3	Fluid buttermilk (plain)
01.2	Fermented and renneted milk products (plain) ¹
01.4.1	Pasteurized cream (plain)
01.4.2	Sterilized and UHT creams, whipping or whipped creams, and reduced fat creams (plain)
01.6.3	Whey cheese
01.6.6	Whey protein cheese
01.8.2	Dried whey and whey products, excluding whey cheese
02.1	Fats and oils essentially free from water
02.2.1	Butter
04.1.1	Fresh fruit
04.2.1	Fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds

GENERAL STANDARD FOR FOOD ADDITIVES

TABLE THREE

**Additives Permitted for Use in Food in General, Unless
Otherwise Specified, in Accordance with GMP**

INS No	Additive	Functional Class	Year Adopted	Specific allowance in the following commodity standards ¹
260	Acetic acid, glacial	Acidity regulator, Preservative	1999	CS 70-1981, CS 94-1981, CS 119-1981, CS 302-2011, CS 249-2006
472a	Acetic and fatty acid esters of glycerol	Emulsifier, Sequestrant, Stabilizer	1999	
1422	Acetylated distarch adipate	Emulsifier, Stabilizer, Thickener	1999	CS 70-1981, CS 94-1981, CS 119-1981, CS 249-2006

¹ 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 a functional class, not those that allow specific Table 3 additives which are listed in the fifth column of Table 3.

References to Commodity Standards for GSFA Table 3 Additives²

01.6.2.1	Ripened Cheese, includes rind
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards. Acidity regulators are only acceptable for use in the cheese mass. Colours are only for use in the cheese mass to obtain the colour characteristics as described in Section 2 of the commodity standard. Anticaking agents are only justified for the surface treatment of sliced, cut, shredded or grated cheese.
Codex standards	Cheddar (CXS 263-1966), Danbo (CXS 264-1966), Edam (CXS 265-1966), Gouda (CXS 266-1966), Havarti (CXS 267-1966), Samsø (CXS 268-1966), Emmental (CXS 269-1967) Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968), Provolone (CXS 272-1968), Coulommiers (CXS 274-1969), Camembert (CXS 276-1973) and Brie (CXS 277-1973)

04.1.2.4	Canned or bottled (pasteurized) fruit
	Acidity regulators listed in Table 3 are acceptable for use in all products conforming to the standard. Antioxidants and firming agents listed in Table 3 are acceptable for use in canned mangoes conforming to the standard. Colours listed in Table 3 are acceptable for use in special holiday pack canned pears conforming to the standard. Only certain Table 3 antioxidants (as indicated in Table 3) are acceptable for use in canned pineapples conforming to the standard.
Codex Standard	Certain Canned Fruits (CODEX STAN 319-2015)

04.1.2.4	Canned or bottled (pasteurized) fruit
	Acidity regulators and firming agents listed in Table 3 are acceptable for use in foods conforming to the standard.
Codex standard	Certain canned citrus fruits (CODEX STAN 254-2007)

04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce
	Acidity regulators, antioxidants, colour retention agents (table olives darkened with oxidation only), firming agents, flavour enhancers, preservatives, and thickeners (table olives with stuffing only) listed in Table 3 are acceptable for use in foods conforming to the standard.
Codex standard	Table olives (CODEX STAN 66-1981)

[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 GSFA 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.



FAO/WHO Food Standards
CODEX alimentarius

GSFA Online
Updated up to the 46th Session of the Codex Alimentarius Commission (2023)
**CODEX GENERAL STANDARD FOR FOOD ADDITIVES (GSFA)
ONLINE DATABASE**

The "Codex General Standard for Food Additives" (GSFA, Codex STAN 192-1995) sets forth the conditions under which permitted food additives may be used in all foods, whether or not they have previously been standardized by Codex. The Preamble of the GSFA contains additional information for interpreting the data. Users are encouraged to consult the Preamble when using this database.

Other identified issue associated with GSFA 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 GSFA 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 been 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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