

codex alimentarius commission E



FOOD AND AGRICULTURE
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JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 6 (b)

CX/FA 07/39/7-Add. 1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES

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Beijing, China, 24-28 April 2007

COMMENTS ON REPORT OF THE ELECTRONIC WORKING GROUP ON THE REVISION OF THE PROCEDURAL MANUAL

The following comments have been received from the following Codex Members and observers: Australia, Brazil, Canada, European Community, United States, IDF

Australia

Australia welcomes the report and considers it a useful document which will facilitate discussion at this year's CCFA meeting. Australia supports the work done so far and agrees in principle with the recommendations. We wish to thank the Delegation of Switzerland for agreeing to lead the drafting of the report.

However we note that recommendations 1 and 2 (paragraphs 10 and 11) discuss that the proposed amendments to the Procedural Manual will be discussed by the 39th session of the CCFA, taking in to account, if possible, the discussions on the *Procedures for Consideration* that will have taken place at the 24th session of the CCGP. Depending on the results of the discussion the CCFA may wish to forward the proposed amendments directly to the Commission for adoption, send it to the Commission via the CCGP, or allow for another round of discussion within the Committee.

Australia interprets this process to mean that CCGP will consider a **matter referred** by the CCFA on *Procedures for Consideration* at its next meeting in early April 2007. Depending on the outcome of the discussions at CCGP, if CCGP agrees with the matter referred to it by CCFA, then CCGP will refer the matter straight to the Commission. However, if CCGP considers that CCFA needs to do more work, then CCGP will refer the matter back to CCFA for more discussion.

Given that the proposed discussions have not yet taken place, and depending on the outcome of the discussions at both CCFA and CCGP, Australia reserves the right to make a decision on whether to send the proposed amendments directly to the Commission or via the CCGP or allow another round of consultation.

Australia agrees with recommendation 3 (paragraph 12.) that since the Working Group agreed that the section *Relations between commodity committees and general committees* shall describe only the relation between commodity committees and the CCFA, CCGP should be asked to draft a separate section.

Australia would like to submit the following general comments:

1. Australia notes that the main objective of the proposed amendments to the Procedural Manual is to align the procedures related to the elaboration of food additive provisions and the formats to be used with those changes of the Preamble to the General Standard for Food Additives (Codex Stan 192) (GSFA) which were adopted by the Commission at the 29th session (ALINORM 06/29/41, para 40; ALINORM 06/29/12, Appendix V) and those proposed changes contained in the draft *Procedures for Consideration of the Entry and Review of Food Additive Provisions in the General Standard for Food Additives* (ALINORM 06/29/12, Appendix VI; this document is referred to as draft *Procedures for Consideration*) that will be discussed at the 39th session of the CCFA taking into account, if possible, the discussions on the Procedures for Consideration that will have taken place at the 24th CCGP.
2. We also note that Appendix I provides a comprehensive table of the relevant current sections of the Procedural Manual, the new proposed texts to replace those, and comments which provide a justification for each proposal. The clear format provided in Appendix I allows a transparent and informed discussion by the Committee. We understand that only the column *Proposed new text* of Appendix I will be forwarded to the Codex Committee on General Principles for endorsement and subsequently to the Commission for final adoption. Appendix II is the consolidated proposal.
3. Australia agrees with the new text proposed on pp89. **We do note however that this part of the Procedural Manual may need to be amended further following the discussions for the integration into the GSFA of the Food Additive Provisions of Commodity Standards with a one-to-many relationship with the food categories of the GSFA.** This will depend on the outcome of the discussions to be held at the 39th CCFA on the Report of the Electronic Working Group on the Inclusion of the Food Additive Provisions of the Commodity Standards into the GSFA, prepared by USA with the assistance of Australia, Canada, European Community and New Zealand.
4. We note that the Working Group's terms of reference mentioned only the section *Food Additives and Contaminants* (pp 93-95 of the 15th edition). However, we note as part of the Working Groups closer examination of the general introduction (p 92) that it was revealed that its second and third paragraph could possibly also require some revisions; they are therefore included in Appendix I. We agree with the addition of words "food additives" to the second and third paragraphs of page 92 proposed in Appendix I. Australia believes that this proposed new text for p92 should be referred to CCGP since it pertains to the work of several committees, not just CCFA.
5. Australia agrees with the proposed new text for page 93f in Appendix I. This text is consistent with previous discussion of the Committee.
6. Australia can agree with the proposed changes to the wording and order of paragraph 94 with the clarification noted by the drafters regarding the term "working papers".
7. Australia can agree to the proposed new wording to paragraph 94f. Australia believes that the GSFA should be the single authoritative reference point for food additives. Deviations should be minimised as much as possible and should be considered exceptions to the rule.
8. Australia agrees with the proposed removal of the section on Good Manufacturing Practice and be placed with the "Definitions for the purposes of the Codex Alimentarius", pages 42-43 of the Procedural Manual.
9. Australia agrees with the proposed new text and revised sequence to the CCFA Terms of Reference.

Brazil

Brazil would like to submit the following comments on CX/FA 07/39/7, regarding to the table lines in Appendix I and their respective explanation texts in Appendix II:

Page 92 (line 2): for consistency with the Procedural Manual (page 88, 15th edition), we suggest mentioning the sections of the Commodity Standards in this order: food additives, hygiene, labeling and analysis and sampling methods. Also, we recommend including “contaminants”, as follows: “*Codex Commodity Standards shall contain sections on food additives, contaminants, hygiene, labeling and methods of analysis and sampling (...)*” and “*Sections on ~~hygiene, labeling~~, food additives, contaminants, hygiene, labeling, and methods of analysis and sampling which contain specific provisions (...)*”.

Page 94 (line 1): we suggest the following change – “*All provisions in respect of food additives ~~(including processing aids)~~ and of contaminants contained in Codex commodity standards should be referred to the Codex Committee on Food Additives or on Contaminants in Food (...)*”. These words are present in the “Current Text” and are missing in the “Proposed New Text”. We propose to delete “processing aids” because provisions for these substances have not been discussed within CCFA.

Page 94 (line 2): we recommend excluding the expression “*and other restrictions*” of the phrase: “*(...) and on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives concerning the safety-in-use (acceptable daily intake (ADI) ~~and other restrictions~~) and an estimate of the potential (...)*”. The original phrase gives the idea that the ADI is a restriction, which is not correct. What is the meant of “other restrictions”?

Page 94 (line 3): Brazil has the following question/ comment:

1. In which conditions the CCFA would “temporarily” endorse a provision?

“(…) *and whether the additive was previously endorsed (or **temporarily** endorsed by the Codex Committee on Food Additives)*”.

2. To include the basis in which food additives provisions should be expressed in the following statement:

“*When forwarding a food additive section (...), the Acceptable Intake (ADI) assigned by the Joint FAO/WHO Expert Committee on Food Additives, technological justification, proposed level expressed in the same basis as the food additive ADI, and whether the additive (...)*”.

Page 95 (line 1): we suggest replacing the phrase “*No changes required*” in the “Comments” column by “*Technical amendments*”, since a change was proposed.

Terms of reference:

- Proposed new text, item (b): the maximum levels should be referenced as “*acceptable*” and not as “*permitted*”, as agreed in the CCFAC and for consistency with the item (a):

“(…) *to establish or endorse ~~permitted~~ acceptable maximum levels (...)*”

- The statement (c) in the “Current Text” column is not included in the Procedure Manual (15th Edition). Is this a proposed inclusion for a new text?

- According to the current item (b), or (c) in the proposed new text: if the CCFA intend to continue including in the priority list substances which are not food additives, such as nutrients, new ingredients (for example, phytosterols) and sugars, such procedure should be proposed in this Term of reference. This would be in agreement with what was discussed in the 39th CCFAC (ALINORM 06/29/12, para. 203, page 40):

“(…) *The JECFA Secretariat noted that JECFA had in the past evaluated substances that could be used as food ingredients, in addition to uses as food additives. The Committee agreed that the JECFA Secretariat, together with the Codex Secretariat, will prepare for the next session of the Committee a discussion paper dealing with possible changes to the Procedural Manual, i.e. further explanations in the terms of reference of this Committee on the scope of requests to JECFA for scientific advice*”.

- Items (f) and (g) are related to issues (methods of analysis and elaboration of standards or codes for labeling) which do not correspond to specific tasks of the Committee on Food Additives and belong to other Codex Committees. These actions have not been included in the CCFA agenda in the last years.

- According to the Procedure Manual (15th Edition, English version, page 125), the expression “*and food irradiation*” is part of the current sentence (f). Consequently, proposed new text (g) should read:

“(g) to consider and elaborate standards or codes for related subjects such as the labelling of food additives when sold as such, **and food irradiation**”.

European Community

The European Community and its Member States (ECMS) would like to thank the Swiss delegation for the elaboration of this complete report. The ECMS agree in principle with the report and would like to offer the following comments with regard to the proposed changes to the procedural manual listed in Appendix I of the report:

1. We propose the **second paragraph of the proposed new text for page 93f** to read:

"Should the Codex commodity committee consider that a general reference to the General Standard for Food Additives does not serve its purpose, a proposal should be prepared and forwarded to the Codex Committee on Food Additives for consideration and endorsement. The commodity committee shall provide a justification for why a general reference to the General Standard would not be appropriate in light of the criteria for the use of food additives established in the Preamble of the General Standard, in particular Section 3. "

2. The European Community and its Member States support the option of maintaining the GMP principle also in the Procedural Manual and move it to the ‘Definitions for the purposes of the Codex Alimentarius’, pages 42-43 of the procedural manual, where ‘Good Agricultural Practice in the Use of Pesticides’ and ‘Good Practice in the use of Veterinary Drugs’ are also defined.

United States

The United States congratulates the Delegation of Switzerland for preparing the report of the electronic working group. We believe that this report will contribute significantly to the 39th CCFA’s discussion of this very important issue, namely how Codex subsidiary bodies will communicate and work together when establishing food additive provisions in the Codex system.

The enclosed attachment contains our proposals for revising the recommendations contained in Appendix II of the report. A number of our comments are editorial in nature; however, in addition there are substantive revisions that are discussed below.

Format for Codex Commodity Standards – Food Additives

We note that the Commission has indicated that the GSFA should be the single Codex reference for food additives. As proposed, the second paragraph of this section; however, explicitly states that when there are exceptions to general reference to the GSFA, there is only one option. That is Codex commodity standards may contain listings of food additives and their acceptable maximum use level. We do not support this approach as we believe that this is a direct contradiction of the Commission’s guidance to the CCFA. Therefore, we recommend that the CCFA not endorse this text.

Food Additives

A close reading of the proposed second and third paragraphs of this section, reveals that if a commodity standard is following the principles for the use of food additives as described in the GSFA Preamble, then the only basis for justifying why a general reference to the GSFA is not appropriate, is that the use would result in unfair trade practices. Therefore, we recommend deleting the last sentence of the second paragraph and the entire third paragraph and replacing them with new text specifying that the commodity committee should justify the exception based on unfair trade practices.

Codex Committee on Food Additives – Terms of Reference

It appears that the intent of adding new "b" is to add clarity, however in our view it fails. One implication of the new “b” is that technological justification is not a criterion for adding additives to the GSFA. Another implication is that provisions for food additives used in commodity standards are not listed in the GSFA. Therefore, we recommend that there be only one entry. That is (a) "To establish acceptable maximum levels for individual food additives." In our view, this is complete and unambiguous and not subject to interpretation.

Attachment

Suggested **additions are indicated in bold** font and recommended ~~deletions are indicated in strike through~~ font.

FORMAT FOR CODEX COMMODITY STANDARDS - FOOD ADDITIVES

This section should contain a general reference to the corresponding sections of the General Standard for Food Additives which **should take the following form:**

“[Food Additive functional class] used in accordance with Tables 1 and 2 of the Codex 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.”)

Exceptions from, or addition to, the General Standard for Food Additives that are necessary for its interpretation with respect to the product concerned should be justified fully **to the Codex Committee on Food Additives**, and should be restricted where possible. ~~In such cases the names of the additives/functional classes permitted and, where appropriate, the maximum amount permitted in the food should be prepared in accordance with guidance given in the section on Food Additives in the *Relations between Commodity Committees and General Committees*, and may take the following form:~~

~~“The following provisions in respect of food additives and their specifications as contained in section of the Codex Alimentarius are subject to endorsement [have been endorsed] by the Codex Committee on Food Additives.”~~

Then should follow a tabulation, viz.:

~~“Name of additive, maximum level (in percentage or mg/kg).”~~

RELATIONS BETWEEN COMMODITY COMMITTEES AND GENERAL COMMITTEES

Codex Committees may ask the advice and guidance of committees having responsibility for matters applicable to all foods on any points coming within their province. The Codex Committees on Food Labelling; Food Additives; Contaminants in Foods; Methods of Analysis and Sampling; Food Hygiene; Nutrition and Foods for Special Dietary Uses; and Food Import and Export Inspection and Certification Systems may establish general provisions on matters within their terms of reference. These provisions should only be incorporated into Codex Commodity Standards by reference unless there is a need for doing otherwise.

Codex commodity standards shall contain sections on food additives, hygiene, labelling and methods of analysis and sampling and these sections should contain all of the relevant provisions of the standard. Provisions of Codex General Standards, Codes or Guidelines shall only be incorporated into Codex Commodity Standards by reference unless there is a need for doing otherwise. Where Codex Committees are of the opinion that the general provisions are not applicable to one or more commodity standards, they may request the responsible Committees to endorse deviations from the general provisions of the Codex Alimentarius. Such requests should be fully justified and supported by available scientific evidence and other relevant information. Sections on hygiene, labelling, food additives, and methods of analysis and sampling which contain specific provisions or provisions supplementing the Codex General Standards, Codes or Guidelines shall be referred to the responsible Codex Committees at the most suitable time during Steps 3, 4 and 5 of the Procedure for the Elaboration of Codex Standards and Related Texts, though such reference should not be allowed to delay the progress of the standard to the subsequent steps of the Procedure.

Subject and commodity Committees should refer to the principles and guidelines developed by the Codex Committee on Food Import and Export Inspection and Certification Systems when developing provisions and/or recommendations on inspection and certification and make any appropriate amendments to the standards, guidelines and codes within the responsibility of the individual committees at the earliest convenient time

[FOOD LABELLING – No Changes]

FOOD ADDITIVES

Codex commodity committees shall examine the General Standard for Food Additives with a view toward incorporating a reference to the General Standard. All proposals for additions or revisions to the General Standard in order to establish a reference to the General Standard shall be referred to the Codex Committee on Food Additives. The Codex Committee on Food Additives shall consider such proposals for endorsement. Revisions of a substantive nature that are endorsed by the Food Additives Committee will be referred back to the commodity committee in order to achieve consensus between both committees at an early stage of the step procedure.

Should a Codex commodity committee consider that a general reference to the General Standard for Food Additives does not serve its **purpose**; a proposal should be prepared and forwarded to the Codex Committee on Food Additives for consideration and endorsement. **The commodity committee shall provide a justification for why a general reference to the General Standard for Food Additives would not ensure fair practices in the food trade.**

~~The commodity committee shall provide a justification for why a general reference to the General Standard would not protect consumer health, ensure fair practices in the food trade or does not meet the criteria for the use of food additives established in the Preamble of the General Standard, in particular Section 3.~~

When considering provisions for food additives in standards, all Codex committees should follow the guidance in the Preamble of the General Standard for Food Additives, specifically Section 3. Full explanation should be provided to the Codex Committee on Food Additives for any departure from this guidance

All provisions in respect of food additives (including processing aids) contained in Codex commodity standards should be referred to the Codex Committee on Food Additives preferably before the Standards have been advanced to Step 5 of the Procedure for the Elaboration of Codex Standards or before they are considered by the Commodity Committee concerned at Step 7, though such referral should not be allowed to delay the progress of the Standard to the subsequent Steps of the Procedure.

All provisions in respect of food additives contained in commodity standards will require endorsement by the Codex Committee on Food Additives, on the basis of technological justification submitted by the commodity committees and on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives concerning the safety-in-use (acceptable daily intake (ADI) and other restrictions) and an estimate of the potential and, where possible, the actual intake of the food additives, ensuring conformity with the Preamble of the General Standard for Food Additives.

The Codex Secretariat should prepare a report of the food additive section of all commodity standards forwarded to the Codex Committee on Food Additives for endorsement. The report to the Committee on Food Additives should include not only the proposed provisions for food additives but also indicate the International Numbering System (INS) number, the Acceptable Daily Intake (ADI) assigned by the Joint FAO/WHO Expert Committee on Food Additives, technological justification, proposed level, and whether the additive was previously endorsed (or temporarily endorsed by the CCFA). The Secretariat's report should also include any proposed provisions for flavourings and optional ingredients, along with the auxiliary information that should accompany the proposed food additive provisions.

When commodity standards are sent to governments for comment at Step 3, they should contain a statement that the provisions “in respect of food additives are subject to endorsement by the Codex Committee on Food Additives and to incorporation into the General Standard for Food Additives.”

When an active commodity committee exists, proposals for the use of additives in any commodity standard under consideration should be prepared by the commodity committee concerned, and forwarded to the Codex Committee on Food Additives for endorsement and inclusion in the General Standard **for Food Additives**. When the Codex Committee on Food Additives decides not to endorse specific additives provisions, the reason should be clearly stated. The section under consideration should be referred back to the commodity committee concerned if further information is needed, or for information if the Codex Committee on Food Additives decides to amend the provision.

When no active commodity committee exists, proposals for new additive provisions or amendment of existing provisions for inclusion in the General Standard for Food Additives should be forwarded directly by Codex members to the Codex Committee on Food Additives.

CODEX COMMITTEE ON FOOD ADDITIVES -Terms of reference:

- (a) to establish acceptable maximum levels for individual food additives ~~for inclusion in the General Standard for Food Additives (GSFA);~~
- (b) ~~to establish permitted maximum levels for individual food additives for inclusion into Codex commodity standards where appropriate on the basis of technological justification submitted by the commodity committees~~
- (c) to prepare priority lists of food additives for risk assessment by the Joint FAO/WHO Expert Committee on Food Additives;
- (d) to assign functional classes to individual food additives;
- (e) to recommend specifications of identity and purity for food additives for adoption by the Commission;
- (f) to consider methods of analysis for the determination of additives in food; and
- (g) to consider and elaborate standards or codes for related subjects such as the labelling of food additives when sold as such.

IDF**Comments of general nature**

The IDF wishes to congratulate Switzerland and its working group partners in preparing this document, which clarifies a number of practical issues relating to the practical management of the additive provisions in the GSFA/commodity standards, respectively.

IDF generally supports the concept that the commodity standards are the authoritative reference points for functional additive classes (i.e. by specifying which functional additive classes are justified), while the GSFA is the single authoritative reference point for the individual additives, with exceptions to the GSFA that are reviewed and approved by CCFA added to the commodity standards.

Since both types of standard texts fall under the concept of a “food additive provision”, we see a need for this divided responsibility/authority be made clear throughout the document.

A quick review of the Codex dairy standards and comparing their names with the names of the food category system in the GSFA shows there may be some need to adjust the GSFA food category system for dairy products to be more similar to commodity names. We understand that the purpose of food category names in the GSFA is only for classification purpose, not for naming the food, but if there was more alignment of the two names, it would reduce confusion.

Finally, we note that some differences exist between this document and the CX/FA 07/39/6 (inclusion of the food additive provisions of the commodity standards into the GSFA), which has been developed by another CCFA working group. We strongly recommend that the concepts contained in CX/FA 07/39/6 be finalized prior to any amendments to the Procedural Manual.

Specific comments to proposals in Appendix I**Format for Codex Commodity Standards – Food Additive:**Page 89 – Proposed new text

IDF supports the approach that the functional additive classes be specified in the commodity standards. However, we recommend that the term “food category name” be amended to include both “food category name and number.” Since the food category system is not intended for food labeling purposes, the use of the term “name” by itself could create confusion between the labeling term “name of the food” in the commodity standard and the GSFA term “food category name.”

The use of the term “where possible” in the third paragraph from the top provides conflicting direction and can be interpreted differently by different parties and should be deleted. Any exceptions from the GSFA should always be fully justified. The intent is to have the Codex commodity standards contain only the table of food additive functional classes and any exceptions from the GSFA, which need to be fully justified and accepted by CCFA, prior to inclusion in to the commodity standard.

Relation between Codex Commodity and General Committees:

Page 92 – Proposed new text

There is a need to clearly reflect that, at least in commodity standards, there are two types of additive provisions:

- lists of functional classes, and
- exceptions to the lists of individual additives found in the GSFA

The new text should clarify that the commodity standards are the authoritative reference points for technologically justified functional additive classes (i.e. by specifying in the commodity standard which functional additive classes are technologically justified), while the GSFA is the single authoritative reference point for the individual additives, including maximum levels.

Contrary to individual additives, it needs to be made more clear whether a list of functional classes in a commodity standard need be endorsed by CCFA, or just the exceptions to the GSFA that would appear in the commodity standard.

Food Additives and Contaminants

Page 93f – Proposed new text

The first paragraph, first sentence states, "*Codex commodity committees shall examine the General Standard for Food Additives with a view toward incorporating a reference to the General Standard.*" The use of "with a view" is permissive and can be interpreted in a number of ways, possibly creating conflicting views. We would recommend the language be changed as follows.

"Codex commodity committees shall examine the General Standard for Food Additives (GSFA) and incorporate a reference in a commodity standard's food additive section (4), identifying the GSFA food category name(s) and number(s) as the reference for specific food additives."

It would be an improvement to the existing language in the last paragraph, if it clearly stated that the Codex Commodity Committees can make recommendations to CCFA for modification of the GSFA; however, the Codex commodity standards will only contain a table of food additive functional classes and any exceptions to the GSFA that have been endorsed by CCFA. Suggested language is shown below.

"When considering provisions for food additives in standards, all Codex committees should follow the guidance in the Preamble of the General Standard for Food Additives (CCFA) specifically Section 3, recognizing that Codex commodity standards shall only contain a table of food additive functional classes and exceptions to the GSFA, as endorsed by CCFA. A full explanation should be provided to the CCFA for any departure from this guidance.

Page 94 – first proposal Proposed new text (CX document page 6/7)

It does not seem to have been taken into account that commodity standards, according to the new approach, do not contain additives list (except if there are justified exemptions from the GSFA) but only lists of functional classes.

Further, we recognize a draft commodity standard that contains food additive functional classes and suggested modifications to the GSFA for that food category may not be complete prior to step 5, but we can accept the qualifying language, "preferably before." In practice, the cooperation between the commodity committee and the CCFA could benefit from addressing functional additives classes prior to developing lists of individual additives or their exceptions from the GSFA.

The language at the end of this paragraph, ". . . should not be allowed to delay the progress of the Standard to the subsequent Steps in the Procedure." may be improved by replacing it with ". . . if possible, it might not restrict advancement of the work."

Page 94 – second proposal - Proposed new text (CX document page 7)

It is not clear that Codex Commodity Standards, according to the new approach, should not contain additives list (except if there are justified exemptions from the GSFA) but only lists of functional classes and exceptions to the GSFA. Language should be added to ensure this concept is contained in this paragraph. See previous suggestions for appropriate language.

Page 94 – third [square bracketed] proposal - Proposed new text (CX document page 7)

It is not clear that commodity standards, according to the new approach, should not contain additives list (except if there are justified exemptions from the GSFA) but only lists of functional classes and exceptions to the GSFA. Language should be added to ensure this concept is contained in this paragraph. See previous suggestions for appropriate language.

Page 94 – fifth proposal - Proposed new text (CX document page 8)

The comments state that the reworded section will be moved to a new paragraph in this subsection. We were unclear what was being reworded and where will the language be moved to?

Page 94f – Proposed new text (CX document page 8)

It is not clear that commodity standards, according to the new approach, should not contain additives list (except if there are justified exemptions from the GSFA) but only lists of functional classes and exceptions to the GSFA. Language should be added to ensure this concept is contained in this paragraph. The new text should clarify that the commodity standards are the authoritative reference points for technologically justified functional additive classes (i.e. by specifying in the commodity standard which functional additive classes are technologically justified) and exceptions to the GSFA, while the GSFA is the single authoritative reference point for the individual additives, including maximum levels. See previous suggestions for appropriate language.

We also recommend that "should" be changed to "may" at the end of the third line in the proposed new text since there should not be an obligation for commodity committees to prepare lists of acceptable food additives, but they "may" want to do so.

Page 95 – Proposed new text (CX document page 8)

We recommend that the "Good Manufacturing Practice (GMPs)" text in the Procedural Manual be left in place since as written it is more complete than that found in the GSFA Preamble and is a significant concept for understanding Codex food additive levels. There is no harm in retaining it and this explanation is more detailed than other references to GMPs.

Terms of reference - (CX document page 9)

The new indent (b) is not consistent with the concept of limiting the commodity food additive sections to a table of functional classes and exceptions to the GSFA and should be deleted or reworded as shown below.

(b) to review recommendations and technical justification from other Codex committees to allow for exceptions from the GSFA for food additive provisions in commodity standards and determine if these recommendations are acceptable.

Specific comments to proposals in Appendix II)

Please see our recommendations above which would apply to the "clean" copy of the changes to the Procedures manual contained in Appendix II. Such recommendations should be made throughout the language in Appendix II.