

# codex alimentarius commission



FOOD AND AGRICULTURE  
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Agenda Item 7

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(English only)

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-eighth Session

The Hague, the Netherlands, 24 – 28 April 2006

### DISCUSSION PAPER ON THE DEVELOPMENT OF GUIDELINES FOR FLAVOURING AGENTS

Comments by Kenya and Norway

#### KENYA

##### 1.0 General comments

Kenya proposes that the clause on the methods of test be moved to be the last clause of the standard

##### 2.0 DEFINITION

Kenya proposes that the all definitions provided be in a flowing order and as sub clauses of clause 2 for ease of numbering and reference

##### 3.0 Flavouring adjuvants

It is proposed that the sentence be deleted as it is the same wording as that in the definition of flavouring adjuvants and therefore it may not add value in this clause

##### 4.0 Substance of toxicological concern

The sentence introducing the table was rephrased as indicated below where the strikes are proposed deletion on the original version in the draft

“Substances *listed below* of toxicological concern *should not be added to directly to food with the exception of quinine and quassine*. ~~The intake resulting from their presence in flavourings should not exceed thresholds of toxicological concern. With the exception of quinine and quassine, the following biologically active substances should not be added directly to food. Their presence in foods that are ready for consumption should be as low as possible, but not exceed the maximum levels specified in the Table 1 below. The maximum levels for quinine and quassine should not be exceeded whether they are added directly to food, or are present only through the use of flavourings in foods.”~~

The title of the table is proposed as, “*Table 1 — Maximum levels of toxicological substances*”

##### 4.0 Hygiene

The word ‘represents’ in sub clause 7.3 part a and b be replaced with ‘pose’ which is more scientific as the prior may be interpreted wrongly and not bring out clearly of the microorganism and the hazard

## **NORWAY**

Norway would like to thank the Working Group and especially the US delegation for their extensive work on the discussion paper on the development of guidelines for flavouring agents.

Norway is pleased to present some general and some specific comments on this subject:

### **General Comments**

The 37<sup>th</sup> session of the CCFAC agreed to propose that a project document for new work on the elaboration of a Codex guideline for the use of flavourings be elaborated.

Norway welcomes the proposed new work on a Guideline on the use of flavouring agents and natural flavouring complexes - as the use of flavourings is important in international trade; the Joint FAO/WHO Expert Committee on Food Additives (JECFA) has assessed a number of flavouring substances and some natural flavouring complexes. Flavourings and subgroups thereof have not been thoroughly described in the Codex system; and for the time being, a number of descriptions are used without being properly defined. This may lead to confusion and hence become a barrier to trade.

Guidelines on the safe use of flavourings including definitions may be a feasible way for the CCFAC to address the use of flavourings in foods in international trade in a way that will not slow down the work on finishing the General Standard for Food Additives - which must have the highest priority.

The mandate given by the 37<sup>th</sup> session of the CCFAC was to develop guidelines on flavouring substances and natural flavouring complexes, with definitions on flavourings in General. This discussion paper addresses flavourings, not only flavouring substances and natural flavouring complexes. Norway supports this widening of the scope of the guidelines.

### **Specific Comments**

#### **Appendix I - Project Document proposal for new work**

Norway supports the elaboration of a project document for new work to prepare Codex guidelines for the use of flavourings.

##### 1. Purpose and scope

Norway supports the purpose and scope. However, we propose that “safety assessment” be replaced with “risk assessment” as this is the term defined by the Codex Alimentarius Commission.

##### 2. Its relevance and timeliness

It is relevant and timely to develop guidelines as JECFA has assessed a number of flavouring substances and have developed a method for evaluation of natural flavouring complexes.

However – intake estimates are an extremely important part of the JECFA method for risk assessment of flavouring substances. There have been some questions concerning the method currently used by JECFA – the Maximum Survey-derived Daily Intake (MSDI). The method is known to underestimate the intake, especially when the annual production figures are low. The 65<sup>th</sup> JECFA meeting of 7-16 June 2005 discussed this topic and recommended to the JECFA secretariat that a working group be formed to look into this matter.

We still believe this project document should be proposed, but we would propose for the CCFAC to include a note of the ongoing work by JECFA to evaluate the intake method used in the risk assessment in the project document.

##### 3. The main aspects to be covered

We support the proposed main aspects to be covered, but we propose that the CCFAC consider inserting a chapter on the specific conditions to be used in order to protect the health of the consumer following additional scientific advice on exposure assessment in the project document. This would be in compliance with the scope to establish safe conditions of use given in point 1 of the project document.

## 6. Information on the relation between the proposal and other existing Codex documents

We support the proposal to include the Appendix A of CAC/GL 29-1987 (References to Lists of Raw Materials Suitable for the Preparation of Natural Flavors) as Appendix A to the Guidelines as these provides considerable guidance to both Member States and the industry.

## 7. Identification of any requirement for and availability of expert scientific advice

We refer to our comment on point 2 on the current ongoing work by JECFA to look into the method currently used by JECFA to estimate intake of flavouring substances.

## 9. Proposed timeline

We would like the CCFAC to ask for JECFAs advice on the proposed timeline considering the additional work that need to be carried out by JECFA on the intake method. It may be prudent to fix a timeline only when this matter is solved.

## **Appendix II**

Norway welcomes and supports this proposed draft guidelines as a starting point for further work. Depending on the conclusions and recommendations on method for intake assessment by JECFA, an additional chapter on the conditions of use may be necessary.

## 2. Definitions

Norway agrees to the categories of flavourings that are proposed. However, we have some comments on the definitions.

The definition of flavourings includes the phrase “added in small amount”. This is an unclear description that should not be included in the definition.

We propose that the CCFAC consider the following definition of flavourings:

“Flavourings are products, not intended to be consumed as such, which are added to foods in order to impart flavour to food, excluding only salty, sweet or acid tastes. Flavourings may be natural or artificial, and may contain adjuvants.

We do not agree with the last sentence in the definition of adjuvants. If food additives are added to flavourings with an intended technical effect in the finished food, it should be covered in the General Standard for Food Additives (GSFA). We therefore propose that the last sentence of the definition of flavouring adjuvants be deleted.

## 3. General principles for the use of flavourings

### 3.1

The guidelines concern the flavouring substances evaluated by JECFA and shown to be safe at the proposed levels of use. We propose that the following sentence be included: “The use of flavourings should not lead to intake that exceeds the threshold of toxicological concern.”

### 3.3

We propose that this point be aligned with the scope for this guideline and the definition of flavourings reading; “the use of flavourings is justified only when they *impart flavour* to food, provided that such use does not *mislead* the consumer about the nature or quality of the food.

### 3.4.b

We propose this point to read: “the quantity of carriers and flavouring adjuvants should be reduced to the extent reasonably possible; and”

## 4 Flavouring adjuvants

We propose to replace this point with the following:

“Flavourings may contain flavouring adjuvants as a matrix for dissolving or diluting flavourings in food and flavouring adjuvants necessary for production, storage, handling and use of flavourings. The use of flavouring adjuvants should be limited to the lowest levels that are necessary to guarantee the safety and quality of flavourings and to facilitate their storage.

Food additives that are used with flavourings that provide a technical effect in the finished food are additives in the finished food itself and hence may only be used in compliance with the General Standard for Food Additives (GSFA; CODEX STAN 192-1995 Rev. 6 – 2005).”

#### 8. Labelling

In order to avoid misleading the consumer, we would like CCFAC to consider introducing specific provisions to this text or the Codex Committee on Labelling in order to inform the consumer about the source of the natural flavouring.

#### 10 Reference to the evaluations of flavouring substances completed by JECFA

We would like to propose that a list of the described aromatic raw materials suitable for the preparation of natural flavourings be included.