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FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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**Agenda Item 7** **CX/PFV 08/24/9**
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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES**

**24th Session**
**Arlington, VA (Washington DC metro area), U.S.A.,**
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# FOOD ADDITIVE PROVISIONS FOR PROCESSED FRUITS AND VEGETABLES

**(Comments in response to CL 2006/56-PFV)**

**Comments from the European Community and the United States of America**

## EUROPEAN COMMUNITY

**General Comments**: If considering eventual incorporation into the GSFA the EC is of the opinion that products falling under concentrated tomatoes and preserved tomatoes should be added to the Annex to Table 3 of the GSFA as these categories of fruit and vegetable based-products are widely consumed and only need a very limited number of food additives from a technological point of view.

### 1. DRAFT CODEX STANDARD FOR PICKLED FRUIT AND VEGETABLES

**General comments:** the European Community notes that the products of Annex XIII belong to several food categories in the Codex General Standard for Food Additives, namely 04.1.2.3, 04.1.2.10, 04.2.2.3 and 04.2.2.7 for which substantial differences may be observed in term of technologically necessary food additives uses. In particular, the food category 04.2.2.7 is listed in the Annex to Table III, with the consequence that the food additives listed in the Table III are not currently permitted according to the GMP principle (except if mentioned in tables I and II) in this food category.

**Acidity regulators:**

- **Fumaric Acid (INS 297) and Sodium Fumarate (INS 365)**

  Fumaric acid is allocated a numerical ADI by the SCF and its use is therefore restricted to a limited number of applications in the EC. The EC does not support the proposal for inclusion of Fumaric acid in pickled fruits and vegetables.

  Sodium Fumarate is also allocated an ADI of 6 mg/kg by the SCF. For the same reason the EC does not support the inclusion of sodium Fumarate in the pickled fruits and vegetables standard.

- **Adipic acid (INS 355) and its sodium and potassium salts (respectively INS 356 and INS 357)**

  Adipic acid and Adipates are allocated a numerical ADI of 5 mg/kg bw both by the SCF and JECFA and their use is restricted to a limited number of applications within the EC. Therefore, the EC does not support the inclusion of Adipic acid and its sodium and potassium salts in the pickled fruits and vegetables standard.

**Antioxidants**

- **Erythorbic acid (INS 315) and sodium Erythorbate (INS 316)**

  Erythorbic acid and sodium Erythorbate are allocated a numerical ADI of 6 mg/kg bw by the SCF. In order to avoid an exceedance of the ADI, the use of erythorbic acid and its sodium salt is restricted in the EC to a limited number of applications.

  Therefore, the EC does not support the inclusion of Erythorbic acid (INS 315) nor sodium Erythorbate (INS 316) in the pickled fruits and vegetables standard.

**Colours**

- **Curcumin (INS 100i), Tartrazine (INS 102), Quinoline yellow (INS 104), Sunset yellow (INS 110), Carmines (INS 120), Azorubine (INS 122), Amaranth (INS 123), Ponceau 4R (INS 124), Erythrosine (INS 127), Allura Red AC (INS 129), Indigotine (INS 132), Brilliant Blue FCF (INS 133), Fast green (INS 143), Brilliant Black (INS 151), Brown HT (INS 155), Carotenoids (only INS 160e and 160f), annatto extracts (INS 160b), Lutein (INS 161bi), Canthaxanthin (INS 161g), Iron oxides (INS 172i-ii)**

  Most of these food colours are allocated a low ADI (or a very low ADI for Canthaxanthin) by the SCF. As pickled fruits and vegetables are widely consumed in some countries, the use of these colours should be restricted in order to avoid the exceedance of the ADI.

  In addition, the use of these colours in pickled fruits and vegetables could mislead the consumer. Therefore, the EC does not support the inclusion of Curcumin, Tartrazine, Quinoline yellow, Sunset yellow, Carmines, Azorubine, Amaranth, Ponceau 4R, Erythrosine, Allura Red AC, Indigotine, Brilliant Blue FCF, Brilliant Black, Brown HT, carotenoids INS 160e and INS 160f, annatto extracts, Lutein, Canthaxanthin, Iron oxides and Fast green in pickled fruits and vegetables.

- **Lecithin (INS 322)**

  The EC would like to get clarification on the technological need of Lecithin as antioxidant.

**Firming agents**

- **Aluminium Ammonium Sulphate (E 523)**

  The EC notes the recent recommendation from the joint FAO/WHO Expert Committee on Food Additives to lower the Provisional Tolerable Weekly intake for all food additives containing aluminium (from 7 mg/kg bw to 1 mg/kg bw).

  The EC does not support the use of aluminium ammonium sulphate in pickled fruits and vegetables.

**Flavour enhancers**

- **Disodium guanylate, 5' (INS 627), Disodium inosinate 5'(INS 631), Calcium and Disodium ribonucleotides, 5' (respectively INS 634 and INS 635)**

  The EC supports the inclusion of Disodium guanylate, 5', Disodium inosinate 5' and Calcium and Disodium ribonucleotides, 5' in the pickled fruits and vegetables standard, but at the maximum permitted level of 500 mg/kg (expressed as guanylic acid). The technological need of higher maximum levels should be demonstrated.

**Preservatives**

- **Hydroxybenzoates (INS 214, INS 216, INS 218)**

  The EC does not support the application of Hydroxybenzoates in pickled fruits and vegetables and questions the technological need of such preservatives to foodstuffs which are stable after heat treatment. These food additives are not permitted in the EC for such applications.

- **Sulphites**

  The sulphites are allocated a low numerical ADI. Therefore, their use should be restricted in order to avoid the possible exceedance of the ADI. The EC supports the application of sulphites in pickled fruits and vegetables, but at a maximum level of 100 mg/kg (expressed as $SO_2$). This limit has also been considered as appropriate to reach the desired effect according to the adopted standard on pickled fruit and vegetables.

**Sequestrants**

- **Phosphates (INS 338, INS 339i-iii,INS 340i-iii,INS 341i-iii, INS 342i-ii, INS 343i-iii, INS 450i to vii, INS 451i-ii,INS 452i-v, INS 542)**

  The EC does not support the usage of phosphates in pickled fruit and vegetable. None of these food additives are authorised in these foods in the EC. The usage of Phosphates could also mislead the consumer as Phosphates are primarily acting a role of water retention and not as sequestrants.

- **Citric and fatty esters of glycerol (INS 472c), Diacetyltartaric and fatty esters of glycerol (INS 472e)**

  The EC questions the technological need of INS 472c and 472e as sequestrants. These food additives have a primarily function of emulsifiers. The usage of these food additives as sequestrants could mislead the consumer.

**Sweeteners**

- **Sorbitol (INS 420), Maltitol and maltitol syrup (INS 965), Lactitol (INS 966), Xylitol (INS 967), Isomalt (INS 953)**

  The EC supports the use of these food additives in pickled fruit and vegetables, at the maximum levels proposed by the Codex standard, **but only** for general purposes other than sweetening as flavour enhancers or humectants.

- **Acesulfame potassium (INS 950)**

  The EC supports the usage of Acesulfame potassium, acting as a sweetener, in pickled fruits and vegetables but only at a maximum permitted level of 200 mg/kg.

- **Aspartame (INS 951)**

  The EC supports the usage of Aspartame, acting as a sweetener, in pickled fruits and vegetables, but only at a maximum permitted level of 300 mg/kg (instead of 2000 or 2500 mg/kg as proposed).

- **Saccharin (INS 954)**

  The EC supports the usage of Saccharin, acting as a sweetener, in pickled fruit and vegetables, but only at a maximum permitted level of 160 mg/kg

- **Thaumatin (INS 957)**

  The EC does not support the usage of thaumatin in pickled fruit and vegetables.

- **Neotame (INS 961)**

  The use of neotame is not currently permitted in the EC.

- **Aspartame-Acesulfame Salt (INS 962)**

  The EC supports the usage of Aspartame-Acesulfame Salt, acting as a sweetener, in pickled fruit and vegetables, but only at a maximum permitted level of 200 mg/kg (expressed as a acesulfame-K equivalent)

**Comments on Table 3 food additives to be used in pickled fruit and vegetables.**

The EC is of the view that the Commodity Committee should evaluate the technological justification of the use of individual food additives, and list the additives that really achieve the desired effect in the respective food categories. Therefore, we do not support the proposal to allow the use of all the additives used in accordance with Table 3 of the Codex General Standard for Food Additives (CODEX STAN 192).

**2. DRAFT CODEX STANDARD FOR PROCESSED TOMATO CONCENTRATES**

**Acidity regulators**

- **Acetic Acid (INS 260), Malic Acid (INS 296),**

  According to the adopted standard for processed tomato concentrates (CODEX STAN-57-1981), Citric acid and its salts are the only food additives which are justified as acidity regulators from a technological point of view. The EC questions the technological need for inclusion of Acetic Acid and Malic acid as acidity regulators.

- **Lactic Acid (INS 270)**

  Lactic acid (and its salts) should not be authorised on the grounds that one way to determine the quality of a fresh raw material is to analyse the amount of Lactic acid contained in the final product.

- **Fumaric Acid (INS 297) and Sodium fumarate (INS 365)**

  Fumaric acid is allocated a numerical ADI by the SCF and its use is therefore restricted to a limited number of applications in the EC. The EC does not support the proposal for inclusion of Fumaric acid in tomato concentrates.

  Sodium Fumarate is also allocated an ADI of 6 mg/kg by the SCF. For the same reason the EC does not support the inclusion of sodium Fumarate in tomato concentrates.

**3. DRAFT CODEX STANDARD FOR PRESERVED TOMATOES**

**Acidity regulators and firming agents**

- **Phosphates**

  The EC does not support the inclusion of any phosphates mentioned in the draft standard for preserved tomatoes and questions the technological need for such inclusion.

**Comments on Table 3 food additives to be used in preserved tomatoes**

The EC is of the view that the Commodity Committee should evaluate the technological justification of the use of individual food additives, and list the additives that really achieve the desired effect in the respective food categories. Therefore, we do not support the proposal to allow the use of all the additives used in accordance with Table 3 of the Codex General Standard for Food Additives (CODEX STAN 192) as the addition of these food additives will inevitably mislead the consumer.

**4. DRAFT CODEX STANDARD FOR JAMS, JELLIES AND MARMALADES**

EC comments will be prepared in response to **Codex Circular Letter CL 2007/22-PFV.**

**5. DRAFT CODEX STANDARD FOR CERTAIN CANNED VEGETABLES**

EC comments will be prepared in response to **Codex Circular Letter CL 2007/22-PFV.**

**6. DRAFT CODEX STANDARD FOR CERTAIN CANNED CITRUS FRUITS**

The EC position is identical to the previous section related to the draft codex standard for certain canned vegetables.

In addition, The EC would like to provide the following comments concerning Phosphate, Tartrates and Methyl cellulose.

- **Phosphates**

  The EC does not support the inclusion of any phosphates mentioned in the draft standard for canned citrus fruits and questions the technological need for such inclusion.

- **Tartrates**

  The EC questions the technological need for using up to 1 300 mg/kg (expressed as tartaric acid) of tartrates in canned citrus fruits.

- **Methyl cellulose**

  The EC would like to obtain more clarification on the technological function of the Methyl cellulose when added to canned citrus fruits.

**UNITED STATES OF AMERICA**

The United States appreciates the opportunity to respond to CL 2006/56-PFV -Part B: Request for Comments and Information on items 10,11 and 12, which include, *Proposals for Amendments to the Priority List for the Standardization of Processed Fruits and Vegetables (para. 149 and Appendix XI)*; Item 11, *Methods of Analysis for Processed Fruits and Vegetables - Aqueous Coconut Products (para. 156 and Appendix XII)*; and Item 12, *Food Additive Provisions for Processed Fruits and Vegetables (para. 171 Appendix XIII).*

With respect to Item 12, *Food Additive Provisions for Processed Fruits and Vegetables (para. 171 Appendix XIII)*, though the CCPFV agreed to append to the Report of 23rd CCPFV Session a list of food additives for the various standards under consideration for comments on the technological justification for their use and on the proposed levels according to the criteria established in the GSFA, the United States reiterates that the GSFA should be referenced in lieu of individual additives. The lengthy debates over prescriptive allowances and non-allowances of additives and preservatives delays the work of the CCPFV.

To expedite the CCPFV standardization process, the United States recommends general referencing of the GSFA. The United States notes that there are already numerous additives and preservatives referenced that are limited by GMP and do not have quantified, numeric allowances. To date, there are no reports brought to the attention of the CCPFV of the misuse of additives or preservatives whose maximum levels in the manufacturing process are limited by GMP.

Thank you for the opportunity to provide these comments. We look forward to a discussion of these topics at the 24$^{th}$ Session of the Committee.