



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

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Comments in reply to CL 2014/17-PFV on the:

FOOD ADDITIVE PROVISIONS IN CERTAIN STANDARDS FOR PROCESSED FRUITS AND VEGETABLES

Submitted by:

Brazil, Costa Rica, Thailand, United States of America

Brazil

In regard to the aforementioned request, we would like to inform that the additives listed below are used in Brazil for Pickled fruits and vegetables, mushrooms and bamboo shoots:

- a) tartaric acid and tartrates in the functional class of acidity regulators.
- b) propylene glycol alginate in the functional class of stabilizer.
- c) sorbates in the functional class of preservative.

Costa Rica

Costa Rica has examined the document and has no comments. We therefore supports the document.

Thailand

Pickled fruits and Vegetables

Ethylene diamine tetra acetates (INS 385,386) are used as an antioxidants and sequestrants in pickled fruits and vegetables.

Canned Bamboo Shoots

Manufacturers of canned bamboo shoots only use Tartaric acid L (+) (INS 334) form as acidity regulators at a level of 1300 mg/kg as tartaric acid. They never have an experience on the use of other tartrate.

United States of America

General Comments

The United States urges CCPFV to make a general reference to relevant food additive functional classes and the corresponding food categories of the General Standards for Food Additives (GSFA; CODEX STAN 192-1995) in the food additive section of all CCPFV commodity standards instead of the current practice of prescribing food additives. This approach of making a general reference to the GSFA in food additive provisions is a more efficient use of committee resources as it avoids reopening discussions of food additive provisions that have already been evaluated by CCPFV and CCFA and follows the rules of the Codex Procedural Manual - Section II on Elaboration of Codex Standards and Related Texts-Relations between Commodity Committees and General Subject Committees, which instructs that a general reference to the GSFA be made in commodity standards unless there is a technological justification warranting an exception.

Specific Comments:

ANNEX I: Food Additive Provisions for Pickled Fruits and Vegetables

The food additive e-WG report states that “no technological need could be identified” for certain food additives where no comments were received. The U.S. believes that this wording may be misinterpreted to suggest that a conclusion was reached on the technological need of these additives although no review was conducted in the absence of comments. As such, we propose using the more accurate statement instead:

“In the absence of specific comments, the e-WG could not conclude whether or not the food additives newly adopted by the CCFA or in the Step Process were being used and solicits further input/comments on their technological needs.”

We also note that the additive list has been updated by CCFA and have provided the following updated table for CCPFV's reference.

Acidity Regulators

Tables 1 and 2 of the GSFA list the following acidity regulators for food categories 04.1.2.3, 04.1.2.10, 04.2.2.3, and 04.2.2.7:

Food Cat.	INS	GSFA Mainterm	ML	Notes	Step
04.1.2.4	334; 335(i),(ii); 336(i),(ii); 337	Tartrates	GMP 1300 mg/kg	45	Step 7
04.2.2.7	260	Acetic acid, glacial	GMP		Step 4 Adopted 2013
04.2.2.7	300	Ascorbic acid, l-	GMP		Step 4 Adopted 2013
04.2.2.7	170(i)	Calcium carbonate	10000 mg/kg GMP	58	Step 4 Adopted 2013
04.2.2.7	327	Calcium lactate	10000 mg/kg	58	Step 4 Adopted 2013
04.2.2.7	330	Citric acid	GMP		Step 4 Adopted 2013
04.2.2.7	270	Lactic acid, l-, d- and dl-	GMP		Step 4 Adopted 2013
04.2.2.7	504(i)	Magnesium carbonate	5000 mg/kg	36	Step 4 Adopted 2013
04.2.2.7	501(i)	Potassium carbonate	GMP		Step 4 Adopted 2013
04.2.2.7	262(i)	Sodium acetate	GMP		Step 4 Adopted 2013
04.2.2.7	500(i)	Sodium carbonate	GMP		Step 4 Adopted 2013
04.2.2.7	365	Sodium fumarates	GMP		Step 4 Adopted 2013
04.2.2.7	325	Sodium lactate	GMP		Step 4 Adopted 2013
04.2.2.7	350(ii)	Sodium dl-malate	GMP		Step 4 Adopted 2013
04.2.2.7	331(iii)	Trisodium citrate	GMP		Step 4 Adopted 2013

Table 3 of the GSFA lists the following acidity regulators:

INS	Additive Name	INS	Additive Name
330	Citric acid	515(ii)	Potassium hydrogen sulfate (Step 3) Adopted 2014

Antioxidants

Tables 1 and 2 of the GSFA list the following antioxidants for food categories 04.1.2.3, 04.1.2.10, 04.2.2.3 and 04.2.2.7:

Food Cat.	INS	GSFA Mainterm	ML	Notes	Step
04.2.2.7	300	Ascorbic acid, l-	GMP		Step 4 Adopted 2013
04.2.2.7	330	Citric acid	GMP		Step 4 Adopted 2013
04.2.2.7	472c	Citric and fatty acid esters of glycerol	GMP		Step 4 Adopted 2013
04.2.2.7	322(i)	Lecithin	GMP		Step 4 Adopted 2013
04.2.2.7	301	Sodium ascorbate	GMP		Step 4 Adopted at 2014
04.2.2.7	316	Sodium isoascorbate (sodium isoascorbate)	GMP	New Note ¹	Step 4 Adopted at 2014 Step 4
04.2.2.7	325	Sodium lactate	GMP		Step 4 Adopted 2013

Colours

Tables 1 and 2 of the GSFA list the following colours for food categories 04.1.2.3, 04.1.2.10, 04.2.2.3 and 04.2.2.7:

Food Cat.	INS	GSFA Mainterm	ML	Notes	Step
04.2.2	150b	Caramel II - sulfite caramel	80000 mg/kg	92	Step 4
04.2.2	150d	Caramel IV - sulfite ammonia caramel	50000 mg/kg	92, 161	Adopted 2009
04.2.2.7	170(i)	Calcium carbonate	40000 mg/kg GMP	58	Step 4 Adopted 2013

Table 3 of the GSFA lists the following colours:

INS	Additive Name	INS	Additive Name
160d(i)	Lycopene, synthetic (Step 3) <i>(Recommended for adoption at Step 5/8 by the 44th CCFA (REP 12/FA, Apx. VI))</i> Adopted at Step 8, 2012	170(i)	Calcium carbonate
160d(ii)	Lycopene, tomato (Step 3) <i>(Recommended for adoption at Step 5/8 by the 44th CCFA (REP 12/FA, Apx. VI))</i> Adopted at Step 8, 2012	171	Titanium dioxide

¹ **New Note:** For use in pickled radish only.

Firming Agents

Tables 1 and 2 of the GSFA list the following firming agents for food categories 04.1.2.3, 04.1.2.10, 04.2.2.3 and 04.2.2.7:

Food Cat.	INS	GSFA Mainterm	ML	Notes	Step
04.2.2.3	523	Aluminium ammonium sulfate	500 mg/kg 520 mg/kg	6, 245 & 245A ²	Step 3 Adopted 2013
04.2.2.7	509	Calcium chloride	10000 mg/kg GMP	58	Step 4 Adopted 2013

Flavour Enhancers

Tables 1 and 2 of the GSFA list the following flavour enhancers for food categories 04.1.2.3, 04.1.2.10, 04.2.2.3 and 04.2.2.7:

Food Cat.	INS	GSFA Mainterm	ML	Notes	Step
04.2.2.7	634	Calcium 5'-ribonucleotides	GMP	New Note ³	Step 4 Adopted at 2014
04.2.2.7	627	Disodium 5'-guanylate	GMP	New Note ³	Step 4 Adopted at 2014
04.2.2.7	631	Disodium 5'-inosinate	GMP	New Note ³	Step 4 Adopted at 2014
04.2.2.7	635	Disodium 5'-ribonucleotides	GMP	New Note ³	Step 4 Adopted at 2014
04.2.2.7	621	Monosodium l-glutamate	GMP	New Note ³	Step 4 Adopted at 2014
04.2.2.7	508	Potassium chloride	GMP		Step 4 Adopted 2013

Preservatives

Tables 1 and 2 of the GSFA list the following preservatives for food categories 04.1.2.3, 04.1.2.10, 04.2.2.3 and 04.2.2.7:

Food Cat.	INS	GSFA Mainterm	ML	Notes	Step
04.1.2.3	214, 218	Hydroxybenzoates, para-	800 mg/kg 250 mg/kg	27	Adopted 2012
04.2.2.7	260	Acetic acid, glacial	GMP		Step 4 Adopted 2013
04.2.2.7	262(i)	Sodium acetate	GMP		Step 4 Adopted 2013

² Adopted in 2013 with Note 245. At the 46th CCFA (2014), the format of the GSFA notes were revised so similar concepts were expressed in a similar note construct. Consequently, Note 245 was divided into 2 notes: **Note 245**: For use in pickled vegetables only. **Note 245A**: Except for use in perilla in brine at 780 mg/kg. Note 245A will be assigned a new note number for the 2014 update of the GSFA.

³ **New Note**: Except for products conforming to the Standard for Edible Fungi and Fungus Products (CODEX STAN 038-1981).

Sequestrants

Tables 1 and 2 of the GSFA list the following sequestrants for food categories 04.1.2.3, 04.1.2.10, 04.2.2.3 and 04.2.2.7:

Food Cat.	INS	GSFA Mainterm	ML	Notes	Step
04.2.2.7	400	Alginic acid	GMP		Step 4 Adopted 2013
04.2.2.7	330	Citric acid	GMP		Step 4 Adopted 2013
04.2.2.7	472c	Citric and fatty acid esters of glycerol	GMP		Step 4 Adopted 2013
04.2.2.7	262(i)	Sodium acetate	GMP		Step 4 Adopted 2013
04.2.2.7	576	Sodium gluconate	GMP		Step 4 Adopted 2013
04.2.2.7	331(iii)	Trisodium citrate	GMP		Step 4 Adopted 2013

N.B: phosphates were entered twice in the sequestrants table.

ANNEX II: FOOD ADDITIVE PROVISIONS FOR BAMBOO SHOOTS

CODEX STANDARD FOR CANNED BAMBOO SHOOTS (CODEX STAN 241-2007)

4.1 ACIDITY REGULATORS:

The U.S. recommends that tartrates be included in the food additive provisions for bamboo shoots because the functions of all tartrates (INS 334; 335(i), (ii); 336(i), (ii); 337) are acidity regulators and no technological justification has been identified yet to limit the use of tartrates only to tartaric acid (INS 334). Additionally, the CCFA indicates that there is currently a draft (Step 7) provision in food category 04.2.2.4 of 10000 mg/kg, with Note 45 ("As tartaric acid.") for food category 04.2.2.4, which applies to canned bamboo shoots.

Therefore the U.S recommends the following table be used to include tartrates:

INS No.	Name of the Food Additive	Maximum Level
334; 335(i), (ii); 336(i), (ii); 337	Tartrates	1300 mg/kg, as tartaric acid

ANNEX III: FOOD ADDITIVE PROVISIONS FOR CANNED MUSHROOMS

CODEX STANDARD FOR CERTAIN CANNED VEGETABLES (ANNEX ON MUSHROOMS) (CODEX STAN 207-2009)

3. Food Additives (applying to canned mushrooms in particular)

3.2 Only the colour listed below is permitted for use in canned mushroom in sauce.

INS No.	Name of the Food Additive	Maximum Level
150d	Caramel IV - sulfite ammonia caramel	50,000 mg/kg

The U.S. requests that CCPFV consider whether caramel colors other than Caramel IV (INS 150d) could be technologically justified for use in canned mushroom sauce. Although not all colors listed in food category 04.2.2.4 may be technologically justified for use in canned mushrooms in sauce, those approved colors that impart a brown color to canned mushrooms still could be used. For example, Caramel III - ammonium caramel (INS 150c) has been adopted (2010) at 50,000 mg/kg in 04.2.2.4, and Caramel II – sulfite caramel (INS 150b) has a proposed draft (Step 4) provision in 04.2.2 at 80,000 mg/kg. In addition, Caramel I – plain caramel (INS 150a) is a Table 3 additive, and therefore can be allowed for food category 04.2.2.4 in accordance with GMP.

3.3 Flavor Enhancers

The U.S. questions why monosodium L-glutamate is the only flavor enhancer allowed for canned mushrooms. No technical justification has been identified to specify monosodium L-glutamate as the only flavor enhancer to be used in canned mushroom. Several other flavor enhancers, such as are salts of ribonucleotides (including guanine and inosine), are allowed and listed in Table 3 of the GSFA.

4 FOOD ADDITIVES (Applying to canned vegetables in general)

4.2 Colours;

Since no technological justification has been identified, the U.S. questions limiting the colors in Tables 1 and 2 of the GSFA to the four colors in this table.

4.3 Colour Retention Agents

The U.S. notes that the maximum level for EDTAs (INS 385 and 386) should be reported on the same basis as the JECFA ADI – that is, “as anhydrous calcium disodium ethylenediamine tetraacetate.” This is also consistent with the reporting basis in the GSFA (Note 21).