

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
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Agenda Item 4b

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS: REPORT OF THE ELECTRONIC WORKING GROUP ON ALIGNMENT

(Comments of Australia, Ghana, India, Malaysia, Thailand)

Australia

Australia thanks Canada, the United States of America and Japan for chairing the Electronic Working Group (EWG) and preparing CX/FA 25/55/6, relating to the alignment of the food additive provisions of commodity standards with the GSFA. Australia supports Canada's approach and the Chair's proposals for aligning the commodity standards with the GSFA. Australia has a small number of minor errors and suggestions which are provided below.

The comments are listed to the relevant section of the document.

Annex 1 – Explanatory document

Issue 7 related to FC 02.1.2 Chair's final proposals (page 11)

Australia supports the Chair's proposals 1 and 2.

However it disagrees with the subsequent suggestion initiated by Japan to replace notes 508 and 509 with the exclusion note XS19 for all colour provisions within FC 02.1.2.

This is because the important condition requirements within the original CXS 19-1981 permitted the addition of colors for the purposes of restoring natural color lost in processing, or standardising color only. These allowances seem important to ensure consistency with the original intent of the standard. If XS19 is also added to the other exclusion notes than colors would only be permitted for non-standardised products without any conditions about how they can be added.

Annex 2 (CCASIA)

Amendment to alignment statement to go into CXS 298R-2009 (Fermented soybean paste) (page 17)

Australia suggests the standard Procedural Manual wording (paragraph 92 in the 29th edition) should be used in the sentence. That is 'used in' should be removed so that the amended sentence would read (highlighted the suggested amendment):

Acidity regulators, antioxidants, colours, ~~flavours enhancers~~, preservatives, ~~stabilizers~~ and sweeteners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 12.9.1 Fermented soybean paste (e.g., miso) ~~or~~ and acidity regulators, antioxidants, colours, flavours enhancers, preservatives, stabilizers and sweeteners **used in listed in Table 3 of the GSFA are acceptable for use in foods conforming to this standard.**

Amendment to alignment statement to go into CXS 355R-2023 (Cooked rice wrapped in plant leaves) (page 21)

Similar to above a slight amendment to the sentence is suggested where the word 'or' is removed.

Colours and stabilizers used in accordance with Table 1 and Table 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 06.7 "pre-cooked or processed rice products, including rice cakes (Oriental type only)" and acidity regulators, antioxidants, colours, **emulsifiers, flavour enhancers**, preservatives, stabilizers, ~~emulsifiers, flavour enhancers~~ and thickeners, ~~or~~ **listed** as indicated in Table 3 of

the *General Standard for Food Additives* (CXS192-1995) are acceptable for use in foods conforming to this standard.

Proposed entries to tables within section 2 of Table 3 (pages 38 & 39)

From checking the latest version of the GSFA Australia thought that some of the proposed entries due to Alignment are new entries so some of them need to be bold and underlined to make the proposed changes explicit.

Australia considered the entries to be for food categories and standards:

- 06.7 (CXS 355R-2023)
- 06.8.1 (CXS 322R-2015)
- 06.8.2 (CXS 322R-2015)
- 06.8.3 (CXS 322R-2015)
- 06.8.4 (CXS 322R-2015)
- An additional entry to CXS 6.8.6 (CXS 354R-2023)
- 12.9.1 (CXS 298R-2009)

<u>06.7</u>	<u>Pre-cooked or processed rice products, including rice cakes (Oriental type only)</u>
	<u>Acidity regulators, antioxidants, colours, emulsifiers, flavour enhancers, preservatives, stabilizers and thickeners listed in Table 3 are acceptable for use in foods conforming to the standard.</u>
<u>Codex Standard</u>	<u>Cooked Rice Wrapped in Plant Leaves (CXS 355R-2023)</u>

<u>06.8.1</u>	<u>Soybean-based beverages</u>
	<u>Acidity regulators, antioxidants, colours, emulsifiers, flavour enhancers, stabilizers and sweeteners listed in Table 3 are acceptable for use in composite/flavoured soybean beverages and soybean-based beverages only, conforming to the standard.</u>
<u>Codex Standard</u>	<u>Non-Fermented Soybean Products (CXS 322R-2015)</u>

<u>06.8.2</u>	<u>Soybean-based beverage film</u>
	<u>Preservatives listed in Table 3 are acceptable for use in foods conforming to the standard.</u>
<u>Codex Standard</u>	<u>Non-Fermented Soybean Products (CXS 322R-2015)</u>

<u>06.8.3</u>	<u>Soybean curd (tofu)</u>
	<u>Acidity regulators, firming agents and stabilizers listed in Table 3 are acceptable for use in soybean curd conforming to the standard.</u>
	<u>Acidity regulators and firming agents listed in Table 3 are acceptable for use in semisolid soybean curd conforming to the standard.</u>
<u>Codex Standard</u>	<u>Non-Fermented Soybean Products (CXS 322R-2015)</u>

<u>06.8.4</u>	<u>Semi-dehydrated soybean curd</u>
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	<u>Acidity regulators, firming agents and preservatives listed in Table 3 are acceptable for use in foods conforming to the standard.</u>
<u>Codex Standard</u>	<u>Non-Fermented Soybean Products (CXS 322R-2015)</u>

06.8.6	Fermented soybeans (e.g. natto, tempe)
	Food additives are not permitted for use in products conforming to this standard.
<u>Codex Standard</u>	Tempe (CXS 313R-2013) (regional standard) <u>Soybean Products Fermented with Bacillus Species (CXS 354R-2023)</u>

<u>12.9.1</u>	<u>Fermented soybean paste (e.g. miso)</u>
	<u>Acidity regulators, antioxidants, colours, flavour enhancers, preservatives, stabilizers and sweeteners listed in Table 3 are acceptable for use in foods conforming to the standard.</u>
<u>Codex Standard</u>	<u>Fermented Soybean Paste (CXS 298R-2009)</u>

Annex 3 (CCNE)

Proposed entries to tables within section 2 of Table 3 (page 61)

Similar to the comments above related to Annex 2 (CCASIA) Australia suggests that some slightly different entries be made to the tables within section 2 of Table 3.

However, it notes that what the Chair has proposed is a new standalone entry for FC 04.2.2.4. Australia wonders if it could be incorporated with the table that already exists. Australia notes this is a minor suggestion as it may depend on Codex Secretariat's preferred approach for writing these Tables, either combining entries into one table or adding new standalone tables to make their understanding easier.

Australia's alternative suggestions are provided below for consideration.

04.2.2.4	Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds
	Firming agents listed in Table 3 and certain other Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to the standards.
<u>Codex Standard</u>	Preserved Tomatoes (CODEX STAN <u>CXS</u> 13-1981)
	Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to the standards.
<u>Codex Standard</u>	Processed tomato concentrates (CODEX STAN <u>CXS</u> 57-1981) <u>Regional Standard for Canned Humus with Tehena (Near East) (CXS 257R-2007)</u> <u>Regional Standard for Canned Foul Medames (CXS 258R-2007)</u>

Australia suggests that the two current entries for FC 04.2.2.6 could be combined into one as below.

04.2.2.6	Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g. vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5
	Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards.
Codex Standard	Processed tomato concentrates (CODEX STAN <u>CXS</u> 57-1981)
	Food additives are not permitted in products conforming to <u>these standards</u>
Codex Standard	Harissa (Red Hot Pepper Paste) (CXS 308R-2011) <u>Regional Standard for Tehena (Near East) (CXS 259R-2007)</u>

Ghana

ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS: REPORT OF THE EWG ON ALIGNMENT (CX/FA 23/53/6)

1. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR DRIED OREGANO (CXS 342-2021)

Position: Ghana supports amendments to Section 4 of the standard as proposed with the term “ground.”

Rationale: The amendment aligns with the GSFA, which serves the purpose of the alignment work.

2. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBS: DRIED OR DEHYDRATED GINGER (CXS 343-2021)

Position: Ghana supports the proposed amendments to the additives provision. We also support the addition of “ground” to the provision.

Rationale: The standard makes provisions for additives contained in the GSFA. The proposed addition of “ground” is consistent with the wording in the standard.

3. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR DRIED FLORAL PARTS: CLOVES (CXS 344-2021)

Position: Ghana supports the adoption of the proposed alignment including proposed addition of “ground”.

Rationale: The proposed addition of “ground” is consistent with the wording in the standard.

4. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR DRIED FLORAL PARTS: CLOVES (CXS 344-2021)

Position: Ghana supports the addition of “ground” to the provision.

Rationale: The proposed addition of “ground” is consistent with the wording in the standard.

5. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR DRIED BASIL (CXS 345-2021)

Position: Ghana supports the proposed amendments to Section 4 of the standard and the inclusion of the term “ground”.

6. Rationale: The proposed addition of “ground” is consistent with the wording in the standard. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR DRIED OR DEHYDRATED GARLIC (CXS 347-2019)

Position: Ghana supports the inclusion of the term “ground”.

Rationale: The proposed addition of “ground” is consistent with the wording in the standard.

7. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR DRIED SEEDS—NUTMEG (CXS 352-2022)

Position: Ghana supports the inclusion of the term “ground”.

Rationale: The proposed addition of “ground” is consistent with the wording in the standard..

8. **PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR DRIED OR DEHYDRATED CHILLI PEPPER AND PAPRIKA (CXS 353-2022)**

Position: Ghana supports the inclusion of the term “ground”.

Rationale: The proposed addition of “ground” is consistent with the wording in the standard. **PROPOSED AMENDMENTS TO TABLE ONE OF THE GSFA FOR THE ALIGNMENT OF THE CCSCH COMMODITY STANDARDS**

Position: Ghana supports the proposed amendments to the GSFA Food Categories (FCs) 12.0, 12.2 and 12.2.1. for adoption. We also support the recommendation to maintain draft and proposed draft food additive provisions that are in the Codex Step process at their current steps to allow for the completion of the work of the eWG on GSFA.

Rationale: The proposed amendments ensure that latest updates are aligned to GSFA.

9. **PROPOSED AMENDMENTS TO TABLE TWO OF THE GSFA FOR THE ALIGNMENT OF CXS 19-1981**

Position: Ghana supports proposed amendments to food category 02.1.2

Rationale: The proposed amendments ensure the inclusion of the latest updates to GSFA.

India

ISSUES RELATED TO CCSCH STANDARDS-

4. Sulfites with bleaching agent function in products conforming to the Standard for Dried Roots, Rhizomes and Bulbs: Dried or Dehydrated Ginger (CXS 343-2021)

As per working procedure of CCFA, the technological justification for use of any additives in the commodity is provided by the concerned Commodity Committees, when such Commodity Committees are active. As this issue is also covered in the chair's final proposal at serial number (2). India suggests that, this agenda be referred to CCSCH for their comment and clarification.

India supports Chair's final proposal to refer this agenda to CCSCH for possible general principle of expanding provisions to all food additives in a group that share an appropriate technological functions.

5. Herbs in Food Category 12.2.1 “Herbs and spices” are in the Annex to Table 3, while Spices are not

India supports chairs final proposals i.e.,

- (1) Alignment should proceed as though herbs are in the Annex to Table 3, while spices are not (i.e., status quo)
- (2) CCSCH will be consulted on the wording of the general reference to the GSFA in the Standards template.

6. Consider whether a change should be made to the Annex to Table 3 of the GSFA to treat herbs and spices the same

India Supports, Chair's final proposal to consult CCSCH and take appropriate actions in future CCFA meetings

12. Change to the wording in the References to Commodity Standards for GSFA Table 3 Additives for the Food Category 12.2.1 entry

India Supports, Chair's final proposal to amend the text in the References to Commodity Standards for GSFA Table 3 Additives for Food Category 12.2.1, to reflect actual allowance in spices, so that the entry reads “Herbs and spices (~~EXCLUDING ONLY SPICES~~).”

13. Amend Notes 532 and 534 to reflect functional class use as a preservative and as an anti caking agent, respectively; and Note 534 to also clarify use in spices from FC 12.2.1

India supports Chair's final proposal to amend Note 532 and 534 to include “as a preservative” and “as an anticaking agent”, respectively, for accuracy and consistency.

Note 532 would then read “For products conforming to the Standard for Black, White and Green Peppers (CXS 326-2017), only sulfur dioxide (INS 220) may be used and only in green peppers **as a preservative**.”

Note 534 would then read “For herbs use is limited to herbs that have been ground or processed into powder only, as an anticaking agent.”

14. Maintain consistency in Alignment of Standardized Herbs and Spices between Standards, correction to GSFA in regard to previously Aligned CXS 326-2017

India supports Chair’s final proposal to add XS326 Notes to all Table 3 anticaking agents entries in Tables 1 and 2 for Food Category 12.2.1.

Malaysia

Annex 1

ISSUES RELATED TO PROVISIONS IN GSFA FOOD CATEGORY 02.1.2

7. Revision of Note 508 to better reflect provisions of CXS 19-1981

Malaysia would like to highlight that the CXS 19-1981 (Standard for Edible Fats and Oils not Covered by Individual Standards) applies to all vegetable fats and oils that are not covered by specific standards developed by CCFO. Under this standard, vegetable fats may be added with colours in accordance with the provisions of this standard.

For example, vanaspati falls under Food Category 02.1.2. Since there is no specific standard for vanaspati, it falls under CXS 19-1981. This aligns with the decision made at the 35th Session of CCFA in 2012, which agreed on the use of carotenoid colors in FC 2.1.2, including vanaspati, with the addition of a new note: “Only for use in vegetable fats conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981), singly or in combination”.

Therefore, Malaysia supports the proposal to revise Note 508 and deletion of Note 509. However, Malaysia disagrees with the proposed addition of Note XS19 to this food category.

Thailand

Alignment of the food additive provisions of commodity standards: Report of the Electronic Working Group on Alignment (CX/FA 25/55/6)

Thailand would like to thank Canada and the United States of America and Japan for leading the Electronic Working Group (EWG) on the alignment of the food additive provisions of the commodity standards with the GSFA. We are pleased to provide our comments on the Annexes 1 and 2 as follow:

Annex 1: Explanatory document – questions, comments and chair’s proposals for the EWG for CCMMMP, and the issues associated with the alignment of CCPFV and regional commodity standards (Page 10)

Issues related to provisions in GSFA food category 02.1.2

Regarding the revision of the Note 508 and 509 or replacement with Note XS19 related to all colour provisions in FC 02.1.2, we would like to propose that such a change should be presented to the CCFO for consideration to ensure compliance with the food additive provisions of the Standard for Edible Fats and Oils not Covered by Individual Standards (CXS 19-1981).

Annex 2: Proposed amendments to the food additive provisions of the regional commodity standards for CCASIA and to tables 1, 2 and 3 of the GSFA relating to the alignment of those standards (CXS 298R-2009; CXS 301R-2011; CXS 322R-2015; CXS 354R-2023; CXS 355R-2023) (Page 35)

Proposed amendments to table two of the GSFA for the alignment of the CCASIA regional commodity standards

PROPOSED AMENDMENTS TO FOOD CATEGORY 06.8.4

Amendments related to the Regional Standard for Non-Fermented Soybean Products (Asia) (CXS 322R-2015)

Regarding the proposed amendment to the food additive provisions in FC 06.8.4 related to the Regional Standard for Non-Fermented Soybean Products (Asia) (CXS 322R-2015) (page 35), there appears to be an editorial error that “paprika extract (INS 160c(ii))” should be replaced with “sodium diacetate (INS 262(ii))”.