



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

GSFA: PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS (REPLIES TO CL 2024/58-FA)

(Comments of Australia, Indonesia, Kenya)

Australia

China

Australia has specific comments to China's proposal seeking to add provision of the commodity standard CXS 249-2006 (Standard for instant noodles) linked to the entry of glycerol (INS 422) in Table 3. This would be to add CS 249-2006 into column 5 of the glycerol entry in Table 3.

Additionally China seeks an additional phase ('**with or without specific functional classes**') into the last dot point in the *Explanatory Note: Determining the Use of Table 3 Additives in Foods Covered by Commodity Standards based on the Revised Approach* below Table 3. That is, that this note should read:

- If the text indicated that "only certain Table 3 food additives (as indicated in Table 3) **with or without specific functional classes**" are permitted for use in foods covered by the commodity standard, then the user may refer to column 5 of Table 3 where the commodity standard number will be listed for the particular Table 3 food additives that are permitted for use in the commodity standard.

Australia considers that more justification for both proposed changes are required before it can support these requests.

1. Glycerol entry

In relation to adding CXS 249-2006 to the glycerol provision in Table 3 there is a lack of technological justification for why the provision should be made. Australia notes that if accepted by the committee this request will be further considered by the EWG for the GSFA but Australia suggests more justification should be provided before it could be added to the list for consideration.

2. Explanatory note amendment

Separately Australia is also unclear what the justification for adding the new phrase 'with or without specific functional classes' to the dot point within the Explanatory Note below Table 3 as the case does not appear to have been made why this is important and what is the purpose for adding the phrase.

Australia notes that a lot of work was conducted within the Alignment EWG/PWG in revising the approach for the provision of Table 3 food additives, by the US delegation several years earlier. This work simplified and shortened Table 3, as well as developing the current footnotes and the Explanatory Note below Table 3. This work occurred over several CCFA meetings within various Alignment documents and reports.

Australia identified some of these more critical reports that explained how Table 3 was simplified at that time. The most important one is Appendix 5 within CX/FA 18/50/6¹ (agenda item 4(b) Alignment) for the CCFA50 meeting in

¹ https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-50%252FWD%252Ffa50_06e.pdf

2018. This was copied into CRD3² Annex 4 as the outcome of the PWG on Alignment at the meeting. Unfortunately the Explanatory Note was not copied into CRD03 but it is the current Explanatory Note below Table 3, and was provided in CX/FA 18/50/6 Appendix 5.

Australia does not believe adding the proposed phase 'with or without specific functional classes' to the last dot point in the current Explanatory Note is needed or appropriate. Provisions to the Table 3 food additives are linked to one or other of the functional classes listed in the entry for the food additive.

International Food Additives Council (IFAC)

Australia notes the request of the IFAC.

However, the complication that Australia has noted is that food additive sucroglycerides (INS 474) does not have a functional class or technological purpose as a glazing agent unlike the other two food additives, INS 473 and 473a, within the food additive group of sucrose esters. Its only functional class is as an emulsifier. This is from the current version of CXG 36-1989. This situation would therefore require different provisions and notes to those proposed.

Indonesia

Glycerol:

Indonesia agrees with China's proposal to add the codex standard number 249-2006 (CXS 249-2006) into Column 5 of table 3 for the food additive "Glycerol".

Kenya

Comment: Kenya supports revision of an existing provision in Table 3 of the GSFA for Glycerol as humectant/thickener and new provision for Potassium sorbate under the specific food categories as proposed by China and South Africa, respectively.

Kenya notes and appreciates the submission by IFAC of Sucrose Esters as a glazing agent.

Noting the current provisions in GSFA for Food additives under F.C 13, Kenya proposes that the assessment of food Additives provisions be based on the processed form of the product 'as is' and not as 'ready to use product' after reconstitution.

Justification: Expressing the levels based on the form of the product as processed will make it easy for regulatory authorities to determine the amount of additives in a product without the need to reconstitute.

² https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-50%252FCRDs%252Ffa50_CRD03x.pdf