

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

PROPOSED DRAFT REVISION TO THE CLASS NAMES AND THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CXG 36-1989)

(Comments of Ghana, Kenya, Mexico, Nigeria, Republic of Korea, Russian Federation, African Union, East African Community)

Ghana

PROPOSED DRAFT REVISION TO THE CLASS NAMES AND THE INTERNATIONAL NUMBERING SYSTEM (INS) FOR FOOD ADDITIVES

Position: Ghana supports the proposed changes to the INS list as presented in the Annex to CX/FA 24/55/9 including the footnote clarifying the exact name as well as the update of the Information document/table on INS for deleted and re-used numbers with the deletion of INS 231 and INS 232.

Kenya

Comment: Kenya appreciates the work done by the EWG, chaired by Belgium and co-chaired by Iran, in collating the proposals for change and/or addition to Section 3 of the Class Names and International Numbering System for Food Additives (CXG 36-1989).

Kenya supports

- proposed inclusions and deletions as proposed in the annex of the INS EWG report.
- Addition of 'Jagua blue' as a synonym of name of INS 183 Jagua (genipin-glycine) blue as proposed in the annex of the EWG report

Kenya proposes that CCFA55 recommends deletion of azodicarbonamide (INS 927a) from CXG 36-1989

Justification: Considering that azodicarbonamide (INS 927a) was deleted from GSFA on the basis of safety, it would be appropriate to delete it from CXG36-1989 to avoid introducing interpretation challenges among member countries especially those using GSFA as the reference document for regulatory purposes.

Mexico

Tema 6 Anteproyecto de revisión de Nombres genéricos y sistema internacional de numeración de aditivos alimentarios

CX/FA 25/55/9

Tema 6 Documento-Descripción	Comentarios	
1. Documento CX/FA 25/55/9 A. Respuestas a la carta circular CL 2024/57-FA sobre adiciones y cambios al SIN Adición de "azul de Jagua" como sinónimo del nombre del SIN 183 azul de Jagua (genipina-glicina)	a. México apoya la adición del sinónimo "azul de jagua" sin cambiar el nombre actual, de conformidad con el regulación nacional en el <i>Acuerdo por el que se determinan los aditivos y coadyuvantes en alimentos, bebidas y suplementos alimenticios, su uso y disposiciones sanitarias.</i>	
	32. AZUL DE JAGUA (genipina-glicina)	
	No. CI:	SIN 183

	Sinónimos: Azul de jagua		
	Categoría/Subcategoría de alimento	Límite máximo mg/kg	Observaciones
	...	...	...
	b. En la declaración de aditivos utilizados en la producción de productos preenvasados debe utilizarse el nombre común o en su defecto, alguno de los sinónimos, establecidos en el Acuerdo, por lo que el uso de sinónimo “azul de jagua” se encuentra permitido.		
2. Documento CX/FA 25/55/9 II. Eliminación de ortofenilfenol (SIN 231) y ortofenilfenol de sodio (SIN 232).	En México no se permite el uso de ambos aditivos, por lo que apoyaría la eliminación del SIN.		
3. Documento CX/FA 25/55/9 B. Eliminación de azodicarbonamida (SIN 927a)	México permite el uso de azodicarbonamida SIN 927a, por lo que apoya la recomendación de añadir este punto en cinco años, para investigar si ha llegado el momento de eliminar este aditivo del SIN.		

Nigeria

Nigeria supports the proposed changes and deletions as presented in the annex Part 1 of CXG 36-1989.

Republic of Korea

1. The Republic of Korea supports to add 'Jagua blue' as a synonym for INS 183 'Jagua (genipin-glycine) blue.'
2. The Republic of Korea supports to delete the INS 231(Ortho-phenylphenol) and INS 232(Sodium ortho-phenylphenol).
3. The Republic of Korea supports of the INS for Azodicarbonamide (INS 927a) be retained, as some countries use it as a food additive.

Russian Federation

- 1) The Russian Federation supports proposals the proposal to add the function of glazing agent to the Oxidised polyethylene wax.
- 2) We agree with the EWG Chair's proposal not to add Phycocyanin from *Bacillus subtilis* and Phycocyanin from *Escherichia coli* to the INS. Phycocyanins are biologically active substances that have a pronounced effect on metabolism. Such products of microbial synthesis are considered as new food products and must be assessed in terms of risks for consumer health with the development of specifications taking into account possible changes in the properties of producer strains and the phycocyanins they produce.

African Union

Position: African Union supports the recommendations proposed by the Electronic Working Group (EWG) for revisions to the Class Names and International Numbering System for Food Additives (CXG 36-1989). Specifically, they agree with:

1. The addition of "Jagua blue" as a synonym for INS 183 to simplify labeling and enhance consumer understanding.
2. The deletion of ortho-phenylphenol (INS 231) and sodium ortho-phenylphenol (INS 232) from the INS list, as these substances are no longer used as food additives and pose toxicity risks to human health.
3. The future deletion of azodicarbonamide (INS 927a) from CXG 36-1989, aligning with its removal from the General Standard for Food Additives (GSFA) due to safety concerns. AU further proposes that CCFA55

recommend this deletion to prevent regulatory interpretation challenges among member countries, particularly those relying on GSFA as a reference document.

Rationale: The addition of "Jagua blue" as a synonym for INS 183 streamlines labeling practices, improving clarity for consumers. The deletion of ortho-phenylphenol and sodium ortho-phenylphenol is justified by their toxicity and discontinued use in food. The proposed removal of azodicarbonamide (INS 927a) from CXG 36-1989 is consistent with its deletion from the GSFA, in relation to safety concerns and ensuring regulatory coherence across Codex texts. This alignment will prevent potential inconsistencies and interpretation challenges for member countries, particularly those using GSFA as a regulatory benchmark.

East African Community

Comment: EAC appreciates the work done by the EWG, chaired by Belgium and co-chaired by Iran, in collating the proposals for change and/or addition to Section 3 of the Class Names and International Numbering System for Food Additives (CXG 36-1989).

EAC also supports the EWG recommendations for CCFA55 to consider:

- The addition of "Jagua blue" as a synonym for INS 183 to simplify labelling and enhance consumer understanding.
- The deletion of ortho-phenylphenol (INS 231) and sodium ortho-phenylphenol (INS 232) from the INS list, as these substances are no longer used as food additives and pose toxicity risks to human health.
- The future deletion of azodicarbonamide (INS 927a) from CXG 36-1989, aligning with its removal from the General Standard for Food Additives (GSFA) due to safety concerns

Rationale: The addition of "Jagua blue" as a synonym for INS 183 streamlines labelling practices, improving clarity for consumers. The deletion of ortho-phenylphenol and sodium ortho-phenylphenol is justified by their toxicity and discontinued use in food. The proposed removal of azodicarbonamide (INS 927a) from CXG 36-1989 is consistent with its deletion from the GSFA, in relation to safety concerns and ensuring regulatory coherence across Codex texts. This alignment will prevent potential inconsistencies and interpretation challenges for member countries, particularly those using GSFA as a regulatory benchmark.