

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

DISCUSSION PAPER ON THE WORKING PRACTICES AND THE ENGAGEMENT PLAN TO AVOID DIVERGENCE BETWEEN THE GSFA, COMMODITY STANDARDS AND OTHER RELATED CODEX TEXTS

(Comments of India, Indonesia, Kenya, Malaysia, Republic of Korea, Russian Federation, African Union, East African Community)

India

India appreciates the work done by China and Australia, Brazil, Canada, the European Union, Senegal and the United States of America.

India supports option-2 as appropriate strategy to avoid divergence between The GSFA, Commodity Standards and other related Codex texts. Further work can be initiated in this direction.

Indonesia

Regarding the future working practices for the incorporation and endorsement of food additive provisions for commodity and regional committees, Indonesia supports option 1 (Commodity/Regional Committee prepares the first draft of the provisions) for the development of food additive provisions relating to commodity/regional standards.

Kenya

Kenya appreciates the work done by the author (China), and co-authors (Australia, Brazil, Canada, the European Union, Senegal and the United States of America) of the discussion paper presented as CX/FA 25/55/12 and agrees with the progress made. For improvement, Kenya proposes the following:

Annex 1

Para 2- Comment : Kenya supports the provision of food categories by the commodity committees and regional committees to the CCFA for development and updating of the GFSA.

Justification : This will increase the one-to-one relationship between commodity committees and CCFA.

Para 3- Comment : Kenya supports the determination of functional classes and further restrictions appropriate for different foods captured in the standard to be considered for CCFA.

Justification : This information will be critical in determining the food additives to be considered.

Para 6- Comment: Kenya proposes collaboration between the CCFA and the commodity/regional committees in the provision of technological functions of Food Additives for consideration.

Justification: This will enhance collaboration and feedback between CCFA and the commodity/regional committees in the provision of technological functions for Food A.

Annex 2

Additional Para: Between para 5 & 6: The commodity/regional committees should be informing the CCFA of issues related to FA at step 4

Justification: The inclusion will ensure that CCFA and regional/commodity committees work on the FA provision in good time to avoid delay in progression of the standard.

Malaysia

Malaysia supports Option 2, in which CCFA takes the lead in preparing the first draft of the provisions for amendments to the General Standard for Food Additives (GSFA), based on request and information on proposed food additive provision, by the Commodity/Regional Committees. Malaysia notes from the alignment exercise thus far, changes in GSFA due to alignment with commodity/regional committee's standards sometimes require consequential changes to food categories that is not relevant to the aligned standard, introduction of new notes and new structure for Table 3. GSFA expert then has better understanding and more experience dealing with different scenarios.

Allowing CCFA to develop the amendments based on standardized information provided by Commodity/Regional Committees would also ensure a structured and efficient process, possibly can shorten the timeline since CCFA meets on yearly basis. We also acknowledge the importance of collaboration between CCFA experts and commodity experts, particularly for complex cases, to minimize unnecessary iterations between Committees and streamline the amendment process. Furthermore, this approach promotes clear and transparent decision-making by keeping Commodity/Regional Committees informed of GSFA amendments while providing an avenue to address any substantive concerns effectively.

Republic of Korea

The Republic of Korea supports Option 2, in which CCFA prepares the first draft of the provisions, ensuring efficiency.

Russian Federation

The Russian Federation supports *Option 2 – CCFA prepares the first draft of the provisions*. We believe that this option allows for the consideration of countries' opinions on establishing priorities for food additives provisions review and establishment and adds greater transparency to CCFA procedures. Such an approach seems to contribute to a better assessment of the food additives daily intake from all food sources, which is a key safety requirement.

African Union

Position: African Union appreciates the work done by China, and co-chairs Australia, Brazil, Canada, the European Union, Senegal and the United States of America in preparing the discussion paper presented as CX/FA 25/55/12 and agrees with the proposals made.

Rationale: Enhancing collaboration between commodity committees, regional committees, and the Codex Committee on Food Additives (CCFA) will strengthen alignment and efficiency in developing food additive provisions by integrating GSFA and commodity experts early in the process. This approach will improve coordination and information exchange through structured engagement, and ensure that technological justifications for food additives are well understood and incorporated from the outset, while minimizing delays and redundant reviews by streamlining discussions and expediting the development and adoption of provisions. Ultimately, closer collaboration between CCFA and commodity/regional committees will support harmonized decision-making, promoting consistency across Codex texts and reducing the risk of regulatory divergence, thereby fostering global harmonization in food additive standards.

East African Community

EAC Position

General comment: EAC appreciates the work done by the author (China), and co-authors (Australia, Brazil, Canada, the European Union, Senegal and the United States of America) of the discussion paper presented as CX/FA 25/55/12 and agrees with the progress made. For improvement, EAC proposes the following:

Annex 1

Para 2- Comment: EAC supports the provision of food categories by the commodity committees and regional committees to the CCFA for development and updating of the GSFA.

Rationale: This will increase the one-to-one relationship between commodity committees and CCFA.

Para 3- Comment: EAC supports the determination of functional classes and further restrictions appropriate for different foods captured in the standard to be considered for CCFA.

Rationale : This information will be critical in determining the food additives to be considered.

Para 6- Comment: EAC proposes collaboration between the CCFA and the commodity/regional committees in the provision of technological functions of Food Additives for consideration.

Rationale: This will enhance collaboration and feedback between CCFA and the commodity/regional committees in the provision of technological functions for Food A.

Annex 2

Additional Para: Between para 5 & 6 Comment: The commodity/regional committees should be informing the CCFA of issues related to FA at step 4

Rationale: The inclusion will ensure that CCFA and regional/commodity committees work on the FA provision in good time to avoid delay in progression of the standard.