

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5a and 5b

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

(Comments of Nigeria, Republic of Korea, Russian Federation, African Union, East African Community,
International Daily Federation)

Nigeria

Agenda Item 5 (a)

CX/FA 25/55/7

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE ELECTRONIC WORKING GROUP ON THE GSFA

1. Category No 01.2.1 (Revocation of the adopted provision for Annatto extracts, bixin-based (INS 160b(i)) in FC 01.21 -Fermented Milks (Plain)

Nigeria supports the revocation of the adopted provision for Annatto Extracts in FC 01.2.1

Rationale

Plain food categories should not contain food color, so plain Fermented Milks having Annatto Extracts is a likely error.

2. Category No. 02.2.2 (Fat spreads, dairy fat spreads and blended spreads)

Nigeria accepts the proposal of the Chair to adopt 40mg/kg with note 39 and note XS256 on the use of Paprika Extracts

Republic of Korea

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE ELECTRONIC WORKING GROUP ON THE GSFA

[CX/FA 25/55/7 Appendix 1] Colours in FCs 01.0 through to 08.0 and their subcategories

Annex3 Draft and proposed draft provisions for colours and adopted provisions for colours with Note 161 in food categories 01.0 through 08.0 and their subcategories – EWG on the GSFA to CCFA55

Food Category No. 04.1.1.2 (Surface treated fresh fruit)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	20	4,16 & 185	4	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.
BEET RED	162	GMP	4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.
CARAMEL I - PLAIN CARAMEL	150a	GMP	4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.
CHLOROPHYLLS	140	GMP	4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.
CURCUMIN	100(i)	500	4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.

Category No. 04.1.2.4 (Canned or bottled (pasteurized) fruit)

Additives	INS	Max Level	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
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		(mg/kg)					
AMARANTH	123	200		7	Colour	Discontinue	It is permitted at 500 mg/kg in the Republic of Korea under this FC.
BRILLIANT BLUE FCF	133	200	161 & 267	2018	Colour	Revise adopted provision - Remove Note 161 -Maintain use level at 200 mg/kg -Maintain Note 267 ("Excluding products conforming to the Standard for Certain Canned Fruits (CXS 192 319-2015) except for use in special holiday packs for canned pears conforming to the standard." -add New Note "For use with red fruits only" -Add Notes XS17, XS60, XS62, XS78, XS99, XS242 and XS254	It is permitted at 500 mg/kg in the Republic of Korea under this FC.
ERYTHROSINE	127	200	54 & 161	6	Colour	Revise adopted provision -Remove Note 161 -Revise Note 54 to state: "For use only in non-standardized cocktail cherries and candied cherries, artificially coloured cherries conforming to the Standard for Canned Fruit Cocktail (CXS 78-1981), and sweet cherries conforming to the Standard for Canned Stone Fruits (CXS 242-2003)." -Add XS17, XS254 and XS319	supports the adoption at 200 mg/kg.
PONCEAU 4R (COCHINEAL RED A)	124	300	161 & 267	2018	Colour	Revise adopted provision Remove Note 161 Replace Note 267 with Note 104 (due to comments by EWG member that INS 124 is permitted in canned mangoes and special holiday packs for canned pears) Add New Note "For use with red fruits only"	It is permitted at 500 mg/kg in the Republic of Korea under this FC.

						Add XS17, XS78, XS99, XS242, and XS254 Add New Note "Except for products conforming to the Standard for Canned Raspberries (CXS 60-1981): at 300 mg/kg of the final product."	
TARTRAZINE	102	200		7	Colour	Adopt at 200 mg/kg with Note 267 ("Excluding products conforming to the Standard for Certain Canned Fruits (CXS 192 319-2015) except for use in special holiday packs for canned pears conforming to the standard.", New Note "For use with red fruits	It is permitted at 500 mg/kg in the Republic of Korea under this FC.

Category No. 04.1.2.5 (Jams, jellies, marmalades)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
ALLURA RED AC	129	100	161	2009	Colour	Revise adopted provision Maintain use level at 100 mg/kg, remove Note 161.	It is permitted at 300 mg/kg in the Republic of Korea under this FC.
BRILLIANT BLUE FCF	133	100	161	2009	Colour	Revise adopted provision Remove Note 161 Maintain use level at 100 mg/kg	It is permitted at 250 mg/kg in the Republic of Korea under this FC.
INDIGOTINE (INDIGO CARMINE)	132	300	161	2009	Colour	Revise adopted provision - Maintain use level at 300 mg/kg - Remove Note 161 - Add Note XS296	supports the adoption at 300 mg/kg.
SUNSET YELLOW FCF	110	300	161	2008	Colour	Revise adopted provision Maintain use level at 300 mg/kg Remove Note 161	supports the adoption at 300 mg/kg.

Category No. 04.1.2.6 (Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
BRILLIANT BLUE FCF	133	100	161 & XS160	2023	Colour	Revise adopted provision Maintain use level at 100 mg/kg with Note XS160 Remove Note 161	It is permitted at 500 mg/kg in the Republic of Korea under this FC.
TARTRAZINE	102	500		7	Colour	Adopt at 500 mg/kg with Note XS160	supports the adoption at 500 mg/kg.

Category No. 04.1.2.9 (Fruit-based desserts, incl. fruit-flavoured water-based desserts)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
ALLURA RED AC	129	300	161	2009	Colour	Revise adopted provision Maintain use level at 300 mg/kg Remove Note 161	supports the adoption at 300 mg/kg.
FAST GREEN FCF	143	100	161	2009	Colour	Revise adopted provision Maintain use level of 100 mg/kg Remove Note 161	It is permitted at 400 mg/kg in the Republic of Korea under this FC.
INDIGOTINE (INDIGO CARMINE)	132	150	161	2009	Colour	Revise adopted provision Maintain use level at 150 mg/kg	It is permitted at 300 mg/kg in the Republic of Korea under this FC.

						Remove 161	Note	
SUNSET YELLOW FCF	110	50	161	2008	Colour	Revise adopted provision Maintain use level at 50 mg/kg Remove 161	Note	It is permitted at 300 mg/kg in the Republic of Korea under this FC.
TARTRAZINE	102	300		7	Colour	Adopt at 150 mg/kg		It is permitted at 300 mg/kg in the Republic of Korea under this FC, but no objections to adopting it at 150 mg/kg.

Category No. 04.2.1.2 (Surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
BEET RED	162	GMP	4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.
CAMEL I - PLAIN CAMEL	150a	GMP	4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.
CHLOROPHYLLS	140		4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.
CURCUMIN	100(i)	500	4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.
TITANIUM DIOXIDE	171	GMP	4 & 16	7	Colour	Discontinue	supports discontinue. They may be used for the purpose of adulterating food.

Category No. 04.2.2.3 (Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soybean sauce)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
ALLURA RED AC	129	300	161 & XS66	2024	Colour	Revise adopted provision Maintain use level at 300 mg/kg with Note XS66 Remove Note 161 Add Notes XS38, XS115 and XS260	supports the adoption at 300 mg/kg.
AMARANTH	123	300	XS66	7	Colour	Adopt at 50 mg/kg with Notes XS38, XS66, XS115 and XS260	It is permitted at 500 mg/kg in the Republic of Korea under this FC.
BRILLIANT BLUE FCF	133	500	161 & XS66	2024	Colour	Revise adopted provision Maintain use level at 500 mg/kg with Note XS66 Remove Note 161 Add Notes XS38, XS260 and New Note "Except for use at 300 mg/kg in products conforming to the Standard for Pickled Cucumbers (Cucumber Pickles) (CXS 115-1981), singly or in combination, with other colours permitted in CXS 115-1981.	supports the adoption at 500 mg/kg.
INDIGOTINE (INDIGO CARMINE)	132	150	161 & XS66	2024	Colour	Revise adopted provision Maintain use level at 150 mg/kg with Note XS66 Remove Note 161	It is permitted at 300 mg/kg in the Republic of Korea under this FC.

						Add Notes XS38, XS115 and XS260.	
TARTRAZINE	102	500	XS66	7	Colour	Adopt at 100 mg/kg with Notes 39, XS38, XS66, XS260 and New Note "Except for use at 300 mg/kg in products conforming to the Standard for Pickled Cucumbers (Cucumber Pickles) (CXS 115-1981), singly or in combination, with other colours permitted in CXS 115-1981."	It is permitted at 500 mg/kg in the Republic of Korea under this FC.

Category No. 04.2.2.7 (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food category 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
AMARANTH	123	300		4	Colour	Discontinue	supports discontinue
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	20	8	4	Colour	Adopt at 10 mg/kg with Notes 8, XS38, XS151, XS223, and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	200	185	4	Colour	Discontinue	supports discontinue
BEET RED	162	GMP		4	Colour	Adopt at GMP with Notes XS38, XS151, XS223, and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to

							CXS 223-2001 and CXS 294-2009.
BRILLIANT BLUE FCF	133	100	92, 161 & XS294	2023	Colour	Revise adopted provision -Maintain use level at 100 mg/kg - Remove Note 161 -Maintain Notes 92 and XS294 - Add Notes XS38, XS151, XS223 and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
CARAMEL I - PLAIN CARAMEL	150a	GMP		4	Colour	Adopt at GMP with Notes XS38, XS151, XS223, and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
CARAMEL III - AMMONIA CARAMEL	150c	50000	161 & XS294	2023	Colour	Revise adopted provision Maintain use level at 50000 mg/kg Remove Note 161 Maintain Note XS294 Add Notes XS38, XS151, XS223 and XS294	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
CHLOROPHYLLS	140	GMP		4	Colour	Adopt at GMP with Notes XS38, XS151, XS223 and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to

							CXS 223-2001 and CXS 294-2009.
CURCUMIN	100(i)	500		4	Colour	Adopt at 200 mg/kg with Notes XS38, XS151, XS223 and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
FAST GREEN FCF	143	100	161 & XS294	2023	Colour	Revise adopted provision Maintain use level at 100 mg/kg Remove Note 161 Maintain Note XS294 Add Notes XS38, XS151, XS223 and XS294	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
GRAPE SKIN EXTRACT	163(ii)	100	161, 181 & XS294	2023	Colour	Revise adopted provision Maintain use level at 100 mg/kg Remove Note 161 Maintain Notes 181 and XS294 Add Notes XS38, XS151, XS223 and XS294	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
INDIGOTINE (INDIGO CARMINE)	132	300	161 & XS294	2023	Colour	Revise adopted provision Lower use level to 200 mg/kg Remove Note 161	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to

						Maintain Note XS294 Add Notes XS38, XS151 and XS223	CXS 223-2001 and CXS 294-2009.
LUTEIN FROM TAGETES ERECTA	161b(i)	GMP		4	Colour	Adopt at GMP with Notes XS38, XS151, XS223 and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
PAPRIKA EXTRACT	160c(ii)	15	39	2	Colour	Adopt at 20 mg/kg with Notes 39, XS38, XS151, XS223 and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
PONCEAU 4R (COCHINEAL RED A)	124	500	161 XS294 &	2023	Colour	Revise adopted provision Lower use level to 100 mg/kg Remove Note 161 Maintain Note XS294 Add Notes XS38, XS151 and XS223	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.
TARTRAZINE	102	500		4	Colour	Adopt at 200 mg/kg with Notes XS38, XS151, XS223 and XS294.	supports adding Note XS223 and XS294. Because colors are not permitted in the products according to CXS 223-2001 and CXS 294-2009.

Category No. 06.3 (Breakfast cereals, including rolled oats)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
SUNSET YELLOW FCF	110	300	161	2008	Colour	Revise adopted provision - Maintain use level at 300 mg/kg - Remove Note 161	supports the adoption at 300 mg/kg.
TARTRAZINE	102	300		7	Colour	Adopt at 300 mg/kg.	It is permitted at 500 mg/kg in the Republic of Korea under this FC.

Category No. 06.5 (Cereal and starch based desserts (e.g. rice pudding, tapioca pudding))

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
AMARANTH	123	300		7	Colour	Adopt at 80 mg/kg.	It is permitted at 500 mg/kg in the Republic of Korea under this FC, but no objections to adopting it at 80 mg/kg.
TARTRAZINE	102	300		7	Colour	Adopt at 100 mg/kg	It is permitted at 500 mg/kg in the Republic of Korea under this FC, but no objections to adopting it at 100 mg/kg.

Category No. 06.8.8 (Other soybean protein products)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
LYCOPENE, TOMATO	160d(ii)	10000	GMP	3	Colour	Discontinue: Lycopene, Tomato is a Table 3 food	supports discontinue in Table 1 and 2

						additive (GMP) and FC 06.8.8 is not in the Annex to Table 3	
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[CX/FA 25/55/7 Appendix 3]

New and revised provisions in the GSFA entered into the step process at Step 2 as a result of CX/FA 24/54/8

Category No. 04.2.2.7 (Fermented vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1, and 12.9.2.3)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
ACETIC ACID, GLACIAL	260	GMP	XS294	2023	Acidity regulator, preservative	Revise Adopted provision removing Note XS294	Supports removing Note XS294. This proposal was submitted to facilitate the development of various Gochujang products conforming to the Standard for Gochujang (CXS 294-2009).
ACETIC ACID, GLACIAL	260	GMP		2	Acidity regulator, preservative	Discontinue	
CALCIUM LACTATE	327	10000	58, XS294	2023	Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener	Revise Adopted provision removing Note XS294	Supports removing Note XS294. This proposal was submitted to facilitate the development of various Gochujang products conforming to the Standard for Gochujang (CXS 294-2009).
CALCIUM LACTATE	327	10000	58	2	Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener	Discontinue	

CITRIC ACID	330	GMP	XS294	2023	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	Revise Adopted provision removing Note XS294	Supports removing Note XS294. This proposal was submitted to facilitate the development of various Gochujang products conforming to the Standard for Gochujang (CXS 294-2009).
CITRIC ACID	330	GMP		2	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	Discontinue	
DISODIUM 5'-GUANYLATE	627	GMP	279, XS294	2023	Flavour enhancer	Revise Adopted provision removing Note XS294	Supports removing Note XS294. This proposal was submitted to facilitate the development of various Gochujang products conforming to the Standard for Gochujang (CXS 294-2009).
DISODIUM 5'-GUANYLATE	627	GMP	279	2	Flavour enhancer	Discontinue	
DISODIUM 5'-INOSINATE	631	GMP	279, XS294	2023	Flavour enhancer	Revise Adopted provision removing Note XS294	Supports removing Note XS294. This proposal was submitted to facilitate the development of various Gochujang products conforming to the Standard for Gochujang (CXS 294-2009).
DISODIUM 5'-INOSINATE	631	GMP	279	2	Flavour enhancer	Discontinue	
DISODIUM 5'-RIBONUCLEOTIDES	635	GMP	279, XS294	2023	Flavour enhancer	Revise Adopted provision	Supports removing Note XS294. This

						removing Note XS294	proposal was submitted to facilitate the development of various Gochujang products conforming to the Standard for Gochujang (CXS 294-2009).
DISODIUM 5'-RIBONUCLEOTIDES	635	GMP	279	2	Flavour enhancer	Discontinue	
LACTIC ACID, L-, D-, and DL-	270	GMP	XS294	2023	Acidity regulator	Revise Adopted provision removing Note XS294	Supports removing Note XS294. This proposal was submitted to facilitate the development of various Gochujang products conforming to the Standard for Gochujang (CXS 294-2009).
LACTIC ACID, L-, D-, and DL-	270	GMP		2	Acidity regulator	Discontinue	

Russian Federation

Agenda Item 5 (a):

General Standard for Food Additives (GSFA): Report of the Electronic Working Group on the GSFA

- **Appendix 1: Colours in FCs 01.0 through to 08.0 and their subcategories**

1) Russia appreciates the EWG Chair's proposal to amend the MLs for Caramel II - Sulfite caramel (INS 150b) from really high values of 80 000 to 7500 mg/kg and lower (in the FCs 04.1.2.3, 04.1.2.4, 04.1.2.7, 04.1.2.8, 04.1.2.9, 04.1.2.11). We believe that the previous MLs (80000 mg/kg) were unreasonably high and unsafe for consumers' health. However we would like to seek clarification on what is the basis for the updated ML values?

2) Russia does not support the use of amaranth (INS 123) as a food additive (FCs 04.1.2.5, 04.1.2.7, 04.1.2.9, 04.2.2.3 u 06.5). INS 123 has low ADI (0.5 mg/kg bw/d JECFA) and the proposed MLs (50 – 100 mg/kg) are too high and cannot ensure the safety for consumers' health. For that reason this food additive is not permitted for use in food industry in Russia and countries-members of Eurasian Union.

- **Appendix 3: New and revised provisions in the GSFA entered into the step process at Step 2 as a result of CX/FA 24/54/8**

3) Russia does not support the use of Methacrylate copolymer, basic (BMC, INS 1205) in FCs 06.4.2, 12.2.1 and 13.2, because there is no technological need for this food additive in this FCs.

African Union

Item 5b: GSFA – Proposals for New and/or Revised Food Additive Provisions (Replies to CL 2024/58-FA). Document: CX/FA 25/55/8

Position: African Union support the proposal for Potassium sorbate (INS 202) as a preservative in FC 04.1.1.2: Surface-treated fresh fruit submitted by South Africa. African Union 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, African Union 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.

Rationale: Potassium sorbate is a widely used food preservative known for its fungicidal or fungistatic properties. It is also used in the post-harvest treatment of citrus fruits to act against spoilage fungi and moulds. The proposed usage level (up to 20 mg/kg) is required to act against some of the major post-harvest spoilage organisms of citrus fruit. When used on surface-treated citrus fruits, it prevents the decay of the fruit, thus enhancing the keeping quality or stability. The GSFA permits preservatives (sulphites) in this food category to preserve the freshness and quality of surface-treated fruits. Expressing the levels based on the form of the product as processed will make is easy for regulatory authorities to determine the amount of additives in a product without the need to reconstitute.

East African Community

Agenda item 5a) General standard for food additives (GSFA): Report of the Electronic Working Group on the GSFA CX/FA 25/55/7

EAC Position

EAC appreciates the work done by the EWG on the proposed maximum limits (MLs) stipulated in the General standard for food additives (GSFA) for the numerous food commodities. These are based on practical available data and sound scientific based approach for the various food additives and processing aids as stated in the commodity standards.

Further, the EAC supports the conclusions of the EWG that CCFA55 considers:

- The replies of the Codex Committee on Fats and Oils (CCFO);
- Revocation of the adopted provision for Annatto extracts, bixin based (INS 160b(i)) in FC 01.2.1;
- Draft and proposed draft provisions for colours in FCs 01.0 through 08.0 and their subcategories; and
- Adopted provisions for colours with Note 161 in FCs 01.0 through 08.0 and their subcategories.

Rationale: This will facilitate their safe use by the food industries thus facilitating fair trade while protecting the safety and health of consumers.

Agenda item 5b) GSFA: Proposals for new and/or revision of food additive provisions (replies to CL

2024/58-FA) CX/FA 25/55/8**EAC Position****The Proposal Submitted By China**

Comment: EAC supports the proposal of revising an existing provision in Table 3 of the GSFA to add 'CXS 249-2006' commodity standard on instant noodles with the justifications provided by China.

EAC is not in support of the proposal to amend the explanatory note to the Table 3 of GSFA.

Rationale: The current table provides for functional classes and therefore the note should be consistent with the application of the provisions in the table. Having the functional class also provides more guidance to the user of the standard.

The Proposal Submitted By South Africa.

Comment: EAC supports the proposal for a new provision on Potassium sorbate (INS 202) for food category 04.1.1.2 at maximum use level of 20 mg/kg (ppm).

Rationale: The GSFA permits preservatives (sulphites) in this food category to preserve the freshness and quality of surface-treated fruits. Potassium sorbate is a widely used food preservative known for its fungicidal or fungistatic properties. It is also used in the post-harvest treatment of citrus fruits to act against spoilage fungi and moulds. The proposed usage level (up to 20 mg/kg) is required to act against some of the major post-harvest spoilage organisms of citrus fruit. When used on surface-treated citrus fruits, it prevents the decay of the fruit, thus enhancing the keeping quality or stability.

The Proposal Submitted By International Food Additives Council (IFAC)

Comment: EAC does not support the proposal to replace Note 454 with Note 453 as the property function of glazing is captured in Note 454 along with other technological function of Sucrose Esters (INS 473) under food category 4.1.1.2

EAC supports the proposal for a new provision in Tables 1 and 2 of the GSFA for the introduction of (INS 473) under food category 4.2.1.2. with the maximum use level at 1,500 mg/kg. However, EAC seeks clarification for the restricted use of this additive with the inclusion of Note 455 instead of Note 456.

Rationale: Notes 454 and 456 provides for broader application of the food additive while still capturing the property function as a glazing agent.

The Proposal Submitted By International Special Dietary Foods Industries (ISDI)

Comment: The EAC supports the proposal to revise existing provisions in Tables 1 and 2 of the GSFA by adding a new note to all additive provisions in FC 13 products for alignment:

"Products in food category 13 are available in multiple formats (e.g., liquid ready-to-consume and powder requiring reconstitution with water). In all cases, consistent with Section 6 of the GSFA Preamble, the maximum level listed in the GSFA applies to the final product as consumed."

Rationale: This provides for consistent application of the note to all Food Categories.

Comment: The EAC would further propose 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.

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

International Daily Federation**Physical Working Group on GSFA/Agenda item 5.1 GSFA****Harmonization of GSFA Notes****Introduction**

The way that some notes are worded in the General Standard for Food Additives (GSFA) is confusing and inconsistent with the wording of other notes with similar meanings. This creates difficulty for the users of the GSFA to interpret the meaning of notes. This issue has been compounded by the addition of many new notes through the course of the alignment of the GSFA and commodity standards, particularly for dairy food categories which have recently completed their alignment.

The International Dairy Federation have completed an initial review of all notes associated with dairy food categories (FCs), which we identified as being FCs 1.1 – 1.8; 02.1.1; and 02.2. In this review, the IDF have identified approximately 70 Notes for proposed revision for the purposes of clarity. These revisions do not change the meaning of the notes but rather make their intended meaning clearer to GSFA users. Most of the notes consequent to the alignment of the Codex Standards for Fermented Milks and for Creams and Prepared Creams and adopted at the CAC 2024 already benefited from that review and clearer language.

Recommendation

IDF recommends that the CCFA consider the review of GSFA Notes as part of the mandate of the GSFA physical working group (PWG), and consequential electronic Working Groups (eWG).

Given that alignment of the dairy commodity standards with the GSFA is complete, we propose that Notes relevant for the dairy categories be the first batch to go through review. The principles derived from this review can be applied more broadly across other GSFA FCs. We note also that these principles will be important groundwork for Table Three notes once that resumes.

If the Committee agrees, we propose that the eWG on GSFA add to its terms or reference a discussion point to review the principles of harmonizing language of GSFA notes relevant for dairy categories based on the examples provided in this document to report at CCFA56. Then a full review of the notes could be undertaken by the following eWG on GSFA for completion at CCFA 57.

Example of issue

We have selected the following example Notes from the GSFA (2024 version) to show a few of the most common issues encountered:

Note 624 from FC 01.4.3

Note 550 from FC 01.5.1

Note 557 from FC 02.2.2

Note 619 from FC 01.4.2

Appendix I of this document shows these Notes as they appear in their GSFA provisions.

These examples are non-exhaustive. There are additional Notes with the same types of issues, and there are additional issues outside of those demonstrated here.

We have converted each Note into a “Note format”. The idea of the Note format is to replace the specificities of the Note with placeholders (e.g. [1], [2], etc) to better illustrate the syntax of the Note. The bolding of certain words is also to highlight the differences in Note formats.

Note number	Note wording	Note format	Note meaning
624	Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as a stabilizer or thickener.	Except for use in products conforming to [1] as [2] Where: [1] is a Standard or Standards [2] is a functional class or classes	If the product complies to Standard [1], the GSFA permission is limited to function [2] Products not covered by the Standard [1] are permitted to use the default GSFA permission unless another Note applies.
550	For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995) as an acidity regulator.	For use in products conforming to [1] as [2] Where: [1] is a Standard or Standards [2] is a functional class or classes	

557	Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), as an emulsifier only .	Except for use in products conforming to [1] as [2] only Where: [1] is a Standard or Standards [2] is a functional class or classes	
619	For use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only, as a stabilizer or thickener.	For use in products conforming to [1] only , as [2] Where: [1] is a Standard or Standards [2] is a functional class or classes	If the product complies to Standard [1] then the additive in this provision can only be used for function [2] Non-standardised products (i.e. products not covered by the Standard [1]) are not permitted to use the GSFA permission.

In these examples, we can see that there are the following differences:

1. Some Note formats begin with “except for use in” (e.g. Notes 624 and 557) while others begin with “for use in” (e.g. Notes 550 and 619)
2. For the Notes that begin with “for use in”, some have “only” after the commodity standard (e.g. Note 619) while others do not (e.g. Note 550)
3. For the Note formats that begin with “except for use in”, some have “only” after the functional class (e.g. Note 557) while others do not (e.g. Note 624)

Despite all these differences, three of the Note formats share the same meaning (i.e. Notes 624, 550, and 557) while only the fourth has a different meaning (i.e. Note 619). For a typical reader of the GSFA, it would not be clear that this is the case when the four Note formats are all worded differently.

IDF’s proposed changes for these examples

To make the Note formats clearer and more consistent, we recommend that this Note format is kept separate, as it currently stands:

For use in products conforming to [1] **only**, as [2]

Where:

[1] is a Standard or Standards
[2] is a functional class or classes

We then recommend merging the other three Note formats into one:

Except for use in products conforming to [1] as [2]

Where:

[1] is a Standard or Standards
[2] is a functional class or classes

These two resulting Note formats are the most distinct from each other so that a reader can easily identify that one is a “for use in ... only” Note and the other is an “except for use in ...” Note.

Therefore, the example Notes would be revised as follows, with new text being underlined and deleted text struck out:

Note number	Note wording	Revised Note wording	Note format

624	Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as a stabilizer or thickener.	No change needed (adopted in 2024)	Except for use in products conforming to [1] as [2] Where: [1] is a Standard or Standards [2] is a functional class or classes
550	For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995) as an acidity regulator.	Except for use in products conforming to the Standard for Edible Casein Products (CXS 290-1995) as an acidity regulator.	
557	Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), as an emulsifier only .	Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), as an emulsifier only .	
619	For use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only, as a stabilizer or thickener.	No change needed (adopted in 2024)	For use in products conforming to [1] only , as [2] Where: [1] is a Standard or Standards [2] is a functional class or classes

Again, our recommendation to the pWG on GSFA, and CCFA plenary, is that the eWG on GSFA include in its terms or reference a discussion point to review principles for harmonizing language of GSFA notes based on the examples provided in this document and to report the outcome of that discussion at CCFA56. CCFA56 would then be able to consider the outcome of this discussion to inform consideration of a full review of the Notes as part of the terms of reference for the eWG on GSFA to be completed and presented at CCFA 57.

APPENDIX I: Example Notes within their GSFA Table Two provisions

Note 624 in FC 01.4.3:

Food Category No. 01.4.3		Clotted cream (plain)		
Additive	INS	Year Adopted	Max Level	Notes
PROPYLENE GLYCOL ALGINATE	405	2024	5000 mg/kg	624
Note 624	Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as a stabilizer or thickener.			

Note 550 in FC 01.5.1:

Food Category No. 01.5.1		Milk powder and cream powder (plain)		
Additive	INS	Year Adopted	Max Level	Notes
CALCIUM CARBONATE	170(i)	2023	GMP	544, 549 & 550
MAGNESIUM CARBONATE	504(i)	2023	GMP	544, 549 & 550
MAGNESIUM HYDROXIDE CARBONATE	504(ii)	2023	GMP	550
Note 550	For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995) as an acidity regulator.			

Note 557 in FC 02.2.2:

Food Category No. 02.2.2		Fat spreads, dairy fat spreads and blended spreads		
Additive	INS	Year Adopted	Max Level	Notes
DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL	472e	2023	10000 mg/kg	359 & 557
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	2023	5000 mg/kg	359 & 557
POLYSORBATES	432-436	2023	10000 mg/kg	360 & 557
SORBITAN ESTERS OF FATTY ACIDS	491-495	2023	10000 mg/kg	359 & 557
STEAROYL LACTYLATES	481(i), 482(i)	2009	10000 mg/kg	359 & 557
SUCROSE ESTERS	473, 473a, 474	2023	10000 mg/kg	360 & 557
Note 557	Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), as an emulsifier only.			

Note 619 in FC 01.4.2:

Food Category No. 01.4.2		Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)		
Additive	INS	Year Adopted	Max Level	Notes
PROPYLENE GLYCOL ALGINATE	405	2024	5000 mg/kg	619
Note 619	For use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only, as a stabilizer or thickener.			