

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

Comments of Costa Rica with the support of Brazil, Chile, Colombia, El Salvador, Paraguay and Uruguay

Agenda item 10

The signatory countries recognize the importance of keeping Codex Alimentarius standards and guidelines, particularly those related to food additives, up to date in order to ensure food safety, facilitate international trade and protect the health of consumers. In this context, we express the position with respect to the recommendations proposed in the reference document FA55/CRD07, prepared by China, as Host Secretariat of the CCFA.

1. Review and consider topics for future work

Regulation of secondary food additives and processing aids

It is supported to establish clear and updated guidelines for these substances, ensuring that their use is safe and adequately regulated.

Revision of the General Standard for Food Additives (GSFA)

The revision of the GSFA is supported with the aim of simplifying its structure and facilitating its adoption and application by member countries as long as a clear focus on food safety and quality is maintained, which is the core mandate of Codex.

Attention to emerging challenges

The signatory countries agree that the CCFA should address new additives and technologies, such as those used in cultured meats, alternative proteins, and precision fermentation, by developing regulatory frameworks that ensure their safety.

Sustainability considerations and assessment of the life cycle of additives and their environmental footprint

It is recognized the global relevance of sustainability and the role that the Codex Alimentarius can play in achieving the Sustainable Development Goals (SDGs) through its main mandate: to ensure food safety and quality. However, Codex's work on sustainability should be restricted to aspects directly related to its area of competence, avoiding incursions into areas outside its mandate.

In this context, concerns are expressed regarding the proposal to include sustainability criteria and assessment of the life cycle of food additives and their environmental footprint in the work of the CCFA, given that the Codex Alimentarius was established with the main objective of ensuring food safety and promoting fair practices in international trade. Issues such as the use of non-renewable resources, greenhouse gas emissions or the generation of chemical waste correspond to other specialized international organizations, with the experience and technical capacity to address them in a comprehensive manner.

Incorporating sustainability considerations into the work of the CCFA could divert resources and attention from its primary objective, creating confusion and making it more difficult for member countries to implement standards. Additionally, it could complicate the evaluation and approval process for additives without providing concrete benefits for food safety. Addressing these issues could dilute Codex's focus and redirect resources that, at a critical moment like the present, are essential to fulfilling its core priorities.

This concern has been highlighted in reports presented to the Executive Committee (CCEXEC), particularly in documents such as "Codex Budgetary and Financial Matters," which reflect significant limitations in resource availability. Therefore, it is considered essential to concentrate efforts and available funds on areas that form the core of Codex's mandate, avoiding the dispersion of capacities into topics beyond its direct scope. The regulation

of food additives should be based on clear, scientifically sound, and internationally harmonized criteria. Introducing environmental considerations, which vary depending on geographic context, production systems, and national priorities, could create obstacles to the harmonization of standards.

Moreover, Codex has expert committees, each focused on specific issues and already handling a complex and demanding workload. At a certain point, addressing topics outside its mandate could undermine the scientific evidence that supports Codex decisions and texts. Without a solid and consensual scientific basis, the inclusion of these topics could lead to the adoption of unclear standards, which contradicts the evidence-based approach that has always characterized Codex.

As highlighted in the 84th Session of the Executive Committee, Codex already contributes to sustainability within its scope. Examples include establishing maximum levels for mycotoxins in emergency situations, which helps reduce food waste; incorporating provisions on date marking in labeling, which contributes to minimizing losses; and developing guidelines for the safe use and reuse of water, supporting sustainable water resource management. These actions demonstrate that Codex addresses sustainability indirectly and within its mandate, without the need to expand its scope.

The signatory countries emphasize the importance of avoiding duplication of efforts and, instead, fostering complementarity with the work carried out by specialized sustainability bodies.

2. Review of the Terms of Reference (TOR) of CCFA

It is considered that there is no need to modify or expand the current mandate of the CCFA. The mandate of the CCFA is clear and adequate to address the challenges related to the safety and regulation of food additives.

Rather than expanding the mandate, the CCFA should focus on strengthening its current work, ensuring that standards and guidelines are scientifically sound, practical and globally applicable.

3. Issuing a Circular Letter to Collect New Work Proposals and Preparation of Discussion Paper to be Considered in CCFA56

The issuance of a circular letter is supported, to seek proposals for future work from Codex member and observer countries in order to identify the emerging needs and priorities of member countries, ensuring that the work of the CCFA responds to current challenges.