

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 1, 2, 3a, 3b, 4a, 5a, 5b, 6, 7, 8, 9, and 10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

Comments of Burundi

Agenda item 1

Burundi takes note of the provisional agenda and proposes its adoption by CCFA55.

Agenda item 2

Matters referred by the Codex Alimentarius Commission and other subsidiary bodies

Burundi notes all the matters from the commission and other subsidiary bodies and considering the recommendations to CCFA55 the following is proposed:

- i. Allocation of INS number for carbomer (INS 1210) and carbomer be referred to INS IWG for reconsideration of the appropriate INS number.
- ii. Gum arabic (Acacia gum) (INS 414), silicon dioxide, amorphous (INS 551), mannitol (INS 421), and sodium ascorbate (INS 301) would be included as batch 6 in the work plan (CRD15 REV of CCFA49) for future technological justification appraisal.
- iii. Suggestions from the Codex Secretariat outlined in paragraphs 15 and 18 to be forwarded to the IWG on alignment for consideration.

Rationale: The different work items will be thoroughly discussed in different IWGs and CCNFSDU work plan as proposed above. This will facilitate discussion at future CCFA meetings.

Agenda item 2a

Matters related to the proposed revisions to the Standard for food grade salt (CXS 150-1985)

Burundi Position

- Burundi supports the proposal to amend the standard for food-grade salt in section 7.2, 9.2-9.13 with the new proposed texts in Annex 1 of CX/FA 25/55/2 Add 1
- Burundi supports the inclusion of the method for determination of sodium chloride in CXS 234-1999

Rationale: This consequential amendment has previously been agreed on by the commission for commodity committees.

Agenda item 2b

The progress report on restructuring the GSFA database

Burundi Position

Burundi appreciates the work done by the Codex Secretariat but notes that the information was posted quite late to facilitate meaningful deliberations and further recommends that the work could be discussed during CCFA56.

Agenda item 3a

Matters of interest arising from FAO/WHO and from the 99th meeting of the Joint FAO/WHO Expert Committee on Food Additives (JECFA)

Burundi Position

General comment: Burundi takes note of all the matters from FAO/WHO and agrees with findings of JECFA and therefore supports recommendation for adoption by CAC.

Agenda item 3b**Proposed draft specifications for the identity and purity of food additives arising from the 99th JECFA meeting****Burundi Position**

Burundi supports the recommendation to adopt the "full specifications" for the food additives as Codex specifications, covering three processing aids (including two types of endo-1,4- β -xylanase and one glucosidase), three food additives (natamycin, nisin A, and polyglycerol esters of fatty acids), and ten flavouring agents. The evaluation of nisin, an antimicrobial polypeptide, focused on nisin A, as no new data were provided for other variants.

Rationale: The safety of these food additives and processing aids has been thoroughly assessed by JECFA and confirmed to be within acceptable limits, hence their suitability for inclusion in the Codex standards.

Agenda item 4a**Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards****Burundi Position**

Burundi supports that CCFA55 to consider for endorsement the food additive provisions forwarded by the 23rd Session of the FAO/WHO Coordinating Committee for Latin America and the Caribbean (CCLAC23) on Regional standard for Castilla lulo (naranja) and the 23rd Session of the Codex Committee on Fresh Fruits and Vegetables (CCFFV23) on Standard for fresh curry leaves both for adoption by CAC48 at Step 5/8.

Burundi further seeks clarification on the use of different texts for the endorsement of the food additive provisions in the two draft standards.

Rationale: Adopting the above position is consistent with the requirements of the Codex Procedure Manual.

Agenda item 4b**Alignment of the food additive provisions of commodity standards: Report of the Electronic Working Group on Alignment****Burundi Position**

Burundi appreciates the work done by the EWG on Alignment chaired by Canada and co-chaired by the United States of America and Japan.

Burundi supports amendment of the text in the References to Commodity Standards for GSFA Table 3 Additives for Food Category 12.2.1, to reflect actual allowance in spices, so that the entry reads "Herbs and spices (ONLY SPICES)".

Annex 5

Comment: Burundi supports the proposed amendments to the food additive provisions to tables 1, 2 and 3 of the GSFA relating to the alignment of provisions in food category 02.1.2 with CXS 19- 1981

Annex 6

Comment: Burundi supports the proposed amendments to the Food Additive Provisions of CXS 198-1995 and to Tables 1, 2 and 3 of the GSFA relating to the alignment of the standard.

Rationale: The conclusions from the EWG consultations indicate completion of the work as per the Terms Of Reference.

Agenda item 5a

General standard for food additives (GSFA): Report of the Electronic Working Group on the GSFA

Burundi Position

Burundi 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, Burundi 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)

Burundi Position

The Proposal Submitted By China

Comment: Burundi 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.

Burundi is not in support with 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: Burundi supports the proposal for a new provision on Potassium sorbate (INS202) 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: Burundi 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 (INS473) under food category 4.1.1.2

Burundi supports the proposal for a new provision in Tables 1 and 2 of the GSFA for the introduction of (INS473) under food category 4.2.1.2. with the maximum use level at 1,500 mg/kg. However, Burundi 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: Burundi 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: Burundi 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 it easy for regulatory authorities to determine the amount of additives in a product without the need to reconstitute.

Agenda item 6

Proposed draft revision to the class names and the international numbering system (INS) for food additives (CXG 36-1989)

Burundi Position

Comment: Burundi 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).

Burundi 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.

Agenda item 7

Proposals for additions and changes to the Priority List of Substances proposed for evaluation by JECFA (replies to CL 2024/59-FA)

Burundi Position

Burundi has no objection to the inclusion of Monk fruit extract, Butterfly Pea Flower Extract, Neohesperidin Dihydrochalcone, Potassium bisulfite (INS 228) and the list of flavoring agents proposed by the International Organization of the Flavor Industry (IOFI), in JECFA priority list for evaluation and/or re-evaluation if they get support from a Member Country.

Burundi proposes deletion of Endo-1,4-xylanase from *Thermotoga maritima* produced by *B. subtilis* strain LMG S-27588 from priority list.

Rationale: The proposing member indicates that the request for Endo-1,4-xylanase from *Thermotoga maritima* produced by *B. subtilis*, strain LMG S-27588 is no longer in effect.

Agenda item 8

Standard for baker's yeast (Step 4)

Burundi Position

Scope

Comment: The second sentence may be moved to the product definition in 2.1.1.

Rationale: A scope as guided in Para 89 of the procedural manual should only contain a clear, concise statement as to the food or foods to which the standard is applicable unless this is self-explanatory in the name of the standard.

2.1.1 – Product definition

Comment: the word in square bracket [Typically] may be deleted

Rationale: The species from which the baker's yeast is obtained is already indicated. Retaining the word 'typically' gives connotation that unicellular fungus may belong to other species other than *Saccharomyces cerevisiae*.

Section 2.1.2

Comment: Burundi proposes to define fresh yeast as 'bakers yeast consisting of living cells of *Saccharomyces cerevisiae*.'

Section 2.1.3

Comment: Burundi proposes to define dry yeast as 'baker's yeast consisting of living but inactive cells of *Saccharomyces cerevisiae*.'

Rationale: The definitions of fresh and dry yeast are more descriptive of their function/application rather than defining the true nature of the products.

Section 2.2.2

Comment: Burundi proposes deletion of the words "unique smell" in the description of both fresh and dry yeasts.

Rationale: The use of "unique smell" in description of the type of yeast is ambiguous.

3.2.3

Comment: Burundi supports the inclusion of the parameter of Nitrogen content requirement as part of the quality factors.

Rationale: Nitrogen content is essential for the performance of the baker's yeast to attain the intended result during baking

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Comment: Burundi proposes to amend the text in the clause to 'Food additives listed in Table 1 and 2 in the Codex General Standard for Food Additives (GSFA) in this Food Category or the applicable ones in Table 3 may be used in foods subject to this standard.'

6.3

Comment: Burundi supports the opening of the square brackets with the following rephrase for clarity, to read as *Saccharomyces cerevisiae* used as starter cultures should **not** be ~~harmless, not~~ GMO microorganisms".

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Comment: Burundi supports the introduction of the 'ISO 1871' as a method for testing of Nitrogen Content in Bakers Yeast and the opening of the square brackets.

Agenda item 9

Discussion paper on the working practices and the engagement plan to avoid divergence between the GSFA, commodity standards and other related Codex texts

Burundi Position

General comment: Burundi 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, Burundi proposes the following:

Annex 1, Para 2

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

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

Para3

Comment: Burundi 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: Burundi 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.

Agenda item 10

Discussion paper for new work on development of guidelines for food safety assessment of cell culture media components in cell-based food production (prepared by Singapore and China)

Burundi Position

Burundi takes note of the proposal to develop guidelines for the food safety assessment of cell culture media components in cell-based food production. While we recognize the potential of cell-based foods as an emerging food technology, we are of the view that it is essential to address several key questions and considerations before proceeding with the development of such guidelines. These questions are aimed at ensuring that the proposed work is grounded in a clear understanding of the current landscape, addresses the needs of all Codex Members, and aligns with the principles of science-based risk assessment and harmonization.

1. Understanding the Global Trade Context

Codex standards are primarily developed for products moving in international trade. Given that cell-based foods are still in the early stages of commercialization, what data or analysis is available to assess the current and projected global trade in these products? How will this information inform the nature and scope of the standards to be developed?

2. Harmonization with Existing National Regulations

Before developing international guidelines, it is important to understand the current national regulations that exist for cell-based foods. What steps will be taken to map and analyze existing regulatory frameworks in Member States? How will the proposed guidelines ensure harmonization with these frameworks?

3. Establishment of Residue Limits and Safety Thresholds

The discussion paper acknowledges that some cell culture media components may remain as residues in the final product. However, it does not address how residue limits will be established. What methodologies will be used to determine acceptable daily intake (ADI) or other safety thresholds for these residues? How will the guidelines ensure that these limits are scientifically robust and protective of consumer health?

4. Coordination Between Codex Committees

The discussion paper briefly mentions that the Code of Hygienic Practice for cell-based foods will be submitted to the Codex Committee on Food Hygiene (CCFH). How will the work of CCFA and CCFH be coordinated to avoid duplication or conflicting standards? What mechanisms will be put in place to ensure consistency and coherence in the development of Codex standards for cell-based foods?

Burundi emphasizes the importance of addressing these questions and considerations before proceeding with the development of guidelines for the food safety assessment of cell culture media components in cell-based food production. We believe that a thorough understanding of the global trade context, existing national regulations, and the needs of developing countries is essential to ensure that any guidelines developed are relevant, practical, and inclusive.