

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 10

FA55/CRD29

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-Fifth Session

COMMENTS OF CANADA

Agenda item 10

Canada appreciates the CCFA Secretariat preparing a discussion paper on future work of the CCFA and considers the discussion very timely. Canada would like to provide specific comments on the recommendations in CRD07 as follows:

Recommendation 1: Review and consider topics for future work

Given the diversity of thoughts and proposals presented in the document, Canada suggests that the discussion at CCFA55 focus on the establishment of a systematic approach to prioritization and development of new work proposals. Canada notes that the Codex Committee on Food Labelling (CCFL) has published an [Information Document](#) on *Approach and Criteria for Evaluation and prioritization of the work of CCFL* which may be of value to considering a path forward for CCFA.

While Canada could support consideration of new work proposals related to secondary food additives, processing aids, and the review of the GSFA, Canada would have concerns on including sustainability and environmental issues in the work of CCFA as sustainability issues cover broad and diverse areas which are not relevant to the mandate of Codex. Canada recognizes the contributions Codex can make towards the achievement of the Sustainable Development Goals (SDGs), and we note that Codex has developed standards, guidelines and codes of practice that directly or indirectly aid in addressing certain environmental challenges while remaining within its mandate to protect the health of consumers and ensure fair practices in the food trade. Examples of such Codex texts include the *Guidelines for the Safe Use and Reuse of Water in Food Production and Processing* (CXG 100-2023); and *Guidelines for Rapid Risk Analysis Following Instances of Detection of Contaminants in Food where there is No Regulatory Level* (CXG 92-2019). Furthermore, CCFA, in its risk analysis principles, is required to base its risk management recommendations on JECFA's risk assessment of food additives and, in Canada's view, the assessment of the sustainability, lifecycle and environmental impact and footprint of new food additives are outside the expertise of JECFA and CCFA. As such, Canada would not support the inclusion of sustainability and environmental issues as key drivers of work for CCFA.

Recommendation 2: Review of the Terms of Reference (TOR) of CCFA

Canada recognizes that the CCFA TOR is limited to the current standing agenda items for CCFA sessions. We also note that CCFA has demonstrated flexibility in undertaking its work within the existing TOR. Should CCFA wish to consider whether there is a need to amend or expand its TOR to address potential new work that is not currently covered by its TOR, Canada would suggest that consideration could be given to a new point that would allow CCFA to address other relevant issues that could be assigned to it by CAC (e.g. cell culture media components in cell-based food production). The new bullet in the CCFA TOR could read: "to consider other matters assigned to it by the Commission in relation to food additives". This new bullet could allow the CCFA to maintain its relevance in the face of emerging food science and technology and would be consistent with the TORs of many of the other Codex committees, such as CCCF.

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

Canada believes that implementing a systematic approach to new work as suggested under Recommendation 1 above will ensure CCFA can continue its standard development work within the mandate of Codex while considering and prioritizing new work proposals in an efficient and consistent manner.