



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-fifth Session

THE PROGRESS REPORT ON RESTRUCTURING THE GSFA DATABASE

(Prepared by Codex Secretariat)

BACKGROUND

1. The 52nd Session of the Codex Committee on Food Additives (CCFA52, 2021)¹ agreed to investigate the development and implementation issues associated with establishing Table 3 notes in the GSFA, in consultation with the Codex Secretariat. CCFA52 endorsed the recommendation to, in-principle, introduce Notes in Table 3 similar to those in Table 1 and 2 in the GSFA, as this new approach would ensure clarity in the use of food additives with numeric use levels; and thus, avoid potentially complicated requirements that could arise once a commodity standard has been aligned with the GSFA. CCFA52 further tasked the alignment EWG established by CCFA52 to identify and consider the implementation issues around Table 3 notes; and to consult the Codex Secretariat to identify any issues associated with the inclusion of the new notes in the GSFA database.

2. CCFA53 (2023)² agreed to proceed with the development of Table 3 notes, incorporating the features outlined in document CX/FA 23/53/6, as detailed at the front of Appendix 4 (page 167) (refer to Appendix I of this document). CCFA53 noted that the development of Table 3 notes was dependent on the Codex Secretariat's ability to implement the necessary changes to the online version. Furthermore, it was emphasized that additional discussions would be required to determine the specific information on functional classes to be included in the Table 3 notes. These discussions were deemed critical to ensuring clarity and enhancing the utility of Table 3.

3. CCFA54(2024)³ considered the [CX/FA 24/54/6 Annex 5 \(Table 3 Notes Development\)](#) and endorsed the following recommendations related to Table 3 Notes: i) that CCFA pause work on the Table 3 Notes to the GSFA until the functionality of the new GSFA database is better understood; and ii) that the WG on alignment maintain a list of Table 3 additives that will subsequently be migrated from Tables 1 and 2 when the functionality of the GSFA database allows the incorporation of Table 3 Notes.

PROGRESS ON EXPLORING THE POSSIBILITY OF IMPLEMENTING THE NEW TABLE 3 STRUCTURE AS LISTED IN CX/FA 24/54/6 ANNEX 5 (DEVELOPMENT OF TABLE 3 NOTES)

4. Three types of Table 3 Notes were outlined in CX/FA 24/54/6 Annex 5. The following sections provide an analysis of the feasibility of their application. Additionally, the representations of the GSFA in both the PDF and online versions are presented for reference.

5. Regarding the GSFA database, a new table will be needed to structure the integration of the new notes of Table 3 Notes efficiently. An example of the table would be as follows:

ID	T3CodexCod	T3NotesToNotes_EN	T3NotesToNotes_FR	T3NotesToNotes_ES	T3NotesToNotes_ZH	T3NotesToNi	T3NotesToNi	Click to Add
1	T3-1	For use at 3,000 mg/kg, singly	Pour utilisation à 3 000 mg/kg	Para uso a 3.000 mg/kg, solo	单独或联合使用剂量为 3,000 mg/kg (INS 282)	السليوم	Для применени	
2	T3-2	Surface treatment only	Traitement de surface unique	Solo tratamiento superficial	仅表面处理	لجّة السطحية فقط	Только обрабо	
3	T3-3	For use of surface decoration	À utiliser uniquement pour la	Para uso exclusivo en decora	仅供表面装饰使用	لتزيين السطح فقط	Только для укр	
4	T3-4	As antioxidant in canned pine	Comme antioxydant dans les	Como antioxidante únicamer	仅作为菠萝罐头中的抗氧化剂	فقط ثنائس المعلب فقط	В качестве анти	
5	T3-5	Test						
*	(New)							

¹ REP23/FA paragraphs 89 and 90

² REP24/FA paragraph 44

³ REP24/FA paragraphs 61 and 62

6. This revision should allow for seamless categorization of food additives under specific functional classes and ensure alignment with corresponding commodity standards. The database should incorporate an additional column dedicated to the new notes of Table 3 Notes, ensuring that users can easily reference conditions and restrictions applicable to specific additives. An example for Calcium propionate (ID=306) would be like this:

JoinAdditiveTbl3CommNote				
Additive_ID number	Tbl3CommNote_ID	Show_In_Table3	Tech_Classes_OnlineHeader	T3_NotesToNotes_ID
306	8 N	21		
306	25 N	21		
306	44 Y			1
306	45 Y			1
306	46 Y			1
306	34 N	21		
306	68 N	21		
306	64 Y			1
306	93 Y			1
306	98 N	21		
*				

Type 1: Notes setting specific maximum levels for Table 3 additives in standards that fall under food categories not in the Annex to Table 3

Request in CX/FA 24/54/6 Annex 5:

INS No.	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards ¹	Notes relevant to the commodity standards in column 5 of this table only
282	Calcium propionate	Preservative	1999	CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968	T3-1

¹ This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis or based on functional class, that information is contained in the "References to Commodity Standards for GSFA Table 3 Additives"

T3-1: For use at 3,000 mg/kg, singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282).

The possible image in the GSFA PDF version

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INS No	Additive	Functional Class	Year Adopted	Specific allowance in the following commodity standards ¹	Notes ²
282	Calcium propionate	Preservative	1999	CS 221-2001, CS 273-1968, CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968	T3-1

¹ This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis

² Notes relevant to the commodity standards in column 5 of this table only

The possible image in the GSFA online version

GSFA Table 3 Provisions

Calcium propionate is a food additive that is included in **Table 3**, and as such may be used in the following foods under the conditions of good manufacturing practices (GMP) as outlined in the Preamble of the Codex GSFA. Although not listed below, Calcium propionate could also be used in heat-treated butter milk of food category 01.1.1 and spices of food category 12.2.1. Note that food categories listed in the **Annex to Table 3** were excluded accordingly. **Calcium propionate** is acceptable in foods conforming to the following commodity standards: CS 221-2001, CS 273-1968, CS 275-1973, CS 262-2006, CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968.

Calcium propionate is a: Preservative

Any Preservative listed in Table 3 can be acceptable for use in all products

T3-1: For use at 3,000 mg/kg, singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282).

CS 256-2007, CS 306-2011.

Number	Food Category
01.1.4	Flavoured fluid milk drinks
01.3	Condensed milk and analogues (plain)
01.4.3	Clotted cream (plain)
01.4.4	Cream analogues
01.5	Milk powder and cream powder and powder analogues (plain)
01.6.1	Unripened cheese
01.6.2	Ripened cheese
01.6.4	Processed cheese
01.6.5	Cheese analogues
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)
01.8.1	Liquid whey and whey products, excluding whey cheeses
02.2.2	Fat spreads, dairy fat spreads and blended spreads
02.3	Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions

Type 2: Notes that further specify the conditions under which a Table 3 additive may be used in a particular commodity standard

Example 1

Request in CX/FA 24/54/6 Annex 5:

INS No.	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards ¹	Notes relevant to the commodity standards in column 5 of this table only
282	Calcium propionate	Preservative	1999	CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968	T3-1, T3-2

¹ This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis or based on functional class, that information is contained in the "References to Commodity Standards for GSFA Table 3 Additives"

T3-1: For use at 3,000 mg/kg, singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282).

T3-2: Surface treatment only

The possible image in the GSFA PDF version

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INS No	Additive	Functional Class	Year Adopted	Specific allowance in the following commodity standards ¹	Notes ²
282	Calcium propionate	Preservative	1999	CS 221-2001, CS 273-1968, CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968	T3-1, T3-2

¹ This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis

² Notes relevant to the commodity standards in column 5 of this table only

The possible image in the GSFA online version

GSFA Table 3 Provisions	
Calcium propionate is a food additive that is included in Table 3, and as such may be used in the following foods under the conditions of good manufacturing practices (GMP) as outlined in the Preamble of the Codex GSFA. Although not listed below, Calcium propionate could also be used in heat-treated butter milk of food category 01.1.1 and spices of food category 12.2.1. Note that food categories listed in the Annex to Table 3 were excluded accordingly. Calcium propionate is acceptable in foods conforming to the following commodity standards: CS 221-2001, CS 273-1968, CS 275-1973, CS 262-2006, <u>CS 263-1966</u>, <u>CS 264-1966</u>, <u>CS 265-1966</u>, <u>CS 266-1966</u>, <u>CS 267-1966</u>, <u>CS 268-1966</u>, <u>CS 270-1968</u>, <u>CS 271-1968</u>, <u>CS 272-1968</u>. Calcium propionate is a: Preservative Any Preservative listed in Table 3 can be acceptable for use in all products conforming to CS 306-2011.	
T3-1: For use at 3,000 mg/kg, singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282). T3-2: Surface treatment only	
Number	Food Category
01.1.4	Flavoured fluid milk drinks
01.3	Condensed milk and analogues (plain)
01.4.3	Clotted cream (plain)
01.4.4	Cream analogues
01.5	Milk powder and cream powder and powder analogues (plain)
01.6.1	Unripened cheese
01.6.2	Ripened cheese
01.6.4	Processed cheese
01.6.5	Cheese analogues
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)
01.8.1	Liquid whey and whey products, excluding whey cheeses
02.2.2	Fat spreads, dairy fat spreads and blended spreads
02.3	Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions
02.4	Fat-based desserts excluding dairy-based dessert products of food category 01.7

Type 3: Notes that restrict the functional class for which the Table 3 additive may be used in a particular commodity standard

INS No.	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards ¹	Notes relevant to the commodity standards in column 5 of this table only
300	Ascorbic acid, L-	Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant	1999	CS 88-1981, CS 89-1981, CS 96-1981, CS 97-1981, CS 98-1981, CS 13-1981, CS 57-1981, CS 302-2011, CS 249-2006, CS 251-2006, CS 275-1973	
				CS 319-2015	T3-4

¹ This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis or based on functional class, that information is contained in the "References to Commodity Standards for GSFA Table 3 Additives"

T3-4: As antioxidant in canned pineapples only

The possible image in the GSFA PDF version

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INS No	Additive	Functional Class	Year Adopted	Specific allowance in the following commodity standards ¹	Notes ²
300	Ascorbic acid, L-	Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant	1999	CS 88-1981, CS 89-1981, CS 96-1981, CS 97-1981, CS 98-1981, CS 13-1981, CS 57-1981, CS 302-2011, CS 249-2006, CS 251-2006, CS 275-1973, CS 319-2015	T3-4

¹ This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis

² Notes relevant to the commodity standards in column 5 of this table only

The possible image in the GSFA online version

Number		Food Category
01.1.4		Flavoured fluid milk drinks
01.3		Condensed milk and analogues (plain)
01.4.3		Clotted cream (plain)
01.4.4		Cream analogues
01.5		Milk powder and cream powder and powder analogues (plain)
01.6.1		Unripened cheese
01.6.2		Ripened cheese
01.6.4		Processed cheese
01.6.5		Cheese analogues
01.7		Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)
01.8.1		Liquid whey and whey products, excluding whey cheeses
02.2.2		Fat spreads, dairy fat spreads and blended spreads
02.3		Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions
02.4		Fat-based desserts excluding dairy-based dessert products of food category 01.7
03.0		Edible ices, including sherbet and sorbet
04.1.2		Processed fruit
04.2.2.2		Dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds

RECOMMENDATIONS

7. CCFA55 is invited to:

- take note of the progress made in the development of the Table 3 Notes; and
- provide comments on the possible images described above.

APPENDIX I

**CONSIDERATION OF THE DEVELOPMENT AND IMPLEMENTATION ISSUES ASSOCIATED WITH
ESTABLISHING TABLE 3 NOTES IN THE GSFA**

Recommendation

The Chair recommends that the EWG for Alignment supports the development of Table 3 (T3) notes to the GSFA.

Such T3 notes could be developed and have the following features:

- Relevant current Table 1 & 2 notes could be used as the basis for future T3 notes.
- Current condition statements already in the 5th column in Table 3 could be used and converted into T3 notes.
- The T3 notes could be listed as T3-1, T3-2, etc to differentiate them from Table 1 & 2 notes.
- A 6th column is proposed to be created to add such T3 notes. A footnote is proposed to be added to the title explaining that the notes only apply to standardized foods. The short title could be 'Notes²', with footnote 2 stating 'Notes relevant to the commodity standards in column 5 of this table only'. This proposal is designed to keep the width of the column narrow.
- The 5th and 6th column could be split into sub rows, with each row dealing only with one commodity standard and linked note, to ensure full clarity on which notes apply to which standards.
- Reference to the commodity standard is not required in notes since they are linked directly to the commodity standard in column 5.
- A question that has not been resolved is whether T3 notes can be used just to identify the function class the food additive is performing in the products conforming to the standard. Some members supported this to ensure full alignment of the standard. Others considered it was not warranted, further noting that it would increase the number of notes needed and make Table 3 larger and more cumbersome.
- The chair recommends the former (i.e. not use T3 notes for this purpose) but suggests further EWG and PWG discussion is required to hopefully reach consensus.