



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 8

CX/FA 25/55/11 Add.1
March 2025

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-fifth Session

STANDARD FOR BAKER'S YEAST

Comments at Step 3 in reply to CL 2025/22-FA

*Comments by Brazil, Burundi, Canada, Cuba, Egypt,
European Union, Senegal, Türkiye, Zambia and ICUMSA*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/22-FA issued in March 2025. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
Cuba agradece la oportunidad de comentar sobre el Anteproyecto de Norma para la levadura de panadería, y en principio consideramos que podemos apoyar el documento presentado.	Cuba
Egypt appreciates the work which done in the document and agrees on it, kindly take into consideration the comment related to item No. (4)	Egypt
Position : Le Sénégal soutient le processus par étape sur l'élaboration de la norme pour la levure de boulangerie Justification : Le canevas est conforme aux normes Codex et les préoccupations en termes de contrôle qualité et méthodes utilisées ainsi que la définition et composition sont prises en compte.	Senegal
Zambia supports the proposals for additions and changes to the Priority List of Substances proposed for evaluation by JECFA This is a critical ingredient in the Confectionary industry and having the standard will help regulate the use of the product. However, under section 6, Zambia would like to emphasize the use of NON GMO <i>Saccharomyces cerevisiae</i> used as starter cultures. This will ensure product use even by countries that do not accept GMOs even in processed products. Its importance confectionary cannot be over emphasized and hence need for use by all members as a GMO free product	Zambia
No obvious formatting errors and the text seems appropriate.	ICUMSA

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
2.1.1 Baker's yeast refers to a type of unicellular fungus typically belonging to the species of <i>Saccharomyces cerevisiae</i>. It is produced by the multiplication of pure strains and is used as a biological leavening agent in bakery applications, with the main function of producing carbon dioxide and flavors. It is not a ready-to-eat product. The use of the word [typically] in the part 2.1 'Product definition' implies that other species of yeast than <i>Saccharomyces cerevisiae</i> could be covered by the standard. Currently, baker's yeast produced and traded globally is only obtained from <i>S. cerevisiae</i> strains. Therefore, the EUMS suggest to delete the word "typically".	European Union

2.1.1 La Baker's yeast<u>levure de boulanger</u> refers to a fait référence à un type of unicellular fungus de champignon unicellulaire appartenant [typically][généralement] belonging to the species of à l'espèce Saccharomyces Saccharomyces cerevisiae. It is produced by the Il est produit par la multiplication of pure strains and is used as a biological leavening de souches pures et est utilisé comme agent in bakery applicationslevant biologique dans les applications de boulangerie, with the main function of producing carbon dioxide and flavorsavec pour fonction principale de produire du dioxyde de carbone et des arômes. It is not a ready-to-eat productIl ne s'agit pas d'un produit prêt à consommer. Burundi proposes the word typically to be deleted to avoid the confusion in the definition	Burundi
2.1.1 Türkiye supports the inclusion of the word "typically". It should be included because, while <i>Saccharomyces cerevisiae</i> is the predominant species used as baker's yeast, new developments in yeast strain engineering may lead to the use of other yeast species in baking applications. Including 'typically' ensures that the statement remains accurate and adaptable to potential advancements in the field.	Türkiye
2.1.1 The use of the word [typically] in the product definition as a way to broaden the scope of the standard to other yeast species than <i>Saccharomyces cerevisiae</i>: For safety reasons, it is not appropriate to use the term in brackets to broadly expand the scope to allow the use of other yeast species. The species <i>Saccharomyces cerevisiae</i> has a long history of safe use, but other yeast species cannot be assumed to be harmless in general, some can even be pathogenic. If other species are identified as appropriate and proven to be safe for this use, the document should include a list specifying them.	Brazil
2.1.3 <u>Dry yeast</u> is <u>a type of baker's yeast, which is</u> obtained by removing water from fresh yeast and then drying to a low water content to maintain a low metabolic activity. For consistency within 2.1 terms, Canada recommends 2.1.3 read: Dry yeast is a type of baker's yeast, which is obtained....	Canada
2.2.1 Fresh yeast is a milky white to yellowish brown solid or liquid with a unique smell <u>typical for yeast</u> and may be in three major forms: The expression "unique smell" is too vague to characterise the smell of baker's yeast. The EUMS recommend to replace it with "smell typical for yeast."	European Union
2.2.2 Dry yeast is an ivory-coloured particle or granule, with a unique smell<u>smell typical for yeast</u>. Dry yeast may be classified into two types. The expression "unique smell" is too vague to characterise the smell of baker's yeast. The EUMS recommend to replace it with "smell typical for yeast."	European Union

2.2.2 (b) “The instant yeast or instant active dry yeast is used in a way that can be added directly to the flour during mixing without a rehydration step in water. The product consists of porous cylindrical particles with a diameter of about 0.2 to 0.7 mm.” The proposed revision adjusts the particle size range of instant yeast from 'about 0.5 mm in diameter and up to a few millimetres in length' to 'about 0.2 to 0.7 mm in diameter' to ensure consistency with section 2.2.2 a. This change improves accuracy by providing a more precise size range for instant yeast particles.	Türkiye
3.2 QUALITY FACTORS a) Yeast as defined in Section 2, along with other optional ingredients.	Türkiye
Table 1 The EUMS recommend to replace the tilde notation (~) by a dash (-) to specify the moisture range in Table 1 for consistency with other Codex documents.	European Union
Table 1 Granulated yeast / crumble yeast 60~72 [60~70] Burundi supports the Moisture (% w/w) of granulated yeast / crumble yeast 60~70	Burundi
[3.2.3 Nitrogen content] <u>Nitrogen content on dry matter typically has a value of 8.0% ± 1.5% for fresh baker's yeast and 7.5% ± 1.5% for dry baker's yeast.</u> The Procedural Manual indicates that quality factors should be limited to those essential for the designation, definition or composition of the product (section 91), and further specifies these should be with the object of preventing fraud. Nitrogen content or crude protein may not provide a measure of the essential composition. Certainly, yeast may have their characteristic crude protein content, fat, oligosaccharides, etc.; but for this food ingredient purpose these parameters may not be significant/relevant.	Canada
[3.2.3 Nitrogen content] The EUMS support inclusion of the quality factor 3.2.3 Nitrogen content.	European Union
<u>Nitrogen content on dry matter typically has [La teneur en azote de la matière sèche a value of généralement une valeur de 8.0%, 0 % ± 1.5% for fresh baker's yeast and ,5 % pour la levure de boulanger fraîche et de 7.5%, 5 % ± 1,5 % pour la levure de boulanger sèche, 5% for dry baker's yeast.]</u> Burundi has no comment because there are unavailability of reference data	Burundi
4. FOOD ADDITIVES With respect to section 4 on food additives, the EUMS suggest to further consult Codex members and observers with the view to receive information on the technological need for food additives in fresh yeasts or for other functional classes than antioxidants and emulsifiers in dried yeasts. The text of this section would need to be reviewed in light of this information.	European Union
4. FOOD ADDITIVES	Egypt

Antioxidants and emulsifiers Food additives used in accordance with Tables 1 and 2 of the <i>General Standard for Food Additives</i> in food category 12.8 (yeast and like products) or [additives] listed in Table 3 of the GSFA are acceptable for use in foods conforming to this standard. Replace "Antioxidants and emulsifiers" with "food additives"	
<u>[6.3 Saccharomyces cerevisiae used as starter cultures should be harmless, not GMO microorganisms.]</u> Canada does not support the text in square brackets in section 6.3. The possibility of using biotechnology in <i>S. cerevisiae</i> in the production of food has been acknowledged. The Scope of the standard sets out Baker's yeast as a food ingredient, and therefore the food safety risk assessment principles set out by Codex should be applicable. Canada recommends that the prohibition against GMOs be removed and that any issues related to the use of biotechnology should respect the guidelines already established in CXG 44-2003, CXG 46-2003, and CXG 76-2011.	Canada
<u>[6.3 Saccharomyces cerevisiae used as starter cultures should be harmless, not GMO microorganisms.]</u> The product definition as defined in 2.1.1 implies a history of safe use and sections 6.1 and 6.2 provide comprehensive requirements. Therefore, the EUMS consider that the proposed additional requirement [6.3] should not be included.	European Union
<u>[6.3 Saccharomyces cerevisiae used as starter-utilisé comme cultures should be harmlessde démarrage devrait être inoffensif, not GMO microorganismspas des micro-organismes OGM.]</u> Burundi supports the statement as it is.	Burundi
<u>[6.3 Saccharomyces cerevisiae used as starter cultures should be harmless, not GMO microorganisms.]</u> As Türkiye, we support this provision requiring that <i>Saccharomyces cerevisiae</i> starter cultures be non-GMO and harmless, as it aligns with our precautionary approach to food safety.	Türkiye
6.3 The exclusion of genetically modified microorganisms (GMO) strains in section 6 (food hygiene): Brazil supports the exclusion of GMOs from the standard, as these cases require specific risk assessment considering the genetic modification. However, it would be more appropriate for this exclusion to be in item 2. DESCRIPTION, rather than in 6. FOOD HYGIENE. In this way, it would be more clear that GMOs are excluded from the scope of the standard.	Brazil
9. METHODS OF ANALYSIS AND SAMPLING Table ElectrometryPotentiometry The EUMS note that pH measurement methods are most commonly described as "potentiometry" in the Codex standard on recommended methods of analysis and sampling (CODEX STAN 234-1999). ISO 11289 also refers to the pH determination method as the "potentiometric method". Therefore, the term "electrometry" should be changed to "potentiometry" in the table under section 9.1. In addition, CCMAS should be consulted as regards the recommended methods.	European Union
<u>[Nitrogen content] [ISO 1871] [Titrimetry, Kjeldahl] [IV]</u>	Canada

See comments in 3.2.3	
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