

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 4(a)

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEx COMMITTEE ON FOOD ADDITIVES

#### Fifty-sixth Session

#### ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS

(Comments of European Union, Thailand, and Global Organization for EPA and DHA Omega-3s (GOED))

#### European Union

The European Union and its Member States (EUMS) would like to provide the following comments:

##### **General comments: - CX/FA 26/56/5 Add.2**

The EUMS welcome and would like to thank Canada, Japan and the United States of America for preparing the document CX/FA 26/56/5 Add.2 ahead of the Physical Working Group taking place on 11 April 2026. The publication of the paper is very important as the ambition is not to only endorse the respective food additive provisions but also to incorporate them in the GSFA, where possible and appropriate, at the same CCFA session.

The EUMS observe that CX/FA 26/56/5 Add.2 identifies that there is less time for the CCFA to consider consequential GSFA amendments, when presented to the physical working group for the first time, as a short-coming. This becomes in particular evident when the process of the GSFA amendment due to the endorsement is compared with the GSFA amendment as a follow-up to the annual Circular Letter requesting proposals for new and/or revision of the GSFA food additive provisions, the latter being subject to the discussion under item 5b to enter the step process at one CCFA session and consequentially to the GSFA Electronic and Physical Working Group and to the Committee prior to and at the following CCFA session.

The EUMS recognise that there is a difference as for endorsement (and incorporation) the Committee does not in principle appraise the technological need, which is done by Commodity / Regional Committees, but CCFA still needs to scrutinise all food additive provisions and consider in particular their safety aspects.

In essence, the EUMS are of the view that new GSFA provisions or revised (extended) GSFA provisions should be subject to the same level of scrutiny no matter whether the GSFA amendments are initiated due to endorsement or as a follow-up to the annual Circular Letter requesting new provisions.

The EUMS take note of the discussion on the working practices (item 9), which should improve consistency of the consideration on endorsement and incorporation and ensure that safety aspects are fully considered when developing new standards or revising the existing ones having the implications on the GSFA.

##### **Specific comments:**

##### **CX/FA 26/56/5**

##### **Regional standard for quick-frozen dumplings (Asia) (for adoption by CAC at Step 8)**

It follows from the referred documents (CX/ASIA 25/23/10, ASIA23/CRD20, REP25/ASIA) that CCASIA considered in detail the technological need for the use of additives for foods conforming to the standard, which is appreciated.

Nevertheless, the EUMS observe that the information provided in the template in Appendix VII, Part B of REP25/ASIA for the individual proposed amendments of the GSFA provisions is not complete.

The EUMS observe that the template used does not include any information on the JECFA evaluation, justification for use and technological need, dietary intake assessment and justification that the use does not mislead the

consumer. Such information is required for proposals for new and/or revision of food additive provisions of the GSFA as per the Codex Procedural Manual and as reflected every year in the Circular Letter requesting proposals for amendments to the GSFA.

The EUMS consider that such information should be available for the requests that extend the use of food additives in the GSFA so that the Committee adheres to the procedure for consideration of the entry and review of food additives in the GSFA as laid down in the Procedural Manual and checks safety aspects of the proposed amendments.

#### Other standards submitted for endorsement in CX/FA 26/56/5

The EUMS understand that for the other standards submitted for the endorsement, no amendments to the GSFA provisions are requested by the respective Committees and therefore the respective Committees consider the existing GSFA provisions in Table 1 and 2 and Table 3, to which they refer, suitable for those standards.

#### CX/FA 26/56/5 Add.1

##### draft standard for microbial omega-3 oils

The EUMS take note of the CCFO29 request to advise on the appropriate categorisation of microbial omega-3 oils in the GSFA and of its preference to establish a new sub-category for oils of microbial origin under FC 02.1 (Fats and oils essentially free from water). The EUMS are open to further consider this option.

#### Thailand

#### CCNE: Regional standard for doogh (Near East) (CXS 332R-2018)

For Regional standard for doogh (Near East) (CXS 332R-2018) of CCNE, Thailand would like to note that the footnote indicated in the functional class table of the Regional Standard for Doogh does not appear to be consistent with the table presented in the report of CCNE12. This may be an editorial error; therefore, Thailand would like to request the Codex Secretariat to kindly review this matter. The food additive table from the CCNE12 report in Appendix II, page 20, is as follows.

|                                                                 | Doogh (plain, not heat treated) | Doogh (Flavoured, not heat treated)     | Doogh (plain, heat treated) | Doogh (Flavoured, heat treated)         |
|-----------------------------------------------------------------|---------------------------------|-----------------------------------------|-----------------------------|-----------------------------------------|
| Food category of the <i>General standard for food additives</i> | 01.2.1.1                        | 1.1.4 (Drinks based on fermented milks) | 01.2.1.2                    | 1.1.4 (Drinks based on fermented milks) |
| Acidity regulators:                                             | -                               | X                                       | X                           | X                                       |
| Carbonating agents:                                             | X <sup>b</sup>                  | X <sup>b</sup>                          | X <sup>b</sup>              | X <sup>b</sup>                          |
| Colours:                                                        | -                               | X                                       | -                           | X                                       |
| Emulsifiers:                                                    | -                               | X                                       | -                           | X                                       |
| Flavour enhancers:                                              | -                               | X                                       | -                           | X                                       |
| Packaging gases:                                                | -                               | X                                       | X                           | X                                       |
| Preservatives:                                                  | -                               | -                                       | -                           | X                                       |
| Stabilizers:                                                    | X <sup>a</sup>                  | X                                       | X                           | X                                       |
| Sweeteners:                                                     | -                               | X <sup>c</sup>                          | -                           | X <sup>c</sup>                          |
| Thickeners:                                                     | X <sup>a</sup>                  | X                                       | X                           | X                                       |

<sup>a</sup> Use is restricted to reconstitution and recombination and if permitted by national legislation in the country of sale to the final consumer.

<sup>b</sup> Use of carbonating agents is technologically justified in drinks based on fermented milk only.

<sup>c</sup> The use of sweeteners is limited to milk and milk derivatives-based products energy reduced or with no added sugar.

X The use of additives belonging to the class is technologically justified. In the case of flavoured products the additives are technologically justified in the dairy portion.

- The use of additives belonging to the class is not technologically justified.

**GOED**

The Global Organization for EPA and DHA Omega-3s (GOED) wishes to provide the following comments in relation to the endorsement of the food additive provisions in the proposed draft standard for microbial omega-3 oils at Step 5, as presented in Codex document CX/FA 26/56/5 Add.1 March 2026, and their incorporation in the General Standard for Food Additives (GSFA), in line with the Chair's proposal to be considered for the first time by the Physical Working Group (PWG), as presented in Annex 1 (Explanatory) of Codex document CX/FA 26/56/5 Add.2 March 2026 with regard to the food additive provision for ascorbyl palmitate (INS 304).

GOED supports the endorsement of the food additive provisions in the proposed draft standard for microbial omega-3 oils at Step 5, as presented in the ANNEX of Codex document CX/FA 26/56/5 Add.1 March 2026, and their incorporation as food additive provisions in the GSFA, as proposed by the 29<sup>th</sup> Session of the Codex Committee of Fats and Oils (CCFO29).

GOED proposes an amendment with regard to the food additive provision for ascorbyl palmitate (INS 304):

Ascorbyl palmitate (INS 304)

The 100<sup>th</sup> Meeting of the Joint FAO/WHO Expert Committee on Food Additives (JECFA)<sup>1</sup> established a revised Acceptable Daily Intake (ADI) of "not specified" (NS). GOED supports this ADI and recommends CCFA56 amend:

- the food additive provision for ASCORBYL ESTERS (INS 304, 305) by adding a Note to the maximum level of 2500 mg/kg to indicate the use of ascorbyl palmitate (INS 304) at a maximum level of GMP, as follows: **\*Use of ascorbyl palmitate (INS 304) in microbial omega-3 oils at GMP.**
- the General Standard for Food Additives (CXS 192-1995) to include in Tables 1 and 2 the food additive provisions in the proposed draft standard for microbial omega-3 oils in proposed new food category 02.1.4 Microbial oils and fats for microbial omega-3 oils, including the insertion of a new Note to the maximum level of 2500 mg/kg for ASCORBYL ESTERS (INS 304, 305) to indicate the use of ascorbyl palmitate (INS 304) at a maximum level of GMP, as follows: **\*Use of ascorbyl palmitate (INS 304) in microbial omega-3 oils at GMP.**

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<sup>1</sup> <https://openknowledge.fao.org/items/c69eaacf-dd6b-478e-ad98-3e7d90df6275>