

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5(a)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-sixth Session

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA) (CXS 192-1995): REPORT OF THE EWG ON THE GSFA

(Comments of Indonesia, Thailand, Uganda, Natural Food Colours Association (NATCOL) and International Special Dietary Foods Industries (ISDI))

Indonesia

Indonesia would like to thank eWG chaired by United States of America for preparing working document on General Standard for Food Additives (GSFA): Report of The Electronic Working Group on The GSFA. Indonesia would like to provide the following comment:

ANNEX 3A

REVOCATION OF GUAR GUM (INS 412), DISTARCH PHOSPHATE (INS 1412), PHOSPHATED DISTARCH PHOSPHATE (INS 1413), ACETYLATED DISTARCH PHOSPHATE (INS 1414) AND HYDROXYPROPYL STARCH (INS 1440) IN FCS 13.1.1 (INFANT FORMULAE) AND 13.1.3 (FORMULAE FOR SPECIAL MEDICAL PURPOSES FOR INFANTS)

Indonesia supports the revocation of guar gum (INS 412), distarch phosphate (INS 1412), phosphated distarch phosphate (INS 1413), acetylated distarch phosphate (INS 1414), and hydroxypropyl starch (INS 1440) in FC 13.1.1 (Infant formulae) and FC 13.1.3 (Formulae for special medical purposes for infants).

ANNEX 3B

CONSIDERATION OF THE REMOVAL OF NOTE XS73 (EXCLUDING PRODUCTS CONFORMING TO THE STANDARD FOR CANNED BABY FOODS (CXS 73-1981)) FROM PROVISIONS IN FC 13.2 (COMPLEMENTARY FOODS FOR INFANTS AND YOUNG CHILDREN) TO ALLOW FOR THE USE OF ADDITIVES AS NUTRIENT CARRIERS IN FOODS CONFORMING TO THE STANDARD FOR CANNED BABY FOODS (CXS 73-1981) BASED ON THEIR LISTING IN THE ADVISORY LISTS OF NUTRIENT COMPOUNDS FOR USE IN FOODS FOR SPECIAL DIETARY USES INTENDED FOR INFANTS AND YOUNG CHILDREN (CXG 10-1979) PART D.

Category No. 13.2 (Complementary foods for infants and young children)

Corresponding commodity standards: CODEX STAN 73-1981: Acidity regulators, antioxidants, emulsifiers, packaging gases and thickeners used in accordance with Table 1 and Table 2 of the GSFA are permitted in canned baby foods; **CODEX STAN 74-1981:** Acidity regulators, anticaking agents, antioxidants, carriers, emulsifiers, packaging gases, raising agents and thickeners used in accordance with Table 1 and Table 2 of the GSFA are permitted in processed cereal-based foods for infants and young children

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
GUM ARABIC (ACACIA GUM)	414	10,000	273, 592 & XS73	2014	Anticaking agent, Bulking agent, Carrier, Humectant, Stabilizer, Sweetener, Thickener	Revise Adopted Provision - Maintain use level of 10,000 mg/kg and Note 273 - Remove Notes 592 and XS73 - Add New Note: <i>“Except for use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) and the Standard for processed cereal-based foods for infants and young children (CXS 74-1981) at 10 mg/kg in the food as consumed.”</i> Chair’s Note: A comment by an EWG member raised concerns that the new note as originally written would not prevent the use of the additive at the higher use level in CXS 73-1981 and CXS 74-1981 when used for a functional effect other than nutrient carrier. They recommend adding the word “only” in the note to clarify that the additive can only be used as a nutrient carrier in the two standards at 10 mg/kg. We have attempted to address their concern by adding the word “only” above (in bold). This will likely be further discussed during the GSFA PWG.	Indonesia supports maintaining the maximum level at 10,000 mg/kg and Note 273, removing Notes 592 and XS73, and adding the new note as proposed.
			318,		Anticaking agent, Bulking agent, Carrier, Humectant, Stabilizer,	Revise Adopted Provision - Maintain use level of 2000 mg/kg and Note 318 - Remove Notes 592 and XS73 - Add New Note: <i>“Except for use only as a nutrient carrier in a raw material or other</i>	Indonesia supports maintaining the maximum level at 2000 mg/kg and Note 318, removing Notes 592 and XS73, and adding the new note as proposed.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
SILICON DIOXIDE, AMORPHOUS	551	2000	592 & XS73	2023	Sweetener, Thickener	<i>ingredient used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) and the Standard for processed cereal-based foods for infants and young children (CXS 74-1981) at 10 mg/kg in the food as consumed."</i> Chair's Note: A comment by an EWG member raised concerns that the new note as originally written would not prevent the use of the additive at the higher use level in CXS <i>73-1981 and CXS 74-1981 when used for a functional effect other than nutrient carrier. They recommend adding the word "only" in the note to clarify that the additive can only be used as a nutrient carrier in the two standards at 10 mg/kg. We have attempted to address their concern by adding the word "only" above (in bold). This will likely be further discussed during the GSFA PWG</i>	
STARCH SODIUM OCTENYL SUCCINATE	1450	50000	269, 49 & XS73	2023	Anticaking agent, Bulking agent, Carrier, Humectant, Stabilizer, Sweetener, Thickener	Revise Adopted Provision - Maintain use level of 50000 mg/kg and Note 269. - Remove Notes 49 and XS73 - Add New Note: "Except for use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) and the Standard for processed cereal-based foods for infants and young children (CXS 74-1981) at 100 mg/kg in the food as consumed."	Indonesia supports maintaining the maximum level at 50000 mg/kg and Notes 269, removing Note 49 and XS73, and adding the new note as proposed.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
						Chair's Note: A comment by an EWG member raised concerns that the new note as originally written would not prevent the use of the additive at the higher use level in CXS 73-1981 and CXS 74-1981 when used for a functional effect other than nutrient carrier. They recommend adding the word "only" in the note to clarify that the additive can only be used as a nutrient carrier in the two standards at 10 mg/kg. We have attempted to address their concern by adding the word "only" above (in bold). This will likely be further discussed during the GSFA PWG	

ANNEX 4

MATTERS REFERRED FROM JECFA RELATED TO HIGH EXPOSURE TO POLYGLYCEROL ESTERS OF FATTY ACIDS (INS 475) FOR COMMENT ON TECHNOLOGICAL JUSTIFICATION AND RECONSIDERATION OF ACTUAL USE AND USE LEVELS FOR ALL ADOPTED PROVISIONS IN THE GSFA FOR INS 475

Category No. 01.7 (Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000	354 & 629	2024	Emulsifier, Stabilizer	Revise Adopted Provision - Lower use level to 2000 mg/kg - Maintain Note 629 Chair's Note: If the use level is lowered to 2000 mg/kg then Note 354 is not needed.	Indonesia supports lowering the maximum level to 2000 mg/kg and maintaining Note 629 in FC 01.7 (Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)).

Category No. 02.2.2 (Fat spreads, dairy fat spreads and blended spreads)

Corresponding commodity standards: CODEX STAN 253-2006: Emulsifiers and stabilizers used in accordance with Tables 1 and 2 of the GSFA as well as some emulsifiers and stabilizers listed in Table 3 of the GSFA are permitted in dairy fat spreads with <70% milk fat content; **CODEX STAN 256-2007:** Emulsifiers and stabilizers used in accordance with Tables 1 and 2 of the GSFA are permitted in fat spreads and blended spreads

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000	359 & 557	2023	Emulsifier, Stabilizer	.Maintain Adopted Provision	Indonesia supports maintaining the adopted provision in FC 02.2.2 (Fat spreads, dairy fat spreads and blended spreads).

Category No. 02.3 (Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	20000	363	2016	Emulsifier, Stabilizer	.Revise Adopted Provision - Lower use level to 5000 mg/kg - Maintain Note 363	Indonesia supports lowering the maximum level to 5000 mg/kg and maintaining Note 363 in FC 02.3 (Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions).

Category No. 05.2 (Confectionary including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment

POLYGLYCEROL ESTERS OF FATTY ACIDS	475	2000	367 & XS309R	2016	Emulsifier, Stabilizer	.Maintain Adopted Provision	Indonesia supports maintaining the adopted provision in FC 05.2 (Confectionery including hard and soft candy, nougats, etc., other than FC 05.1, 05.3, and 05.4).
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Category No. 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	2000	368	2016	Emulsifier, Stabilizer	.Maintain Adopted Provision	Indonesia supports maintaining the adopted provision in FC 05.4 (Decorations, toppings (non-fruit) and sweet sauces).

Category No. 07.1.1 (Breads and rolls)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10000	372	2016	Emulsifier, Stabilizer	.Revise Adopted Provision - Lower use level to 1000 mg/kg - Maintain Note 372	Indonesia supports lowering the maximum level to 1000 mg/kg and maintaining Note 372 in FC 07.1.1 (Breads and rolls).

Category No. 07.2.1 (Cakes, cookies and pies (e.g. fruit-filled or custard types))

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
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POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10000		2016	Emulsifier, Stabilizer	.Maintain Adopted Provision	Indonesia supports maintaining the adopted provision in FC 07.2.1 (Cakes, cookies, and pies, e.g. fruit-filled or custard types).
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Category No. 07.2.2 (Other fine bakery products (e.g. doughnuts, sweet rolls, scones, and muffins))

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	10000		2016	Emulsifier, Stabilizer	.Maintain Adopted Provision	Indonesia supports maintaining the adopted provision in FC 07.2.2 (Other fine bakery products, e.g. doughnuts, sweet rolls, scones, and muffins).

ANNEX 1

CONSIDERATION OF LOWER USE LEVELS FOR ADOPTED PROVISIONS FOR INDIGOTINE (INS 132) IN FC 04.1.2.8, AND ALLURA RED (INS 129) AND INDIGOTINE (INS 132) IN FC 04.1.2.11

Category No. 04.1.2.11 (Fruit fillings for pastries)

Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
ALLURA RED AC	129	300	161	2009	Colour	.Revise adopted provision - Maintain use level at 300 mg/kg - Remove Note 161	Indonesia supports maintaining the maximum level at 300 mg/kg and removing Note 161 in FC 04.1.2.11 (Fruit fillings for pastries).

ANNEX 4**CONSIDERATION OF TECHNOLOGICAL JUSTIFICATION AND USE LEVEL IN ALL APPROPRIATE SUBCATEGORIES FOR DRAFT PROVISIONS FOR CARAMEL III – AMMONIA CARAMEL (INS 150C) AND CARAMEL IV – SULFITE AMMONIA CARAMEL (INS 150D) IN FCS 08.1 AND 08.3 AND THE ADOPTED PROVISIONS FOR CARAMEL III – AMMONIA CARAMEL (INS 150C) AND CARAMEL IV – SULFITE AMMONIA CARAMEL (INS 150D) IN THE PARENT FC 08.0****Category No. 08.2.1.1 (Cured (including salted) non-heat treated processed meat, poultry, and game products in whole pieces or cuts)****Corresponding commodity standards:** CXS 350R-202: Colours are not permitted in dried meat

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final Proposal	EWG	Indonesia Comment
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	.Adopt at 1000 mg/kg with Notes 3, 4, 16 and XS350R		Indonesia supports adopting the maximum level at 1000 mg/kg with Note 3,4,16 and XS350R in FC 08.2.1.1 (Cured (including salted) non-heat treated processed meat, poultry, and game products in whole pieces or cuts)

Category No. 08.2.2 (Heat-treated processed meat, poultry, and game products in whole pieces or cuts)**Corresponding commodity standards:** CODEX STAN 96-1981: Only certain Table 3 food additives are acceptable for use in cooked cured ham; **CODEX STAN 97-1981:** Only certain Table 3 food additives are acceptable for use in cooked cured pork shoulder; CXS 350R-202: Colours are not permitted in dried meat

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final Proposal	EWG	Indonesia Comment
CARAMEL III- AMMONIA CARAMEL	150c	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	.Adopt at 9,600 mg/kg with Notes 3, 4, 16, XS96, XS97 and XS350R.		Indonesia supports adopting the maximum level at 9,600 mg/kg with Notes 3, 4, 16, XS96, XS97 and XS350R in FC 08.2.2 (Heat-treated processed meat, poultry, and game products in whole pieces or cuts).

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final Proposal EWG	Indonesia Comment
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 3,400 mg/kg with Notes 3, 4, 16, XS96, XS97 and XS350R.	Indonesia supports adopting the maximum level at 3,400 mg/kg with Notes 3, 4, 16, XS96, XS97 and XS350R in FC 08.2.2 (Heat-treated processed meat, poultry, and game products in whole pieces or cuts)

Category No. 08.2.3 (Frozen processed meat, poultry, and game products in whole pieces or cuts)

Corresponding commodity standards: CXS 350R-202: Colours are not permitted in dried meat

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final Proposal EWG	Indonesia Comment
CARAMEL III- AMMONIA CARAMEL	150c	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	.Adopt at 15,100 mg/kg with Notes 3, 4, 16 and XS350R.	Indonesia supports adopting the maximum level at 15,100 mg/kg with Notes 3, 4, 16 and XS350R in FC 08.2.3 (Frozen processed meat, poultry, and game products in whole pieces or cuts).
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 300 mg/kg with Notes 3, 4, 16 and XS350R.	Indonesia supports adopting the maximum level at 300 mg/kg with Notes 3, 4, 16 and XS350R in FC 08.2.3 (Frozen processed meat, poultry, and game products in whole pieces or cuts).

Category No. 08.3.1.1 (Cured (including salted) non-heat treated processed comminuted meat, poultry, and game products)

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	5000	335	2	Colour	Adopt at 2,000 mg/kg with Note 373 (For use in sausage only) <i>Chair's Note: The comments received indicate that it may not be appropriate to use Note 335 in this food category. The note either implies that the products only contain vegetable protein (in which case</i>	Indonesia supports adopting the maximum level at 2,000 mg/kg with Note 373 (for use in sausage only) in FC 08.3.1.1 (Cured (including salted) non-heat treated processed

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
						<i>this food category would not be the correct place for them) or it implies that only products with mixed meat and vegetable protein are appropriate (but we have comments indicating Caramel is appropriate in meat products alone). Other comments note that caramel color is used only in sausages. As a result, we are proposing to add Note 373 in place of Note 335.</i>	comminuted meat, poultry, and game products)

Category No. 08.3.3 (Frozen processed comminuted meat, poultry, and game products)

Corresponding commodity standards: None

Canada: There are no corresponding commodity standards for FC 08.3.3. As such, Canada recommends removing notes XS88, XS89, and XS98.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
CARAMEL III-AMMONIA CARAMEL	150c	5000	335		Colour	.Adopt at 9,400 with no notes. <i>Chair's Note: Use of Note 335 (For use in products containing vegetable protein only) was not considered appropriate for this food category based on comments received.</i>	Indonesia supports adopting the maximum level at 9,400 with no notes in FC 08.3.3 (Frozen processed comminuted meat, poultry, and game products)
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 2,000 with no notes. <i>Chair's Note: Use of Note 335 (For use in products containing vegetable protein only) was not considered appropriate for this food category based on comments received.</i>	Indonesia supports adopting the maximum level at 2,000 mg/kg with no notes in FC 08.3.3 (Frozen processed comminuted meat, poultry, and game products).

COLOURS IN FC 09.0 AND THEIR SUBCATEGORIES**Category No. 09.2.4.1 (Cooked fish and fish products)****Corresponding commodity standards:** None**GSFA:** Parent FC 09.2 is in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
AZORUBINE (CARMOISINE)	122	500		7	Colour	Adopt at 15 mg/kg	Indonesia supports adopting the maximum level at 15 mg/kg in FC 09.2.4.1 (Cooked fish and fish products)

Category No. 09.2.4.2 (Cooked mollusks, crustaceans, and echinoderms)**Corresponding commodity standards:** None**GSFA:** Parent FC 09.2 is in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
AZORUBINE (CARMOISINE)	122	500		7	Colour	.Discontinue	Indonesia proposes to reinstate the maximum level at 15 mg/kg in FC 09.2.4.2 (Cooked mollusks, crustaceans, and echinoderms), as the colour provides the desired colour in the relevant food category and exposure remains safe at this level.
TARTRAZINE	102	250		7	Colour	Adopt at 400 mg/kg with Note 479 (<i>"For use in cooked mollusks only"</i>)	Indonesia proposes a maximum level at 15 mg/kg in FC 09.2.4.2 (Cooked mollusks, crustaceans, and echinoderms), as this level meets the technological need.

Category No. 09.2.4.3 (Fried fish and fish products, including mollusks, crustaceans, and echinoderms)**Corresponding commodity standards:** None**GSFA:** Parent FC 09.2 is in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
CURCUMIN	100(i)	500	16	7	Colour	.Adopt at 100 mg/kg with Note 16 Chair's Note: All currently adopted colours in FC 09.2.4.3 currently contain Note 16. For consistency, we have included it here.	Indonesia considers that the ML of 500 mg/kg gives exposure of 10% ADI in children and 4,17% ADI in adults. Indonesia considers exposure remains safe at this level. Therefore, Indonesia proposes the ML of 500 mg/kg in FC 09.2.4.3 (Fried fish and fish products, including mollusks, crustaceans, and echinoderms).

Category No. 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: CODEX STAN 167-1989: Preservatives are permitted in accordance with GSFA; CODEX STAN 189-1993: No additives are permitted; CODEX STAN 222-2001: Flavour enhancers and sequestrants are permitted in accordance with GSFA; CODEX STAN 236-2003: No additives are permitted; CODEX STAN 244-2004: Acidity regulators, antioxidants and preservatives are permitted in accordance with GSFA; CODEX STAN 311-2013: Acidity regulators, colours and preservatives and only certain Table 3 acidity regulators, antioxidants and packaging gases as indicated in Table 3 of the GSFA are permitted in smoked fish, Acidity regulators, colours and preservatives only certain Table 3 acidity regulators, antioxidants and packaging gases as indicated in Table 3 of the GSFA are permitted in smoke-flavoured fish, No additives are permitted in smoke-dried fish

GSFA: Parent FC 09.2 is in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
CURCUMIN	100(i)	50			Colour	Adopt at 20 mg/kg with Note 50 ("For use in fish roe only"), XS167, XS189, XS222, XS236, XS244 and XS311 Chair's Note: This provision is moved down from the parent category (FC 09.2) based on a member request to use in fish roe	Indonesia considers that the ML of 500 mg/kg gives exposure of 16,67% ADI in children and 6,94% ADI in adults. Indonesia considers exposure remains safe at this level. Therefore, Indonesia proposes the ML of 500 mg/kg in FC 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms).

Category No. 09.3.1 (Fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly)**Corresponding commodity standards:** None**GSFA:** FC is not in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
CURCUMIN	100(i)	500	16	7	Colour	.Adopt at 100 mg/kg with Note 16	Indonesia considers that the ML of 500 mg/kg gives exposure of 26,67% ADI in children and 11,11% ADI in adults. Indonesia considers exposure remains safe at this level. Therefore, Indonesia proposes the ML of 500 mg/kg in FC 09.3.1 (Fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly).

Category No. 09.3.2 (Fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine)**Corresponding commodity standards:** None**GSFA:** FC is not in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Indonesia Comment
CURCUMIN	100(i)	500	16	7	Colour	.Adopt at 100 mg/kg with Note 16	Indonesia considers that the ML of 500 mg/kg gives exposure of 26,67% ADI in children and 11,11% ADI in adults. Indonesia considers exposure remains safe at this level. Therefore, Indonesia proposes the ML of 500 mg/kg in FC 09.3.2 (Fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine)

Category No. 09.3.3 (Salmon substitutes, caviar, and other fish roe products)**Corresponding commodity standards:** CODEX STAN 291-2010: Acidity regulators, antioxidants and preservatives are permitted in accordance with GSFA**GSFA:** FC is not in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final Proposal	EWG	Indonesia Comment
CURCUMIN	100(i)	500		7	Colour	.Adopt at 500 mg/kg with Note XS291		Indonesia supports adopting the maximum level at 500 mg/kg with Note XS291 in FC 09.3.3 (Salmon substitutes, caviar, and other fish roe products)

Category No. 09.3.4 (Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g. fish paste), excluding products of food categories 09.3.1 - 09.3.3)

Corresponding commodity standards: None

GSFA: FC is not in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final Proposal	EWG	Indonesia Comment
CURCUMIN	100(i)	500		7	Colour	.Adopt at 100 mg/kg		Indonesia considers that the ML of 500 mg/kg gives exposure of 26,67% ADI in children and 11,11% ADI in adults. Indonesia considers exposure remains safe at this level. Therefore, Indonesia proposes the ML of 500 mg/kg in FC 09.3.4 (Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g. fish paste), excluding products of food categories 09.3.1 - 09.3.3)

Category No. 09.4 (Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms)

Corresponding commodity standards: **CODEX STAN 3-1981:** No food additives are permitted; **CODEX STAN 37-1981:** Acidity regulators, colours, and sequestrants and only certain Table 3 acidity regulators as indicated in Table 3 of the GSFA are permitted in accordance with GSFA; **CODEX STAN 70-1981:** Acidity regulators and only certain Table 3 acidity regulators, emulsifiers, gelling agents, stabilizers and thickeners as indicated in Table 3 of the GSFA are permitted in accordance with GSFA; **CODEX STAN 94-1981:** Only certain Table 3 acidity regulators, emulsifiers, gelling agents, stabilizers and thickeners as indicated in Table 3 of the GSFA are permitted in accordance with GSFA; **CODEX STAN 119-1981:** Only certain Table 3 acidity regulators, emulsifiers, gelling agents, stabilizers and thickeners as indicated in Table 3 of the GSFA are permitted in accordance with GSFA

GSFA: FC is not in the Annex to Table 3. Colours have previously been adopted in this FC

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Indonesia Comment
AZORUBINE (CARMOISINE)	122	500		7	Colour	.Adopt at 290 mg/kg with Notes XS3, XS37, XS70, XS90, XS94, and XS119	Indonesia proposes a maximum level at 15 mg/kg in FC 09.4 (Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms), as the colour provides the desired colour in the relevant food category and exposure remains safe at this level.

ANNEX 3

ADDITION SPECIFIC ALLOWANCE OF GLYCEROL IN ADDITIONAL COMMODITY STANDARD TABLE 3

General Note: Information provided by the China in CX/FA 25/55/8

- **Revise adopted provision:** Submitted by China at CCFA55 (CX/FA 25/55/8). Proposal is to add **CS 249-2006**.
- **Justification:** Glycerol could interact with emulsifiers added into instant noodles, thereby enhancing the emulsifying function. Additionally, glycerol could improve the water retention and anti-aging properties of flour-based products, enhances their resistance to freezing. And also glycerol has the capability to reduce the water activity of the emulsion oil products which could avoid the microbial contaminations and eventually protect instant noodle products.
- **Safety:** The use of glycerol was considered by JECFA in 2002.
- **Mislead Consumer:** The presence of glycerol would be declared on product labels.

Additive	INS	Step Adopted /	INS Functional Class	Specific allowance in the following commodity standards	Final EWG Proposal	Indonesia Comment
Glycerol	422	1999	Humectant, Thickener	CS 87-1981, CS 253-2006 (see functional class and footnote)	Revise adopted provision; Add CS 249-2006	Indonesia supports revising the adopted provision for glycerol (INS 422) to add CS 249-2006 and discontinuing the step provision.
Glycerol	422	2	Humectant, Thickener	CS 87-1981, CS 253-2006 (see functional class and footnote), <u>CS 249-2006</u>	Discontinue provision in step process if adopted provision is revised.	

Thailand

Annex 1: MATTERS REFERRED FROM THE CODEX SECRETARIAT RELATED TO THE APPROPRIATE REPLACEMENT NOTES FOR NOTES XS130 AND XS67 ASSOCIATED WITH PROVISIONS IN FC 04.1.2.2

Category No. 04.1.2.2)Dried Fruit(

Corresponding commodity standards: CODEX STAN 360-2020)General Standard for Dried Fruits(; CXS 177-1991)Standard for Desiccated Coconut(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
TOCOPHEROLS (page 5)	307a, b, c	200	XS67 & XS130	2018	Antioxidant	Revise Adopted Provision - Maintain use level of 200 mg/kg - Delete Notes XS67 and XS130 - Add New Note "Excluding dried apricots, dates, raisins, dried longans and dried persimmons conforming to the General Standard for Dried Fruits (CXS 360-2020)."	Thailand supports the proposal.

ANNEX 2: Matters referred from the Codex Secretariat related to the provision for Jagua)genipin-glycine(blue)INS 183(in FCs 01.1.4 and 01.7 for comment for consideration to include Note XS243

Category No. 01.1.4)Flavoured fluid milk drinks(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
JAGUA (GENIPIN-GLYCINE) BLUE (page 6)	183	160	52 & 601	2024	Colour	Maintain Adopted Provision at 160 mg/kg with Note 52 and 601 (without XS243)	Thailand supports the proposal.

Category No. 01.7)Dairy-based desserts)e.g. pudding, fruit or flavoured yoghurt((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
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JAGUA)GENIPIN- GLYCINE(BLUE (page 6)	183	120	600 & 601	2024	Colour	Maintain Adopted Provision at 120 mg/kg with Note 600 and 601 (without XS 243)	Thailand supports the proposal.
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ANNEX 3A: **Revocation of guar gum)INS 412(, distarch phosphate)INS 1412(, phosphated distarch phosphate)INS 1413(, acetylated distarch phosphate)INS 1414(and hydroxypropyl starch)INS 1440(in FCs 13.1.1)Infant formulae(and 13.1.3)Formulae for special medical purposes for infants(**

Category No. 13.1.1 (Infant formulae(

Additive	INS	Max Level)mg/kg(	Notes	Step/ Adopted	Final EWG Proposal	Comment of Thailand
ACETYLATED DISTARCH PHOSPHATE (page 8)	1414	5000	150, 284, 292, 381 & 551	2023	Revoke	Thailand supports the proposal.
DISTARCH PHOSPHATE (page 8)	1412	5000	150, 284, 292, 381 & 551	2023	Revoke	Thailand supports the proposal.
GUAR GUM (page 8)	412	1000	14, 381 & 551	2023	Revoke	Thailand supports the proposal.
HYDROXYPROPYL STARCH (page 8)	1440	5000	150, 284, 292, 381 & 551	2023	Revoke	Thailand supports the proposal.
PHOSPHATED DISTARCH PHOSPHATE (page 8)	1413	5000	150, 284, 292, 381 & 551	2023	Revoke	Thailand supports the proposal.

Category No. 13.1.3 (Formulae for special medical purposes for infants(

Additive	INS	Max Level)mg/kg(	Notes	Step/ Adopted	Final EWG Proposal	Comment of Thailand
ACETYLATED DISTARCH PHOSPHATE (page 8)	1414	5000	150, 284, 292, 381 & 551	2023	Revoke	Thailand supports the proposal.
DISTARCH PHOSPHATE (page 8)	1412	5000	150, 284, 292, 381 & 551	2023	Revoke	Thailand supports the proposal.
GUAR GUM (page 8)	412	1000	14, 381 & 551	2023	Revoke	Thailand supports the proposal.

Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	Final EWG Proposal	Comment of Thailand
HYDROXYPROPYL STARCH (page 9)	1440	5000	150, 284, 292, 381 & 551	2023	Revoke	Thailand supports the proposal.
PHOSPHATED DISTARCH PHOSPHATE (page 9)	1413	5000	150, 284, 292, 381 & 551	2023	Revoke	Thailand supports the proposal.

ANNEX 3B: Consideration of the removal of note xs73 (excluding products conforming to the standard for canned baby foods (CXS 73- 1981)) from provisions in fc 13. 2 (complementary foods for infants and young children) to allow for the use of additives as nutrient carriers in foods conforming to the standard for canned baby foods (CXS 73-1981) based on their listing in the advisory lists of nutrient compounds for use in foods for special dietary uses intended for infants and young children (CXG 10-1979) Part D.

Category No. 13.2 (Complementary foods for infants and young children)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
GUM ARABIC (ACACIA GUM) (page 10)	414	10,000	273, 592 & XS73	2014	Anticaking agent, Bulking agent, Carrier, Humectant, Stabilizer, Sweetener, Thickener	Revise Adopted Provision - Maintain use level of 10,000 mg/kg and Note 273 - Remove Notes 592 and XS73 - Add New Note: <i>"Except for use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) and the Standard for processed cereal-based foods for infants and young children (CXS 74-1981) at 10 mg/kg in the food as consumed."</i>	Thailand supports the proposal.
MANNITOL (page 11)	421	10	592 & XS73	2023	Anticaking agent, Bulking agent, Carrier, Humectant, Stabilizer,	Revise Adopted Provision - Maintain use level of 10 mg/kg - Remove Notes 592 and XS73	Thailand supports the proposal.

					Sweetener, Thickener	- Add New Note: <i>"For use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for Canned Baby Foods (CXS 73-1981) and the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) at 10 mg/kg in the food as consumed."</i>	
SILICON DIOXIDE, AMORPHOUS (page 11)	551	2000	318, 592 & XS73	2023	Anticaking agent, Bulking agent, Carrier, Humectant, Stabilizer, Sweetener, Thickener	Revise Adopted Provision - Maintain use level of 2000 mg/kg and Note 318 - Remove Notes 592 and XS73 - Add New Note: <i>"Except for use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) and the Standard for processed cereal- based foods for infants and young children (CXS 74- 1981) at 10 mg/kg in the food as consumed."</i>	Thailand supports the proposal.
STARCH SODIUM OCTENYL SUCCINATE (page 12)	1450	50000	269, 49 & XS73	2023	Anticaking agent, Bulking agent, Carrier, Humectant, Stabilizer, Sweetener, Thickener	Revise Adopted Provision - Maintain use level of 50000 mg/kg and Note 269. - Remove Notes 49 and XS73 - Add New Note: <i>"Except for use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to</i>	Thailand supports the proposal.

						<i>the Standard for canned baby foods (CXS 73-1981) and the Standard for processed cereal-based foods for infants and young children (CXS 74-1981) at 100 mg/kg in the food as consumed."</i>	
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ANNEX 4: Matters referred from JECFA related to high exposure to polyglycerol esters of fatty acids (INS 475) for comment on technological justification and reconsideration of actual use and use levels for all adopted provisions in the GSFA for INS 475

General comments

Thailand conducted a dietary exposure assessment for polyglycerol esters of fatty acids)INS 475(by using national food consumption data, at the proposed ML. The results revealed that the mean of total dietary intake of young children aged 3–6 years and 6–13 years was 237.87% and 121.47% of the ADI, respectively, which indicates a safety concern.

Specific comments

Category No. 01.3.2)Beverage whiteners(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 14)	475	5000	352, XS250 & XS252	2016	Emulsifier, Stabilizer	Maintain Adopted Provision - Maintain use level at 5000 mg/kg - Maintain Notes 352, XS250 & XS252	Thailand supports the proposal.

Category No. 01.4.1)Pasteurized cream)plain((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 14)	475	6000	626	2024	Emulsifier, Stabilizer	Maintain Adopted Provision - Maintain use level at 6000 mg/kg - Maintain Notes 626	Thailand supports the proposal.

Category No. 01.4.3)Clotted cream)plain((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
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POLYGLYCEROL ESTERS OF FATTY ACIDS (page 15)	475	6000	2016		Emulsifier, Stabilizer	Maintain Adopted Provision - Maintain use level at 6000 mg/kg	Thailand supports the proposal.
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Category No. 01.7)Dairy-based desserts)e.g. pudding, fruit or flavoured yoghurt(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 17)	475	5000	354 & 629	2024	Emulsifier, Stabilizer	Revise Adopted Provision - Lower use level to 2000 mg/kg - Maintain Note 629	Thailand supports the proposal.

Category No. 02.2.2)Fat spreads, dairy fat spreads and blended spreads(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 17)	475	5000	359 & 557	2023	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 02.4)Fat-based desserts excluding dairy-based dessert products of food category 01.7(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 18)	475	2000		2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 05.1.5)Imitation chocolate, chocolate substitute products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 20)	475	2000	366	2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 05.2)Confectionary including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
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POLYGLYCEROL ESTERS OF FATTY ACIDS (page 20)	475	2000	367 & XS309R	2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.
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Category No. 05.3)Chewing gum(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 20)	475	5000		2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 05.4)Decorations)e.g. for fine bakery wares(, toppings)non-fruit(and sweet sauces(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 20)	475	2000	368	2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 06.4.3)Pre-cooked pastas and noodles and like products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 21)	475	2000	194	2016	Emulsifier, Stabilizer	Maintain existing provision	Thailand supports the proposal.

Category No. 07.1.6)Mixes for bread and ordinary bakery wares(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 23)	475	15000	11	2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 07.2.1)Cakes, cookies and pies)e.g. fruit-filled or custard types((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 23)	475	10000		2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 07.2.2)Other fine bakery products)e.g. doughnuts, sweet rolls, scones, and muffins((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
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POLYGLYCEROL ESTERS OF FATTY ACIDS (page 23)	475	10000		2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.
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Category No. 10.2)Egg products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 26)	475	1000		2018	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 12.5.1)Ready-to-eat soups and broths, including canned, bottled, and frozen(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 26)	475	400	XS117	2018	Emulsifier, Stabilizer	Revise Adopted Provision - Maintain use level at 400 mg/kg - Maintain Note XS117	Thailand supports the proposal.

Category No. 12.5.2)Mixes for soups and broths(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 27)	475	3000	127, XS117	2018	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 12.6.1)Emulsified sauces and dips)e.g. mayonnaise, salad dressing, onion dip((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 27)	475	5000		2018	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 12.6.2)Non-emulsified sauces)e.g. ketchup, cheese sauce, cream sauce, brown gravy((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 27)	475	5000	582	2023	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 12.6.3)Mixes for sauces and gravies(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 28)	475	5000	127	2018	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 13.3)Dietetic foods intended for special medical purposes)excluding products of food category 13.1((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 28)	475	1000	566	2023	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 13.4)Dietetic formulae for slimming purposes and weight reduction(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 28)	475	1000		2018	Emulsifier, Stabilizer	Maintain Adopted Provision	Thailand supports the proposal.

Category No. 14.2.7)Aromatized alcoholic beverages)e.g. beer, wine, and other hot cereal and spirituous cooler-type beverages, low alcoholic refreshers((

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
POLYGLYCEROL ESTERS OF FATTY ACIDS (page 30)	475	20		2018	Emulsifier, Stabilizer	Revise adopted provision -Increase use level to 150 mg/kg	Thailand conducted a dietary exposure assessment for polyglycerol esters of fatty acids)INS 475(by using national food consumption data, at the proposed ML. The results revealed that the mean of total dietary intake of young children aged 3–6 years and 6–13 years was 237.87% and 121.47% of the ADI, respectively, which indicates

							a safety concern. Thailand allows its use at 20 mg/kg in this food category.
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Appendix 3 PROVISIONS CONSIDERED DURING CCFA55 THAT REQUIRE ADDITIONAL CONSIDERATION

ANNEX 1: Consideration of lower use levels for adopted provisions for indigotine (INS 132) IN FC 04.1.2.8, and allura red (INS 129) and indigotine (INS 132) IN FC 04.1.2.11

Category No. 04.1.2.11)Fruit fillings for pastries(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
ALLURA RED AC (page 37)	129	300	161	2009	Colour	Revise adopted provision - Maintain use level at 300 mg/kg	Thailand supports the proposal.

ANNEX 2: adopted provision for caramel III - ammonia caramel (INS 150C) IN FC 04.2.2.2 for comment on technological justification and actual use level

Category No. 04.2.2.2)Dried vegetables)including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera(, seaweeds, and nuts and seeds(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III – AMMONIA CARAMEL (page 39)	150c	50000	76, 161 & XS323R	2024	Colour	Revise adopted provision - Lower use level to 25000 mg/kg - Maintain Notes 76 and XS323R - Remove Note 161 - Add notes XS38, XS39, XS321, XS336R, and XS341R	Thailand supports the proposal.

ANNEX 3: TECHNOLOGICAL JUSTIFICATION AND USE LEVEL FOR THE DRAFT PROVISION FOR ANNATTO EXTRACTS, BIXIN-BASED 160B(I) AND THE ADOPTED PROVISION FOR CARAMEL III - AMMONIA CARAMEL (INS 150C) IN FC 04.2.2.8

Category No. 04.2.2.8 (Cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 40)	150(c)	50000	161 & XS323R	2024	Colour	Revise adopted provision - Lower use level to 25000 mg/kg - Remove Note 161 - Maintain Note XS323R - Add Note XS334R	Thailand supports the proposal.

ANNEX 4: Consideration of technological justification and use level in all appropriate subcategories for draft provisions for caramel iii – ammonia caramel (INS 150c) and caramel iv – sulfite ammonia caramel (INS 150d) in FCs 08.1 and 08.3 and the adopted provisions for caramel iii – ammonia caramel (INS 150c) and caramel iv – sulfite ammonia caramel (INS 150d) in the parent FC 08.0

Category No. 08.1.2)Fresh meat, poultry, and game, comminuted(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 42)	150c	5000	335	2	Colour	Adopt at 5000 mg/kg with Note "For use only in breakfast sausages, merguez type products, salsicha fresca, butifarra fresca, longaniza fresca and mici." Remove Note 335.	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children (3-6 years old) at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 42)	150d	5000	335	2	Colour	Adopt at 5000 mg/kg with Note "For use only in breakfast sausages, merguez type products, salsicha fresca, butifarra	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML.

						fresca, longaniza fresca and mici.” Do not include Note 335.	The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.
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Category No. 08.2.1.1)Cured)including salted(non-heat treated processed meat, poultry, and game products in whole pieces or cuts(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 43)	150c	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 325 mg/kg with Notes 3, 4, 16 and XS350R	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 43)	150d	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 1000 mg/kg with Notes 3, 4, 16 and XS350R	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.

Category No. 08.2.2)Heat-treated processed meat, poultry, and game products in whole pieces or cuts(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 44)	150c	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 9,600 mg/kg with Notes 3, 4, 16, XS96, XS97 and XS350R.	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 44)	150d	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 3,400 mg/kg with Notes 3, 4, 16, XS96, XS97 and XS350R.	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.

Category No. 08.2.3)Frozen processed meat, poultry, and game products in whole pieces or cuts(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
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CARAMEL III - AMMONIA CARAMEL (page 44)	150c	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 15,100 mg/kg with Notes 3, 4, 16 and XS350R.	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 44)	150d	GMP	3, 4, 16, XS88, XS89, XS96, XS97 & XS98		Colour	Adopt at 300 mg/kg with Notes 3, 4, 16 and XS350R.	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.

Category No. 08.3.1.1)Cured)including salted(non-heat treated processed comminuted meat, poultry, and game products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 45)	150c	5000	335	2	Colour	Adopt at 5,000 mg/kg with Note 373 (For use in sausage only)	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI,

							which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 46)	150d	5000	335	2	Colour	Adopt at 2,000 mg/kg with Note 373 (For use in sausage only)	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.

Category No. 08.3.1.2)Cured)including salted(and dried non-heat treated processed comminuted meat, poultry and game products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 46)	150c	5000	335		Colour	Adopt at 5,000 mg/kg with Note 373 (For use in sausage only).	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 46)	150d	5000	335		Colour	Adopt at 2,000 mg/kg with Note 373 (For use in sausage only).	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th

							percentile was 120.50% of ADI, which indicates a safety concern.
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Category No. 08.3.1.3)Fermented non-heat treated processed comminuted meat, poultry, and game products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 46)	150c	5000	335		Colour	Adopt at 5,000 mg/kg with Note 373 (For use in sausage only).	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 46)	150d	5000	335		Colour	Adopt at 5,000 mg/kg with Note 373 (For use in sausage only).	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.

Category No. 08.3.2)Heat-treated processed comminuted meat, poultry, and game products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 47)	150c	5000	335		Colour	Adopt at 8,600 with Notes XS88, XS89 & XS98	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using

							national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 47)	150d	5000	335		Colour	Adopt at 10,000 with Notes XS88, XS89 & XS98	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.

Category No. 08.3.3)Frozen processed comminuted meat, poultry, and game products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 47)	150c	5000	335		Colour	Adopt at 9,400 with no notes.	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 47)	150d	5000	335		Colour	Adopt at 2,000 with no notes.	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA

							CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.
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Category No. 08.4)Edible casings)e.g. sausage casings(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL III - AMMONIA CARAMEL (page 48)	150c	5000	335		Colour	Adopt at 60,000 with Note 365 (On a casings basis).	Thailand conducted dietary exposure assessment to CARAMEL III - AMMONIA CARAMEL)INS 150c(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 124.33% of ADI, which indicates a safety concern.
CARAMEL IV - SULFITE AMMONIA CARAMEL (page 48)	150d	5000	335		Colour	Adopt at 50,000 with Note 365 (On a casings basis).	Thailand conducted dietary exposure assessment to CARAMEL IV - SULFITE AMMONIA CARAMEL)INS 150d(by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 120.50% of ADI, which indicates a safety concern.

Appendix 4 ALL COLOUR PROVISIONS IN FC 08.4

ANNEX 2: Requests comments on the actual use level of colours in food category 08.4 to further refine the reporting basis on the weight of the casings

Category No. 08.4 (Edible casings (e.g. sausage casings))

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
ALLURA RED AC (page 52)	129	300	16	2009	Colour	Revise adopted provision: - Maintain 300 mg/kg - Remove Note 16 - Add Note 365 (On a casing basis)	Thailand supports the proposal.
CURCUMIN (page 53)	100(i)	500	16	7	Colour	Adopt at 4,000 mg/kg with Note 365	Thailand conducted dietary exposure assessment to CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.
GRAPE SKIN EXTRACT (page 53)	163(ii)	5000	2009	Colour	Revise adopted provision - Maintain use level at 5,000 mg/kg - Add Note 365	GRAPE SKIN EXTRACT	Thailand conducted dietary exposure assessment to GRAPE SKIN EXTRACT)INS163)ii((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young

							children)3-6 years old(at the 97.5th percentile was 111.13% of ADI, which indicates a safety concern.
PAPRIKA EXTRACT (page 54)	160c(ii)	9000	39	2	Colour	Adopt at 20,000 mg/kg with Notes 39 and 365.	Thailand conducted dietary exposure assessment to PAPRIKA EXTRACT)INS 160c)ii((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 111.13% of ADI, which indicates a safety concern.
PONCEAU 4R (COCHINEAL RED A) (page 54)	124	500	16	2008	Colour	Revise adopted provision - Maintain use level at 500 mg/kg - Remove Note 16 - Add Note 365	Thailand supports the proposal.
SUNSET YELLOW FCF (page 54)	110	300	16	2008	Colour	Revise adopted provision - Revise use level to 1,500 mg/kg - Remove Note 16 - Add Note 365	Thailand conducted dietary exposure assessment to SUNSET YELLOW FCF)INS 110(by using national food consumption data, at the proposed ML. The result revealed that

							the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 103.31% of ADI, which indicates a safety concern. Thailand allows its use at 300 mg/kg with Note 16 (For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only.) in this food category.
TARTRAZINE (page 54)	102	300	2	Colour	Adopt at 300 mg/kg with Note 365	TARTRAZINE	Thailand supports the proposal.

Appendix 5 COLOURS IN FC 09.0 AND THEIR SUBCATEGORIES

Category No. 09.1.1)Fresh fish(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CAMEL I - PLAIN CAMEL (page 56)	150a	GMP	4, 16 & 50	7	Colour	Discontinue	Thailand supports the proposal.
CHLOROPHYLLS (page 57)	140	GMP	4, 16 & 50	7	Colour	Discontinue	Thailand supports the proposal.
CURCUMIN (page 57)	100(i)	300	4, 16 & 50	7	Colour	Discontinue	Thailand supports the proposal.
LUTEIN FROM TAGETES ERECTA (page 57)	161b(i)	300	4, 16 & 50	4	Colour	Discontinue	Thailand supports the proposal.

Category No. 09.1.2)Fresh mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CAMEL I - PLAIN CAMEL (page 58)	150a	GMP	4 & 16	7	Colour	Discontinue	Thailand supports the proposal.

CHLOROPHYLLS (page 58)	140	GMP	4 & 16	7	Colour	Discontinue	Thailand supports the proposal.
CURCUMIN (page 58)	100(i)	500	4 & 16	7	Colour	Discontinue	Thailand supports the proposal.

Category No. 09.2)Processed fish and fish products, including mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 59)	100(i)	500	95	7	Colour	Discontinue	Thailand supports the proposal.
PAPRIKA EXTRACT (page 59)	160c(ii)	150	39	2	Colour	Discontinue	Thailand supports the proposal.

Category No. 09.2.1)Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL I - PLAIN CARAMEL (page 60)	150a	GMP	95	7	Colour	Discontinue	Thailand supports the proposal.
CHLOROPHYLLS (page 60)	140	GMP	95	7	Colour	Discontinue	Thailand supports the proposal.
CURCUMIN (page 60)	100(i)	500	95	7	Colour	Discontinue	Thailand supports the proposal.
LUTEIN FROM TAGETES ERECTA (page 60)	161b(i)	500	95	4	Colour	Discontinue	Thailand supports the proposal.

Category No. 09.2.2)Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 63)	100(i)	500	16	7	Colour	Adopt at 200 mg/kg with Note 41 (For use in breading or batter coatings only) and XS166	Thailand conducted dietary exposure assessment to CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary

							intake of young children (3-6 years old) at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.
PAPRIKA EXTRACT (page 63)	160c(ii)	100	39	2	Colour	Adopt at 200 mg/kg with Note 39, Note 41 (For use in breading or batter coatings only) and XS166	Thailand conducted dietary exposure assessment to PAPRIKA EXTRACT)INS 160c)ii((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 111.13% of ADI, which indicates a safety concern.

Category No. 09.2.3)Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CARAMEL I - PLAIN CARAMEL (page 64)	150a	GMP	16	7	Colour	Discontinue	Thailand supports the proposal.
CHLOROPHYLLS (page 64)	140	GMP	16	7	Colour	Discontinue	Thailand supports the proposal.
CURCUMIN (page 64)	100(i)	500	16	7	Colour	Discontinue	Thailand supports the proposal.

Category No. 09.2.4.1)Cooked fish and fish products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 66)	100(i)	500		7	Colour	Adopt at 420 mg/kg with Note 95	Thailand conducted dietary exposure assessment to CURCUMIN)INS 100)i((by using national food consumption

							data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.
PAPRIKA EXTRACT (page 66)	160c(ii)	25	39	2	Colour	Adopt at 35 mg/kg with Note 39 and Note 95	Thailand conducted dietary exposure assessment to PAPRIKA EXTRACT)INS 160c)ii((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 111.13% of ADI, which indicates a safety concern.

Category No. 09.2.4.2)Cooked mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CHLOROPHYLLS (page 67)	140	GMP		7	Colour	Discontinue	Thailand supports the proposal.
CURCUMIN (page 67)	100(i)	250		7	Colour	Discontinue	Thailand supports the proposal.
LUTEIN FROM TAGETES ERECTA (page 67)	161b(i)	250	4		Colour	Discontinue	Thailand supports the proposal.
PAPRIKA EXTRACT (page 67)	160c(ii)	60	39	2	Colour	Adopt at 60 mg/kg with Note 39 and New Note "Except for	Thailand conducted dietary exposure assessment to PAPRIKA

						<i>use in surimi type products at 180 mg/kg"</i>	EXTRACT)INS 160c)ii((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 111.13% of ADI, which indicates a safety concern.
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Category No. 09.2.4.3)Fried fish and fish products, including mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 68)	100(i)	500	16	7	Colour	Adopt at 100 mg/kg with Note 16	Thailand conducted dietary exposure assessment to CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.

Category No. 09.2.5)Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
ANNATTO EXTRACTS, BIXIN-BASED (page 69)	160b(i)	10	8, 382, XS167, XS189, XS222, XS236 & XS244	2018	Colour	Maintain adopted provision	Thailand supports the proposal.
CURCUMIN (page 70)	100(i)	50			Colour	Adopt at 20 mg/kg with Note 50 ("For	Thailand conducted dietary exposure assessment to

						<i>use in fish roe only</i> ”), XS167, XS189, XS222, XS236, XS244 and XS311	CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.
PAPRIKA EXTRACT (page 70)	160c(ii)	30	39	2	Colour	Adopt at 30 mg/kg with Note 39, New Note “ <i>Except for use in surimi products at 180 mg/kg</i> ”, XS167, XS189, XS222, XS236, XS244 and XS311	Thailand conducted dietary exposure assessment to PAPRIKA EXTRACT)INS 160c)ii((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 111.13% of ADI, which indicates a safety concern.

Category No. 09.3)Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 70)	100(i)	50		7	Colour	Discontinue (consider in subcategories)	Thailand supports the proposal.
PAPRIKA EXTRACT (page 70)	160c(ii)	150	39	2	Colour	Discontinue (consider in subcategories)	Thailand supports the proposal.

Category No. 09.3.1)Fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 71)	100(i)	500	16	7	Colour	Adopt at 100 mg/kg with Note 16	Thailand conducted dietary exposure assessment to

							CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.
LUTEIN FROM TAGETES ERECTA (page 71)	161b(i)	GMP	4		Colour	Discontinue: Lutein from Tagetes Erecta is a Table 3 food additive (GMP) and FC 09.3.1 is not in the Annex to Table 3	Thailand supports the proposal.
PAPRIKA EXTRACT (page 71)	160c(ii)	150	39		Colour	Do not consider in subcategory	Thailand supports the proposal.

Category No. 09.3.2)Fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 72)	100(i)	500	16	7	Colour	Adopt at 100 mg/kg and Note 16	Thailand conducted dietary exposure assessment to CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of

							ADI, which indicates a safety concern.
PAPRIKA EXTRACT (page 72)	160c(ii)	150	39		Colour	Do not consider in this subcategory	Thailand supports the proposal.

Category No. 09.3.3)Salmon substitutes, caviar, and other fish roe products(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 73)	100(i)	500		7	Colour	Adopt at 500 mg/kg with Note XS291	Thailand conducted dietary exposure assessment to CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.
LUTEIN FROM TAGETES ERECTA (page 73)	161b(i)	500		4	Colour	Discontinue: Lutein from Tagetes Erecta is a Table 3 food additive (GMP) and FC 09.3.3 is not in the Annex to Table 3	Thailand supports the proposal.
PAPRIKA EXTRACT (page 74)	160c(ii)	160	39	2	Colour	Adopt at 350 mg/kg with Note XS291	Thailand conducted dietary exposure assessment to PAPRIKA EXTRACT)INS 160c)ii((by using national food consumption

							data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 111.13% of ADI, which indicates a safety concern.
TARTRAZINE (page 74)	102	500		7	Colour	Adopt at 300 mg/kg with Note XS291	Thailand supports the proposal.

Category No. 09.3.4)Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms)e.g. fish paste(, excluding products of food categories 09.3.1 - 09.3.3(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
CURCUMIN (page 74)	100(i)	500		7	Colour	Adopt at 100 mg/kg	Thailand conducted dietary exposure assessment to CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.

Category No. 09.4)Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms(

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final proposal	Comment of Thailand
AMARANTH (page 75)	123	30	435, XS3, XS70, XS90, XS94	2018	Colour	Maintain existing provision	Thailand supports the proposal.

			& XS119				
CURCUMIN (page 76)	100(i)	500		7	Colour	Adopt at 100 mg/kg with Notes XS3, XS37, XS70, XS90, XS94, and XS119	Thailand conducted dietary exposure assessment to CURCUMIN)INS 100)i((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 113.25% of ADI, which indicates a safety concern.
PAPRIKA EXTRACT (page 76)	160c(ii)	150	39	2	Colour	Adopt at 150 mg/kg with Note 39 and New Note "Except for use in surimi products at 180 mg/kg" with Notes XS3, XS37, XS70, XS90, XS94, and XS119	Thailand conducted dietary exposure assessment to PAPRIKA EXTRACT)INS 160c)ii((by using national food consumption data, at the proposed ML. The result revealed that the total dietary intake of young children)3-6 years old(at the 97.5th percentile was 111.13% of ADI, which indicates a safety concern.

Uganda

Uganda appreciates the work done by the EWG chaired by the United States of America on the following topics;

- Notes and Labelling Adjustments: Review of replacement notes (XS130 and XS67) linked to provisions in food category FC 04.1.2.2.
- Consideration of adding Note XS243 for Jagua blue (INS 183) in FCs 01.1.4 and 01.7.
- Infant and Young Child Food Standards (CCNFSDU-related): Revocation proposed for several additives (e.g., guar gum, modified starches) in: Infant formula (FC 13.1.1) and Special medical infant formula (FC 13.1.3), due to lack of technological need. Proposal to remove Note XS73 in FC 13.2 (complementary foods), would allow additives as nutrient carriers in canned baby foods aligned with advisory nutrient lists.
- Safety and Exposure Concerns (JECFA-related): Concern over high exposure to polyglycerol esters fatty acids for comment on technological justification and reconsideration of actual use and use levels for all adopted provisions in the GSFA for INS 475.

- Requests for Data / Industry Feedback: Call for information on actual use of erythrosine (INS 127) in Canned raspberries and strawberries standards.
- Multiple requests for technological justification and real use levels for food additives such as:
 - ✓ Indigotine (INS 132) and Allura Red (INS 129)
 - ✓ Caramel colours (INS 150c, 150d)
 - ✓ Annatto extracts (INS 160b(i))
- Review and Adjustment of Use Levels: Consideration of lowering permitted levels for some colours in specific fruit products (FC 04 categories). Broader review of caramel colours in FC 08 (meat products): Align use levels across subcategories based on technological need and consistency.
- Harmonisation and Consistency Issues: Establish a consistent reporting basis for colour additives in FC 08.4 (casings), including: Possible note to allow conversion to levels in final food. Review of colour provisions in FC 09 (fish and seafood): Includes draft, proposed, and adopted provisions (including those with Note 161).
- Procedural / GSFA Development Matters: Consideration of new provisions at Step 2 (early stage in Codex process). Discussion on clarifying the explanatory note to Table 3 of the GSFA.

Uganda comment/ position

Uganda accepts the report of the EWG and supports the outcomes of the EWG report.

NATCOL

NATCOL expresses gratitude to the Electronic Working Group, led by the United States of America, for drafting the working document regarding the General Standard for Food Additives (GSFA): Report of The Electronic Working Group on the GSFA (CX/FA 26/56/7).

We would like to share in the below following tables, additional comments about curcumin's applications as a natural colour in FC 09.0 and its subcategories:

1. Food Category 09.2.1 (Frozen fish, fish fillets, and fish products)

Position: Support adoption

NATCOL supports the inclusion of curcumin (INS 100(i)) at 500 mg/kg.

Examples of use include frozen marinated prawns, frozen smoked fish, and frozen breaded fish products.

Other colours are already permitted; inclusion of curcumin provides flexibility.

2. Food Category 09.2.3 (Frozen minced and creamed fish products)

Position: Support adoption without Note 16

Curcumin is used directly in products such as fishcakes, not only in coatings.

Therefore, Note 16 is not necessary.

3. Food Category 09.2.5 (Smoked, dried, fermented, and/or salted fish products)

Position: Support adoption without Note 50

Curcumin is widely used in smoked fish such as haddock.

Restricting use to fish roe does not reflect actual use.

Therefore, Note 50 should not be applied.

Conclusion

NATCOL supports adoption at proposed levels in FC 09.2.1, FC 09.2.3 without Note 16, and FC 09.2.5 without Note 50.

These proposals are supported by technological justification and examples of existing commercial use.

Category No. 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Final EWG Proposal	Additional Comments
CURCUMIN	100(i)	500	95	7	Discontinue Chair's Note: While there is some member country support, a number of member countries have asked for discontinuation. If member countries support adoption, please bring information on technological justification and actual product use to provide to the PWG. We note that there are already adopted provisions for colours in FC 09.2.1 (with Note 95 and multiple XS notes).	NATCOL supports adoption in this category which covers a broad range of products including frozen processed fish and crustacean products and frozen surimi Other similar colours such as Sunset Yellow and Riboflavin are already adopted in this category and curcumin would give additional choice. Curcumin is used in a variety of frozen fish products examples include: • Frozen marinated prawns, • Frozen smoked fish, • frozen marinated prawns, • frozen breaded fish and fishery products – see below product examples Ingredients and Nutrition Ingredients: Raw king prawns (80%)/long prawns (Penaeus vannamei)(Crustaceans), salt, antioxidants: sodium metabisulfite, water, garlic powder (3.5%), maltodextrin, sugar, wheat flour (wheat flour, calcium carbonate, iron, zinc, thiamine), tapioca starch, dextrose, dried parsley, yeast extract, spices, thiamine, tapioca starch, dextrose, dried parsley, yeast extract, flavoring, black pepper, salt, white pepper, color: curcumin, garlic extract.

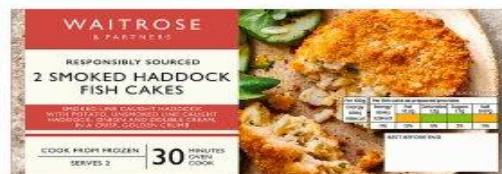
						 Deluxe THREE FISH ROAST WITH COD, SALMON & SMOKED HADDOCK WITH A CREAMY CHEESE SAUCE & SPRING POTATO SALAD, TOMATO & CUCUMBER & FRESH GREEN OLIVE OIL DRESSING 650g  Iceland Boneless 4 SMOKED HADDOCK FILLETS CERTIFIED SUSTAINABLE SEAFOOD MSC www.msc.org
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Category No. 09.2.3 (Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Final EWG Proposal	Additional Comments
CURCUMIN	100(i)	500	16	7	Adopt at 500 mg/kg <i>Chair's Note: Request comment on whether Note 16, "For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only" is necessary to be applied to this provision.</i>	NATCOL does not consider Note 16 to be necessary: Curcumin is also used in minced fish products such as the below examples of fishcakes where the curcumin is used in the fish component

**Ingredients**

Smoked Haddock (23%) [Haddock (*Melanogrammus aeglefinus*) (**Fish**) (98%), Salt, Colours (Curcumin, Paprika Extract)], Potatoes (14%), Fortified Wheat Flour [**Wheat** Flour, Calcium Carbonate, Folic Acid, Iron, Niacin, Thiamin], Haddock (*Melanogrammus aeglefinus*) (**Fish**) (12%), Mature Cheddar Cheese (**Milk**) (10%), Leek (9%), Rapeseed Oil, Potato Flakes (4%), Water, Single Cream (**Milk**), Maize Starch, Dijon Mustard [Water, **Mustard** Seeds, Spirit Vinegar, Salt], **Wheat** Gluten, Parsley, Salt, Yeast, Rice Flour, White Pepper



INGREDIENTS: Smoked haddock (33%) (haddock (**fish**), salt, colours (curcumin, annatto norbixin)), potato (18%), wheat flour (**wheat** flour, calcium carbonate, folic acid, iron, niacin, thiamin), haddock (**fish**) (11%), rapeseed oil, water, onion (3%), dried potato, double cream (**milk**), cornflour, parsley, lemon juice from concentrate, rice flour, **wheat** semolina, salt, maize flour, extra virgin olive oil, **wheat** gluten, yeast, cider vinegar, sugar, ground white pepper, dried garlic, dried onion

Category No. 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Final Circular Proposal	
CURCUMIN	100(i)	50		7	Adopt at 20 mg/kg with Note 50 ("For use in fish roe only"), XS167, XS189, XS222, XS236, XS244 and XS311 Chair's Note: This provision is moved down from the parent category (FC 09.2) based on a member request to use in fish roe	NATCOL supports adopting the proposed provision without Note 50. Curcumin is regularly used in smoked white fish such as haddock. This use was considered in the 2014 EFSA refined exposure assessment with a maximum usage level of 100 mg/kg. See examples of smoked fish colored with Curcumin below:  

ISDI

Annex 3B - ISDI Comments

ISDI supports the recommendation of the EWG to Maintain the previously agreed use levels for Gum Arabic (Acacia Gum) (INS 414), Mannitol (INS 421), Silicon Dioxide, Amorphous (INS 551) and Starch Sodium Octenyl Succinate (INS 1450). ISDI also supports the recommendation of the EWG to remove Note XS73.

However, ISDI cannot agree with the wording of the new footnotes, as proposed by the EWG. ISDI believes that the proposed footnotes are not easy to understand and are likely to cause interpretation issues if adopted as such.

Rationale:

Prior to alignment of the provisions for category 13.2 into the GSFA, CXS 74-1981 permitted the use of Gum Arabic (Acacia Gum) (INS 414), Silicon Dioxide, Amorphous (INS 551) and Starch Sodium Octenyl Succinate (INS 1450) for functions other than nutrient carriers (*Please see annex 1 – CXS 74-1981 Rev. 1 - 2006*).

The new notes as proposed by the EWG would restrict the use of these additives only for function as nutrient carrier in products conforming to CXS 74-1981.

Moreover, introduction of the word “only” into the new Notes for these additives introduces confusion across the GSFA Notes more broadly. For example, one point of confusion is whether the absence of the word “only” in other Notes means the restrictions in those Notes are optional.

Therefore, ISDI would like to propose two separate footnotes covering the provisions for products conforming to standards CXS 73-1981 and CXS 74-1981 and considering the provisions from CXG 10-1979. This would ensure clear understanding of the nutrient carrier use in both standards and address the comments raised during the EWG discussions.

The proposed new footnotes would be as follows:

- **Gum Arabic (Acacia Gum) INS 414**
 - **Note 1:** “For use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) at 10 mg/kg in the food as consumed.”
 - **Note 2:** “Except for use as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for processed cereal-based foods for infants and young children (CXS 74-1981) at 10 mg/kg in the food as consumed.”
- **Silicon dioxide, Amorphous INS 551**
 - **Note 1:** “For use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) at 10 mg/kg in the food as consumed.”
 - **Note 2:** “Except for use as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for processed cereal-based foods for infants and young children (CXS 74-1981) at 10 mg/kg in the food as consumed.”
- **Starch sodium octenyl succinate INS 1450**
 - **Note 1:** “For use only as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) at 100 mg/kg in the food as consumed.”
 - **Note 2:** “Except for use as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for processed cereal-based foods for infants and young children (CXS 74-1981) at 100 mg/kg in the food as consumed.”

For Mannitol, since the permission is limited to use as a nutrient carrier, ISDI would like to propose the following footnote:

- **Mannitol INS 421**
 - **New Note:** “For use only as a nutrient carrier in a raw material or other ingredients used to produce the foods conforming to the Standard for canned baby foods (CXS 73-1981) and to the Standard

for processed cereal-based foods for infants and young children (CXS 74-1981) at 10 mg/kg in the food as consumed.”

Annex 1



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