

CODEx ALIMENTARIUS COMMISSION



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

Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-sixth Session

PROPOSALS FOR ADDITIONS AND CHANGES TO THE PRIORITY LIST OF SUBSTANCES PROPOSED FOR EVALUATION BY JECFA (REPLIES TO CL 2025/32-FA)

(Comments of Indonesia, Rwanda and Uganda)

Indonesia

Indonesia supports the proposal from the Republic of Korea to add ammonia in the priority list of substances proposed for evaluation by JECFA, specifically as processing aid (nutrient source/nitrogen source) for microbial fermentation.

Rwanda

Rwanda has no proposals for additions and changes to the priority list of substances proposed for evaluation by JECFA.

Uganda

Uganda takes note of the proposals submitted by Japan, Paraguay, Republic of Korea, FoodDrinkEurope, International Association of color Manufacturers, International Food Additives Council, International Organisation of the Flavour Industry, International Sweeteners Association on the items below;

Safety Evaluation of Ammonia as a Processing Aid:

Function in processing: Ammonia (NH_3) is used as a nitrogen source in microbial fermentation, supporting microbial growth via metabolic pathways (e.g., GDH and GS).

Mode of use: Added to the fermentation medium (~26,000 mg/kg) and not directly added to final foods. Serves only as an indirect role during production of food additives, flavourings, and ingredients.

Fate after processing: Converted to ammonium ions in aqueous systems and removed or neutralized after fermentation and has no technological function in the final product.

Applications: Ingredients produced using ammonia are used in food category 12.0 (e.g., spices, sauces, soups, protein products).

Safety basis: Comparable substance (ammonium hydroxide) previously evaluated by JECFA (1965) with no safety concerns identified.

Uganda comments/position

Uganda supports JECFA evaluation on use of ammonia as a processing aid in microbial growth and protein synthesis.

Safety Assessment and New Production Method for Beet Red (from *S. cerevisiae* strain P0)

Rationale for new method: Traditional beetroot extraction is resource-intensive (land, water), climate-dependent, and generates significant waste (~40%), posing environmental risks. There is a need for sustainable, scalable, and reliable alternatives.

Proposed solution: Production of Beet Red via microbial fermentation using *S. cerevisiae* strain P0 enables year-round, large-scale supply, reduces environmental impact and agricultural dependency.

Substance equivalence and safety: Fermentation-derived betanin is chemically identical to plant-derived Beet Red, meets existing JECFA specifications. May offer improved safety by avoiding agricultural contaminants and requires recognition of the new production method rather than a new additive.

Regulatory status and use: Not yet listed in the GSFA, Proposed for inclusion with same food categories and use levels as Beet Red (INS 162).

Uganda comments/position

Uganda had issues with fresh beet root having contaminants, thus need to carry out JECFA assessment / risk assessment on the heavy metals availability in beet roots used in manufacturing of beet red (color) a food additive. Uganda also seeks to evaluate the stability of the Beet red color after processing it at high temperatures. In case the color fades there may be need to include a stabilizer during its processing.

Appendix IIa 2026CCFA56

Appendix IIa_2026CCFA56, to be evaluated by the Procedure for the Safety Evaluation of Flavouring Agents and Appendix IIc_2026CCFA56 for substances that have updates to the online edition of "Specifications for Flavourings."

Uganda comment / Position

Uganda supports consideration of the JECFA evaluation on the flavourings.

Japan would like to withdraw No13 in PART B

Japan would like to withdraw No13 in PART B because they were unable to confirm that the sponsor's submission materials were ready. Other items proposed from Japan have no change.

Uganda comment/position

Uganda agrees with Japan on the withdraw of the items due to limited data submitted to support the technical considerations and discussions.

Annex 3 - Priority list of substances proposed for evaluation by JECFA

Paraguay on the information requested in Annex 3 - Priority list of substances proposed for evaluation by JECFA. In the context of Circular Letter CL 2025/32-FA, and regarding the information requested in point 2.2 of Annex 3, Paraguay submitted the following observation: Paraguay considered it appropriate that Transglutaminase (EC 2.3.2.13), derived from *Streptomyces mobaraensis* strain M2020197, be considered by JECFA for safety assessment and establishment of specifications. In order to have an international scientific reference to support national and regional regulatory decisions, according to the information contained in Annex 3, Part B: list of substances used as processing aids proposed for evaluation by JECFA of Circular Letter CL 2025/32-FA.

Uganda comments /position

Uganda accepts the assessment to be carried out by JECFA for safety studies if no toxicological reactions to different consumers' categories are observed by the Transglutaminase enzyme when used in food processing.

Polyglycerol Esters of Interesterified Ricinoleic Acid (INS 476) and JECFA Priority Considerations.

Re-evaluation context: INS 476 is under consideration for re-evaluation, informed by available data, including the EFSA 2017 re-evaluation. Input is being sought on substances listed in the JECFA priority list for future safety evaluations.

Stakeholder input (IFAC): The International Food Additives Council (IFAC), representing industry stakeholders and holding Codex observer status, provided comments.

Key request: IFAC requests deprioritization of silicon dioxide (INS 551) from Priority 1 on the JECFA list. Implies that other substances (potentially including INS 476) may warrant higher priority for evaluation based on available data and need. Rationale includes:

- Silicon dioxide, amorphous has been used for many years and does not raise any health concerns;
- There has been no change in the specifications or the manufacturing process;
- The European Food Safety Authority has confirmed that the use of silicon dioxide, amorphous in

foods (E 551), including those for infants and children is safe;

- JECFA guidelines on how to evaluate nanoparticles have not been developed yet.

It is for these reasons, that respectfully request that INS 551 be given a lower priority and that its safety evaluation be postponed until after 2028 or until JECFA guidance on nanomaterials is available. The updated form “Confirmation of Previous Requests and Data Availability” is included as an annex to this letter.

Uganda comments/position

Uganda agrees with the proposal from IFAC on deprioritization of silicon dioxide, amorphous (INS 551) on the JECFA priority list due to previous studies existing.

Appendix IIb 2026CCFA56

The appendix_IIb to be evaluated by the Procedure for the Safety Evaluation of Flavouring Agents and Appendix_IId) 2026CCFA56, for Flavouring Agents for consideration of revision of existing specifications.

Uganda comments/position

Uganda agrees with the proposal for JECFA evaluation of the flavouring agents.

Inclusion of Neohesperidin Dihydrochalcone (NHDC)

The International Sweeteners Association (ISA), following the inclusion of Neohesperidin Dihydrochalcone (NHDC) in the priority list of substances proposed for evaluation by JECFA (Report of the Fifty-Fifth Session of the Codex Committee on Food Additives, 24–28 March 2025). In response to Circular Letter CL 2025/32 from the JECFA Secretariat, confirms its previous request and the availability of data for the evaluation of NHDC as a sweetener for inclusion in the Codex General Standard for Food Additives. As requested in Circular Letter CL 2025/32, the ISA has completed Annex 4 (confirmation of previous requests and data availability) as provided below. The corresponding data package was submitted to WHO/FAO, with receipt confirmed by the WHO JECFA Secretariat on 10 December 2025.

Uganda comments/position

Uganda supports the proposal for consideration for JECFA revaluation of Neohesperidin Dihydrochalcone.