

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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

Agenda Item 11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-sixth Session

DISCUSSION PAPER ON THE FUTURE WORK FOR CCFA

(Comments of European Union and Thailand)

European Union

The European Union and its Member States (EUMS) would like to thank the host secretariat for supporting proactive reflections on the future work of CCFA.

The EUMS would like to express the following views on the recommendations included in CX/FA 26/56/14:

Recommendation 1: To Initiate work to address implementation challenges in the GSFA food category system.

Given the central role of the food category system in the GSFA and the recurring implementation difficulties reported by Members, CCFA may wish to consider initiating work in this area through one of the following 3 options:

- **Option 1:** Establish a dedicated working group to undertake a comprehensive review of the GSFA food category system.
- **Option 2:** Establish a working group to conduct a targeted review of specific food categories that present well-documented implementation challenges.
- **Option 3:** Request Members and Observers to submit concrete examples of problematic food categories as a preliminary step, prior to deciding on the establishment and scope of a working group.

EUMS position:

The EUMS are in favour of option 3.

The EUMS can also support the establishment of an electronic working group of which the mandate would consist in:

- 1) collecting information on food categories or foods/commodities that present well-documented implementation challenges;
- 2) making proposals regarding the conduct of a targeted review of specific food categories. A priority could be to review the articulation between food categories and commodity standards from active/interested commodity committees or a selection of commodity standards. This would both facilitate the use of the GSFA and the Commodity standards and facilitate the work on GSFA provisions that are related to commodity standards (see Item 9 of this meeting "Draft working practices for the development of GSFA food additive provisions relevant to commodity standards and related templates").

Recommendation 2: To improve clarity and consistency of notes associated with GSFA provisions.

CCFA may consider establishing a working group or assigning the task to the GSFA EWG to initiate a systematic review of notes associated with GSFA provisions, with a view to improving clarity, consistency and usability.

EUMS position:

The EUMS are in principle supportive of efforts towards improving the clarity and the consistency of notes. It is also noted that a systematic review will be a demanding process. Against this background, the EUMS:

- propose targeted work that would consist of the inclusion of a list of commodity standards that do not permit any food additive uses in the GSFA to replace the XS notes. This task could be assigned to a new EWG or to the GSFA EWG.
- can agree with the initiation of a systematic review of notes associated with GSFA provisions. The objective should be purely “administrative”, i.e. to detect inconsistencies/similar wordings creating confusion and shall not have an impact on the scope of the applicability of the adopted provisions. As a consequence and similarly to the process applied in the past, the task should preferably be assigned to the Codex secretariat.

Recommendation 3: To consider next steps on secondary food additives and processing aids.

Recognizing that practical and regulatory challenges related to secondary food additives and processing aids, including enzymes, continue to be reported, but that views differ on the readiness for further work, CCFA may wish to consider the following 2 options:

- **Option 1:** Request Members and Observers to submit information on national definitions, regulatory approaches and implementation challenges related to secondary food additives and processing aids.

And based on the information collected, consider whether additional Codex guidance or clarification is warranted.

- **Option 2:** Defer further work in this area until resources permit, while keeping the issue under review.

EUMS position:

Secondary food additives

Secondary additives should be treated with a higher priority (as they fall in the scope of the GSFA) should the Committee consider to manage them within the GSFA in a more appropriate way than is the current practice ‘to address the use of secondary additives by using notes within the current GSFA food category system’ (see para 136, REP16/FA).

The EUMS are of the view that, should there be support to re-launch discussions on the topic, it should use the information collected in CX/FA 16/48/17 as a starting point.

Processing aids

The EUMS support further Codex work to facilitate safe use of processing aids in internationally traded products noting that the existing International Processing Aids Database lacks any official Codex status. The EUMS see merits in particular in further work on food extraction solvents. The use of extraction solvents is subject to the safety assessment and approval in the EU¹. This work would however require substantial JECFA resources.

The EUMS would like also to express views on the following other topics that are considered in CX/FA 26/56/14:

Online version

The EUMS support efforts to improve the outlook and readability in particular of the GSFA online version and are ready to consider any specific suggestion that would simplify the GSFA while not compromising its content.

The EUMS welcome the decision of last CAC to request the secretariat to proceed with the update of databases as a priority. The update of the GSFA database is an opportunity to make it “user friendly”.

Class Names and the International Numbering System for Food Additives (CXS 36-1989)

The EUMS consider that CXS 36-1989 should be restricted to food additives, which are legally on the market of Codex Members and to avoid lists of preliminary ideas for new food additives, e.g. in research phase, for which no production unit and no safety dossier is ready. This would ensure that CXS 36-1989 is reflective of additives present on the market and used in commercially available foods.

Role of JECFA in supporting future work

The EUMS stress the importance of the consistency of the GSFA provisions with the JECFA assessments as regards exposure (repeating the statement that we made at the CCFA and CAC).

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02009L0032-20230216&qid=1757497978112>

In addition, the EUMS take note of the request of JECFA (see CX/FA 26/56/3, para. 23) about the need to update the safety assessment of additives for which the assessment is outdated and thus the toxicological evaluation and specifications considered obsolete. Appropriate resources for this JECFA work should be made available.

Thailand

Recommendation 1: Thailand supports Option 3. Thailand is of the view that it may not be necessary at this time to undertake a comprehensive revision of the GSFA food category system. It is recommended that issues encountered in the classification of food categories under the GSFA be first compiled in order to provide an overall picture.

Recommendation 2: Thailand supports the recommendation of the Codex Secretariat.