

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5(a)

FA56/CRD20 Rev.1
Original Language Only

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 Cabo Verde, China, El Salvador, India, Japan, Kenya, Malaysia and Republic of Korea)

Cabo Verde

POSITION OR COMMENT

Cabo Verde supports the adoption of the food additive provisions listed in Annex 1 of document CX/FA 26/56/7, intended for inclusion in the General Standard for Food Additives (GSFA). We reiterate the importance of all provisions progressing to final adoption at Steps 8 or 5/8, as recommended by the Electronic Working Group.

RATIONALE

Our position is grounded in the rigorous scientific evaluation conducted by JECFA, which ensures that the proposed maximum use levels are safe for public health. As a country dependent on food imports, Cabo Verde considers the harmonization of additive limits within the GSFA essential to guarantee the safety of imported products and to facilitate official control in the national market. This ensures that the technological need declared by industry does not compromise the sanitary integrity of food products.

China

China appreciates the United States of America preparing agenda item 5(a) General Standard for Food Additives (GSFA): Report of The Electronic Working Group on The GSFA. China would like to provide the following comments on CX/FA 26/56/7 Appendix 1 Annex 4.

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
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	2000		2016	Emulsifier, Stabilizer	Revoke

China:

Suggests do not revoke. Lower the maximum use level to 1000 mg/kg.

Justification:

Polyglycerol esters of fatty acids as an α -crystal promoting emulsifier, stabilizes fat crystal forms and thereby inhibits polymorphic transformation between crystals. PGE primarily functions to significantly improve emulsification and high-temperature stability in high-fat systems and effectively prevents fat aggregation. These functional properties render PGE suitable for use in fruit fillings for pastries. The actual use level is up to 1000 mg/kg.

Category No. 14.1.4 (Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulated drinks)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000	127	2019	Emulsifier, Stabilizer	Revise Adopted Provision - Lower use level to 1000 mg/kg - Remove Note 127 “On the served to the consumer basis.” <i>Chair’s note: Based on discussions related to the need for notes pertaining to “on a consumer basis,” we do not believe that Note 127 is necessary as the Preamble to the GSFA specifies “Unless otherwise specified, maximum use levels for additives in Tables 1 and 2 are set on the final product as consumed.”</i>

China:

Suggests the maximum use level of 1200 mg/kg. and supports to remove Note 127.

Justification:

Some plant protein beverages (such as almond milk beverage, walnut milk beverage, etc.) usually contain both oils and proteins, which are prone to oil separation and protein precipitation during shelf life. Polyglycerol esters of fatty acid are widely used in such beverages as emulsifiers due to their ability to adjust the hydrophilic-lipophilic balance (HLB) and stabilize oil-water interfaces. By forming a stable emulsion system, they help prevent oil separation and protein aggregation, thereby maintaining product uniformity and physical stability throughout shelf life. The use level of polyglycerol esters of fatty acid in these beverages is up to 1200 mg/kg.



El Salvador

- **TEMA 5a – NORMA GENERAL PARA LOS ADITIVOS ALIMENTARIOS (NGAA) (CXS 192-1995): INFORME DEL GRUPO DE TRABAJO ELECTRÓNICO SOBRE LA NGAA**

Comentarios Generales:

El Salvador agradece el documento CCFA preparado por el Grupo de Trabajo Electrónico, presidido por Estados Unidos de América, encargado del tema, y los países y observadores que le asistieron.

El Comité Espejo del Codex sobre Aditivos Alimentarios (CCFA) ha revisado el Informe del Grupo de Trabajo Electrónico (GTE) sobre la Norma General para los Aditivos Alimentarios (NGAA) y sus apéndices 1, 2, 3, 4, 5, 6 y 7.

Comentarios Específicos:

A continuación se presentan los comentarios específicos, según la revisión del informe del GTE (documento CX/FA 26/56/7):

Apéndice 1, Anexo 1: ASUNTOS REMITIDOS POR LA SECRETARÍA DEL CÓDEX EN RELACIÓN CON LAS NOTAS DE SUSTITUCIÓN APROPIADAS PARA LAS NOTAS XS130 Y XS67 RELACIONADAS CON LAS DISPOSICIONES DE LA CATEGORÍA DE ALIMENTOS 04.1.2.2

El Salvador apoya las propuestas finales del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, para las siguientes categorías de alimentos y sus aditivos indicados:

- Categoría No. 04.1.2.2 (Frutas Desecadas)

Apéndice 1, Anexo 2: ASUNTOS REMITIDOS DESDE LA SECRETARÍA DEL CÓDICE RELACIONADOS CON LA DISPOSICIÓN PARA AZUL DE JAGUA (GENIPINA-GLICINA) (INS 183) EN FCS 01.1.4 Y 01.7 PARA COMENTARIOS SOBRE LA CONSIDERACIÓN DE INCLUIR LA NOTA XS243

El Salvador apoya las propuestas finales del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, para el uso del aditivo AZUL DE JAGUA (GENIPINA-GLICINA) (INS 183) en las siguientes categorías de alimentos:

- Categoría No. 01.1.4 (Bebidas lácteas líquidas aromatizadas)
- Categoría No. 01.7 (Postres lácteos (como pudines, yogur aromatizado o con fruta))

Apéndice 1, Anexo 3A: REVOCACIÓN DE LAS DISPOSICIONES RELATIVAS A LA GOMA GUAR (SIN 412), FOSFATO DE DIALMIDÓN (SIN 1412), FOSFATO DE DIALMIDÓN FOSFATADO (SIN 1413), FOSFATO DE DIALMIDÓN ACETILADO (SIN 1414) Y ALMIDÓN HIDROXIPROPÍLICO (SIN 1440) EN ALIMENTOS CORRESPONDIENTES A LA NORMA PARA PREPARADOS PARA LACTANTES Y PREPARADOS PARA USOS MEDICINALES ESPECIALES DESTINADOS A LOS LACTANTES (CXS 72-1981) EN LAS CATEGORÍAS DE ALIMENTOS 13.1.1 (PREPARADOS PARA LACTANTES) Y 13.1.3 (PREPARADOS PARA USOS MEDICINALES ESPECÍFICOS DESTINADOS A LOS LACTANTES).

El Salvador apoya las propuestas finales del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, relativas a la revocación de las disposiciones para los aditivos SIN 412, 1412, 1413, 1414 y 1440 en las categorías de alimentos 13.1.1 y 13.1.3, en concordancia con la evidencia de ausencia de necesidad tecnológica y priorizando la protección de la salud de los lactantes. según las normativas actualizadas de nuestro país por medio de la Ley Amor Convertido en Alimento.

Justificación:

- Se determinó la ausencia de necesidad tecnológica para estos aditivos en fórmulas infantiles.
- Se trata de una categoría altamente sensible (13.1.1 y 13.1.3) destinada a lactantes
- La formulación de alimentos para lactantes debe regirse por el principio de mínima intervención tecnológica
- La eliminación de estos aditivos reduce exposición innecesaria a sustancias no esenciales, y refuerza la inocuidad y protección de la salud infantil
- Es coherente con el Código internacional de los Sucedáneos de la Leche Materna y enfoques de Fomento y Protección de la lactancia materna y regulación de los sucedáneos de la leche materna.

- Al eliminar aditivos sin necesidad tecnológica en fórmulas infantiles
 - Se evita normalizar o “mejorar” artificialmente los sucedáneos comparándolos con la leche materna.
 - Se refuerza el principio de que la lactancia materna es el mejor alimento.
- La Ley Amor Convertido en Alimento para el Fomento, Protección y Apoyo a la Lactancia Materna, refuerza:
 - Priorizar la lactancia materna, y
 - Regula estrictamente el registro, la etiqueta y la publicidad de los sucedáneos de la leche materna.

Apéndice 1, Anexo 3B: CONSIDERACIÓN DE ELIMINACIÓN DE LA NOTA XS73 (EXCLUIDOS LOS PRODUCTOS REGULADOS POR LA NORMA PARA ALIMENTOS ENVASADOS PARA LACTANTES Y NIÑOS (CXS 73-1981) DE LAS DISPOSICIONES DE LA CATEGORÍA DE ALIMENTOS 13.2 (ALIMENTOS COMPLEMENTARIOS PARA LACTANTES Y NIÑOS PEQUEÑOS) A FIN DE PERMITIR EL USO DE ADITIVOS COMO PORTADORES DE NUTRIENTES EN ALIMENTOS CORRESPONDIENTES A LA NORMA PARA ALIMENTOS ENVASADOS PARA LACTANTES Y NIÑOS (CXS 73-1981) SOBRE LA BASE DE SU INCLUSIÓN EN LA PARTE D DE LAS LISTAS DE REFERENCIA DE COMPUESTOS DE NUTRIENTES PARA SU UTILIZACIÓN EN ALIMENTOS PARA FINES DIETÉTICOS ESPECIALES DESTINADOS A LOS LACTANTES Y NIÑOS PEQUEÑOS (CXG 10-1979)

El Salvador apoya las propuestas finales del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, relativas a los aditivos SIN 414, 421, 551, 1450 para la Categoría No. 13.2 (Alimentos complementarios para lactantes y niños pequeños).

Justificación:

- Se apoya la eliminación de la Nota XS73 y 592, siempre que se garantice que el uso de aditivos se limite estrictamente como portadores de nutrientes (“solo como portador”), con niveles máximos claramente definidos, evitando cualquier función tecnológica adicional.
- Se propone eliminar la exclusión XS73 para permitir el uso de aditivos como vehículos de nutrientes y se introduce un uso restringido “solo como portador” con límites específicos.
- Facilita la fortificación cuando es tecnológicamente justificada
- Alinea con CXG 10-1979 (Listas de Referencia de Compuestos de Nutrientes para su Utilización en Alimentos para Fines Dietéticos Especiales Destinados a los Lactantes y Niños Pequeños)
- Riesgos identificados:
 - Posible uso indebido del uso de aditivos con función tecnológica adicional.
 - Dificultad en fiscalización si no queda claramente delimitado el “solo como portador”.
- Condiciones claves para El Salvador:
 - Mantener explícitamente:
 - La palabra “ONLY / SOLO” en la redacción.
 - Límites máximos estrictos (según corresponda).
 - La postura de mínima intervención tecnológica está directamente alineada con:
 - ✓ Control sanitario
 - ✓ No incorporación de componentes innecesarios
- Esto evita:
 - Reformulaciones que puedan hacer los productos más “atractivos” o percibidos como iguales o equivalentes a la leche materna”

Apéndice 1, Anexo 4: CUESTIONES REMITIDAS DESDE LA JECFA RELACIONADAS CON LA ALTA EXPOSICIÓN A ÉSTERES POLIGLICÉRIDOS DE ÁCIDOS GRASOS (SIN 475) PARA COMENTARIOS

SOBRE LA JUSTIFICACIÓN TECNOLÓGICA Y LA RECONSIDERACIÓN DEL USO REAL Y LOS NIVELES DE USO DE TODAS LAS DISPOSICIONES ADOPTADAS EN LA NGAA PARA LA SIN 475.

El Salvador apoya las propuestas finales del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, para el uso del aditivo ÉSTERES POLIGLICÉRIDOS DE ÁCIDOS GRASOS (INS 475) en las categorías de alimentos siguientes:

- Categoría No. 01.1.2 (Otras leches líquidas (naturales/simples))
- Categoría No. 01.1.4 (Bebidas lácteas líquidas aromatizadas)
- Categoría No. 01.3.2 (Blanqueadores de bebidas)
- Categoría No. 01.4.1 (Nata (crema) pasteurizada (natural/simple))
- Categoría No. 01.4.2 (Natas (cremas) esterilizadas y UHT, natas (cremas) para batir o batidas y natas (cremas) de contenido de grasa reducido (naturales / simples))
- Categoría No. 01.4.3 (Nata (crema) cuajada (natural / simple))
- Categoría No. 01.4.4 (Productos análogos a la nata (crema))
- Categoría No. 01.5.2 (Productos análogos a la leche y la nata (crema) en polvo)
- Categoría No. 01.6.4 (Queso elaborado)
- Categoría No. 01.6.5 (Productos análogos al queso)
- Categoría No. 01.7 (Postres lácteos (como pudines, yogur aromatizado o con fruta))
- Categoría No. 02.1.2 (Grasas y aceites vegetales)
- Categoría No. 02.2.2 (Grasas para untar, grasas lácteas para untar y mezclas de grasas para untar)
- Categoría No. 02.3 (Emulsiones grasas, principalmente del tipo agua en aceite, incluidos los productos a base de emulsiones grasas mezclados y/o aromatizados)
- Categoría No. 02.4 (Postres a base de grasas, excluidos los postres lácteos de la categoría de alimentos 01.7)
- Categoría No. 03.0 (Hielos comestibles, incluidos los sorbetes)
- Categoría No. 04.1.2.8 (Preparados a base de fruta, incluida la pulpa, los purés, los revestimientos de fruta y la leche de coco)
- Categoría No. 04.1.2.9 (Postres a base de fruta, incluidos los postres a base de agua con aromas de fruta)
- Categoría No. 04.1.2.11 (Rellenos de fruta para pastelería)
- Categoría No. 05.1.1 (Mezclas de cacao (en polvo) y cacao en pasta/torta de cacao)
- Categoría No. 05.1.5 (Productos de imitación y sucedáneos del chocolate)
- Categoría No. 05.2 (Dulces, incluidos los caramelos duros y blandos, los turrone, etc. distintos de los indicados en las categorías de alimentos 05.1, 05.3 y 05.4)
- Categoría No. 05.3 (Goma de mascar)
- Categoría No. 05.4 (Decoraciones (p. ej. para productos de pastelería fina), revestimientos (que no sean de fruta) y salsas dulces)
- Categoría No. 06.3 (Cereales para el desayuno, incluidos los copos de avena)
- Categoría No. 06.4.3 (Pastas y fideos precocidos y productos análogos)
- Categoría No. 06.5 (Postres a base de cereales y almidón (p. ej. pudines de arroz, pudines de mandioca))
- Categoría No. 07.1.1 (Panes y panecillos)
- Categoría No. 07.1.2 ("Crackers" (galletas saladas o de agua), excluidos los "crackers" dulces)

- Categoría No. 07.1.3 (Otros productos de panadería ordinaria (p. ej. panecillos tipo rosca “bagels”, pan tipo mediterráneo “pita”, panecillos ingleses chatos “muffins”, etc.))
- Categoría No. 07.1.4 (Productos similares al pan, incluidos los rellenos a base de pan y el pan rallado)
- Categoría No. 07.1.5 (Panes y bollos dulces al vapor)
- Categoría No. 07.1.6 (Mezclas para pan y productos de panadería ordinaria)
- Categoría No. 07.2.1 (Tortas, galletas y pasteles (p. ej., rellenos de fruta o crema))
- Categoría No. 07.2.2 (Otros productos de panadería fina (p. ej. rosas fritas “donuts” (donas), panecillos dulces, “scones” y panecillos chatos “muffins”))
- Categoría No. 07.2.3 (Mezclas para pastelería fina (p. ej. tortas, tortitas o panqueques))
- Categoría No. 08.4 (Envolturas o tripas comestibles (p. ej. para embutidos))
- Categoría No. 09.2.1 (Pescado, filetes de pescado y productos pesqueros congelados, incluidos los moluscos, crustáceos y equinodermos)
- Categoría No. 09.2.4.1 (Pescado y productos pesqueros cocidos)
- Categoría No. 09.2.4.3 (Pescado y productos pesqueros fritos, incluidos los moluscos, crustáceos y equinodermos)
- Categoría No. 09.3.1 (Pescado y productos pesqueros marinados y/o en gelatina, incluidos los moluscos, crustáceos y equinodermos)
- Categoría No. 09.3.2 (Pescado y productos pesqueros escabechados y/o en salmuera, incluidos los moluscos, crustáceos y equinodermos)
- Categoría No. 10.2 (Productos a base de huevo)
- Categoría No. 10.4 (Postres a base de huevo (p. ej. flan))
- Categoría No. 12.5.1 (Sopas y caldos listos para el consumo, incluidos los envasados, embotellados y congelados)
- Categoría No. 12.5.2 (Mezclas para sopas y caldos)
- Categoría No. 12.6.1 (Salsas emulsionadas y salsas para mojar (p.ej. mayonesa, aderezos para ensaladas, salsa para mojar de cebollas))
- Categoría No. 12.6.2 (Salsas no emulsionadas (p. ej. salsa de tomate “ketchup”, salsas a base de queso, salsas a base de nata (crema) y salsas hechas con jugo de carne asada “gravy”))
- Categoría No. 12.6.3 (Mezclas para salsas y “gravies”)
- Categoría No. 13.3 (Alimentos dietéticos para usos médicos especiales (excluidos los productos de la categoría de alimentos 13.1))
- Categoría No. 13.4 (Preparados dietéticos para adelgazamiento y control del peso)
- Categoría No. 13.6 (Complementos alimenticios)
- Categoría No. 14.1.4 (Bebidas a base de agua aromatizadas, incluidas las bebidas para deportistas, bebidas energéticas o bebidas electrolíticas y bebidas con partículas añadidas)
- Categoría No. 14.1.5 (Café, sucedáneos del café, té, infusiones de hierbas y otras bebidas calientes a base de cereales y granos, excluido el cacao)
- Categoría No. 14.2.7 (Bebidas alcohólicas aromatizadas (p. ej. cerveza, vino y bebidas con licor tipo bebida gaseosa, bebidas refrescantes con bajo contenido de alcohol))
- Categoría No. 15.1 (Aperitivos a base de patatas (papas), cereales, harina o almidón (derivados de raíces y tubérculos, legumbres y leguminosas))

Apéndice 3, Anexo 4: CONSIDERACIÓN DE LA JUSTIFICACIÓN TECNOLÓGICA Y EL NIVEL DE USO EN TODAS LAS SUBCATEGORÍAS APROPIADAS PARA LOS PROYECTOS DE DISPOSICIONES PARA CARAMELO III – CARAMELO AL AMONIACO (SIN 150C) Y CARAMELO IV – CARAMELO AL SULFITO

AMÓNICO (SIN 150D) EN FCS 08.1 Y 08.3 Y LAS DISPOSICIONES ADOPTADAS PARA CAMELO III – CAMELO AL AMONÍACO (SIN 150C) Y CAMELO IV – CAMELO AL SULFITO AMÓNICO (SIN 150D) EN LA FC 08.0.

El Salvador apoya las propuestas finales del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, para el uso de los aditivos CAMELO III - CAMELO AL AMONÍACO (SIN 150C) y CAMELO IV - CAMELO AL SULFITO AMÓNICO (SIN 150D) en la categoría de alimentos siguiente:

- Categoría No. 08.4 Envolturas o tripas comestibles (p. ej. para embutidos)

Apéndice 4, Anexo 1: SOLICITUD DE COMENTARIOS SOBRE LA NOTA QUE PERMITE LA CONVERSIÓN DE LA BASE DE INFORMACIÓN SOBRE EL PESO DE LAS ENVOLTURAS A UN NIVEL MÁXIMO DE USO SOBRE LA BASE DEL ALIMENTO ENTERO.

El Salvador apoya las propuestas finales del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, relativas a la propuesta de prácticas para cuando se consideren las provisiones de color en la categoría No. 08.4 Envolturas o tripas comestibles (p. ej. para embutidos), es decir:

1. Los niveles de uso se informarán en función del peso de la envoltura o tripa comestible.
2. Para que el nivel de uso sea claro para quienes utilizan la NGGA, todas las disposiciones sobre colorantes en FC 08.4 incluirán la Nota 365 (En base a tripas).
3. No se incluirá una nota que permita la conversión al alimento final (por ejemplo, salchicha) en las disposiciones.
4. Otras notas asociadas a cada disposición se considerarán para su eliminación o mantenimiento caso por caso.

Apéndice 4, Anexo 2: SOLICITUD DE COMENTARIOS SOBRE EL NIVEL DE USO REAL DE COLORANTES EN LA CATEGORÍA DE ALIMENTOS 08.4 PARA PERFECCIONAR AÚN MÁS LA BASE DE INFORMACIÓN SOBRE EL PESO DE LAS ENVOLTURAS.

El Salvador apoya las propuestas finales del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, relativas a las provisiones de color en la categoría No. 08.4 Envolturas o tripas comestibles (p. ej. para embutidos) siguientes:

- ROJO ALLURA AC (SIN 129)
- EXTRACTOS DE ANNATO, BASE DE BIXINA (SIN 160b(i))
- EXTRACTOS DE ANNATO, BASE DE NORBIXINA (SIN 160b(ii))
- MARRÓN HT (SIN 155)
- CARMINES (SIN 120)
- CAROTENAL, BETA-APO-8'- (SIN 160e)
- CAROTENOS, BETA- (SIN 160a(i), a(iii), a(iv))
- CAROTENOS, BETA-, VEGETALES (SIN 160a(ii))
- CURCUMINA (SIN 100(i))
- VERDE SÓLIDO FCF (SIN 143)
- EXTRACTO DE PIEL DE UVA (SIN 163(ii))
- ÓXIDOS DE HIERRO (SIN 172(i)-(iii))
- LUTEIN DE TAGETES ERECTA (SIN 161b(i))
- EXTRACTO DE PIMENTÓN (SIN 160c(ii))
- PONCEAU 4R (ROJO DE COCHINILLA A) (SIN 124)
- AMARILLO OCASO FCF (SIN 110)
- TARTRAZINA (SIN 102)
- ZEAXANTHIN, SINTÉTICO (SIN 161h(i))

Apéndice 6, Anexo 2: ADICIÓN DE UNA NUEVA NOTA PARA TODAS LAS DISPOSICIONES ADOPTADAS EN LAS CATEGORÍAS DE ALIMENTOS 13.1.1, 13.1.2, 13.1.3, 13.2, 13.3, 13.4 Y 13.5.

El Salvador apoya la propuesta final del Grupo de Trabajo Electrónico, según el documento CX/FA 26/56/7, en relación de eliminar la Nota 381 “As Consumed” y no incorporar una nota adicional debido a que no es necesaria, en las categorías de alimentos siguientes:

- Categoría No. 13.1.1 (Fórmulas (preparados) para lactantes)
- Categoría No. 13.1.2 (Fórmulas (preparados) de continuación)
- Categoría No. 13.1.3 (Fórmulas (preparados) para usos médicos especiales destinados a los lactantes)
- Categoría No. 13.2 (Alimentos complementarios para lactantes y niños pequeños)

Justificación:

- El preámbulo de la NGAA ya establece que, salvo disposición en contrario, los niveles máximos se refieren al producto tal como se consume. En ese sentido, el país puede acompañar la propuesta presentada.
- No obstante, se considera importante resaltar que el enfoque basado en el producto “según consumo” sigue siendo relevante para la adecuada evaluación de la exposición dietética, especialmente en categorías de alimentos dirigidas a poblaciones vulnerables.
- Por lo anterior, se enfatiza la necesidad de asegurar que la interpretación y aplicación de los niveles máximos permitidos mantengan coherencia con los principios de protección de la salud pública.
- Asimismo, El Salvador destaca la importancia de que cualquier ajuste en la redacción normativa no genere ambigüedades en la aplicación de los niveles de uso ni derive en incrementos indirectos de exposición, particularmente en alimentos destinados a lactantes y niños pequeños, en concordancia con el marco normativo nacional orientado a la protección de la lactancia materna y la alimentación adecuada en la primera infancia.

Apéndice 7: DISCUSIÓN SOBRE LA PROPUESTA DE BUSCAR ACLARACIONES SOBRE LA NOTA EXPLICATIVA A LA TABLA 3 DE LA GSFA COMO RESULTADO DE CX/FA 25/55/8

El Salvador está de acuerdo con la adopción de la modificación propuesta, ya que la aclaración de la nota explicativa del Cuadro 3 contribuye a mejorar la interpretación y aplicación de las disposiciones relativas al uso de aditivos alimentarios en las normas de producto.

En particular, la precisión de que únicamente ciertos aditivos del Cuadro 3, o aquellos pertenecientes a determinadas clases funcionales indicadas en dicho cuadro, podrán utilizarse cuando el número de la norma de producto esté consignado en la Columna 5, proporciona mayor claridad y evita interpretaciones ambiguas.

Por lo anterior, El Salvador considera que la propuesta está debidamente justificada, ya que fortalece la coherencia y la correcta aplicación de las disposiciones establecidas en la Norma General para los Aditivos Alimentarios (NGAA).

India

CX/FA 26/56/7

AGENDA ITEM 5(a): GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE EWG ON THE GSFA

AGENDA ITEM 5a: GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE EWG ON THE GSFA

APPENDIX 1: MATTERS REFERRED FROM THE CODEX SECRETARIAT, CCFNSDU44, AND JECFA

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)

Food Additive	Comment
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TOCOPHEROLS	India supports final EWG proposal 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).”
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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)

Food Additive	Comment
Acetylated distarch phosphate (INS 1414)	India support the EWG recommendation to revoke the provisions for Acetylated Distarch Phosphate (INS 1414), Distarch Phosphate (INS 1412), Guar Gum (INS 412), Hydroxypropyl Starch (INS 1440) and Phosphated Distarch Phosphate (INS 1413) in Food Category 13.1.1 This recommendation is in line with the conclusion of CCNFSDU44 on the technological justification and use of these additives in infant formula and formula for special medical purposes intended for infants.
Distarch phosphate (INS 1412)	
Guar gum (INS 412),	
hydroxypropyl starch (INS 1440)	
Phosphated distarch phosphate (INS 1413)	

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

Food Additive	Comment
Acetylated distarch phosphate (INS 1414)	India support the EWG recommendation to revoke the provisions for Acetylated Distarch Phosphate (INS 1414), Distarch Phosphate (INS 1412), Guar Gum (INS 412), Hydroxypropyl Starch (INS 1440) and Phosphated Distarch Phosphate (INS 1413) in Food Category 13.1.3. This recommendation is in line with the conclusion of CCNFSDU44 on the technological justification and use of these additives in infant formula and formula for special medical purposes intended for infants.
Distarch phosphate (INS 1412)	
Guar gum (INS 412),	
hydroxypropyl starch (INS 1440)	
Phosphated distarch phosphate (INS 1413)	

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)

Food Additive	Comment
GUM ARABIC (ACACIA GUM)	India supports the Final EWG proposal, except use of the word “only” in the new note. - 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 10 mg/kg in the food as consumed.” Removal of the word “only” will help maintain consistency of the wording with the other adopted provisions of the Codex GSFA

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

Food Additive	Comment
MANNITOL	1. India supports the use of this food additive as a nutrient carrier at the level of 10 mg/kg in general. However, India supports the use in vitamin B12 dry rubbing at 0.1 % and removal of note 592 and XS73. 2. Further, India Supports the adoption of new note except the word “only”. - 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 10 mg/kg in the food as consumed.” Removal of the word “only” will help maintain consistency of the wording with the other adopted provisions of the Codex GSFA.

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

Food Additive	Comment
SILICON DIOXIDE, AMORPHOUS	1. India allows the use of this as food additive at GMP level. Further India supports this food additive as a nutrient carrier at 10 mg/kg and with removal of note 592 and XS73. 2. India supports the adoption of new note except the word “only”. - 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 10 mg/kg in the food as consumed.” Removal of the word “only” will help maintain consistency of the wording with the other adopted provisions of the Codex GSFA.

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

Food Additive	Comment
STARCH SODIUM OCTENYL SUCCINATE	1. India supports the use of this as food additive at 50,000 mg/kg and as a nutrient carrier at 100 mg/kg and removal of note 49 and XS73 2. India supports the adoption of new note except the word “only”. - 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 10 mg/kg in the food as consumed.” Removal of the word “only” will help maintain consistency of the wording with the other adopted provisions of the Codex GSFA.

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. 01.1.2 (Other fluid milk (plain))

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India doesn't allow any food additive in plain milk except PHOSPHATES

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India allows use of this additive at GMP level.

Category No. 02.1.2 (Vegetable oils and fats)

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India allows use of this additive at 5000 mg/kg with note 408 (only for baking shortening and interesterified vegetable fats to be used in bakery applications).

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports this food additive at 5000 mg/kg with note 359.

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India allows this food additive at 20000 mg/kg with note 363 (Note 363: For use at 50,000 mg/kg for emulsified oils used in the production of noodles or bakery products)

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India allows this food additive at 10,000 mg/kg in this food category

Category No. 03.0 (Edible ices, including sherbet and sorbet)

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India allows this food additive at 10000 mg/kg in this food category

Category No. 04.1.2.8 (Fruit preparations, including pulp, purees, fruit toppings and coconut milk)

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports revocation

Category No. 04.1.2.11 (Fruit fillings for pastries)

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports revocation

Category No. 05.1.1 (Cocoa mixes (powders) and cocoa mass/ cake)

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports use of this food additive at 3750 mg/kg in this food category

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 2000 mg/kg in this food category with note 366

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 2000 mg/kg in this food category with note 367

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 2000 mg/kg in this food category with note 368

Category No. 07.1.4 (Bread-type products, including bread stuffing and bread crumbs)

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 10000 mg/kg in this food category

Category No. 07.1.5 (Steamed bread and buns)

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports revocation

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 10000 mg/kg in this food category

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 10000 mg/kg in this food category

Category No. 07.2.3 (Mixes for fine bakery wares (e.g. cakes, pancakes))

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 15000 mg/kg in this food category with note 11 (Note 11: On the flour basis.)

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports revocation

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports revocation

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports revocation

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India supports revocation

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 1000 mg/kg in this food category

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

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India support to maintain adopted provision at 1000 mg/kg in this food category

Category No. 13.6 (Food supplements)

Additive	Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	India allows this food additive at 18000 mg/kg in this food category

APPENDIX 2 REPLIES TO CL 2025/29-FA (ERYTHROSINE)**Standard for Canned Raspberries (CXS 60-1981)**

Additive	Comments
Érythrosine	India supports the use of this food additive at 100 mg/kg in this food category.
Ponceau 4 R	India allows the use of this food additive at 200 mg/kg in this food category.

Standard for Canned Strawberries (CXS 62-1981)

Additive	Comments
Érythrosine	India allows the use of this food additive at 100 mg/kg in this food category.
Ponceau 4 R	India allows the use of this food additive at 200 mg/kg in this food category

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. 04.1.2.8 (Fruit preparations, including pulp, purees, fruit topping and coconut milk)**

Additive	Comments
INDIGOTINE (INDIGO CARMINE)	India supports the final EWG proposal

Category No. 04.1.2.11 (Fruit fillings for pastries)

Additive	Comments
ALLURA RED AC	India supports the use of this food additive at 100 mg/kg.

Category No. 04.1.2.11 (Fruit fillings for pastries)

Additive	Comments
INDIGOTINE (INDIGO CARMINE)	India supports the final EWG 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**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	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India supports final EWG proposal to discontinue this additive.
CARAMEL III - AMMONIA CARAMEL	India allows this food additive at 50,000 mg/kg in this food category

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. 08.1.1 (Fresh meat, poultry, and game, whole pieces or cuts)**

Additive	Comments
CARAMEL III - AMMONIA CARAME	India does not allow food additive in this food category
CARAMEL IV - SULFITE AMMONIA CARAMEL	India does not allow food additive in this food category

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

Additive	Comments
CARAMEL III - AMMONIA CARAME	India does not allow food additive in this food category
CARAMEL IV - SULFITE AMMONIA CARAMEL	India does not allow food additive in this food category

Category No. 08.2.1.1 (Cured (including salted) non-heat treated processed meat, poultry, and game products in whole pieces or cuts)

Additive	Comments
CARAMEL III - AMMONIA CARAME	India allows use of this food additive in parent category (8.2: Processed meat and poultry products in whole pieces or cuts) at GMP with notes 3 and 4
CARAMEL IV - SULFITE AMMONIA CARAMEL	India allows use of this food additive in parent category (8.2: Processed meat and poultry products in whole pieces or cuts) at GMP with notes 3 and 4

Category No. 08.2.1.3 (Fermented non-heat treated processed meat, poultry, and game products in whole pieces or cuts)

Additive	Comments
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CARAMEL III - AMMONIA CARAME	Allows use of this food additive in parent category (8.2: Processed meat and poultry products in whole pieces or cuts) at GMP with notes 3 and 4
CARAMEL IV - SULFITE AMMONIA CARAMEL	Allows use of this food additive in parent category (8.2: Processed meat and poultry products in whole pieces or cuts) at GMP with notes 3 and 4

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

Additive	Comments
CARAMEL III - AMMONIA CARAME	India does not permit any added color in this food category.
CARAMEL IV - SULFITE AMMONIA CARAMEL	India does not permit any added color in this food category.

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

Additive	Comments
CARAMEL III - AMMONIA CARAME	India allows use of this food additive in parent category (8.2: Processed meat and poultry products in whole pieces or cuts) at GMP with notes 3 and 4
CARAMEL IV - SULFITE AMMONIA CARAMEL	India allows use of this food additive in parent category (8.2: Processed meat and poultry products in whole pieces or cuts) at GMP with notes 3 and 4

Category No. 08.3 (Processed comminuted meat, poultry, and game products)

Additive	Comments
CARAMEL III - AMMONIA CARAME	India allows use of this food additive in parent category 08.3 at GMP with the following notes; Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only
CARAMEL IV - SULFITE AMMONIA CARAMEL	India allows use of this food additive in parent category 08.3 at GMP Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only

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

Additive	Comments
CARAMEL III - AMMONIA CARAME	India allows use of this food additive in parent category 08.3 at GMP with the following notes; Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only

CAMEL IV - SULFITE AMMONIA CAMEL	India allows use of this food additive in parent category 08.3 at GMP with the following notes; Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only
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Category No. 08.3.1.2 (Cured (including salted) and dried non-heat treated processed comminuted meat, poultry and game products)

Additive	Comments
CAMEL III - AMMONIA CARAME	India allows use of this food additive in parent category 08.3 at GMP Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only
CAMEL IV - SULFITE AMMONIA CAMEL	India allows use of this food additive in parent category 08.3 at GMP with the following notes; Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only

Category No. 08.3.1.3 (Fermented non-heat treated processed comminuted meat, poultry, and game products)

Additive	Comments
CAMEL III - AMMONIA CARAME	India allows use of this food additive in parent category 08.3 at GMP Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only
CAMEL IV - SULFITE AMMONIA CAMEL	India allows use of this food additive in parent category 08.3 at GMP Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only

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

Additive	Comments
CAMEL III - AMMONIA CARAME	India allows use of this food additive in parent category 08.3 at GMP Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only

CARAMEL IV - SULFITE AMMONIA CARAMEL	India allows use of this food additive in parent category 08.3 at GMP Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only
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Category No. 08.3.3 (Frozen processed comminuted meat, poultry, and game products)

Additive	Comments
CARAMEL III - AMMONIA CARAMEL	India allows use of this food additive in parent category 08.3 at GMP Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only
CARAMEL IV - SULFITE AMMONIA CARAMEL	India allows use of this food additive in parent category 08.3 at GMP Note 3: For use in surface treatment only. Note 4: For use in decoration, stamping, marking or branding the product only. Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only

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

Additive	Comments
CARAMEL III - AMMONIA CARAMEL	India does not allow use of this food additive in this food category
CARAMEL IV - SULFITE AMMONIA CARAMEL	India does not allow use of this food additive in this food category

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))****General Comments**

Additive	Comments
ALLURA RED AC	India does not allow use of this food additive in this food category
ANNATTO EXTRACTS, BIXIN-BASED	India does not allow use of this food additive in this food category
ANNATTO EXTRACTS, NORBIXIN-BASED	India does not allow use of this food additive in this food category
CAROTENAL, BETA-APO-8'	India supports use of this food additive at 100 mg/kg in this food category
CAROTENES, BETA-	India supports use of this food additive at 100 mg/kg in this food category
CAROTENES, BETA-, VEGETABLE	India supports use of this food additive at 100 mg/kg in this food category
CURCUMIN	India does not allow use of this food additive in this food category

FAST GREEN FCF	India supports use of this food additive at 100 mg/kg in this food category
GRAPE SKIN EXTRACT	India supports use of this food additive at 5000 mg/kg in this food category
IRON OXIDES	India supports use of this food additive at 1000 mg/kg in this food category
LUTEIN FROM TAGETES ERECTA	India does not allow use of this food additive in this food category
PAPRIKA EXTRACT	India does not allow use of this food additive in this food category
PONCEAU 4R (COCHINEAL RED A)	India does not allow use of this food additive in this food category
SUNSET YELLOW FCF	India does not allow use of this food additive in this food category
TARTRAZINE	India does not allow use of this food additive in this food category
ZEAXANTHIN, SYNTHETIC	India does not allow use of this food additive in this food category

Appendix 5 COLOURS IN FC 09.0 AND THEIR SUBCATEGORIES

Category No. 09.1 (Fresh fish and fish products, including mollusks, crustaceans, and echinoderms)

Additive	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India supports to discontinue
CARAMEL II – SULFITE CARAMEL	

Category No. 09.1.1 (Fresh fish)

Additive	Comments
AZORUBINE (CARMOISINE)	India supports to discontinue
BEET RED	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL I – PLAIN CARAMEL	
CHLOROPHYLLS	
CURCUMIN	
LUTEIN FROM TAGETES ERECTA	
QUINOLINE YELLOW	
TARTRAZINE	
TITANIUM DIOXIDE	

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

Additive	Comments
AZORUBINE (CARMOISINE)	India supports to discontinue
BEET RED	
BRILLIANT BLACK (BLACK PN)	

BROWN HT	
CARAMEL I – PLAIN CARAMEL	
CHLOROPHYLLS	
CURCUMIN	
QUINOLINE YELLOW	
TARTRAZINE	
TITANIUM DIOXIDE	

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

Additive	Comments
ANNATTO EXTRACTS, NORBIXIN-BASED	India supports to discontinue
CARAMEL II – SULFITE CARAMEL	
CURCUMIN	
LYCOPENE, BLAKESLEA TRISPORA	
LYCOPENE, SYNTHETIC	
LYCOPENE, TOMATO	
PAPRIKA EXTRACT	

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

Additive	Comments
AMARANTH	India supports to discontinue
ANNATTO EXTRACTS, BIXIN-BASED	
AZORUBINE (CARMOISINE)	
BEET RED	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL I – PLAIN CARAMEL	
CHLOROPHYLLS	
CURCUMIN	
LUTEIN FROM TAGETES ERECTA	
QUINOLINE YELLOW	
TARTRAZINE	
TITANIUM DIOXIDE	

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

Additive	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India does not allow these food additives in this food category
AZORUBINE (CARMOISINE)	
BEET RED	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL I – PLAIN CARAMEL	
CHLOROPHYLLS	
CURCUMIN	
PAPRIKA EXTRACT	
QUINOLINE YELLOW	
TARTRAZINE	
TITANIUM DIOXIDE	

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

Additive	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India does not allow these food additives in this food category
AZORUBINE (CARMOISINE)	
BEET RED	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL I – PLAIN CARAMEL	
CHLOROPHYLLS	India supports use of this food additive at 40 mg/kg in this food category with note 95.
CURCUMIN	India does not allow these food additives in this food category
QUINOLINE YELLOW	
TARTRAZINE	
TITANIUM DIOXIDE	

Category No. 09.2.4 (Cooked and/or fried fish and fish products, including mollusks, crustaceans, and echinoderms)

Additive	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India does not allow these food additives in this food category

Category No. 09.2.4.1 (Cooked fish and fish products)

Additive	Comments
AMARANTH	India does not allow these food additives in this food category
ANNATTO EXTRACTS, BIXIN-BASED	
AZORUBINE (CARMOISINE)	
BEET RED	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL I - PLAIN CARAMEL	
CHLOROPHYLLS	India supports use of this food additive at 30 mg/kg in this food category with note 62 and 95
CURCUMIN	India does not allow these food additives in this food category
LYCOPENE, TOMATO	
PAPRIKA EXTRACT	
QUINOLINE YELLOW	
TARTRAZINE	
TITANIUM DIOXIDE	

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

Additive	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India does not allow these food additives in this food category
AZORUBINE (CARMOISINE)	
BEET RED	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL I – PLAIN CARAMEL	
CHLOROPHYLLS	
CURCUMIN	
LUTEIN FROM TAGETES ERECTA	
PAPRIKA EXTRACT	
QUINOLINE YELLOW	
TARTRAZINE	

TITANIUM DIOXIDE	
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Category No. 09.2.4.3 (Fried fish and fish products, including mollusks, crustaceans, and echinoderms)

Additive	Comments
AMARANTH	India does not allow this food additive in this food category
ANNATTO EXTRACTS, BIXIN-BASED	
AZORUBINE (CARMOISINE)	
BEET RED	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL I – PLAIN CARAMEL	
CHLOROPHYLLS	India supports use of this food additive at 40 mg/kg in this food category with note 95 and 41 (Note41: For use in breading or batter coatings only, Note95: For use in surimi and fish roe products only)
CURCUMIN	India does not allow these food additives in this food category
LYCOPENE, TOMATO	
QUINOLINE YELLOW	
TARTRAZINE	
TITANIUM DIOXIDE	

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

Additive	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India does not allow these food additives in this food category
ANNATTO EXTRACTS, NORBIXIN-BASED	
BEET RED	
CARAMEL I – PLAIN CARAMEL	
CURCUMIN	
PAPRIKA EXTRACT	

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

Additive	Comments
CARAMEL II – SULFITE CARAMEL	India does not allow this food additive in this food category

CURCUMIN	
PAPRIKA EXTRACT	

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

Additive	Comments
ANNATTO EXTRACTS, NORBIXIN-BASED	India does not allow this food additive in this food category
AZORUBINE (CARMOISINE)	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL II – SULFITE CARAMEL	
CURCUMIN	
LUTEIN FROM TAGETES ERECTA	
PAPRIKA EXTRACT	
QUINOLINE YELLOW	
TARTRAZINE	

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

Additive	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India does not allow this food additive in this food category
ANNATTO EXTRACTS, NORBIXIN-BASED	
AZORUBINE (CARMOISINE)	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL II – SULFITE CARAMEL	
CURCUMIN	
PAPRIKA EXTRACT	
QUINOLINE YELLOW	
TARTRAZINE	

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

Additive	Comments
AMARANTH	India does not allow this food additive in this food category
ANNATTO EXTRACTS, BIXIN-BASED	

ANNATTO EXTRACTS, NORBIXIN-BASED	
AZORUBINE (CARMOISINE)	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CARAMEL II – SULFITE CARAMEL	
CURCUMIN	
LUTEIN FROM TAGETES ERECTA	
PAPRIKA EXTRACT	
QUINOLINE YELLOW	
TARTRAZINE	

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	Comments
ANNATTO EXTRACTS, BIXIN-BASED	India does not allow this food additive in this food category
ANNATTO EXTRACTS, NORBIXIN-BASED	
AZORUBINE (CARMOISINE)	
BRILLIANT BLACK (BLACK PN)	
BROWN HT	
CURCUMIN	
INDIGOTINE (INDIGO CARMINE)	India allow use Indigotine (Indigo Carmine) (INS 132) at 100 mg/kg in this food category
QUINOLINE YELLOW	India does not allow this food additive in this food category
TARTRAZINE	

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

Additive	Comments
AMARANTH	India does not allow this food additive in this food category
ANNATTO EXTRACTS, BIXIN-BASED	
ANNATTO EXTRACTS, NORBIXIN-BASED	
AZORUBINE (CARMOISINE)	
BRILLIANT BLACK (BLACK PN)	

BROWN HT
CARAMEL II – SULFITE CARAME
CURCUMIN
PAPRIKA EXTRACT
QUINOLINE YELLOW
TARTRAZINE

Appendix 6 NEW AND REVISED PROVISIONS IN THE GSFA ENTERED INTO THE STEP PROCESS AT STEP 2 AS A RESULT OF CX/FA 25/55/8

ANNEX 1 NEW AND REVISED PROVISIONS IN THE GSFA ENTERED INTO THE STEP PROCESS AT STEP 2 AS A RESULT OF CX/FA 25/55/8

Category No. 04.1.1.2 (Surface treated fresh fruit)

Additive	Comments
Sucrose esters	India allows INS 474 (Sucroglycerides) at GMP in this Food Category

Category No. 04.1.1.2 (Surface treated fresh fruit)

Additive	Comments
Sorbates	India does not allow use of this food additive in this food category

Category No. 04.2.1.2 (Surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)

Additive	Comments
Sucrose esters	India supports final EWG proposal.

ANNEX 2 ADDITION OF NEW NOTE FOR ALL ADOPTED PROVISIONS IN FOOD CATEGORIES 13.1.1, 13.1.2, 13.1.3, 13.2, 13.3, 13.4, AND 13.5

India supports the final EWG proposal to remove the Note 381 “As Consumed”.

India believes that Note 381 is unnecessary for the products covered by FC 13.1.1, FC 13.1.2, and FC 13.1.3.

Furthermore, use of Note 381 for products in these food categories has led to confusion in the interpretation of the provisions. Section 6 of the preamble of the GSFA states that “Unless otherwise specified, maximum use level for additives in Tables 1 and 2 are set on the final product as consumed.” Consequently, whether products are sold as liquids ready for consumption, powders that require reconstitution prior to consumption, or in both formats, an additive provision should be interpreted to be applied “**as consumed**” in the absence of a Note, as in these cases the provision within Section 6 of the preamble would guide interpretation.

ANNEX 3 ADDITION SPECIFIC ALLOWANCE OF GLYCEROL IN ADDITIONAL COMMODITY STANDARD TABLE 3

India supports the final EWG proposal.

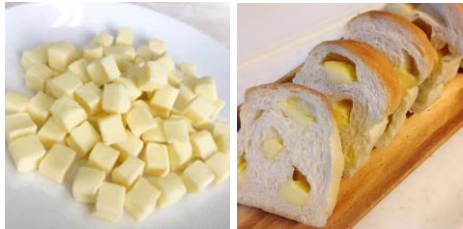
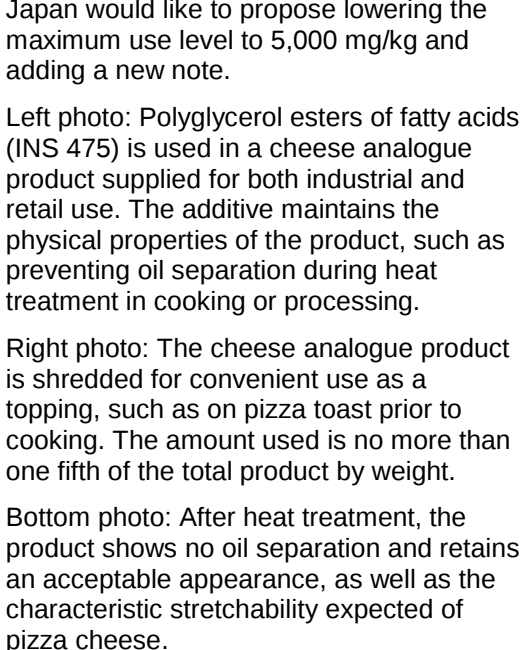
APPENDIX 7 DISCUSSION OF THE PROPOSAL TO SEEK CLARIFICATION ON THE EXPLANATORY NOTE TO TABLE 3 OF THE GSFA AS A RESULT OF CX/FA 25/55/8

India supports the final EWG Proposal for revised “Explanatory Note”.

Japan

Agenda item 5a: General standard for food additives (GSFA): Report of the Electronic Working Group on the GSFA – CX/FA 26/56/7

Japan would like to submit the following comments regarding CX/FA 26/56/7. Addition is in **bold and underlined font** and deletion is in ~~strike through font~~.

Food Cat.	Food additive INS	Final EWG Proposal and Japan's proposal	Japan's comment
01.6.4 (Processed cheese)	POLYGLYCEROL ESTERS OF FATTY ACIDS 475	Revise Adopted Provision – Revise use level to 10,000 mg/kg <u>Adopt at 5000 mg/kg with New Note “Except for use in industrial bakery products at 10,000 mg/kg.”</u>	Japan would like to propose lowering the maximum use level to 5,000 mg/kg and adding a new note. Left photo: polyglycerol esters of fatty acids (INS 475) is used in processed cheese, which is supplied as an industrial ingredient for bakery products. The additive maintains physical properties of the cheese in the bakery product, such as preventing oil separation during heat treatment. Right photo: the amount of the cheese in the bakery is no more than one quarter of the final product by weight. The cubes retain their shape without oil separation, providing an appealing appearance and desirable texture. 
01.6.5 (Cheese analogues)	POLYGLYCEROL ESTERS OF FATTY ACIDS 475	Revise Adopted Provision – Revise use level to 10,000 mg/kg <u>Adopt at 5000 mg/kg with New Note “Except for use as a topping at 10,000 mg/kg.”</u>	Japan would like to propose lowering the maximum use level to 5,000 mg/kg and adding a new note. Left photo: Polyglycerol esters of fatty acids (INS 475) is used in a cheese analogue product supplied for both industrial and retail use. The additive maintains the physical properties of the product, such as preventing oil separation during heat treatment in cooking or processing. Right photo: The cheese analogue product is shredded for convenient use as a topping, such as on pizza toast prior to cooking. The amount used is no more than one fifth of the total product by weight. Bottom photo: After heat treatment, the product shows no oil separation and retains an acceptable appearance, as well as the characteristic stretchability expected of pizza cheese. 

			
03.0 (Edible ices, including sherbet and sorbet)	POLYGLYCEROL ESTERS OF FATTY ACIDS 475	Revise Adopted Provision - Lower use level to 4100 mg/kg <u>2500 mg/kg</u>	In the EWG, Japan reported a maximum use level of 4,100 mg/kg. However, this value referred to glycerol esters of fatty acids, whereas the maximum use level of polyglycerol esters of fatty acids (INS 475) was 2,500 mg/kg. Therefore, Japan proposes lowering the ML for this food category to 2,500 mg/kg.
06.3 (Breakfast cereals, including rolled oats)	POLYGLYCEROL ESTERS OF FATTY ACIDS 475	Revise Adopted Provision - Lower maximum use level to 2100 mg/kg <u>2000 mg/kg</u> - Revise Note 369 to the following: "For use at 10,000 mg/kg in granola-type breakfast cereals."	In the EWG, Japan reported a maximum use level of 2,100 mg/kg. However, this value referred to glycerol esters of fatty acids, whereas the maximum use level for polyglycerol esters of fatty acids (INS 475) was 500 mg/kg. Therefore, although we apologize for requesting a revision, Japan would support lowering the ML for this food category to 2,000 mg/kg, which is the level reported by other Members.
06.4.3 (Pre-cooked pastas and noodles and like products)	POLYGLYCEROL ESTERS OF FATTY ACIDS 475	Maintain existing provision <u>Revise Adopted Provision</u> - <u>Lower maximum use level to 1000 mg/kg</u>	In the EWG, Japan reported a maximum use level of 2,000 mg/kg. However, this value referred to glycerol esters of fatty acids, whereas the maximum use level for polyglycerol esters of fatty acids (INS 475) was 100 mg/kg. Therefore, Japan would support lowering the ML for this food category to 1,000 mg/kg, which is the level reported by other Members.
06.5 (Cereal and starch based desserts (e.g. rice pudding, tapioca pudding))	POLYGLYCEROL ESTERS OF FATTY ACIDS 475	Revise Adopted Provision - Lower use level to 60 mg/kg	Subsequent investigation revealed that the product in question is a dried confectionery and would be more appropriately classified under FC 15.1 rather than FC 06.5. Therefore, Japan would like to withdraw its reported use of this additive at 60 mg/kg in the concerned food category.
14.2.7 Aromatized alcoholic beverages (e.g. beer, wine, and other hot cereal and spirituous cooler-type beverages, low	POLYGLYCEROL ESTERS OF FATTY ACIDS	Revise adopted provision Increase use level to 150 mg/kg <u>Maintain at 20 mg/kg with New Note "Except for use in ready-to-drink alcohol beverages at</u>	In Japanese RTD alcoholic beverages, as shown in the image below(AI generated), PGFE can be used in products containing essential oil and/or milky components and other kinds of emulsified flavors. They can impart a richer aroma and a fuller flavor profile compared with water-soluble flavorings that provide a lighter aromatic

alcoholic refreshers)	475	<u>150 mg/kg.</u>	note. This characteristic is often utilized to enhance the perception of fruitiness in low-alcohol beverages. The figure below presents an investigation conducted by a Japanese company. The test tube on the left contains an aqueous solution of PGFE, while the one on the right contains an aqueous solution of polyethylene glycol-based surfactant. Upon heating, turbidity develops, indicating a deterioration in quality and shows the advantage of PGFE.   https://www.taiyokagaku.com/lab/emulsion_learning/08/ Based on these data, together with actual usage practices in the food industry, Japan would consider the importance of increasing ML of PGFE in this FC. At the same time, Japan recognizes some concern about increasing ML, Japan would like to propose note below. Except for use in ready-to-drink alcohol beverages at 150 mg/kg.
08.2.2 (Heat-treated processed meat, poultry, and game products in whole pieces or cuts)	CARMEL III - AMMONIA CARMEL 150c	Adopt at 9,600 mg/kg <u>3,400 mg/kg</u> with Notes 3, 4, 16, XS96, XS97 and XS350R.	Subsequent investigation revealed that the reported use level of 9600 mg/kg of CARMEL III submitted by Japan referred to use in seasonings. Therefore, Japan would like to withdraw its reported use of this additive in this food category and support lowering the ML for this food category to 3,400 mg/kg, which is the level reported by other Members.
08.2.3 (Frozen processed meat, poultry, and game products in whole	CARMEL III - AMMONIA CARMEL	Adopt at 15,100 mg/kg <u>400 mg/kg</u> with Notes 3, 4, 16 and XS350R	Subsequent investigation revealed that the reported use level of 15,100 mg/kg of CARMEL III submitted by Japan referred to use in seasonings. Therefore, Japan

pieces or cuts)	150c		would like to withdraw its reported use of this additive in this food category and support lowering the ML for this food category to 400 mg/kg, which is the level reported by other Members.
09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms)	PAPRIKA EXTRACT 160c(ii)	Discontinue <u>in parent category 09.2 and consider in subcategory 09.2.3.</u>	In Japan, this additive is used at a level of 20 mg/kg in unheated sea urchin products. This use helps prevent colour unevenness and inhibits browning during long-term storage. If the provision in FC 09.2 is considered inappropriate, Japan proposes establishing a provision in FC 09.2.3 (Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms)). 
09.2.3 (Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms)	TARTRAZINE 102	Adopt at 500 mg/kg with New Note "For use in fish roe and sea urchin only"	The following information on technological justification and examples of use is provided for reference. This additive is used in non-heat-treated sea urchin mixed with other ingredients, such as jellyfish or fish roe, to achieve a uniform colour and to compensate for browning during long-term storage. The photo below shows a product consisting of sea urchin mixed with jellyfish. 
09.2.4.1 (Cooked fish and fish products)	BEET RED 162	Adopt at GMP with New Note "For use in fish floss (sakura denbu) only"	The following information on technological justification and examples of use is provided for reference. Sakura (cherry blossom) denbu is a sweet, pink-coloured fish flake product made from seasoned and finely shredded white fish, commonly used as a topping or filling for sushi and rice dishes in Japan. Beet red imparts a natural pink to reddish colour, enabling the characteristic colour to be achieved. If the use level is reduced, the desired colour cannot be achieved. In addition, compared with similar colours, beet red shows less fading during storage.

			
09.2.4.1 (Cooked fish and fish products)	CARAMEL I - PLAIN CARAMEL 150a	Adopt at GMP with Note 95	The following information on technological justification and examples of use is provided for reference. In Japan, caramel colour is used at up to 2,500 mg/kg to create brown patterns in cooked surimi products (kamaboko). 
09.2.4.1 (Cooked fish and fish products)	CHLOROPHYLLS 140	Adopt at GMP with Note 95	The following information on technological justification and examples of use is provided for reference. In Japan, chlorophyll (INS 140) is used to create green patterns on cooked surimi products (kamaboko). Chlorophyll is more heat-stable than similar colours and does not change colour after heating. In addition, it shows less bleeding into uncoloured portions, making it suitable for creating patterns. If the use level is reduced, the desired colour cannot be achieved. An example of kamaboko coloured with chlorophyll is shown below. 
09.2.4.1 (Cooked fish and fish products)	CURCUMIN 100(i)	Adopt at 420 mg/kg with Note 95	Subsequent investigation revealed that the reported use of curcumin (INS 100(i)) does not relate to foods in FC 09.2.4.1. Therefore, Japan would like to withdraw its reported use of this additive in the concerned food category.
09.2.4.1 (Cooked fish and fish products)	LYCOPENE,	Adopt at GMP with Note 95 Chair's Note: This provision is	The following information on technological justification and examples of use is provided

	TOMATO	moved down from the parent category (FC 09.2) based on a member request. INS 160d(ii) has an ADI Not Specified which is traditionally listed at GMP.	for reference. In Japan, lycopene, tomato is used in crab-flavoured surimi products at 670 mg/kg to color finely ground white fish meat (surimi) and serve as a crab-flavoured cooked kamaboko product (kanikama) that evokes the appearance of crab. Compared with other colours, lycopene, tomato is more heat-stable and can produce a natural red colour similar to that of crab; therefore, suitable alternatives are difficult to identify. If the use level is reduced, the colour becomes too pale to represent the characteristic colour of crab. Example: 
09.2.4.1 (Cooked fish and fish products)	PAPRIKA EXTRACT 160c(ii)	Adopt at 35 mg/kg with Note 39 and Note 95 . <u>New Note (“For use in surimi, flaked fish products and fish roe products only.”)</u>	The use level of 35 mg/kg proposed by Japan corresponds to the use in salmon flakes. Salmon flakes are a seasoned product made from cooked and finely flaked salmon, commonly used as a topping for rice dishes in Japan. For salmon flakes, the use of paprika extract at 35 mg/kg is necessary to prevent colour fading after heating and to ensure uniform colour between production lots. (In addition, paprika extract is used in crab-flavoured surimi products at 10 mg/kg to provide a colour that evokes the appearance of crab.) Paprika extract is suitable for producing a natural reddish colour similar to that of crab and is heat-stable, showing little fading after heating; therefore, suitable alternatives are difficult to identify. If the use level is reduced, the colour becomes too pale and the visual appearance no longer corresponds to the expected appearance of crab. At present, Note 95 applies only to surimi and fish roe. However, products made from flaked fish products (fish flakes) should also be included.
09.2.4.2 (Cooked	TARTRAZI	Adopt at 400 mg/kg with Note	The following information on technological

mollusks, crustaceans, and echinoderms)	NE 102	479 (“For use in cooked mollusks only”)	justification and examples of use is provided for reference. In Japan, tartrazine (INS 102) is used in habanero-flavoured shredded squid to express the spiciness of the product through its colour. Other colours, such as paprika extract, produce a weaker colour tone and tend to appear faded, making it difficult to convey the expected level of spiciness. Therefore, the proposed use level is necessary. Example: 
09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)	ANNATTO EXTRACTS, NORBIXIN-BASED 160b(ii)	Adopt at 45 mg/kg with Note 50 (“For use in fish roe only”), <u>50 mg/kg with New Note (“For use in fish roe and mollusks only”)</u>, 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.	In Japan, annatto extracts, norbixin-based (INS 160b(ii)) is used at 50 mg/kg in salted and fermented mollusk products (shiokara) and 45 mg/kg in fish roe products. Shiokara is produced by salting squid meat and viscera and allowing them to ferment without heat treatment. During the marination, fermentation, and seasoning processes, dullness and discolouration of the squid meat may occur. The additive is used to correct these colour changes and to prevent colour unevenness. Compared with other additives having similar functions, it shows superior dispersibility in aqueous systems, making substitution difficult. If the use level is reduced, colour variation occurs and the desired colour cannot be achieved. For fish roe products, the additive is used to ensure uniform colour between production lots. Due to its superior dispersibility in aqueous systems, suitable alternatives are difficult to identify. If the use level is reduced, colour unevenness occurs. An example of the product is shown below.

			  Therefore, Japan requests that a note be established specifying that the use is limited to fish roe and mollusk products. At present, Note 50, which limits use to fish roe, is already applied to many colours across several food categories. For this reason, rather than revising Note 50 to include mollusks, Japan considers that establishing a new note would be preferable.
09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)	CURCUMIN 100(i)	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	The following information on technological justification and examples of use is provided for reference. Curcumin (INS 100(i)) is used to ensure uniform colour among fish roe from different production lots. In combination with other colours, it produces a colour close to the expected appearance of fish roe, making substitution difficult. If the use level is reduced, colour unevenness occurs. Example: 
09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)	PAPRIKA EXTRACT 160c(ii)	Adopt at 30 mg/kg with Note 39, New Note "Except for use in surimi products at 180 mg/kg", XS167, XS189, XS222, XS236, XS244 and XS311	The following information on technological justification and examples of use is provided for reference. In Japan, this additive is used in salted and fermented fish products (<i>shuto</i>) and in salted and fermented mollusk products (<i>shiokara</i>).

			<i>Shuto</i> is a product prepared by thoroughly washing the viscera of fresh tuna or bonito (stomach and intestine, together with adjacent organs), salting them, and allowing them to ferment and mature for six months to more than one year. Paprika extract is used to produce a colour reminiscent of tuna or bonito, thereby reducing colour variation between production lots and stabilizing the appearance of the product, which improves consumer acceptability. Other colours cannot provide a similar colour tone, and if the use level is reduced, the colour becomes unsatisfactory. The use in <i>shiokara</i> (salted and fermented squid) serves the same purpose. Example of <i>shuto</i>:  Example of <i>shiokara</i>:  Source: "Traditional Foods in Japan" Ministry of Agriculture, Forestry and Fisheries https://www.maff.go.jp/keikaku/syokubunka/traditional-foods/menu/siokara.html
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Kenya

General Comment: Kenya supports the ongoing work of the GSFA EWG, recognizing the importance of aligning food additive provisions with the GSFA and relevant Codex commodity standards to ensure consistency, technological justification, and consumer protection.

Polyglycerol Esters of Fatty Acids (INS 475): Kenya notes JECFA's concern regarding potential ADI exceedance (0–25 mg/kg bw) for INS 475. Kenya further seeks clarification on the application of the additional note for cream and cheese analogues (10,000 and 19,000 mg/kg, respectively), specifically in products intended for subsequent heat sterilization.

Malaysia

Malaysia would like to thank the United States for great work and leading the Electronic Working Group (EWG) on the General Standard for Food Additives (GSFA) to the 56th session of the Codex Committee on Food Additives (CCFA). We are pleased to provide our comments on the Annex 4 under Appendix 1 as follows:

APPENDIX 1 [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

Food Category	Max Level (mg/kg)	EWG Proposal (mg/kg)	Malaysia's Comment
01.4.4 Cream analogues	8000	7100	Malaysia proposes to maintain the existing limit of max 8000mg/kg. INS 475 is used for stable emulsions, aeration, and texture, which are essential for the smooth, creamy mouthfeel of products in this category, such as whipped cream topping. A published study showed that a dosage of up to 9000mg/kg provided good stability and aeration in products of this category.
01.5.2 Milk and cream powder analogues	5000	750	Malaysia proposes to maintain the existing limit of max 5000mg/kg. The product in this category is the powdered version of the product under FC 1.4.4. A typical 2:1 (powder: liquid) ratio is applied when preparing FC 1.4.4 from FC 1.5.2; hence, the provision should correspond accordingly to ensure the desired texture, aeration and stability in the final product.
01.7 Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	5000	2000	Malaysia proposes to lower the max limit to 4000mg/kg. Malaysia use INS 475 at 4000mg/kg in soft serve dessert mix, for stable emulsions, aeration, and texture, which are essential for the smooth, creamy mouthfeel of dairy-based dessert.
02.1.2 Vegetable oils and fats	10000	10000	Malaysia supports the final eWG proposal.
02.2.2 Fat spreads, dairy fat spreads and blended spreads	5000	5000	Malaysia supports the final eWG proposal.

Food Category	Max Level (mg/kg)	EWG Proposal (mg/kg)	Malaysia's Comment
02.3 Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	20000	5000	Malaysia proposes to maintain the existing limit of max 20000mg/kg. Malaysia use INS 475 at 20000 mg/kg in industrial fat emulsion blend mixes. 20000 mg/kg is essential for stable emulsion, aeration, and texture of the fat emulsion blend. The fat emulsion blend can be further used for a wide variety of applications, e.g. bakery, dessert etc., where the provisions set under different FCs can apply after application
05.1.5 Imitation chocolate, chocolate substitute products	2000	2000	Malaysia supports the final eWG proposal.
05.4 Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces	2000	2000	Malaysia supports the final eWG proposal.
07.1.4 Bread-type products, including bread stuffing and breadcrumbs	10000	10000	Malaysia supports the final eWG proposal.
07.2.3 Mixes for fine bakery wares (e.g. cakes, pancakes)	16000	15000	Malaysia proposes to maintain the existing limit of max 16000mg/kg. Malaysia use INS 475 at 16000 mg/kg in various cake mixes, e.g sponge cake mixes. 16000mg/kg will provide sufficient flexibility for cake mixes to work across a wide variety of recipes and various preparation methods. The concentration will anyhow be further diluted in the final cake where the maximum limit is set under FC 7.2.1 and 7.2.2.
12.6.1 Emulsified sauces and dips (e.g. mayonnaise, salad dressing, onion dip)	5000	5000	Malaysia supports the final eWG proposal.

Food Category	Max Level (mg/kg)	EWG Proposal (mg/kg)	Malaysia's Comment
12.6.2 Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	5000	5000	Malaysia supports the final eWG proposal.

Republic of Korea

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE EWG ON THE GSFA

(Prepared by the EWG chaired by the United States of America with the assistance of Australia, Brazil, Canada, Chile, China, Colombia, Costa Rica, El Salvador, European Union, India, Indonesia, Japan, New Zealand, Norway, Republic of Korea, Russian Federation, South Africa, Switzerland, Thailand, United Kingdom, Collagen Casing Trade Association (CCTA), European Food Emulsifier Manufacturers Association (EFEMA), Food Industry Asia (FIA), FoodDrinkEurope, International Association of Color Manufacturers (IACM), International Alliance of Dietary/Food Supplement Associations (IADSA), International Confectionery Association (ICA), International Council of Beverages Associations (ICBA), International Chewing Gum Association (ICGA), International Dairy Federation (IDF), International Food Additives Council (IFAC), International Special Dietary Foods Industries (ISDI), Natural Food Colours Association (NATCOL))

[Appendix 1] MATTERS REFERRED FROM THE CODEX SECRETARIAT, CCNFSU44, AND JECFA

[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. 01.3.2 (Beverage whiteners)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000	352, XS250 & XS252	2016	Emulsifier, Stabilizer	Maintain Adopted Provision - Maintain use level at 5000 mg/kg - Maintain Notes 352, XS250 & XS252	Supports the maintaining.

Category No. 05.1.1 (Cocoa mixes (powders) and cocoa mass/ cake)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000	97 & XS141	2016	Emulsifier, Stabilizer	Revise Adopted Provision - Lower use level to 3750 mg/kg	Do not oppose lowering the Max level to 3750 mg/kg.

						- Maintain Notes 97 & XS141	
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Category No. 05.2 (Confectionary including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	2000	367 & XS309R	2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Supports maintaining.

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

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	2000	368	2016	Emulsifier, Stabilizer	Maintain Adopted Provision	Supports maintaining.

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

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000	241	2018	Emulsifier, Stabilizer	Revoke	Supports Revocation.

[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)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
ALLURA RED AC	129	300	161	2009	Colour	Revise adopted provision - Maintain use level at 300	Supports maintaining the use level at 300 mg/kg.

						mg/kg	
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[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)

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	100	8 & XS323R	3	Colour	Discontinue	Supports discontinue.

[Appendix 4] ALL COLOUR PROVISIONS IN FC 08.4

[Annex1] REQUESTS COMMENTS ON THE NOTE ALLOWING FOR THE CONVERSION OF THE REPORTING BASIS ON THE WEIGHT OF THE CASINGS TO A MAXIMUM USE LEVEL ON THE WHOLE FOOD BASIS

[Given the trade in edible casing products, separate from sausages, the Republic of Korea supports to apply the use level on a casing-weight basis.](#)

[Annex2] 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))

Additives	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final eWG Proposal	Republic of Korea Comments
ALLURARED AC	129	300	161	2009	Colour	Revise adopted provision: -Maintain 300 mg/kg -Remove Note 16 -Add Note 365 (On a casing basis)	Not permitted for use in edible casings in the Republic of Korea.
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	1000	8 & 85	4	Colour	Adopt at 10,000 mg/kg with Notes 8 and 365 Chair's Note: Recommend replacing Note 85 "Use level in	Supports to apply the use level on a casing-weight basis.

						sausage casings; residue in sausage prepared with such casings should not exceed 100 mg/kg” with Note 365 for consistency	
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	20	85 & 185	4	Colour	Adopt at 50 mg/kg with Notes 185 and 365.	Supports to apply the use level on a casing-weight basis.
CARMINES	120	500	16, 178	2005	Colour	Revise adopted provision	Supports to apply the use level on a casing-weight basis.
CARMINES	120	10000	16 & 178	2	Colour	- revise use level to 11,500 mg/kg - maintain Note 178 - remove Note 16 - add Note 365	
CAROTENAL, BETA-APO-8'	160e	100	304	2023	Colour	- Revise adopted provision - Revise Max Level to 2,000 mg/kg - Remove Note 304 - Add note 365	Supports to apply the use level on a casing-weight basis.
CAROTENES, BETA-	160a(i), a(iii), a(iv)	50	304, 341, 344	2023	Colour	- Revise adopted provision - Revise Max Level to 1,500 mg/kg - Remove Note 304 - Maintain Note 341 and 344 - Add Note 365	Supports to apply the use level on a casing-weight basis.
CAROTENES, BETA-, VEGETA	160a(ii)	50	304, 341, 344	2023	Colour	- Revise adopted provision - Revise Max Level to 1,500	Supports to apply the use level on a casing-weight basis.

BLE						mg/kg - Remove Note 304 - Maintain Note 341 and 344 Add Note 365	
CURCUMIN	100(i)	500	16	7	Colour	Adopt at 4,000 mg/kg with Note 365	Supports to apply the use level on a casing-weight basis.
FAST GREEN FCF	143	100	3, 4	2009	Colour	Revise adopted provision - Revise max level to 290 mg/kg - Remove Notes 3 and 4 Add Note 365	Not permitted for use in edible casings in the Republic of Korea.
GRAPE SKIN EXTRACT	163(ii)	5000		2009	Colour	Revise adopted provision - Maintain use level at 5,000 mg/kg Add Note 365	Supports to apply the use level on a casing-weight basis.
IRON OXIDES	172(i)-(iii)	1000	72	2005	Colour	Revise adopted provision - Revise use level to 1,000 mg/kg - Remove Note 72 - Add Note 365 If adopted provision is revised, discontinue provision in step process.	Not permitted for use in edible casings in the Republic of Korea.
PAPRIKA EXTRACT	160c(ii)	9000	39	2	Colour	Adopt at 20,000 mg/kg with Notes 39 and 365.	Supports to apply the use level on a casing-weight basis.
PONCEAU 4R (COCHINEAL RED A)	124	500	16	2008	Colour	Revise adopted provision - Maintain use level at 500 mg/kg	Not permitted for use in edible casings in the Republic of Korea.

						- Remove Note 16 - Add Note 365	
SUNSET YELLOW FCF	110	300	16	2008	Colour	- Revise adopted provision - Revise use level to 1,500 mg/kg - Remove Note 16 - Add Note 365	Not permitted for use in edible casings in the Republic of Korea.
TARTRAZINE	102	300		2	Colour	Adopt at 300 mg/kg with Note 365	Not permitted for use in edible casings in the Republic of Korea.

[Appendix 5] COLOURS IN FC 09.0 AND THEIR SUBCATEGORIES

Category No. 09.1 (Fresh fish and fish products, including mollusks, crustaceans, and echinoderms)							
Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	INS Functional Class	Final EWG Proposal	Republic of Korea Comments
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	25	4, 8 & 16	4	Colour	Discontinue	Supports discontinue.
CARAMEL II - SULFITE CARAMEL	150b	30000	4 & 16	4	Colour	Discontinue	Supports discontinue.
Category No. 09.1.1 (Fresh fish)							
Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Republic of Korea Comments
AZORUBINE (CARMOISINE)	122	300	4, 16 & 50	7	Colour	Discontinue	Supports discontinue.
BEET RED	162	GMP	4, 16 & 50	7	Colour	Discontinue	Supports discontinue.
CARAMEL I - PLAIN CARAMEL	150a	GMP	4, 16 & 50	7	Colour	Discontinue	Supports discontinue.
CHLOROPHYLLS	140	GMP	4, 16 & 50	7	Colour	Discontinue	Supports discontinue.
CURCUMIN	100(i)	300	4, 16 & 50	7	Colour	Discontinue	Supports discontinue.
QUINOLINE YELLOW	104	300	4, 16 & 50	7	Colour	Discontinue	Supports discontinue.

TARTRAZINE	102	300	4, 16 & 50	7	Colour	Discontinue	Supports discontinue.
TITANIUM DIOXIDE	171	GMP	4, 16 & 50	7	Colour	Discontinue	Supports discontinue.

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

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted	INS Functional Class	Final EWG Proposal	Republic of Korea Comments
AZORUBINE (CARMOISINE)	122	500	4 & 16	7	Colour	Discontinue	Supports discontinue.
BEET RED	162	GMP	4 & 16	7	Colour	Discontinue	Supports discontinue.

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

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted	INS Functional Class	Final EWG Proposal	Republic of Korea Comments
CARAMEL I-PLAIN CARAMEL	150a	GMP	4 & 16	7	Colour	Discontinue	Supports discontinue.
CHLOROPHYLLS	140	GMP	4 & 16	7	Colour	Discontinue	Supports discontinue.
CURCUMIN	100(i)	500	4 & 16	7	Colour	Discontinue	Supports discontinue.
QUINOLINE YELLOW	104	500	4 & 16	7	Colour	Discontinue	Supports discontinue.
TARTRAZINE	102	500	4 & 16	7	Colour	Discontinue	Supports discontinue.
TITANIUM DIOXIDE	171	GMP	4 & 16	7	Colour	Discontinue	Supports discontinue.

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 EWG Proposal	Republic of Korea Comments
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	100	185, 305, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312 & XS315	4	Colour	Discontinue in parent food category 09.2 and consider use in FC 09.2.5 (based on comment from Japan).	Supports discontinue.

CURCUMIN	100(i)	50		4	Colour	Discontinue in parent category 09.2 and consider in subcategory 09.2.5.	Supports the proposal.
LYCOPENE , TOMATO	160d(ii)	100	95	4	Colour	Discontinue in parent category and consider in FC 09.2.4.1 and 09.2.4.3.	Supports the proposal.
PAPRIKA EXTRACT	160c(ii)	150	39	2	Colour	Discontinue	Supports discontinue.

Category No. 09.2.4.1 (Cooked fish and fish products)

Additive	INS	Max Level (mg/kg)	Notes	Step Adopted /	INS Functional Class	Final EWG Proposal	Republic of Korea Comments
LYCOPENE , TOMATO	160d(ii)	100	95		Colour	Adopt at GMP with Note 95 Chair's Note: This provision is moved down from the parent category (FC 09.2) based on a member request. INS 160d(ii) has an ADI Not Specified which is traditionally listed at GMP.	Supports the proposal.

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 EWG Proposal	Republic of Korea Comments
LYCOPENE , TOMATO	160d(ii)	100	95		Colour	Adopt at GMP with Note 16 Chair's Note: This provision is moved down from the parent category (FC 09.2) based on a member request.	Supports the adoption at GMP. However, the proposed note should be changed to Note 95, not Note 16.