

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Items 4a, 4b, 5a, 6, 7, 8, 9, 10, 11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-sixth Session

COMMENTS FROM GHANA

Agenda item 4a: ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS

- **Part A: Determination of appropriate food category**

Ghana's Position

Ghana supports the creation of the proposed new subcategory for oils of microbial origin new FC could be established under FC 02.1 (Fats and oils essentially free from water) within the parent category FC 02.0 (Fat and oils, and fat emulsions) with the following description: FC 02.1.4 – Microbial oils and fats and defined as Oils from microalgae fungi yeast and protists.

Rationale

The proposal:

1. Provides clear technological justification for the use of additives (e.g., prevention of oxidation in omega-3 oils)
2. Includes additives that are already consistent with GSFA provisions (Tables 1 and 2)
3. Ensures consumer safety, as additives have established ADI values and are used under GMP conditions
4. Addresses a regulatory gap by appropriately classifying microbial oils within the GSFA framework

- **Part B: Endorsement of food additive provisions in proposed draft standard for microbial omega-3 oils.**

Ghana's Position

Ghana endorses the food additive provision stated or given under the draft standard for microbial omega-3-oil.

Rationale

The provision stated aligns with the GSFA provision as well as the provision provided follows the GSFA correct wording. In addition there is a technological justification provided.

Agenda item 4b: ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS: REPORT OF THE EWG ON ALIGNMENT

- **CCAFRICA Regional Standards. Alignment of The Regional Standard for Fermented Cooked Cassava-Based Products (CXS 334r-2020) And Cross-Reference To GSFA Food Categories**

Ghana's Position:

Ghana supports the proposed amendment to include a Food Additives section stating that “no additives are permitted, along with the consequential renumbering of subsequent section.”

Rationale:

Ensures alignment with the format prescribed in the Codex Procedural Manual for commodity standards. Promotes consistency and harmonization across Codex standards.

- **CCAFRICA Regional Standards. Clarification of the Food Categories (including sub-categories) on for Dried Meat (CXS 350R-2022) for the application of food additive provision**

Ghana's Position

Ghana supports the amendment proposed by the EWG at the food additive section of the standard stating that "Antioxidants and preservatives used in accordance with Tables 1 and 2 of GSFA in food category 08.2.1.2 and 08.2.2 or listed in Table 3 are acceptable"

Rationale

This is because it aligns with Codex Procedural Manual as well as the GSFA provisions and removes ambiguity as well. This also addresses the technical gap that **dried meat** is not a generic 08.2 product, but belongs to specific sub-categories: 08.2.1.2 → dried, non-heat-treated 08.2.2 → dried, heat-treated. If 08.2 is referenced: Additives allowed in these sub-categories are missed.

- CCAFRICA Regional Standards Proposed Amendments to the Food Additive Provisions of the Regional Standard for Fresh Leaves of Gnetum Spp. (CXS 335R-2020)

Ghana's Position

Ghana supports the proposed amendment to include a Food Additives section stating that "no additives are permitted, along with the consequential renumbering of subsequent section."

Rationale:

Ensures alignment with the format prescribed in the Codex Procedural Manual for commodity standards. Promotes consistency and harmonization across Codex standards. As well as the stated provision aligns with the GSFA provision.

- **Annex 5 CCCPC STANDARDS - Re-consideration of the appropriate GSFA food category correspondence.**

Ghana's Position:

Ghana suggest that the matter be referred to the commodity committee (CCCPC) that developed the Cocoa Butter Standard (CXS 86-1981) to help and advised in the categorization of the product.

Rationale

Not enough justification was given by the EWG in the options provided, hence the commodity committee that developed the standard could help in the categorization of the product (cocoa butter) based on the direction given by CCFA.

- Annex 6 – CCPFV - Proposed Amendments to the Food Additives Sections and to the GSFA Relating to the Alignment of the General Standard for Fruit Juices and Nectars (CXS 247-2005)

Ghana's Position:

Ghana thanks the EWG for the good work done and accepts the existing consistency between GSFA and CXS 247-2005.

Rationale:

No technical gaps identified. Only minor updates to GSFA tables.

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

- **Appendix 1, 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**

Ghana's Position:

Ghana supports the deletion of XS Notes, XS67 & XS130 and the addition of the new note intended to exclude products that are covered by individual annexes in the General standards for dried fruits.

Rationale:

The standards for dried apricots and raisins have been revoked, meaning that notes XS67 and 130 are no longer applicable. The proposed new note adequately addresses the original intentions of the XS notes, along with other commodities listed in the annex of the General standard for dried fruits (CXS 360-2020).

- **Appendix 1, Annex 2: Matters referred from the Codex Secretariat related to the provision for jagua (Genipin-glycine) blue (INS 183) in FCS 01.1.4 and 01.7 for comment for consideration to include note XS243**

Ghana's Position:

Ghana supports adoption of Jagua (genipin-glycine) blue in FCs. 01.1.1 and 01.7 without note XS243, which was intended to exclude products conforming to the Standard for Fermented Milks (CXS 243-2003)"

Rationale:

The use of colour in flavoured products conforming to the standards CXS 243-2003 is technologically justified. Jagua blue is a stable, acid-resistant, high-performance colourant, making it suitable for products conforming to CXS 243-2003.

- **Appendix 1, 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)**

Ghana's Position:

Ghana supports the revocation of the specified food additives in FC: 13.3.3 & 13.1.3.

Rationale:

The CCNFSU44 confirmed to CCFA that there was no technological justification for the use of these food additives in products that correspond to GSFA food categories 13.1.1 (Infant formulae) and FC 13.1.3 (Formulae for special medical purposes for infants).

- **Appendix 1, 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.**

Ghana's Position:

Ghana supports the addition of new notes and the removal of the Note XS73 (the interim note established by CCFA53), as the case may be. However, there is no need to specify the maximum limit for use as a nutrient carrier (as it is the same as permitted use level) and names of the standards in the footnote.

Rationale:

CXS 73-1981 allows additives as nutrient carriers based on CXG 10-1979 (Part D)

- **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**

Ghana's position:

Ghana supports the lowering of the usage levels across various food categories and the revocation in certain food categories.

Rationale:

To ensure the safety and effectiveness of food additives, it is important to lower the maximum usage levels while also considering the necessary amounts required to achieve the desired technological effect across different food

categories. This approach will help minimise the risk of exceeding the established ADI for this food additive as referred to in the preamble of the GSFA.

- **Appendix 2: Replies to CL 2025/29-FA (Erythrosine) in products conforming to the Standard for canned raspberries & the Standard for canned strawberries**

Ghana's Position:

Ghana supports removal of erythrosine from CXS 60-1981 (Canned Raspberries).

Ghana supports reduction of ML for CXS 62-1981 (Canned Strawberries) from 300 → 40 mg/kg.

Rationale:

Canned Raspberries: No identified use of erythrosine.

Canned Strawberries: Use of 40 mg/kg identified in products in international trade, though not considered in JECFA exposure estimates.

- **Appendix 3, Annex 1: Consideration of lower use levels for adopted provisions for Indigotine (INS 132) in FC 04.1.2.8- Fruit preparations, including pulp, purees, fruit topping and coconut milk, and Allura red (INS 129) and Indigotine (INS 132) in FC 04.1.2.11- Fruit fillings for pastries**

Ghana's position:

Ghana supports the proposed lower usage levels indigotine (INS 123) & maintain the current usage levels for Allura red (INS 129).

Rationale:

The technological justification for use, at the proposed usage levels, was provided.

- **Appendix 4, Annex 1: Request 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**

Ghana's Position

Ghana supports the on reporting the usage levels based exclusively on the casing.

Rationale:

According to information provided by the EWG, the 1% conversion factor is unrealistic. Additionally, the conversion factor can vary between 0.5% and 5.44% due to differences in product characteristics, such as size, composition, and casing thickness.

- **Appendix 4, Annex 2: Request comments on the actual use level of colours in food category 08.4 - Edible casings (e.g. sausage casings) to further refine the reporting basis on the weight of the casings**

Ghana's Position

Ghana supports the proposed usage levels on a casing basis.

Rationale:

The technological justification for use, at the proposed usage levels, was provided.

- **Appendix 5: Colours in FC 09.0- Fish and fish products, including mollusks, crustaceans, and echinoderms and their subcategories**

Ghana's Position

Ghana supports the recommendation by the EWG at the proposed usage levels, with Note 41.

Rationale:

There is a technological justification for this, and there are no identified safety concerns at the proposed usage levels.

- **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**

Ghana's Position:

Ghana supports the proposed revision of the explanatory note to Table 3.

Rationale:

The revised explanatory note will provide clarity regarding the permissible food additives as outlined in Table 3. This will help eliminate any potential misinterpretations.

Agenda item 6: PROPOSED DRAFT REVISION TO THE CLASS NAMES AND THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES

- **Ghana's Position on the EWG's Term of Reference 1 "Proposals for change and/or addition to Section 3 of the Class names and international numbering system for food additives (CXG 36-1989)"**

Ghana's Position

Ghana acknowledges the workdone by the EWG and its leaderships. Ghana supports the proposed additions and revisions to the Class Names and International Numbering System for Food Additives (CXG 36-1989)

Rationale

Ghana supports the inclusion of these food additives in the INS list, noting they are already permitted in several countries with appropriate safety evaluations. Justifications for their use were provided and agreed by the EWG. Also, this applies only to the INS system, and any future GSFA inclusion should follow JECFA evaluation in line with Codex risk analysis principles.

- **Ghana's Position on the EWG's Term of Reference 2 "Further Consideration of Nisin A"**

Ghana's Position

Ghana supports the EWG's proposal by treating INS 234 as the parent category for Nisin and introducing subcategories (INS 234(i) – Nisin A; future INS 234(ii), INS 234(iii), etc.

Rationale

This approach aligns with the INS system, allows clear identification of specific variants.

Agenda item 7: PROPOSALS FOR ADDITIONS AND CHANGES TO THE PRIORITY LIST OF SUBSTANCES PROPOSED FOR EVALUATION BY JECFA (REPLIES TO CL 2025/32-FA)
Ghana's Position

Ghana does not support the inclusion of ammonia as a food additive in the GSFA (CXS 192-1995).

Rationale

The use of ammonia as a food additive is not widely adopted internationally, with its application generally limited and controlled under Good Manufacturing Practices (GMP).

Furthermore, available scientific evidence indicates that ammonia may pose significant health risks, even at relatively low levels of exposure. This concern is particularly important given that the relevant food categories (salts, spices, soups, sauces, salads, protein products) are widely consumed in Ghana, which could increase potential dietary exposure to such additives. Additionally, Ghana currently lacks the analytical capacity and technical competency to reliably determine ammonia residues in food matrices.

Agenda item 8: STANDARD FOR BAKER'S YEAST (STEP 4)
Ghana's Position

Ghana thanks the EWG and its leadership (chaired by China and co-chaired by France and Turkiye). Ghana supports the draft standards as its standard and hopes to see it at step 5.

Rationale

Ghana's adoption of the international Codex standard for baker's yeast will facilitate global trade due to use of standardized yeast in production of bakery products hence enhancing the safety and quality of bakery products.

Agenda item 9: DRAFT WORKING PRACTICES FOR THE DEVELOPMENT OF GSFA FOOD ADDITIVE PROVISIONS RELEVANT TO COMMODITY STANDARDS AND RELATED TEMPLATES

Ghana's Position

Ghana:

- (1) Supports the stand-alone working practices (Appendix 1), as agreed to, as the basis for avoiding divergence between the GSFA, commodity standards (including regional standards) and other related Codex texts, and be included on the CCFA website as an information document.
- (2) Supports the withdrawal of "Guideline on avoiding future divergence of food additive provisions in the GSFA with commodity standards", once the stand-alone working practices have been implemented.
- (3) Endorses the consideration of the organisational arrangements for WG activities relating to endorsement, incorporation and alignment, once the working practices document is implemented.
- (4) Endorses the use of the Communication and Engagement Plan (Appendix 2) to facilitate both the initial implementation of the working practices document and to support ongoing communications in future years.
- (5) Endorses reviewing the operation of the new working practices document, including any pilots that may have been undertaken, after a period of three to five years post-implementation

Rationale

The working practices as outlined in the two documents will go a long way in establishing efficient ways to handle food additives provisions and minimise divergency between commodity standard food additive provisions and food additive provisions of the GSFA

Agenda item 10: DISCUSSION PAPER ON THE DEVELOPMENT OF A GUIDELINE FOR THE CONDUCT OF FOOD SAFETY ASSESSMENT OF CELL CULTURE MEDIA COMPONENTS USED IN THE PRODUCTION OF CELL-BASED FOODS

Ghana's Position

Ghana thanks the EWG on the work done on this discussion paper. Ghana notes that this process of cell based food are novel and hence will require us as a country to have technical expertise in future to make meaningful contribution when the related text or guideline is fully developed. However, Ghana has few concerns that needs clarification from the EWG on the following issues:

1. Current and estimated future level of trade in these kinds of products.
2. Establishment of scientifically based residue limits and safety thresholds
3. Coordination among Codex committees to avoid duplication

Rationale

The basis for the guideline is on managing the health risk associated with these new food sources. Thus, there is a need for risk assessment before their consumption as well as regulatory considerations and industrial viability for large scale production to enhance consumer trust on safety and quality of cell-based foods.

Agenda item 11: DISCUSSION PAPER ON THE FUTURE WORK FOR CCFA

Recommendation 1

Ghana's Position

Ghana support the third option proposed "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"

Rationale

Ghana believes that before establishing a working group WG on the food category system FCS, it would be right to note and identify all the problematic areas so as to inform may inform either a comprehensive review or targeted review, thus defining the scope of work for the WG.

Recommendation 2**Ghana Position**

Ghana reassures the committee in the participation in a working group established under GSFA EWG.

Rationale

The output of this WG will have a direct effect on the work of GSFA and thus it will be important for coordination within GSFA EWG

Recommendation 3**Ghana Position**

Ghana supports or is in favour of 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”

Rationale

Members and observers should be given an opportunity to submit information on national definitions, regulatory approaches and implementation challenges related to secondary food additives and processing aids. Then based on information received, the Committee could make informed decisions on whether or not to start the work immediately as suggested in option 2.