

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Items 3b, 4a, 4b, 5b, 8 and 10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-sixth Session

Comments of Egypt, Iraq, Libya, Syria and Yemen

INTRODUCTION: Arab and CCNE Coordination - Development of the Conference Room Document

The positions and recommendations expressed in this Conference Room Document (CRD) are the result of structured regional coordination conducted under the framework of the **Arab Codex Initiative**¹, with the oversight and the leadership of the Coordinator for the Near East (Sultanate of Oman). The Arab Codex Initiative is led and implemented by the Arab Industrial Development, Standardization and Mining Organization (AIDSMO), in partnership with the Global Food Regulatory Science Society (GForSS), a disciplinary group of the International Union of Food Science and Technology (IUFoST). Both AIDSMO and IUFoST hold observer status with the Codex Alimentarius Commission.

Within this framework, a dedicated **Regional Expert Working Group** was convened to review the relevant agenda items of CCFA56 and develop coordinated technical recommendations. The Working Group brought together experts from the following Member countries: **Bahrain, Egypt, Iraq, Jordan, Libya, Oman, Qatar, Syrian Arab Republic, Tunisia and Yemen**.

The recommendations presented in this document reflect the coordinated technical views of the participating countries and aim to contribute constructively to the work of CCFA in developing science-based standards for additives in foods, while taking into account the importance of consumer protection, regulatory consistency, and the facilitation of international trade, particularly for commodities/provisions relevant to countries of the Arab/Near East region.

Agenda item 3b: Proposed draft specifications for the identity and purity of food additives arising from the 100th JECFA meeting

The Regional Expert Working Group:

1. Appreciates the work of JECFA and supports the adoption of the proposed draft specifications designated as "Full" arising from the 100th JECFA meeting, recognizing their scientific basis and technical maturity.
2. Highlights the importance of the revisions introduced for additives such as ascorbyl palmitate and gellan gum, including stricter impurity criteria and the introduction of more detailed specifications for uses in infant foods. These revisions strengthen coherence between additive specifications and Codex requirements for finished products intended for vulnerable population groups.
3. Supports the advancement of full specifications for enzyme-based processing aids derived from microbial and biotechnological sources, while emphasizing the importance of clear identification of production organisms and the use of validated analytical methods.
4. Encourages CCFA56 to support the adoption of these specifications while taking into account implementation challenges faced by developing countries, particularly access to validated analytical methods, technical support, and appropriate transition periods.

Agenda item 4(a): Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards

The Regional Expert Working Group appreciates the efforts made by commodity and coordinating committees in forwarding food additive provisions for endorsement and supports a structured approach to ensure consistency between commodity standards and the GSFA.

¹<https://gforss.org/networks/arabcodex/>

In addition to the following:

1. Supports the existing additive provisions in regional standards (e.g. Maamoul) and selected standards for spices and herbs, noting that these provisions generally reflect product characteristics, technological justification, and practical regulatory considerations.
2. Notes that the approaches used for Maamoul and for spices and herbs provide a direct and harmonized linkage to the GSFA. Such approaches, when scientifically justified, support regulatory clarity and facilitate practical implementation.
3. Encourages CCFA56 to maintain clear cross-references to relevant GSFA tables and food categories and to continue promoting consistency across similar products, while respecting product-specific technological needs and regional characteristics.

Agenda item 4(a)- Add1: Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards (CCFO)

The Regional Expert Working Group welcomes the work undertaken on the proposed draft standard for microbial omega-3 oils and recognizes the importance of addressing innovative products within the GSFA framework in a clear and coherent manner.

In addition to the following:

- Supports the establishment of an appropriate GSFA food category for microbial oils and fats, as the current food category system does not explicitly capture oils derived from microbial sources. The proposed categorization under fats and oils essentially free from water appears to be a sound and practical approach for integrating these products into the existing GSFA structure.
- Supports the endorsement of the proposed food additive provisions for microbial omega-3 oils, noting that the use of antioxidants, emulsifiers, and sequestrants is technologically justified for these oxidation-sensitive products and that the proposed additives are supported by JECFA evaluations.
- Encourages CCFA56 to ensure that the final categorization remains sufficiently broad to accommodate the diversity of microbial oil formats while preserving consistency and transparency within the GSFA system.

Agenda item 4(a)- Add2: Endorsement of the food additive provisions of commodity standards

The Regional Expert Working:

1. Supports the concurrent approach of endorsement and GSFA alignment, provided that sufficient review time is maintained to ensure scientific and procedural consistency.
2. Agrees that additive provisions for standards already well aligned with the GSFA, such as those for dumplings and Maamoul, may be endorsed with the necessary notes and clarifications. At the same time, Members of the group consider that endorsement should be deferred where scientific justification or alignment remains incomplete, as in the case of more complex product frameworks.
3. Supports the continued preference for GSFA-based approaches rather than the creation of standalone additive lists, as this strengthens consistency across Codex texts and facilitates implementation by competent authorities.
4. Encourages simplification of the GSFA notes system and requests clarification regarding the use of Table 3 in certain product groups, including herbs and spices, before endorsement decisions are finalized.

Agenda item 4(b): Alignment of the food additive provisions of commodity standards: Report of the Electronic Working Group on Alignment

The Regional Expert Working Group acknowledges the progress made by the Electronic Working Group (EWG) on alignment and supports the continued effort to harmonize food additive provisions in commodity standards with the GSFA.

In addition to the following:

1. Notes that, while substantial progress has been achieved, several issues remain unresolved, including the interpretation of the GSFA food category hierarchy, the classification of mixed or multi-dimensional products, inconsistencies in previously aligned standards, and the application of Table 3 notes.
2. Emphasizes in particular the need to resolve outstanding questions relating to the categorization of cocoa butter, certain fish and seafood standards, and other cases where the current placement within the GSFA remains conceptually or technically unclear.

3. Highlights the conclusions of the 12th Session of the FAO/WHO Coordinating Committee for the Near East (CCNE12), which confirmed the suitability of food category FC 12.2.2 for products conforming to the Regional Standard for mixed zaatar (CXS 341R-2020). In this regard, the group supports maintaining this classification within the GSFA framework and encourages its consistent application, while inviting further clarification where necessary to ensure harmonized interpretation across standards.
4. Supports endorsement of alignment proposals where there are general agreement and no outstanding technical concerns. The group also supports continued work through the EWG and relevant commodity committees to finalize alignment in a scientifically justified and coherent manner.

Agenda item 5(b): GSFA Proposals for new and/or revision of food additive provisions

The Regional Expert Working Group:

1. Supports the review of new and revised food additive provisions submitted under this agenda item, provided that proposals remain supported by technological need, appropriate use levels, and JECFA safety assessments.
2. Highlights that the current proposals reflect both scientific progress and evolving market trends, including the use of natural-origin additives, innovations in reduced-sugar products, and revisions affecting colours, sweeteners, preservatives, antioxidants, and stabilizers.
3. Emphasizes that particular caution is warranted where proposed provisions relate to sensitive population groups, including infants and young children, even when the corresponding additives have been assigned ADIs of “not specified.” In such cases, impurity criteria, use conditions, and exposure considerations should remain especially clear and protective.

Agenda item 8: Standard for baker's yeast

The Regional Expert Working Group would like to thank the delegations and observers involved in the preparation of the draft standard for baker's yeast and support the continued development of this standard as an important step toward harmonized international specifications.

The group considers that the draft standard provides a coherent basis for harmonization, trade facilitation, and consumer protection. The current scope and classification are generally consistent with industry practices and Codex principles.

In addition to the following:

1. Highlights that some further clarification is still needed, particularly regarding the technological justification and presentation of food additive provisions.
2. Supports maintaining consistency with existing Codex practice by excluding GMO-specific provisions from the standard and encourages continued attention to packaging, storage, and quality requirements that are critical to product integrity and trade.
3. Supports advancing the draft standard to the next step of the Codex procedure, subject to resolution of the remaining technical issues.

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

The Regional Expert Working Group welcomes the work undertaken on the discussion paper and supports the development of internationally harmonized guidance for the safety assessment of cell culture media components used in the production of cell-based foods.

In addition to the following:

1. Agrees that the initial scope should remain focused on animal cell-based foods and that the work should address media components rather than final products. This provides an appropriate and manageable starting point while allowing for future expansion as technologies evolve.
2. Supports the proposed tiered, risk-based framework for categorizing media components according to novelty and potential risk and recognizes the need for further FAO/WHO scientific advice on toxicology, exposure assessment, residues, and data requirements.

Supports approval of the new work proposal and encourages CCFA56 to treat the current draft framework as a solid preliminary basis for further technical development and refinement.