

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 1, 2, 3a, 3b, 4a, 4b, 5a, 5b, 6, 7, 8, 9, 10 and 11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-sixth Session

COMMENTS FROM EAST AFRICA COMMUNITY (EAC)

Agenda item 1: Adoption of the agenda

The EAC appreciates the opportunity to provide comments on the different agenda items to be discussed by the 56th session of the Codex Committee on Food Additives. EAC proposes the adoption of the provisional agenda.

Agenda item 2: Matters referred by the Codex Alimentarius Commission and other subsidiary bodies

The EAC takes note of the matters referred by CAC and subsidiary bodies and supports the responses from CCASIA23 relating to GSFA categorization and additive use in soybean and laver products. The EAC supports deletion of synthetic riboflavin (INS 101(i)) where technological justification has not been demonstrated, while retaining other riboflavins where justified and safe.

The EAC also supports the inclusion of carotenoid-related additives in non-fermented soybean products at the proposed levels, agrees with the use of paprika extract (INS 160c(ii)) in soybean beverages subject to confirmation of technological justification by CCASIA, and supports the correction to Note 667 through deletion of the words “as bixin.”

Matters Referred to by the 29th Session of the Committee on Fats and Oils (CCFO29) - CX/FA 26/56/2 Add.1

The EAC agrees to defer consideration of lauric arginate ethyl ester (INS 243) in fat spreads and blended spreads at this stage, pending further technical review and consensus within CCFO. While acknowledging the positive JECFA safety evaluation and the preservation rationale advanced by some Members, the EAC considers that the current level of scientific and technological justification remains insufficient to support regional consensus for endorsement in the GSFA.

Accordingly, the EAC supports referral of the provision back to CCFO for additional discussion, with a request for Members and observers currently using the additive to submit further evidence on technological need, use levels, product categories, and practical preservation outcomes. This deferred approach preserves scientific rigor, supports transparency in decision-making, and allows the Committee to reach a more informed and broadly supported conclusion at a subsequent session.

The progress report on restricting the GSFA database: approach for implementing the display of Table Three Notes (CX/FA 26/56/2 Add.2)

The EAC supports the proposed restructuring of the GSFA database, the phased implementation of the Table 3 Notes, and the use of the proposed interim formats as a practical pathway toward improved usability and consistency. The EAC considers this approach feasible and supportive of greater regulatory clarity, consumer protection, and continued alignment with Codex standards, while also encouraging ongoing technical collaboration, particularly on the treatment and interpretation of functional classes.

At the same time, the EAC seeks clarification on the proposed revision of the table title from “Specific allowance in the following commodity standards” to “Acceptable in foods conforming to the following commodity standards.” In its current form, the revised wording may be interpreted as unintentionally narrowing additive permissions to only those product standards expressly listed, rather than preserving the earlier understanding that the table identified specific exceptions within commodity standards. The EAC therefore requests confirmation that the revised title does not alter the intended scope of additive permissions beyond editorial clarification.

Agenda item 3a: Matters of interest arising from FAO/WHO and from the 100th meeting of the Joint FAO/WHO Expert Committee on Food Additives (JECFA)

The EAC welcomes the updates from FAO, WHO, JECFA, and the Codex technical advisor, recognizing their critical role in strengthening science-based food safety standards and supporting informed risk management

within CCFA. The EAC appreciates the outcomes of the 100th JECFA meeting, endorses the reaffirmed acceptable daily intakes (ADIs), and supports the recommended follow-up actions, including the establishment or revision of ADIs for amyloglucosidase, ascorbyl palmitate and stearate, carob bean gum, dioctyl sodium sulfosuccinate, gardenia blue, glycolipids, rosemary extract, and thaumatin.

Further, the EAC underscores the importance of improved exposure and use-level data for adipic acid to facilitate reassessment of its current ADI and supports its inclusion in the priority list for re-evaluation.

Proposed draft new and revised food additive provisions in the GSFA based on the recommendations of the 100th meeting of JECFA

The EAC supports the inclusion of new provisions in the GSFA for Ascorbyl palmitate (INS 304), Ascorbyl stearate (INS 305), Glycolipids (INS 256), and Low acyl clarified gellan gum (INS 418ii).

The EAC proposes that Ascorbyl stearate (INS 305) be included in the JECFA priority list for evaluation, with a view to reconsidering the maximum use level.

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

The EAC appreciates the scientific work undertaken by JECFA at its 100th meeting and supports the adoption of new, revised, and full draft specifications for the identity and purity of food additives and processing aids, including Gardenia (Genipin) Blue, low-acyl clarified gellan gum, glycolipids, and thaumatin II, alongside full specifications for seven processing aids and revised specifications for two food additives. The EAC endorses the reduction of the maximum lead limit for carob bean gum in infant formula to 0.5 mg/kg as a critical safeguard for infant health, and considering JECFA's robust evaluations, supports the progression of these specifications to the next Codex step for final adoption.

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

The EAC supports endorsement of food additive provisions and related GSFA amendments arising from CCASIA, CCNE, CCSCH, and the draft standard for microbial omega-3 oils. EAC endorses provisions for regional standards such as quick-frozen dumplings, doogh, and maamoul, supports deferral of endorsement for doogh pending further deliberation, and agrees to delay endorsement of CCSCH spice and herb standards until questions on anticaking agents are resolved. The EAC notes that anticaking agents should be restricted to powdered forms only, supports revised wording for notes to ensure consistency with GSFA, and endorses the creation of a new GSFA sub-category for microbial oils and fats (FC 02.1.4) to strengthen consumer protection and facilitate trade.

Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards (CCFO)- CX/FA 26/56/5 Add.1

The EAC supports endorsement and revision of maximum levels for food additives and processing aids, the EAC requests technical clarification on the discrepancies identified in CX/FA 26/56/5 Add.1, Annex, regarding INS 304 and 305 (ascorbyl esters) and INS 307(a, b, c) (tocopherols). The EAC notes that the use levels reflected in the Annex appear inconsistent with those contained in CRD 09 Rev.2 of CCFO29, as referenced in paragraph 70 of the CCFO29 Report, and therefore requests confirmation of the correct maximum levels to ensure consistency with agreed Codex texts.

Agenda 4b: Alignment of the food additive provisions of commodity standards: Report of the Electronic Working Group on Alignment-CX/FA 26/56/6

The EAC supports the alignment of food additive provisions with the GSFA as proposed by the EWG to promote harmonization, regulatory clarity, and consistency across Codex standards.

With respect to CCAFRICA, the EAC notes the following technical gaps and supports the proposed approach for resolution:

1. **Fermented Cooked Cassava-Based Products (CXS 334R-2020):** The EAC observes that this standard currently does not allow food additives and is cross-referenced only to GSFA FC 04.2.2.8 (cooked or fried vegetables). Given that the product is fermented, it may also appropriately fall under FC 04.2.2.7 (fermented vegetables). This omission could restrict the correct application of additive provisions, as additives permitted in fermented categories may not be recognized under the current reference. The EAC agrees with the EWG on the need for consultation with CCAFRICA to confirm whether both categories should apply, ensuring accurate alignment, consistent application of food additive provisions, and clarity for regulatory implementation.
2. **Regional Standard for Dried Meat (CXS 350R-2022):** The EAC notes that the current reference to GSFA parent category 08.2 is too broad, excluding relevant subcategories where certain antioxidants and preservatives are permitted. Specifically, subcategories 08.2.1.2 (cured/salted dried non-heat-treated meats)

and 08.2.2 (heat-treated dried meats) are not fully recognized under the current reference, potentially limiting appropriate additive use. The EAC supports the EWG's proposal to explicitly reference these subcategories to ensure accurate application of GSFA provisions and consistency with Codex standards.

In conclusion, the EAC notes the importance of addressing these alignment gaps to facilitate harmonized, clear, and technically justified application of food additive provisions across CCAFRICA standards.

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

The EAC supports the ongoing work of the GSFA EWG, acknowledging the critical importance of aligning food additive provisions with the GSFA and relevant Codex commodity standards to ensure regulatory consistency, technological justification, and consumer protection.

The EAC notes JECFA's observation regarding the potential exceedance of the ADI for INS 475 (0–25 mg/kg body weight) and underscores the need to carefully assess the safety implications of its use. The EAC also seeks clarification on the application of the additional note for cream and cheese analogues (10,000 and 19,000 mg/kg, respectively), particularly with respect to products intended for subsequent heat sterilization, to ensure that the additive levels are consistent with technological necessity and safe for consumer use.

Agenda 5b: GSFA: Proposals for new and/or revision of food additive provisions (replies to CL 2025/31-FA)

The EAC welcomes the proposals submitted by Members and Observers for new and revised additive provisions and supports continued technical discussion to facilitate harmonization and regulatory clarity.

Agenda 6: Proposed draft revision to the Class names and the international numbering system for food additives (CXG 36-1989)

The EAC supports the proposed revisions to the class names and international numbering system and endorses Option 2 for nisin, which establishes a parent entry with sub-entries for specific variants, as this approach provides clarity, flexibility, and consistency with JECFA specifications.

Agenda 7: Proposals for additions and changes to the priority list of substances proposed for evaluation by JECFA (replies to CL 2025/32-FA)

The EAC supports the addition and revision of substances to the JECFA priority list, recognizing that this process promotes harmonization, ensures consumer safety, and facilitates equitable access to modern food technologies.

The EAC notes the proposals for ammonia (as a processing aid), fermentation-derived Beet Red (INS 162), and new flavouring agents. The EAC supports the evaluation of ammonia to establish an internationally recognized safety conclusion, which will help reduce regulatory inconsistencies and facilitate trade, particularly for developing countries that rely on microbial fermentation processes.

The EAC also supports the evaluation of fermentation-derived Beet Red to provide a safe, sustainable, and affordable natural colour alternative, thereby reducing reliance on synthetic dyes and minimizing the risk of misuse of unsafe industrial dyes in developing regions. Regarding new flavouring agents, the EAC supports their inclusion in the JECFA evaluation to confirm safety at current exposure levels and to ensure that specifications accurately reflect products in commerce.

The EAC notes that these evaluations are essential to safeguard public health, support technological advancement, and promote harmonized trade standards within the region.

Agenda 8: Standard for baker's yeast (Step 4)

The EAC appreciates the work of the EWG in developing the draft standard for baker's yeast and notes that most comments raised during consultations have been constructively addressed. To enhance clarity, accuracy, and consistency, the EAC proposes the following technical amendments:

1. Editorial amendments for clarity and intended use

- i. **Scope:** Insert the word "*intended*" to clarify that the standard applies to baker's yeast meant for direct sale and food manufacture, ensuring alignment with Codex drafting practices.
- ii. **Clause 2.1.1 (Product Definition):** Amend the final sentence to specify that baker's yeast is *not intended to be consumed directly as a ready-to-eat product*, reinforcing its role as a biological leavening agent.
- iii. The table should indicate that there are only two types of yeast while a subtitle on forms that will be necessary for the various forms.
- iv. **Clause 8 (Packaging, Transportation, and Storage):** Add a requirement that *proper conditions for transportation and storage shall be maintained to preserve product stability and fermentation performance*, supporting safe handling and product integrity.

Justification: These editorial changes ensure accurate representation of baker's yeast's intended use, improve safety guidance, and enhance consistency with Codex drafting norms.

2. Inclusion of Physicochemical Quality Parameters

Comment: Incorporate additional parameters under Section 3.2 (Quality Factors), including edible starch content, dispersibility in water, fermenting power, and dough-raising capacity, with associated test methods (ISO 15914 and annexes).

Proposed Table 1: Physicochemical requirements for baker's yeast

S/N	Characteristic	FBY	DBY	Test method
i	Edible starch, % (m/m), max.	7	10	ISO 15914
ii	Dispersibility in water	No yeast cell deposits	No yeast cell deposits	Annex B
iii	Fermenting power (mL), min.	1,000	350	Annex C
iv	Dough-raising capacity	To satisfy the test	To satisfy the test	Annex D

FBY = Fresh Baker's Yeast; DBY = Dry Baker's Yeast

Justification: Parameters such as fermenting power, dough-raising capacity, dispersibility in water, and the level of edible starch present in the yeast directly influence the functional performance of edible yeast. These characteristics determine the yeast's efficiency in fermentation, its ability to ensure consistent dough leavening, ease of incorporation during processing, and overall suitability for intended food applications. Their inclusion in the standard is therefore essential to assure product quality, performance consistency, and fitness for purpose. Additionally, these parameters are already recognized in regional standards (EAS 997:2020) and would strengthen the scientific and quality basis of the Codex text.

3. Submission of Annexes for CCMAS Consideration

Comment: Submit the relevant annexes containing analytical procedures for CCMAS review as official test methods.

Justification: This ensures internationally recognized validation of analytical methods, supporting transparency, scientific rigor, and harmonized application across Member States.

Agenda 9: Draft working practices for the development of GSFA food additive provisions relevant to commodity standards and related templates

The EAC appreciates the work and the document prepared by China as the lead author, and acknowledges the contributions of Australia, Brazil, Canada, El Salvador, the European Union, Japan, and the United States of America (USA) as co-authors. The EAC commends the collaborative effort and recognizes the importance of this work in supporting harmonized, scientifically grounded, and transparent development of Codex standards.

Agenda 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 EAC appreciates the work of the EWG chaired by Singapore, and co-chaired by China, the Republic of Korea, and Saudi Arabia. The EAC also acknowledges the 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, recognizing the importance of this work in supporting harmonized, science-based, and transparent approaches to the safety assessment of novel food production technologies.

Agenda 11: Discussion paper on the future work for CCFA

Recommendation 1: The EAC supports Option 3, which invites members and observers to submit concrete examples of problematic food categories prior to establishing and defining the scope of a working group. This pragmatic approach allows CCFA to gather evidence, identify and prioritize real implementation challenges, and avoid unnecessary workload arising from a premature or overly broad review of the food category system.

Recommendation 2: The EAC supports a systematic review and rationalization of the food category system through the EWG to enhance consistency, clarity, and predictability, while recognizing the significant workload such an exercise entail.

Recommendation 3: The EAC acknowledges the importance of secondary food additives and processing aids and supports Option 1, which involves initially collecting national definitions and practices. This evidence-based approach will inform the need for Codex guidance and ensure the efficient use of resources while maintaining scientific rigor.

Annex B

(normative)

Determination of fermenting power

B.1 Apparatus

B.1.1 Fermentometer. The assembly of the apparatus is illustrated in Figure B.1. It consists of a 250-ml flat-bottomed flask (A), whose mouth is fitted with a ground-glass joint having a glass delivery tube bent at right angle. It is connected to a three-way T-shaped stop-cock (B) which in turn is fitted on a 100-ml graduated tube (D) of the manometer. E is the manometer reservoir of 250-ml capacity. I is the iron stand. D and E are connected by a PVC tube F. G is a waterbath.

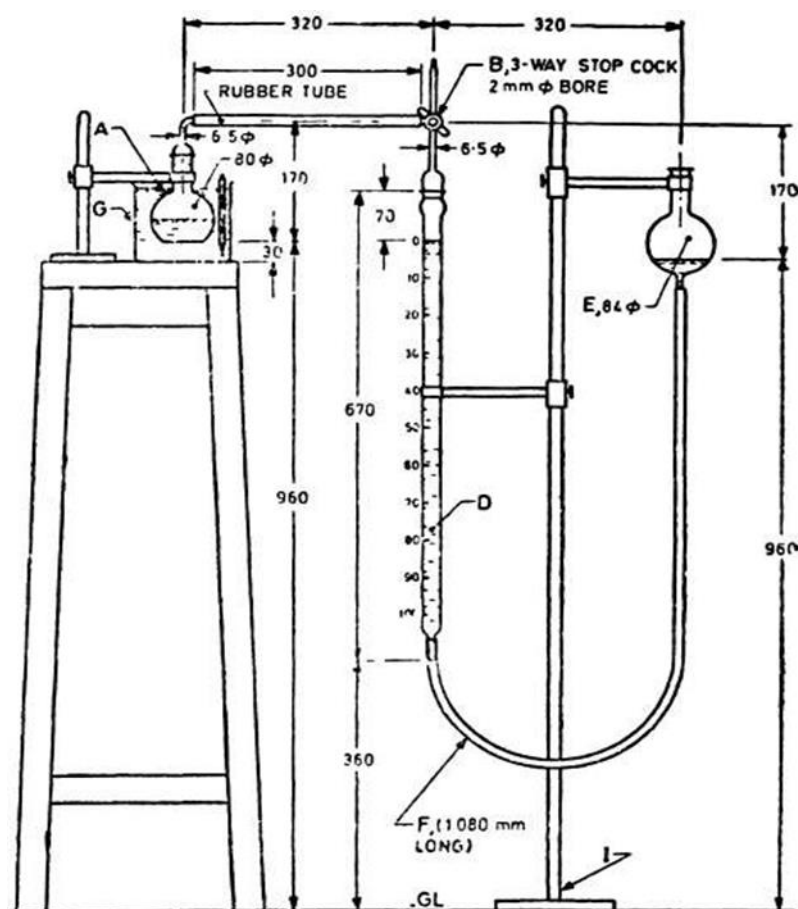


Figure B.1 — Assembly of a fermentometer

B.1.2 Barometer

B.1.3 Thermometer

B.1 Reagents

B.1.1 Sugar phosphate mixture. Grind and mix thoroughly 400 g of sucrose, 25 g of diammonium hydrogen

phosphate $[(\text{NH}_4)_2 \text{HPO}_4]$ and 25 g of dipotassium hydrogen phosphate (K_2HPO_4).

B.1.2 Calcium sulphate solution. Dilute 30 g of saturated calcium sulphate solution ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$) with 70 g of distilled water.

B.1.3 Manometer solution. Weigh 200 g of anhydrous calcium chloride and 10 g of cupric chloride and dissolve in distilled water. Add a little hydrochloric acid so that the final pH after making up the solution to two litres does not exceed 5.0.

B.3 Procedure

Mix 6.75 g of the sugar phosphate mixture with 75 ml of the calcium sulphate solution in the flask. Add to it, 3.67 g of fresh baker's yeast or 0.893 g of dry baker's yeast. Stir well to disperse the yeast. Keep the flask in the waterbath at 30 °C throughout the experiment. Bring the three-way T-shaped stop-cock of the manometer into a position which allows displacement of initial air (by the carbon dioxide evolved) to escape to the atmosphere without displacement of the manometer fluid. This displacement is allowed for the first 13 min after which the stop-cock position is altered to allow the carbon dioxide evolved to enter the manometer and bring about the displacement of the manometer fluid. Shake the contents of the flask every 10 min.

While taking the reading of the gas evolved, the level of the fluid in the manometer shall be adjusted by sliding the reservoir arm of the manometer and the volume of gas evolved at this pressure (which will now be equal to the atmospheric pressure) shall be recorded.

As soon as the reading is taken, the initial gas formed which has just been measured, is allowed to escape into the atmosphere by operating the three-way stop-cock and the stop-cock position is again adjusted to take the second reading. For fresh baker's yeast, readings should be taken every 10 min and for dry baker's yeast, readings shall be taken every 30 min. In both the cases, readings shall be taken for 3 h.

The room temperature and the atmospheric pressure shall also be noted during the course of the experiment. The readings are recorded in a tabulated form (see Table B.1) and the total volume of gas produced is calculated and corrected at 101 kPa pressure and 20 °C temperature by the formula given under B.4.

Table B.1 — Recording carbon dioxide evolved every 10/30 min

Time	Volume of CO ₂ evolved ml	Room temperature °C	Atmospheric pressure mmHg	Corrected volume ml
08:00				
08:10				
08:20				
08:30				
.....				
.....				
11:00				

Calculation

The fermenting power, expressed as corrected volume in millilitres, shall be expressed as follows:

$$\text{Corrected volume} = \frac{\text{Observed volume} \times \text{Observed average pressure} \times 293}{760 \times (273 + \text{Average room temperature})}$$

The mass of carbon dioxide evolved, expressed in grams, may be calculated from this corrected volume as follows:

$$\text{Mass of carbon dioxide evolved} = \frac{44 \times V}{22400} \text{ where}$$

V is the corrected volume of carbon dioxide evolved.

Annex C

(normative)

Determination of dough raising capacity

C.1 Apparatus

C.1.1 Beaker, 500 ml

C.1.2 Measuring cylinder, 100 ml

C.2 Materials

C.2.1 Bakers flour complying with EAS 1

C.2.2 Sucrose

1.3 Procedure

Mix 4.0 g of fresh baker's yeast or 1.0 g of dry baker's yeast with 100 g of bakers flour. Add 1.0 g to 1.5 g of sucrose and a suitable quantity of water (about 55 ml). Knead well. Press the resulting dough into a glass beaker. Note the level of the dough by means of a scale, from the bottom of the beaker. Keep it covered for one hour at 27 °C. At the end of this period, note the level again.

The product shall be deemed to have satisfied the test if the rise in level is at least 80 % of the original for dry baker's yeast and 110 % for fresh baker's yeast.

Annex D
(normative)
Determination of bacterial rope spore count

D.1 *Apparatus*

- D.1.1** **Flask, 100 ml**
- D.1.2** **Conical flask, 250 ml**
- D.1.3** **Water bath**
- D.1.4** **Pipettes, 1 ml and 10 ml**
- D.1.5** **Petri dishes**

D.2 *Reagents*

- D.2.1** Sterilised peptone water, 0.1 %
- D.2.2** **Tryptone glucose extract (TGE) Agar**, composed of:
 - i) Tryptone, 5.0 g;
 - ii) Agar, bacteriological grade, 15.0 g. Granulated or chopped shreds, practically free from thermophilic bacteria shall be used;
 - iii) Yeast extract, 2.5 g;
 - iv) Distilled water, one litre;
 - v) Sodium chloride, 6.5 g;
 - vi) Glucose (dextrose), 1.0 g; and
 - vii) Final pH of 7.0 ± 0.1 .

D.3 Procedure

Weigh 22 g of baker's yeast in a suitable sanitised container and transfer to a conical flask containing 100 ml of sterile 0.1 % peptone water and sterile sand or glass beads. Blend on a shaker for about two minutes or more until all the yeast particles disappear. Dilute the blended mixture further; 1:10, 1:100, 1:1 000, 1:10 000, etc., by dilution technique, using sterile peptone water.

Prepare tryptone glucose extract (TGE) agar; 100 ml per 250-ml conical flask. Prepare one additional flask of medium to serve as sterility control. Sterilise at 121 °C for 15 min and then cool to 45 °C in a waterbath. Pipette volumes of the blended mixture into a series of TGE agar flasks while they are held in the waterbath; 10 ml into the first, 1 ml into the second and 1 ml of each dilution into the third, fourth and fifth TGE flask and so on. Gently agitate the flasks to disperse the blended mixture throughout the medium.

Transfer the flasks without delay to a waterbath adjusted to 65 °C to 90 °C and hold for 30 min with gentle shaking occasionally to assist heat distribution. After 30 min of heat treatment, cool the flasks to about 45 °C without allowing the agar to gelatinise. Pour 100 ml of the medium into each flask representing the product and sterility control into a set of five sterile petri dishes in approximately equal volumes of about 20 ml per plate. When agar has solidified, invert the plates and incubate at 35 °C for 48 h.

Count the surface and sub-surface colonies. The sum of the colonies on the set of five plates poured from TGE agar, containing 10 ml of the blended mixture represents the number of aerobic and mesophilic spores per gram of the product. Similarly, 1 ml of the blended and 1 ml of each dilution are equal to 0.01, 0.001, 0.000 1 and 0.000 01 of the number of spores per gram and shall be multiplied by the respective dilution factor.

Generally, the set of plates showing about 30 to 60 colonies per plate are to be chosen for the counting purposes.

D.4 Precautions and limitations

The procedure permits enumeration of aerobic and mesophilic spores in food samples containing relatively higher number of spores by higher dilution of the samples prior to heat treatment.

Certain thermophilic strains may also be indicated in this method in which case a separate enumeration method for thermophiles may be adopted and their numbers subtracted from the spore count.