

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 4b

CX/FA 21/52/6 Add.1

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Fifty-second Session

#### ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS: REPORT OF THE EWG ON ALIGNMENT

Replies to CL 2021/24-FA of Brazil, Chile, Colombia, Ecuador, Japan, Peru, United Kingdom, EU  
Specialty Food Ingredients, IDF, IFAC and ISC

#### Brazil

Brazil thanks the opportunity to provide comments to this document and thanks USA for the work in coordinating the electronic Working Group.

**CX/FA 21/52/6**

#### Appendix 1

#### Part A: SUMMARY OF CHAIR'S PROPOSALS IN FINAL CIRCULARS

##### Issue 1 – Development of Table 3 notes

Brazil: believes that the proposal would be helpful to the organization of Table 3, but is not sure if it should be a priority at this moment.

##### Issue 2 – Proposed amendments to Codex Standard titles list in Annex C of GSFA

Brazil: does not object to making such a change. Though in our point of view the entries are correct, we may support the recommendation.

##### Issue 3 – Should the general processing aid sentence be added to all cheese commodity standards, or all dairy standards?

Brazil: supports chair's recommendation, since processing aids are listed in the standard but no requirements about the quality of those substances, or criteria they should comply with are currently provided. We also support to add the same sentence into all standards that list processing aids. However, we do not support adding this sentence into commodity standards which processing aids are not listed, unless they are allowed.

#### Part B: SUMMARY OF THE DISCUSSIONS IN THE EWG

##### Alignment of Milk and Milk Products (CCMMP) standards (Appendix 2)

##### Functional Class Table

*Chair's proposal: Make the changes as proposed by adding Functional Class Tables to those CCMMP Codex commodity standards that do not currently have one. As well, an additional column for surface/rind treatment is added as appropriate if such a column does not already exist.*

Brazil: supports Chair's proposal.

##### Group food additives, additional provisions

*Chair's proposal: NOT to make the changes listed in the right hand column of the above table; that is these food additives have not been added to Table 3. The reason was due to concerns about their JECFA specification status. Advice received from the JECFA secretariat confirmed that these substances are not covered by a current JECFA specification.*

Brazil: supports Chair's proposal.

##### Appropriate food category

*Chair's proposal: To request the Codex secretariat remove the second entry for CXS 283-1978 in the tables in Annex C of the GSFA. The proposed changes are (using strikethrough):*

Standard No	Codex Standard Title	Food Cat. No.
283-1978	Cheese (ripened, including mould ripened)	01.6.2.1
<del>283-1978</del>	<del>Cheese (unripened, including fresh cheese) – See also CODEX STAN 221-2004</del>	01.6.1

Brazil: does not object to making such a change.

#### **Additional comments due to submissions to the 1st circular Changes reflecting 2019 updates to GSFA**

*Chair's proposal: To make the suggested entries (standard processing aid statement in section 4.1) for CXS 278-1978 and CXS 283-1978 as agreed by EWG. It is noted that the IDF and New Zealand do not consider starter cultures and coagulating enzymes used in the manufacture of cheese to (always) meet the definition of processing aids. However other processing aids are used in the production of such cheeses, so this is the justification for making such a suggestion.*

*It is felt that the further suggestion by the IDF to add this statement for all cheese (and even all dairy) standards is a broader question to be considered at the PWG on alignment as it has larger implications.*

Question: Should the standard processing aid sentence:

“Processing aids used in products conforming to this standard should be consistent with the *Guidelines on Substances used as Processing Aids* (CAC/GL 75-2010).” be added to all cheese standards (or even all dairy standards) since it is argued that various processing aids are used in the manufacture of products conforming to all these standards and to be consistent with the proposed entries for CXS 278-1978 and CXS 283-1978?

Brazil: supports chair's recommendation, since processing aids are listed in the standard but no requirements about the quality of those substances, or criteria they should comply with are currently provided. We also support to add the same sentence into all standards that list processing aids. However, we do not support adding this sentence into commodity standards which processing aids are not listed, unless they are allowed.

#### **Provisions for phosphates**

*Chair's proposal: Not to change the current approach for listing phosphate provisions, noting that the lists are very long and detailed. The reason is as detailed above.*

Brazil: supports chair's proposal.

*Chair's proposal: Not to make changes to functional class table for CXS 208-1999 for the reason detailed above.*

Brazil: supports chair's proposal

#### **Draft provision for aspartame-acesulfame salt (INS 962)**

*Chair's proposal: It is not proposed to make the changes since they relate to draft provisions, so changes to the GSFA will not be made due to the current alignment work. It is likely that these issues will be better addressed by the GSFA EWG as the draft provisions move through the step process.*

Brazil: supports chair's proposal

#### **Appropriate name for INS 554**

*Chair's proposal: Support was received to Canada's suggestion. Therefore changes have been made to the name of the food additive for INS 554 to be consistent with CXG 36-1989. A recommendation could be made requesting the Codex secretariat investigate the differences within the two versions of the GSFA and amend to use the more appropriate name being "Sodium aluminium silicate".*

Brazil: supports chair's proposal

#### **Provisions for ascorbic acid, L- (INS 300) and sodium ascorbate (INS 301)**

*Chair's proposal: Canada's suggestion is supported and changes have been made by removing provisions for the two food additives (ascorbic acid, L- (INS 300) and sodium ascorbate (INS 301)) in Table 1 and 2 of the GSFA related to food category 01.5.2, and additions have been made for the two food additives entries in Table 3, with CS 251-2006 added to column 5.*

Brazil: supports chair's proposal

**Replacement of note 209 with note XS251**

*Chair's proposal: Make the suggested change as suggested by Canada due to EWG support to clean up the GSFA. That is to replace note 209 with the exclusion note XS251. The Chair further notes that the GSFA EWG has proposed similar changes; to replace current notes with new exclusion notes that say the same thing. Therefore it is appropriate for consistency that the same approach is taken between the EWGs for alignment and the GSFA.*

Brazil: supports chair's proposal

**Additional functional class qualification notes for Table 3**

*Chair's proposal: It is not proposed to make the additional qualification notes, especially those related to functional class, to entries to Table 3 as part of the alignment work for the reason of not making Table 3 too long or complicated.*

*Support has been provided to add new entries for lysozyme and paprika oleoresin to Table 3 as part of the alignment work relating to CXS 283-1978, noting the original Canadian comments to the 1st circular and these changes have been made.*

Brazil: supports chair's proposal

**Additional comments due to submissions to the 2nd circular Turmeric (INS 10(ii))**

*Chair's proposal: Since there is no JECFA specification for turmeric or a group specification for curcumins that includes turmeric it is not proposed to add turmeric to the GSFA as part of the alignment work. This response is consistent and similar to item 2.*

Brazil: supports chair's proposal

**Surface/rind treatment**

*Chair's proposal: To ensure consistency in the Tables of Functional Class for CCMMP no changes will be made for those listed in CXS 273-1968 and CXS 275-1975.*

Brazil: supports chair's proposal

**Note L275**

*Chair's proposal: The duplication is noted but to be consistent and ensure clarity the phrase will be left in.*

Brazil: supports chair's proposal

**Alignment of CCFO (Fats and Oils) standards (Appendix 3)****Additive provisions in non-standardized products**

*to the food additives and food categories as noted above. Therefore the provisions have been left in, with the appropriate XS notes due to alignment with the specific commodity standard. A future review could be undertaken once the alignment work has been completed to address the issue of standardized and non-standardized products which seems to be a vexed issue for CCFA and the commodity committees to deal with. CCFA is not in a position to provide an educated view on the CCFO standards and food categories.*

Brazil: supports chair's proposal

**Provisions for carotenes, beta-, vegetable (INS 160a(ii))**

*Chair's proposal: Use notes relating to the ML provisions for CXS 19-1981 and CXS 211-1999 and the exclusion note XS329 to align provisions in the GSFA for carotenes, beta-, vegetable (INS 160a(ii)), under food category 02.1.3, as currently listed in Appendix 3.*

Brazil: supports chair's proposal.

**Virgin and cold pressed oils**

*Chair's proposal: Support was received for Canada's suggestion and further consideration for dealing with non-standardized products led to the proposal to not add note 356 to food additives from CXS 19-1981, CXS 33-1981 and CXS 210-1999 that are aligned with food category 02.1.2 but not 02.1.1 and 02.1.3 but to use an alternative new note. This is the new note A-CXS19210: "Excluding virgin and cold pressed oils in products conforming to the Standard for Edible Fats and Oils not Covered by Individual Standards (CODEX STAN 19-1981) and the Standard for Named Vegetable Oils (CODEX STAN 210-1999)."*

Brazil: supports chair's proposal.

**Draft provisions versus aligned provisions in the GSFA**

*Chair's proposal: Remove draft provisions in Tables 1 and 2 of the GSFA when they are consistent with provisions added due to alignment, but kept in the current document for information.*

Brazil: supports chair's proposal

#### **No additive provision in virgin oil entry in CXS 33-1981**

*Chair's proposal: To keep the current entry in the commodity standard CXS 33-1981 to ensure clarity and certainty, rather than rely solely on the GSFA.*

Brazil: supports chair's proposal

#### **Revised food additive section in CXS 256-2007**

*Chair's proposal: Changes to what was originally proposed are required to correctly address the original intention of CCFO when it incorporated the food additives section into Standard CXS 256-2007. Its intention was specifically to provide provisions for food additives with the listed functional classes in Table 3.*

Brazil: supports chair's proposal.

#### **Combination of proposed notes**

*Chair's proposal: A number of combined notes as suggested by Canada has been made in the alignment documents.*

Brazil: supports chair's proposal

*Chair's proposal: To combine proposed notes in the 1st circular into one note where it is supported, from the Canadian comments. Checks have been made to ensure no notes are removed that are required for other provisions. A reasonable number of notes have been combined as well as slight edits made to other notes reflecting the Canadian comments.*

Brazil: supports chair's proposal

#### **Replacement of note 215 with note XS256**

*Chair's proposal: To be consistent with the Chair's proposal for item 14 and the GSFA EWG proposals it is suggested to replace the current note 215 with the exclusion note XS256.*

Brazil: supports chair's proposal

#### **Checking food additive sections in CCFO standards**

*Chair's proposal: The functional classes of alignment of food additives from CX/FA 19/51/2 Add. 2 have been rechecked to confirm the entries for the commodity standards are correct.*

Brazil: supports chair's proposal

#### **Alignment of CCSCCH (Spices and Culinary Herbs) standards (Appendix 4)**

##### **Reference in Annex to Table 3 to food category 12.2.1 Herbs and spices (EXCLUDING SPICES)**

*Chair's proposal: It is proposed to use option A as noted above. This is reflected in the entries in Tables 1 and 2 of the GSFA that have been made for all Table 3 anticaking agents in food category 12.2.1 to permit the use of these food additives in foods conforming to the Standard for Dried Thyme (CXS 328-2017).*

Brazil: supports chair's proposal

##### **Aspartame-acesulfame salt (INS 962)**

*Chair's proposal: It is proposed to recommend that this issue (dealing with notes for aspartame, acesulfame potassium and the aspartame-acesulfame salt) be passed to the GSFA EWG for its consideration as a number of comments have recommended. Further, as also recommended by the US note 188 will not be removed from the acesulfame potassium provision for food category 12.2.*

Brazil: supports chair's proposal

##### **Note 51 ("For use in herbs only")**

*Chair's proposal: If accepted a recommendation will be made that the issue is best addressed by the CCSCCH. It notes that note 51 is in the draft provisions for a number of other food additives not just caramel I – plain caramel so the same issue applies to them. The recommendation will also be to remove note 51 from each of these draft provisions in food category 12.2.1 as part of the alignment work as recommended by the US which has been done in Appendix 4.*

Brazil: supports chair's proposal

*Chair's proposal: The EWG recommend that the CCFA refer the issue to the CCSCCH as it is the commodity committee with technical expertise to deal with the suggestions. The suggested specific questions referred to CCSCCH are:*

Does the GSFA note 51 ("For use in herbs only") need to be removed when it is listed with the draft provisions of a range of different food additives for food category 12.2.1 (Herbs and spices) due to apparent inconsistency with the annex to Table 3 which appear to allow Table 3 additives for spices? Does the CCSCCH agree with this Alignment EWG proposal?

Brazil: supports chair's proposal.

#### **Note A-CXS328**

*Chair's proposal: Amendments to new note A-CXS328 as proposed by the US have been made building on the concern of possibly misinterpretation and lack of clarity expressed by Canada.*

Brazil: supports chair's proposal

#### **Alignment relating to tamarind seed polysaccharide (INS 437) and provisions in CXS 249-2006, CXS 273-1968, CXS 275-1973 and CXS 288-1976 (Appendix 5)**

*Chair's proposal: Not add the function class of stabilizer to the qualification note but stay with "in cheese mass only" in the right hand column in Table 3 as part of the alignment of CXS 273-1968 to be consistent with the current alignment of CXS 275-1973. This is also consistent with the proposed approach for item 15 (relevant to Appendix 2).*

Brazil: supports chair's proposal.

#### **Process for alignment of tamarind seed polysaccharide (INS 437)**

*Chair's proposal: leave the work on tamarind seed polysaccharide until the full alignment relating to CXS 288-1976 is undertaken (which has already been undertaken as part of alignment for CCFA53).*

Brazil: supports chair's proposal.

### **Chile**

#### (i) General comments

Chile appreciates the work carried out by the electronic working group and supports most of the issues presented in the document. There are only some corrections that will be detailed in point (ii).

#### (ii) Specific comments

- Part A, Appendix 1
- Issue 1: It is suggested the inclusion of a sixth column to indicate the restrictive notes instead of noting them in the fifth column, this, to avoid confusion and change of title of column 5.

In addition, Chile requests a clarification of the changes that need to be made in order to know how far this proposal will go. For example, indicate how it would be completed for CA 01.2 and 02.1, to visually understand if you want to transfer all the GMP additives from Tables I and II or just alignment what is already in Table III.

- Issue 2: Chile does not support removing the title of the standard, removing this title from the standard does not clarify the category number.
- Issue 3: Chile supports indicating the phrase of processing aid for all standards that mention the use of processing aid.
- From page 57 in the English document, note 460 and 461 are mentioned in various additives, in the GSFA it corresponds to note FF and EE respectively, clarification is requested.
- On page 70 of the document in Spanish, the SIN number for beta-vegetable carotenes is incorrect; says SIN 160a (iii) should say 160a (ii).
- It is requested to correct, on page 89 of the English document and from page 89 of the document in Spanish, note X33 by the correct note XS33.
- It is requested to correct, from page 106 of the English document and from page 111 of the document in Spanish, the note XS236 by the correct note A-CXS236.
- It is requested to correct on page 121 of the document in English and 128 in Spanish the SIN of talc; say 500 (iii) should say 553 (iii).
- It is requested to correct on page 130 of the document in Spanish and 122 of the documents in English, the INS 504 (ii) corresponds to acid carbonate not to magnesium hydroxide carbonate as indicated in the document.

## Colombia

Los cambios propuestos se indican con adiciones en **texto subrayado y en negrita** o con supresiones en ~~texto tachado~~.

APARTES	PROPUESTA DE POSICIÓN	OBSERVACIONES O COMENTARIOS	CATEGORÍA DE COMENTARIO <sup>1</sup>			
			E	S	TE	TR
<p><b>2. DESCRIPCIÓN</b>  <b>2.1 Definición del producto:</b></p> <p><b>CX FA 21/52/6</b>  <b>Propuesta modificación anexo C. de la Norma General del Codex para los Aditivos Alimentarios, GSFA, Codex STAN 192-1995</b></p>	<p><b>2. DESCRIPCIÓN</b>  <b>2.1 Definición del producto:</b></p> <p><b>Asunto 1.</b>            Se propuso remover la entrada para CXS 283-1978 con el título "Queso (no madurado, incluyendo queso fresco)-Ver también CXS 221-2001 y categoría de alimento número 01.6.1.</p> <p><b>Asunto 2.</b>            El ajuste que recomienda el grupo de trabajo electrónico realizar es que se incluya lo siguiente:            "Los coadyuvantes de elaboración utilizados en los productos que cumplen con esta norma deben ser coherentes con las directrices sobre sustancias utilizadas como coadyuvantes de elaboración (CXG 75-2010), y ser adicionados a las normas estándar CXS 278-1978 y CXS 283-1978 ya que ambas se refieren a coadyuvantes tecnológicos. La pregunta adicional es ¿si este mismo ajuste también deben agregarse a las demás normas para el queso, ya que se utilizan varios coadyuvantes de elaboración en su producción, o incluso en las demás normas para derivados lácteos?"</p> <p><b>Asunto 3.</b>            Observaciones respecto a la propuesta de Estados Unidos,</p>	<p><b>GENERALES</b></p> <p><b>Asunto 1.</b>            Colombia no tiene comentarios para la propuesta y solicita que se brinde mayor claridad sobre la propuesta remitida.</p> <p><b>Asunto 2.</b>            Colombia no tiene comentarios para la propuesta y solicita que se brinde mayor claridad sobre la propuesta remitida, en particular acerca de la inclusión del listado de coadyuvantes de elaboración en las citadas normas.</p> <p><b>Asunto 3.</b>            Colombia no tiene comentarios para la propuesta y solicita que se brinde mayor claridad sobre la propuesta remitida, de ser posible, con una estructura definida, ejemplos y un planteamiento sobre el avance de dicho trabajo, a fin de dar la posición correspondiente.</p>			X	

<sup>1</sup> - "Editorial" (Editorial): Este tipo de comentario aclara o simplifica el texto sin cambiar el significado. Incluye correcciones ortográficas o gramaticales, sugerencias de palabras diferentes pero equivalentes y la simplificación de la estructura de la frase.

- "Substantive" (Sustancial): Este tipo de comentario tiene en cuenta cambios conceptuales y la adición de nuevos aspectos o ideas. Incluye adiciones o ampliaciones así como cambios, reorganización del texto o eliminaciones que dan lugar a la alteración del contenido de una frase, párrafo o sección del proyecto de documento.

- "Technical" (Técnico): Este tipo de comentario tiene en cuenta correcciones científicas y ajustes técnicos. Su objetivo es aclarar y mejorar en mayor medida la norma y, en ocasiones, ajustarla a otras normas desde el punto de vista técnico.

- "Translation" (Traducción): Este tipo de comentario corrige puntos cuya traducción a otra versión lingüística del texto se considera inexacta.

APARTES	PROPUESTA DE POSICIÓN	OBSERVACIONES O COMENTARIOS	CATEGORÍA DE COMENTARIO			
			E	S	TE	TR
	para ayudar a simplificar las entradas del cuadro 3, cumplir con el preámbulo de la Norma General de Aditivos Alimentarios (NGAA), y limitar la posible confusión en la comprensión futura de cómo funciona el cuadro 3.					

### Ecuador

El documento CX/FA 21/52/6, que se solicita emitir observaciones sobre la Parte A Apéndice 1. Por parte de Ecuador para las Cuestiones 1 y 3 no tenemos observaciones ni comentarios, sin embargo sobre la Cuestión 2 “*Propuesta de cambios a la lista de títulos de normas del CODEX en el Anexo C de la NGAA*”, donde lo que se plantea es eliminar la entrada de CXS 283-1978 con el título “*Queso (no madurado, incluido el queso fresco) – Véase también CXS 221-2001*” con número de categoría de alimentos 01.6.1 para limitar la confusión, con la entrada CXS 283-1978 con el título “*Queso (madurado, incluido madurado por mohos)* con número de categoría 01.6.2.1. Al respecto, por parte de Ecuador más que una observación tenemos una consulta, deseamos que se aclare el motivo por el cual se quiere dar esta eliminación ya que el número de categoría si bien es similar no es igual y puede ser claramente diferenciados.

### Japan

Japan appreciates the Australia for chairing and the United States for co-chairing the eWG on alignment and the Codex secretariat for the opportunity to submit comment on alignment of the food additive provisions of commodity standards. Japan would like to submit the following comments.

#### (I) General comment

Japan generally supports alignment work undertaken in 2019. For ensuring consistency, Japan proposes that the term “singly or in combination” should be deleted from the notes if food additives listed in the notes are in the same header (e.g. Phosphates) since the use of the additives singly or in combination is implied. Japan also notes that our proposal is consistent with the approach taken by CX/FA 21/52/7 appendix 3.

#### (II) Specific comments

Appendix 2

2. Proposed amendments to Table 1, 2 and 3 of the GSFA for milk and milk products

A: PROPOSED AMENDMENTS TO TABLE 1

FOOD CATEGORY 1.3.2 (page 45)

C250252: Except for use in products conforming to the Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat (CXS 250-2006) and the Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat (CXS 252-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as acidity regulators only, at 4,400 mg/kg as phosphorus, ~~singly or in combination.~~

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.

## FOOD CATEGORY 1.5.2 (page 48)

B251: Except for use in products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006): tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)) for use as anticaking agents only, ~~singly or in combination.~~

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.

C251: Except **for use** in products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450(ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), and ammonium polyphosphate (INS 452(v)), as acidity regulators only, ~~singly or in combination.~~

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.
- For ensuring consistency with the wording of other notes in CX/FA 21/52/6 (e.g. Note C250252, Note B251), “Except in products” should be replaced with “Except for use in products”.

## FOOD CATEGORY 1.6.1 (page 52)

Phosphates INS 338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii) 450(i)-(iii),(v)-(vii),(ix), 451(i),(ii), 452(i)-(v), 542: Functional class: Acidity regulator, Anticaking agent, Antioxidant, Emulsifier, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Preservative, Raising agent, Sequestrant, Stabilizer, Thickener				
Food Category No.	Food Category	Max Level	Notes	Recommendations
01.6.1	Unripened Cheese	4400 mg/kg	33, C221, K273, L275	Adopt

(Rationale)

- For correction of duplicated comma at Notes.

## FOOD CATEGORY 1.6.1 (page 54)

C221: Except for use in products conforming to the Group Standard for Unripened Cheese including Fresh Cheese (CXS 221-2001): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)) and trisodium diphosphate (INS 450(ii)); as stabilizers/thickeners at 1540 mg/kg as phosphorus, ~~singly or in combination,~~ in cheese mass only.

H273275: For use in cheese mass only of products conforming to the Standard for Cottage Cheese (CXS 273-1968) and the Standard for Cream Cheese (CXS 275-1973): sorbic acid (INS 200), potassium sorbate (INS 202), calcium sorbate (INS 203), ~~singly or in combination.~~

J221: For use in cheese mass and the surface treatment of sliced, cut, shredded and grated cheese products conforming to the Group Standard for Unripened Cheese including Fresh Cheese (CXS 221-2001): sorbic acid (INS 200), potassium sorbate (INS 202), calcium sorbate (INS 203), ~~singly or in combination.~~

K273: Except for use in products conforming to the Standard for Cottage cheese (CXS 273-1968): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as stabilizers at 1,300 mg/kg as phosphorus, ~~singly or in combination~~, in cheese mass only.

L275: Except for use in products conforming to the Standard for Cream cheese (CXS 275-1973): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as stabilizers at 4400 mg/kg as phosphorus, ~~singly or in combination~~, in cheese mass only.

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.

FOOD CATEGORY 1.6.2 (page 56)

B278: Except for use in products conforming to the Standard for Extra Hard Grating Cheese (CXS 278-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203), at 1000 mg/kg **as sorbic acid** in the final product, ~~singly or in combination~~.

C283: Except for surface or rind treatment of sliced, cut, shredded or grated cheese only for products conforming to the General Standard for Cheese (CXS 283-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203), at 1000 mg/kg **as sorbic acid**, ~~singly or in combination~~.

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.
- For ensuring consistency with the wording of other notes in CX/FA 21/52/6 (e.g. Note C221, E283), “as sorbic acid” is necessary

FOOD CATEGORY 1.6.2.1 (page 61)

E283: Except for **use in** products conforming to the General Standard for Cheese (CXS 283-1978): propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) at 3000 mg/kg as propionic acid.

(Rationale)

- For ensuring consistency with the wording of other notes in CX/FA 21/52/6 (e.g. Note C250252, Note B251), “Except in products” should be replaced with “Except for use in products.”

## B: PROPOSED AMENDMENTS TO TABLE 2

FOOD CATEGORY 1.3.2 (page 62)

C250252: Except for use in products conforming to the Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat (CXS 250-2006) and the Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat (CXS 252-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen

phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as acidity regulators only, at 4,400 mg/kg as phosphorus, ~~singly or in combination.~~

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.

FOOD CATEGORY 1.5.2 (page 63)

B251: Except for use in products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006): tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)) for use as anticaking agents only, ~~singly or in combination.~~

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.

C251: Except **for use** in products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), and ammonium polyphosphate (INS 452(v)), as acidity regulators only, ~~singly or in combination.~~

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.
- For ensuring consistency with the wording of other notes in CX/FA 21/52/6 (e.g. Note C250252, Note B251), “Except in products” should be replaced with “Except for use in products.”

FOOD CATEGORY 1.6.1 (page 65)

Additive	INS	Max Level	Notes	Recommendation
Phosphates	338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii), 450(i)-(iii), (v)-(vii), (ix), 451(i), (ii), 452(i)-(v), 542	4400 mg/kg	33, <del>C221, K273,</del> <b>L275</b>	Adopt

(Rationale)

- For correction of duplicated comma at Notes.

FOOD CATEGORY 1.6.1 (page 66)

C221: Except for use in products conforming to the Group Standard for Unripened Cheese including Fresh Cheese (CXS 221-2001): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen

phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)) and trisodium diphosphate (INS 450(ii)), as stabilizers/thickeners at 1540 mg/kg as phosphorus, ~~singly or in combination~~, in cheese mass only.

H273275: For use in cheese mass only of products conforming to the Standard for Cottage Cheese (CXS 273-1968) and the Standard for Cream Cheese (CXS 275-1973): sorbic acid (INS 200), potassium sorbate (INS 202), calcium sorbate (INS 203), ~~singly or in combination~~.

J221: For use in cheese mass and the surface treatment of sliced, cut, shredded and grated cheese products conforming to the Group Standard for Unripened Cheese including Fresh Cheese (CXS 221-2001): sorbic acid (INS 200), potassium sorbate (INS 202), calcium sorbate (INS 203), ~~singly or in combination~~.

K273: Except for use in products conforming to the Standard for Cottage cheese (CXS 273-1968): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as stabilizers at 1,300 mg/kg as phosphorus, ~~singly or in combination~~, in cheese mass only.

L275: Except for use in products conforming to the Standard for Cream cheese (CXS 275-1973): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as stabilizers at 4400 mg/kg as phosphorus, ~~singly or in combination~~, in cheese mass only.

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.

FOOD CATEGORY 1.6.2 (page 68)

B278: Except for use in products conforming to the Standard for Extra Hard Grating Cheese (CXS 278-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203), at 1000 mg/kg **as sorbic acid** in the final product, ~~singly or in combination~~.

C283: Except for surface or rind treatment of sliced, cut, shredded or grated cheese only for products conforming to the General Standard for Cheese (CXS 283-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203), at 1000 mg/kg **as sorbic acid**, ~~singly or in combination~~.

(Rationale)

- “Singly or in combination” is not necessary as mentioned in our general comment.
- For ensuring consistency with the wording of other notes in CX/FA 21/52/6 (e.g. Note C221, E283), “as sorbic acid” is necessary.

FOOD CATEGORY 1.6.2.1 (page 69)

E283: Except for **use in** products conforming to the General Standard for Cheese (CXS 283-1978): propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) at 3000 mg/kg as propionic acid.

(Rationale)

- For ensuring consistency with the wording of other notes in CX/FA 21/52/6 (e.g. Note C250252, Note B251), "Except in products" should be replaced with "Except for use in products"

Appendix 3

2. Proposed amendments to Tables 1, 2 and 3 of the GSFA for fats and oils

A: PROPOSED AMENDMENTS TO TABLE 1

FOOD CATEGORY 02.1 (page 87)

Curcumin: INS: <del>100(i)</del> 404(i) Functional class: Colour					
Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
02.1.2	Vegetable oils and fats	5 mg/kg	ACXS19210, A2-CXS19, XS33, XS210		Adopt

(Rationale)

- For correction of INS No. for Curcumin.

FOOD CATEGORY 02.1 (page 97)

F-CXS19210: For use in products conforming to the Standard for Edible Fats and Oils not Covered by Individual Standards (CXS 19-1981) and ~~to~~ the Standard for Named Vegetable Oils (CXS 210-1999) as an antioxidant only.

(Rationale)

- For ensuring consistency with the wording of other notes in CX/FA 21/52/6 (e.g. Note A-CXS19210, Note C2-CXS19210)

FOOD CATEGORY 02.2.2 (page 99)

A-CXS256: For use in products conforming to the Standard for **Fat** Spreads and Blended Spreads (CXS 256-2007)

(Rationale)

- For correction of the name of the CXS 256-2007.

E-CXS256: Except for use ~~as acidity regulators only~~ in products conforming to the Standard for Spreads and Blended Spreads (CXS 256-2007) ~~at 1000 mg/kg as phosphorus~~: phosphoric acid (INS 338), sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450(ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), **as acidity regulators at 1000 mg/kg as phosphorus**.

(Rationale)

- For ensuring consistency with the wording of other Notes in CX/FA 21/52/6 (e.g. Note C250252, Note B251).

## Peru

## DOCUMENTO EXPLICATIVO: PREGUNTAS, OBSERVACIONES Y PROPUESTAS DE LA PRESIDENCIA

## PARTE A: RESUMEN DE LAS PROPUESTAS DE LA PRESIDENCIA EN LAS ÚLTIMAS CIRCULARES

Cuestión 1 – Elaboración de notas del Cuadro 3

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Posición/ propuesta de enmienda	Sustento Técnico de cambio /Comentarios
1	<p><b>Apéndice 1 , Parte A Cuestión 1 (Pág. 3 del CX/FA 21/52/6)</b> La <b>propuesta de EE. UU.</b> de <b>añadir notas a la columna 5</b> de las entradas del Cuadro 3 y, por consiguiente, <b>tener una lista aparte de notas para el Cuadro 3</b>, similar a la lista de notas existente para los Cuadros 1 y 2, <b>fue apoyada</b> y se propone para su consideración</p> <p>Si se apoya la propuesta entonces sería necesario someter a consideración <b>cómo podría desarrollarse y quién podría hacerlo</b>, tomando nota de que EE. UU. brindó su asistencia (¿Cómo posible nuevo trabajo futuro?)</p>	<p><b>POSICIÓN</b></p> <p>De acuerdo con que se incorpore notas adicionales a la columna 5 del Cuadro III de la NGAA y, Se desarrollaría en un GTE.</p>	-----

## DOCUMENTO EXPLICATIVO: PREGUNTAS, OBSERVACIONES Y PROPUESTAS DE LA PRESIDENCIA

## PARTE A: RESUMEN DE LAS PROPUESTAS DE LA PRESIDENCIA EN LAS ÚLTIMAS CIRCULARES

Cuestión 2 – Propuesta de cambios a la lista de títulos de normas del Codex en el Anexo C de la NGAA

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Posición/ propuesta de enmienda	Sustento Técnico de cambio /Comentarios
2	<p><b>Apéndice 1 , Parte A, Cuestión 2 (Pág. 4 del CX/FA 21/52/6)</b> Se propone eliminar la entrada de CXS 283-1978 con el título “Queso (no madurado, incluido el queso fresco) – Véase también CXS 221-2001” y el número de la categoría de alimentos 01.6.1 para limitar la confusión.</p>	<p><b>Posición</b></p> <p>De acuerdo, corresponde la propuesta de eliminación,</p>	<p>en el Anexo C ya se hace referencia a la Norma para quesos no madurados, incluido el queso fresco, correspondiente al número de norma CXS 221-2001 y N° de Categoría 01.6.1</p>

## DOCUMENTO EXPLICATIVO: PREGUNTAS, OBSERVACIONES Y PROPUESTAS DE LA PRESIDENCIA

## PARTE A: RESUMEN DE LAS PROPUESTAS DE LA PRESIDENCIA EN LAS ÚLTIMAS CIRCULARES

Cuestión 3 – ¿Debe añadirse la oración general sobre coadyuvantes de elaboración a todas las normas para el queso, o a todas las normas para productos lácteos?

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Posición/ propuesta de enmienda	Sustento Técnico de cambio /Comentarios
3	<p><b>Apéndice 1 , Parte A, Cuestión 3 (Pág. 4 del CX/FA 21/52/6)</b> El GTE sobre armonización recomienda que la oración estándar sobre coadyuvantes de elaboración “Los coadyuvantes de elaboración utilizados en productos correspondientes a esta norma deberán ser compatibles con las <i>Directrices para sustancias utilizadas como coadyuvantes de elaboración</i> (CXG 75-2010)” se añada a las normas CXS 278-1978 y CXS 283-1978 ya que ambas se refieren a los coadyuvantes de elaboración en la norma. La cuestión ulterior es si esta misma oración debe añadirse también a todas las demás normas para el queso ya que en su producción se utilizan diversos coadyuvantes de elaboración, o incluso a todas las normas sobre productos lácteos</p>	<p><b>Posición</b> Qué se lleve el tema en Cuestión 3 a un mayor debate y se analice en un GTE (ante la situación de pandemia por la enfermedad COVID-19)</p>	<p>Se toma en consideración lo señalado por la IDF y Nueva Zelanda (no consideran que los cultivos de inicio y las enzimas coagulantes utilizados en la fabricación del queso se ajusten (siempre) a la definición de coadyuvantes de elaboración)</p>

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Posición/ propuesta de enmienda	Sustento Técnico de cambio /Comentarios
4	<p><b>Resumen de las demás cuestiones (la numeración se refiere a las entradas más detalladas en la Parte B) (Pág. 4 del CX/FA 21/52/6)</b> (12) Una recomendación será que se pida a la Secretaría del Codex que examine el nombre del aditivo alimentario del SIN 554 en la NGAA y haga los cambios que sean necesarios para utilizar el nombre preferido “silicato de sodio y aluminio” en lugar del nombre anterior “aluminosilicato de sodio”. Los mismos cambios se proponen también para CXS 36-1989</p>	<p>(12) señala: “(...) Los mismos cambios se proponen también para <del>CXS</del> <b>CXG 36-1989</b>”</p>	<p><b>Comentario:</b> Es un error tipográfico NORMA PARA PESCADOS NO EVISCERADOS Y EVISCERADOS CONGELADOS RÁPIDAMENTE corresponde a CODEX STAN 36-1981  NOMBRES GENÉRICOS Y SISTEMA INTERNACIONAL DE NUMERACIÓN DE ADITIVOS ALIMENTARIOS corresponde a CXG 36-1989</p>

N°	General	Posición/ propuesta de enmienda	Sustento Técnico de cambio /Comentarios
5	<p>En la armonización de las normas del Codex sobre productos con la NGAA se ha añadido cuadros de clases funcionales y uso justificado en las normas específicas de productos</p>	<p>-----</p>	<p><b>COMENTARIO:</b> En las normas específicas de productos sería recomendable que consideren temas propios del alimento en cuanto a fabricación, ingredientes, etiquetado, entre otros y lo referente a aditivos alimentarios como: clases funcionales y límites de uso se revisen en la NGAA, es decir, en las normas Codex de productos en el acápite de “Aditivos Alimentarios” sólo se realice un llamado a la NGAA “<b>Véase NORMA GENERAL PARA LOS ADITIVOS ALIMENTARIOS – CXS 192</b>”, a fin de evitar actualizaciones posteriores en las normas Codex específicas, cada vez que se realicen cambios en la NGAA.</p>

## United Kingdom

Comments on Document CX/FA 21/52/6 – Specific Comments

### Appendix 1 - Explanatory document – questions, comments and chair's proposals

Issue 1 – **No UK response, at this time.**

Issue 2 – **No UK response, at this time.**

Issue 3 – Should the general processing aid sentence be added to all cheese commodity standards, or all dairy standards?

*The UK supports that the processing aid sentence be added to all dairy standards. If processing aids are being used in the production of products conforming to any/all of these standards then it should be made clear that such processing aid use must be in line with the guidelines.*

### Alignment of Milk and Milk Products (CCMMP) standards (Appendix 2)

**No comments from UK**

### Alignment of CCFO (Fats and Oils) standards (Appendix 3)

**No comments from UK**

### Alignment of CCSCH (Spices and Culinary Herbs) standards (Appendix 4)

**No comments from UK**

**Alignment relating to tamarind seed polysaccharide (INS 437) and provisions in CXS 249-2006, CXS 273-1968, CXS 275-1973 and CXS 288-1976 (Appendix 5)**

**No comments from UK**

**Appendix 6 - Alignment of food additive provisions in the GSFA – avoiding future divergence between the GSFA and commodity standards:**

**The UK supports the proposed approach to avoiding future divergence between the GSFA and Commodity Standards.**

## EU Specialty Food Ingredients

EU Specialty Food Ingredients would like to thank you for this opportunity to provide comments on the report of the electronic working group on alignment. Our comments deal with the electronic working group Chair recommendation for not adding INS 322(ii) into Table 3 (among group of other additives) following the alignment between milk products related standards and the General Standard for Food Additives (GSFA) (see pages 6 and 7 of CX/FA 21/52/6):

*Chair's proposal: NOT to make the changes listed in the right hand column of the above table; that is these food additives have not been added to Table 3. The reason was due to concerns about their JECFA specification status. Advice received from the JECFA secretariat confirmed that these substances are not covered by a current JECFA specification.*

We would like to stress that an Acceptable Daily Intake (ADI) "not limited" was established for lecithin partially hydrolyzed INS 322 (ii) at the 17<sup>th</sup> JECFA (1973) and the specification<sup>2</sup> prepared at the 37<sup>th</sup> JECFA (1990), published in Food and Nutrition Papers (FNP) 52 (1992), which superseded the specifications prepared at the 30<sup>th</sup> JECFA (1986), published in FNP 37 (1986).

We would like to point out that in 1973 lecithins were considered in Codex Alimentarius as one group of additives under INS 322 (as it is the case in the current EU legislation). In point 2.4.6 of the 17<sup>th</sup> JECFA report<sup>3</sup> it is stated that 'as a number of food additive are closely related chemically and toxicologically, the Committee adopted in its seventh and later reports a system of grouping of additives for purposes of evaluation'. This is the case of lecithin which was until 2006 grouped under INS 322. The monograph for "lecithin, partially

<sup>2</sup> See [http://www.fao.org/fileadmin/user\\_upload/jecfa\\_additives/docs/monograph4/additive-251-m4.pdf](http://www.fao.org/fileadmin/user_upload/jecfa_additives/docs/monograph4/additive-251-m4.pdf)

<sup>3</sup> See [http://apps.who.int/iris/bitstream/handle/10665/41072/WHO\\_TRS\\_539.pdf;jsessionid=F80E0BC465E3DC1B4DD0DB8270F8A4F8?sequence=1](http://apps.who.int/iris/bitstream/handle/10665/41072/WHO_TRS_539.pdf;jsessionid=F80E0BC465E3DC1B4DD0DB8270F8A4F8?sequence=1)

hydrolyzed”, during years appeared as INS 322 – meaning that both lecithins standard and hydrolyzed were grouped in the same category INS 322, and the ADI ‘not limited’ applies to both lecithins INS 322(i) and INS 322(ii).

Finally, at the 37<sup>th</sup> Session of the Codex Committee on Food Additives and Contaminants<sup>4</sup>, the Committee agreed to inform Codex Committees that, when considering the use of the food additive Lecithin, should be aware that there are two substances (Lecithin and Partially Hydrolyzed Lecithin) that are covered under INS 322 – Lecithins.

We sincerely hope this background information will be considered by the alignment working group on 24<sup>th</sup> June and remain accessible for any further information about lecithin partially hydrolyzed INS 322 (ii).

### **IDF (International Dairy Federation)**

IDF welcomes the opportunity to review this document and thanks the delegations of Australia, United States and Japan for the extensive work invested in preparing and reviewing all comments provided.

IDF supports the proposals from the eWG included in the document and wish to provide the following additional comments.

#### **Page 3 - Issue 1 – Development of Table 3 notes**

- (a) IDF would support adding a 'Notes' section to Table 3 similar to that already in place for Tables 1 & 2. IDF sees this approach as a way of simplifying the contents of Column 5. IDF also sees this approach as allowing for Notes that further qualify (by way of ML and/or functional use) the use of Table 3 additives as specified in the commodity standard if other than GMP use.
- (b) IDF would also support the (new) work to reinstate Table 3 additives that have previously been shifted to Tables 1 & 2 (to protect particular use requirements as specified in the commodity standard). If (a) above is agreed to then the requirements specified in the commodity standard can be captured as notes in the (new) 'Notes' section for Table 3 with a numerical reference in Column 5.

#### **Page 4 - Issue 3 – Should the general processing aid sentence be added to all cheese commodity standards, or all dairy standards?**

For consistency IDF would recommend that the same sentence “Processing aids used in products conforming to this standard should be consistent with the Guidelines on Substances used as Processing Aids (CXG 75-2010)” be inserted in all dairy standards.

#### **Page 12, para 15 - Additional functional class qualification notes for Table 3**

IDF would point out that if a 'Notes' section were to be adopted for Table 3 as proposed by the US (Issue 1, p3 of this doc):

- (a) Then Table 3 would be simplified and shorten and,
- (b) It would provide a very simple mechanism for making additional qualification notes (i.e. a numerical reference in Column 5 with a note 'as an acidity regulator' etc in the new 'Notes' section)

While IDF agrees that the maximum use of Lysozyme and Paprika Oleoresin in CXS 283-1978 is listed at GMP, it is not clear to IDF that their JECFA specifications lists them as having a GMP status. If an ADI is specified for one or both then one or both should remain in Tables 1 & 2 with a note specifying a use at GMP for those products conforming to CXS 283-1978. If GMP is specified for one or both then IDF can agree that one or both can be moved to Table 3 as part of the alignment for CXS 283-1978.

#### **Page 24 – para 39 - Alignment relating to tamarind seed polysaccharide (INS 437) and provisions in CXS 249-2006, CXS 273-1968, CXS 275-1973 and CXS 288-1976 (Appendix 5)**

While IDF can agree with the Chair's proposal IDF also believes that a (final) decision on this approach does depend on the resolution of Issue 1 in this document - please see IDF comments to Item 15.

#### **Appendix 2 - 2. Proposed amendments to Table 1, 2 and 3 of the GSFA for milk and milk products - Page 56 and 68 – note C283**

IDF would suggest that to be consistent with the layout of text for Note J221 and for greater clarity, Note C283 could be rewritten as..... **Singly or in combination, for use in the cheese mass at 3000 mg/kg and for surface or rind treatment of sliced, cut, shredded or grated cheese only at 1000 mg/kg, for products**

<sup>4</sup> See [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX\\_7\\_11-37%252Fal28\\_12e.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX_7_11-37%252Fal28_12e.pdf)

conforming to the *General Standard for Cheese* (CXS 283-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203).

#### **IFAC (International Food Additives Council)**

The International Food Additives Council (IFAC) is responding to [CL 2021/24-FA](#): Request for Comments on Alignment of the Food Additive Provisions of Commodity Standards. IFAC is a global association representing manufacturers and end-users of food additives and holds non-governmental observer status with Codex Alimentarius. IFAC strives to promote science-based regulations, standards, and specifications for food additives worldwide.

#### **Part A: Summary of Chair's Proposals Final Circulars**

##### **Issue 1 – Development of Table 3 notes**

IFAC supports the proposal of the USA to capture all Table 3 additives used in food categories not included in the Annex to Table 3 for both standardized and non-standardized foods by adding notes to column 5 of entries in Table 3. IFAC agrees with the USA that creating notes will help simplify entries in Table 3, comply with the GSFA preamble, and limit confusion in the future regarding how Table 3 operates.

#### **ISC (International Stevia Council)**

The [International Stevia Council](#) (ISC) wishes to provide its comments on the [CL 2021/24-FA](#) - Request for comments on alignment of the food additive provisions of commodity standards.

Comments from ISC address in particular [CX/FA 21/52/6](#) (Report of the EWG on Alignment).

I. General Comments:

ISC supports the adoption of note XS251 to steviol glycosides in food category 01.5.2 "Milk and cream powder analogues" as outlined in the [CX/FA 21/52/6](#) (Report of the EWG on Alignment).

ISC looks forward to participating at and contributing to the discussion of the virtual GSFA meetings in June 2021.