

codex alimentarius commission

FOOD AND AGRICULTURE
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ORGANIZATION

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Agenda Item 7 B

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fourth Session

Rotterdam, The Netherlands, 11-15 March 2002

RELATIONSHIP BETWEEN CODEX COMMODITY STANDARDS AND GSFA, INCL. CONSIDERATION OF THE FOOD CATEGORY SYSTEM

The following comments have been received from Canada, Denmark, Japan, Israël, IBFAN, ENCA, IFU, CPIV, AAC and IFMA.

CANADA

This is a well thought-out discussion paper on a very difficult topic conceptually and the United States is to be congratulated for its efforts in leading the drafting group. Canada has only a few comments to offer as our major comments were provided on an earlier draft as part of our role on the Working Group.

PART I - RELATIONSHIP BETWEEN THE GSFA AND COMMODITY STANDARDS

- (1) While Canada does not dispute the major role assigned to CCFAC concerning endorsement of food additives on the basis of technological justification, elucidated in Paragraph #1 of the **INTRODUCTION**, Canada does feel that CCFAC's principal role should be the health-related one embodied in the last sentence of this paragraph, namely, determining whether the proposed food additive provisions are safe in the light of JECFA's safety evaluations.
- (2) Regarding Paragraph #24, Canada would propose the following re-wording in the interests of clarification and simplification:

"24. For most food additives, efficacy increases (not necessarily linearly) with increasing concentrations of the additive. However, a point is reached beyond which adding more of the additive does not result in an increased technical effect. Intake calculations should not be performed beyond this point of maximum (optimal) efficacy. Use levels beyond this point are considered to be technologically unjustified."
- (3) Regarding 34(c) of **RECOMMENDATIONS**, as mentioned in the first sentence of this sub-Section and in Paragraphs 20(a) and 21(a), if a level consistent with "good manufacturing practice" (i.e. the minimum level at which an additive exerts its technical effect) is lower than the level provided in the GSFA, then the level provided in the GSFA may be too high - even though it stands on a health and safety basis. It may be too high because the level in the GSFA is governed by the country reporting the highest level in that class. In such a case, that country should be asked to justify the higher level if other countries maintain that a lower level will suffice technologically.

- (4) With regard to 35(b) and 35(c), these statements appear to be at odds with one another. It would be useful to include further explanations of the intended meaning of these statements.

PART II - FOOD CATEGORY SYSTEM (FCS) AND THE GSFA

- (5) Somewhere, perhaps under the recommendations of Paragraph #16, it should be indicated that it is not the purpose of the GSFA or the Food Category System to deal with intermediate food preparations (e.g. food additive preparations, pumping pickle, flavour preparations, fruit and vegetable coating formulations, etc., etc.).

PART III - PASTAS AND NOODLES

- (6) Canada favours the option elucidated in 21(d), namely establishing three categories, insofar as this option attempts to define these products not so much based on their composition, but based on their physical state which, in the end, seems to be the dictating factor with regard to the food additives employed in them.

DENMARK

GENERAL COMMENTS:

1. The principal difference between the GSFA and the additive list provided in commodity standards is as follows:
 - a. Additives are included in the GSFA on the basis of toxicological evaluation only. The GMP principle is to be respected only in connection with actual usage and not prior to the listing.
 - b. Additives are included in the commodity standards on the basis of both toxicological evaluation (due to CCFAC endorsement) and GMP. The GMP principle is applied prior to the listing.

In principle, there should be no difference between the two approaches. However, where sufficient attention is not paid to documenting adherence to GMP in connection with usage, the real difference may be huge.
2. It is reasonable and logic that Codex develops only one list of additives, notably the GSFA. The commodity standards should not become a “copy” of the relevant parts of the GSFA. On the other hand, this should not result in that no additive regulation at all can be included in the commodity standards. Codex should aim at using the commodity standards to “add value” to the provisions already included in the GSFA.
3. Further work is needed on the descriptions/explanations of the food categories in Annex 2 and the cross references in Annex 3 have to be thoroughly currently reviewed when commodity standards are revised (e.g. revised standards for creams and fermented milks are currently at Step 6 and will be subject to fundamental changes)

COMMENTS TO THE RECOMMENDATIONS:

Para. 34

Commodity standards should continue to address food additive usage with respect to the products covered. However, the scope and content of food additive sections in commodity standards should be changed and contain supplementary provisions and interpretations of the provisions of the GSFA (similar to the way that the labelling sections of commodity standards adds value to the General Standard for the Labelling of Prepackaged Foods), in particular to provide guidance on how to apply GMP (e.g. which additive functions are technologically justified) leaving the listing of individual additives to the GSFA.

Such an approach in support of the GSFA would be more appropriate than to address deviations to the GSFA as outlined in (h).

The following principles of the GSFA should be reviewed:

Principle (f):

Only individual additives should be relocated in the GSFA – not “any provision”. The additive section should contain additional information and guidelines (see general comment above). The relevant principle in the scope of the GSFA should be reformulated, e.g. as follows: "*The food additives listed in Codex commodity standards shall be relocated in the provisions of the GSFA*"

Principle (h) should be reformulated in accordance with the general remarks under paragraph 34.

Para. 35 – Codex Secretariat

The recommendations in (b) and (c) are not sensible. Commodity standards are developed as identity standards mainly with the objective of harmonizing the use of a designation of (a) specific food(s). The driving force for establishing a commodity standard is not and should not be to enabling the understanding of the GSFA. Commodity standard terms are derived from the market place, and Codex terminology would have no or insignificant influence to change that.

It seems more appropriate that the terms used in the GSFA is distanced from terms addressed by the commodity standards rather than the other way around.

COMMENTS TO ANNEX 2

01.0 Dairy Products, excluding products of category 2.0

The text itself should be amended as follows (changes highlighted):

“Includes all types of dairy products ~~that may be~~^() derived from milk of any milking animal ~~appropriate source~~^(*) (e.g., cow, sheep, goat, buffalo^(**)).*

*In this category, a “plain” product is one that is not flavoured, nor contains fruit, vegetables or other non-dairy ingredients not functionally necessary for the processing^(***), nor is mixed with other non-dairy ingredients, unless permitted by relevant standards.*

Rationales:

*) Dairy products are derived from milk.

**) Buffalo is a major source of milk for dairy products

***) Alignment with definition of a milk product (CODEX STAN 206-1999).

01.1.1.1 Milk:

Only the last sentence contains useful information. Add “(plain)” in the title.

01.1.1.2 Buttermilk (plain)

Two types of buttermilk exist. The one already mentioned, as well as the product that remains after the removal of milk fat by churning milk and cream (fermented or not fermented) to manufacture butter and milkfat products (often referred to as buttermilk). Buttermilk may be marketed in a concentrated form or in a dried state as powder.

01.2.1.2 Fermented milks (plain), heat-treated after fermentation

Add “e.g.” prior to the examples in brackets – other heat-treatments may be used.

01.6.1 Unripened cheese:

Remove unnecessary information in the description as follows (changes highlighted):

“Unripened cheese, including fresh cheese, is suitable for consumption immediately after manufacture⁵⁶.

Examples include cottage cheese (a soft, unripened, ~~acid-coagulated curd cheese derived from pasteurized, skimmed cow’s milk~~), ~~creamed cottage cheese (cottage cheese covered with a creaming mixture)~~,⁵⁷ cream cheese (rahmfrischkase, an uncured, soft spreadable cheese ~~made from pasteurized cow’s milk and pasteurized cream~~)⁵⁸, neufchatel ~~cheese~~ and mozzarella ~~and (scamorza) cheese~~. Includes the whole cheese and cheese rind (for those unripened cheeses with a “skin” such as mozzarella). Most products are plain, however, some, such as cottage cheese and cream cheese, may be flavoured or contain ingredients such as fruit, vegetables or meat.”

01.6.2 Ripened cheese:

Amend the description editorially as follows (changes highlighted):

“Ripened cheese is not ~~ready~~suitable for consumption immediately after manufacture, but is held under such time and temperature conditions so as to allow the necessary biochemical and physical changes that characterize the specific cheese. For mould-ripened cheese, the ripening is accomplished primarily by the development of characteristic mould growth throughout the interior and/or on the surface of the cheese⁵⁶. Ripened cheese may be soft (e.g., camembert), ~~firm~~semi-soft (e.g., edam), hard (e.g., cheddar), or extra hard~~low fat~~ (e.g., granarharzer kase). Includes cheese in brine, which is a ~~semi-hard to soft~~ ripened semi-hard to soft cheese, white to yellowish in colour with a compact texture, and without actual rind that has been preserved in brine until presented to the consumer (e.g., feta cheese)⁵⁹.”

01.6.2.1 Total ripened cheese, includes rind

Delete “total” from the title and the term “whole” in the text.

01.6.2.2 Rind of ripened cheese

Delete “ripened” as unripened cheeses may have rind and coatings as well. It should be noted that:

- “Rind” is constituted of cheese mass which, at the start of the ripening, is of the same composition as the internal part of the cheese but which may dry during brining and ripening,
- “Coating” is
 - a film, very often polyvinylacetate, but also other artificial material or material composed of natural ingredients, which helps to regulate the humidity during ripening and protects the cheese against microorganisms.
 - a layer, mostly wax, paraffin or a plastic, which normally is impermeable to moisture, to protect the cheese after ripening against microorganisms and against physical damage during retail handling and, in some cases to contribute to the presentation of the cheese.

Coating of a cheese is done to protect the cheese against microorganisms and other contamination, to protect the cheese from physical damage during transport and distribution and/or to give the cheese a specific appearance (e.g. coloured). Coating can be distinguished very easily from rind, as coatings are made of non-cheese material.

01.6.6 Whey protein cheese

Add text that explains that whey protein cheese are principally made by coagulation of whey proteins. Examples include Ricotta.

COMMENTS TO ANNEX 3

Add an extra row as follows:

212-2001 Rev. 1 Sugars (lactose)

JAPAN

1. Regarding Part II, Annex 2,

(1) Title and 1st line in 05.4

The title of 05.4 should be revised into "Decorations (e.g., for fine bakery wares), toppings(non-fruit), fillings and sweet sauces".

The first sentence of the text should also be revised into "Includes ready-to-eat icings, frostings and fillings(made from flour, starch, cocoa, chocolate, coffee, nut, fruits, potato, beans, vegetables, sugar, fats, powdered milk and egg)for cakes, cookies, pies, bread and flour confectionery, as well as mixes for these products."

(Reason of the revision): The food defined under this title is used not only for decorations, toppings on bakery wares but also for fillings, which should be precisely described. In order to make the classifications clear, the materials of fillings should be specified.

(2) 3rd line in 06.2

"Flour for bread and pastries" should be revised into "flour for bread, noodles and pastries".

(Reason of the revision):In Asian countries, noodles are important uses for flour.

(3) 3rd line in 06.4.2

"Instant noodles (ramen and sokuseki-men)" should be revised into "instant noodles (sokuseki-men)".

(Reason of the revision):Instant noodles mean sokuseki-men, but ramen is just a kind of noodles and its definition is not clear.

(4) 06.8

"Miso", which is categorized into 06.8 as a fermented soybean product, should be classified into 12.2.

(Reason of the revision): Miso itself is a condiment and therefore, it is difficult to classify Miso which is condiment or which is not. In this regard, it is appropriate to classify Miso under 12.2.

(5) 12.9

Soymilk (soybean milk) should not be regarded as a substitute of milk. Soybean milk should be classified into 4.2.2.6, same as Tofu. Also, Soybean milk film should be classified into 4.2.2.6.

(Reason of the revision) After heating soybeans with steam / in boiling water, they are ground. Then, they are made into "soybean milk" and "the solid left after producing soybean milk". Soybean milk films is made through solidifying the protein of soybean milk thermally.

Soybean milk and soybean milk film is similar to prepared pastes and pulps.

2. Part III, RECOMMENDATION (para 21)

1. option/alternative b),

If pastas and noodles are not classified clearly and being lumped them together as "alimentary pasta", it is much the same with the current FCS (para21 b)). All of Japanese instant noodles classified in pre-cooked noodles are pre-gelatinated, whose quality is changed by heating for quick preparing and its seasonings are not separable from the noodles. In this regard, it is not appropriate to put "pre-cooked noodles" and "untreated and dried noodles" in the same category.

2. option/alternative c),

It is difficult to distinguish 06.4.1 and 06.4.2 under the current condition as pastas and noodles can not be distinguished clearly. In the case that 06.4.1 PASTA should be classified into 06.4.1.1 DRIED PASTA and 06.4.1.2 FRESH PASTA, 06.4.2 NOODLES AND LIKE PRODUCTS should be also classified into 06.4.2.1 DRIED NOODLES AND LIKE PRODUCTS and FRESH NOODLES AND LIKE PRODUCTS.

3. option/alternative d),

(1) 1st line

"Rice vermicelli" should be revised into "rice vermicelli)" and also "four subcategories" should be amended to "three subcategories".

(Reason of the revision): an omission of a letter, wrong word.

(2) 5th line in 06.4.3

"Oriental instant noodles (ramen and sokuseki-men)" should be revised into "instant noodles (sokuseki-men)". "Oriental" and "ramen" should be deleted.

(Reason of the revision): Instant noodles mean sokuseki-men, but ramen is just a kind of noodles and its definition is not clear. It is not necessary to limit the instant noodles to Oriental type only.

(3) 5th line in 06.4.3

"Pre-gelatinated and heated prior to sale to the consumer" should be revised into "pre-gelatinated, heated and dried prior to consumer".

(Reason of the revision): An ordinary condition of Instant noodles is dried.

It should be described in precise manner.

POLAND

PART II – Food Category System (FCS) and the GSFA

Point 18

04.2 Vegetables

In our opinion aloe vera should not belong to category “vegetables”. In Poland aloe vera is not use as a raw material in production of foodstuffs intended for general purposes.

ANNEX 2

Category 12.3 Vinegars

In compliance with our national regulations vinegar is a liquid produced **only** from fermentation. Product obtained through dilution of acetic acid can not be named as a “vinegar”.

ISRAEL

Comments concern Food Category System (FCS) for the Elaboration of the GSFA with Description of the Food Categories (Annex 2):

Category 11.0 “Sweeteners, Including Honey”

In my view polyalcohols (polyols) should be mentioned in this category, probably under 11.4 : “Other sugars and syrups”.

Subcategory 11.6 “Table-top sweeteners , including those containing high-intensity sweeteners “ could also mention non-intense sweeteners such as polyols.

Category 14.0 “Beverages, Excluding Dairy Products”

In last years a new type of drinks appeared on the market : so called “Energy drinks” (manufacturer’s denomination). They differ from “Sport” or “Electrolyte” drinks and therefore perhaps the subcategory 14.1.4 “Water-Based Flavoured Drinks,

Including Sport or Electrolyte drinks” could be further subdivided in order to accommodate such type of beverages.

“Energy” drinks usually contain high quantities of caffeine, taurine, carnitine, glucuronolactone and possibly other ingredients. The constituents content of such drinks can be several times higher than in conventional foods. Safety data of such high concentrations are not always available.

However, products are marketed in many countries and therefore could be perhaps reflected in the Codex Food Category System, not necessarily under the name “Energy” as manufacturers of such drinks suggest.

IBFAN (International Baby Food Action Network)

- 13.1. page 41. We propose to delete the sentence „Foods that are the sole source of nutrition“ because this definition is only applicable to 13.1.1. as we can read inter 13.1.2.
Instead the sentence should read:
Foods that are intended for infants and young children
- Under 13.1.1. we propose to change human milk substitute to **breastmilk substitute** as this is the term used in official WHO-papers
- 13.1.2 Change the sentence to read as follows:
Food intended for use as a liquid part of **the complementary feeding of infants (over the age of 6 months) and young children. ...**
- 13.2. Change to: **Complementary foods for infants and young children**
Foods that are **intended for infants 6 months of age and older and for progressive adaptation of infants and young children to family foods. ...**

13.2. The examples given go well beyond the current revision of food standards for this category of foods. No decision of the CAC and CCFNSDU has been made for the development of new work in the category of complementary foods for infants and young children beyond the proposed draft standard for cereal-based foods for infants and young children.

- Regarding item 13.3. We want to recall that at the CCFNSDU in November 2001 no consensus was reached on infant formula for special medical purposes. As long as there is no decision by Codex members for a separate category of infant formulas for special medical purposes, we ask this committee to delete the sections of 13.3. referring to infants and young children.
Delete section 13.3.2

ENCA (European Network of Childbirth Associations)

- Our first comment is related to 13.1. page 41. We propose to delete the sentence „Foods that are the sole source of nutrition“ because this definition is only applicable to 13.1.1. as we can read inter 13.1.2.
- Under 13.1.1. we propose to change human milk substitute to breastmilk substitute as this is the term used in official WHO-papers
- 13.2. weaning foods for infants and growing children. We propose to stay with the wording used in the standards weaning foods for infants and young children or better shift to the WHO-wording complementary foods for infants and young children.
- 13.2. The given examples go largely beyond the up to now existing food standards for this category of consumers. Should not a decision of the CAC and CCFNSDU be awaited before opening the discussion for new work at the CCFNSDU.
- Our comment is related to page 42 category 13.3. We want to recall that at the CCFNSDU in November 2001 no consensus was reached on infant formula for special medical purposes. As long as there is no decision if infant formula for special medical purposes will be included in the draft standard for infant formula or not, we ask this committee to wait for the decision in Berlin and avoid to divide 13.3. into two categories 13.3.1, 13.3.2. before a decision at the CCFNSDU

IFU (International Fruit Juice Producers)

Part I: Relationship between the GSFA and Commodity Standards

During the elaboration of the first draft of a revised Fruit Juice Standard high priority was given to the list of additives. It is a major objective of our industry to keep fruit juices as natural and healthy as possible as this is the most important marketing argument in competition with soft drinks. There is no doubt that for the consumer, who is interested in a natural product, a long list of additives is damaging the impression of a natural product. Therefore the list of additives, which has been established by the global fruit juice industry, represented in our Federation, is very short. Only 11 additives for fruit juices and nectars are foreseen, whereas in the GSFA 87 additives are mentioned. The statement, that *the reporting of the use of an additive by a Member State is evidence for the technological need*, is not realistic. There is any number of additives in the GSFA allowed in fruit juices, which cannot be used in fruit juices. This may be so, because fruit juices are sometimes included in broader food chapters, in which food additives are allowed which are not really used in fruit juices.

The additives which are foreseen in the draft standard on fruit juices and nectars are as close as possible to the natural ingredients in fruits, such as Pectin, existing in all plants and being the only thickener allowed in fruit juices. How would it be possible to make clear to the consumers, that Gum Arabic could be an additive in a fruit juice? That our industry is very restrictive in the use of additives has already been proven when we requested the inclusion of our products in the Annex of Table 3 of the GSFA.

Moreover we are not convinced of the idea of mentioning functional classes in commodity standards. How will it ever be possible to calculate the daily intake of an additive if you have no idea, which of the high number of e.g. colours or thickeners are really used in a certain product?

We therefore request the following solution:

In foods standardised in a commodity standard only the additives in the list of additives of the commodity standard are allowed in the GSFA for this food. With other words Table 2 of the GSFA is identical with the list of additives of the respective commodity.

As an alternative in case this proposal would be considered to be too general, it could be restricted to foods on the Annex of Table 3 of the GSFA.

We therefore support the solution of amendments to the Preamble of the GSFA to make clear that the use of additives in a food that is subject to a Codex commodity standard must be used consistent with both the food additive provisions in the commodity standard and the GSFA, as proposed in point 36 of this document.

Part II: Food Category System and the GSFA

Fruit and Vegetable Juices, Concentrates and Nectars are forming so far the categories 14.1.2 and 14.1.3. As the revision of the Codex Fruit Juice and Vegetable Standards is at step 3 only, many questions regarding the future food categories of the products concerned is still open. There are discussions going on regarding a combination of the fruit and vegetable standards, the abolishment of vegetable nectars and others. It is therefore too early to decide on the relevant food categories regarding fruit and vegetable juices, concentrates and nectars.

We therefore request to keep the food category system open until the revision of the respective commodity standard is adopted.

FOSFA International (Federation of Oils, seeds and fats Associations Limited)

Following your circular the following amendments are required on page 24, point 02.0 Fats and Oils, and Fat Emulsions.

02.1 Fats and Oils essentially free from water: 1st sentence..... Glycerides of fatty acids ~~of~~ from vegetable Delete of.

02.1.2 Vegetable oils and fats: last sentence Spelling of *vanaspati*.

CPIV (Permanent International Vinegar Committee)

First Comment dated 3 January 2002

I refer to the above Codex Document, Part II, „Food Category System (FCS) and the GSFA” (page 11 of the agenda), especially regarding „vinegars”(page 40, number 12.3). In annex II of the FCS document, clause 12.3, “vinegars” are defined as follows:

„Liquid produced from fermentation of ethanol from a suitable source (e.g., wine, cider) or from dilution of acetic acid. Examples include cider vinegar, wine vinegar, malt vinegar, balsamic vinegar, spirit vinegar, and fruit (wine) vinegar.”

In my capacity as spokesman for the European producers of fermentation vinegar, I apply for cancellation of the wording

...„or from dilution of acetic acid“.

In European countries, the national vinegar provisions unanimously define vinegar - with the sole exception of the Netherlands - as

product from fermentation of agricultural raw materials...

Diluted acetic acid may be marketable, but it is not allowed to mark it as “vinegar”.

The national vinegar provisions have been included in both CEN-Standards:

Vinegar – Product made from liquids of agricultural origin – Definitions, Requirements, Marking

Acetic Acid Food Grade – Product made from materials of non-agricultural origin – Definitions, Requirements, Marking.

Please find attached an excerpt of the above standards as **annex**.

Second Comment dated 22 January 2002

I refer to our fax message dated 3 January 2002 covering our application to delete the wording “*or from dilution of acetic acid*” from the definition of “vinegars” (page 40, clause 12.3 of the FCS document).

Our Italian colleague association FEDERVINI, Rome, stressed that it was not correct to include the denomination

“balsamic vinegar”

as an example in the above definition of “vinegars”. We fully agree with FEDERVINI and apply for deletion of the wording “balsamic vinegar”.

According to the CEN Standard for Vinegar in force (annex to our letter of 3 January 2002), the denomination “vinegar” has to be accompanied with the specification of the raw material – obviously “balsamic” is not a raw material.

We like to clarify our proposal and quote in the following how to define vinegars in clause 12.3:

„Liquid produced from fermentation of ethanol from a suitable source (e.g., wine, cider) [or from dilution of acetic acid]¹. Examples include cider vinegar, wine vinegar, malt vinegar, [balsamic vinegar]², spirit vinegar, and fruit (wine) vinegar.”

We should like to ask you to consider the supplement to our application at the Thirty-fourth Session of the Codex Committee on Food Additives and Contaminants in Rotterdam on 11-15 March 2002.

AAC (Association des Amidonneries de Céréales de l’Union Européene)

Page 15, paragraph 19

It is proposed to replace the title to food category 06.0 “*Cereals and cereal products, including flour and starches from roots and tubers, pulses and legumes, excluding bakery wares of food category 07.0*” by the following amendment “*Cereals and cereal products, ~~including flour and starches~~ derived from roots and tubers, pulses and legumes (including soybeans), excluding bakery wares of food category 07.0*”.

This amendment is totally inconsistent as using the words “*derived from*” would include products from roots, tubers, pulses and legumes but would exclude e.g. corn and corn products! Actually, you can not make grain (cereal) or grain (cereal) products from roots, tubers, pulses or legumes.

To our understanding, the purpose of this food category is nevertheless to cover all products that can be made from sources like corn (maize, wheat, barley...), roots, tubers (cassava, potato), pulses and legumes (soya...). Furthermore, flours and starches are indeed a subcategory (06.2) of this category and as such, should remain part of it.

Therefore, to be fully consistent, this category could be revised according to the following title: “***Cereals***” and “***cereal***” products, including flours and starches derived from corn and wheat, roots, tubers, pulses and legumes (including soybeans), excluding bakery wares of food category 07.0, where the quotation marks “cereals” cover grain-like products. Otherwise, this category should be split as it includes a too wide range of different products.

Page 31, category 06.2 Flours and starches

To our opinion, this sub-category should be split in two other categories to be perfectly clear:

- 6.2.1. Flours
- 6.2.2 Starches

The definition of starch is not very accurate and we suggest the following description:

“Starch is a carbohydrate polymer occurring in granular form in certain plant species notably cereals, tubers and pulses (e.g. corn, wheat, rice, tapioca, potato etc.). The polymer consists of linked anhydro- α -D-glucose units. It is separated from the flour, although different starch sources may require additional processes”.

We would like also to retain the single “***native starch***” example, as the two examples given i.e. “***hydrolysed starch***” and “***molding starch***” are very specific and therefore not representative of the general products of the starch industry.

Page 38, Category 11.0 Sweeteners, including honey

We believe that the definition of glucose syrup is not exhaustive and should be in line with its definition as stated in the Codex Standard for Sugars 212-1999. Therefore, we suggest to amend its definition according to the following sentence: “*Glucose syrup is a purified concentrated aqueous solution of nutritive saccharides **obtained from starch and/or inulin***”.

We would be grateful if you could take these comments into account, and we remain at your disposal to provide you with any further information.

IFMA (International Federation of Margarine Associations)

The 34th Session of the Codex Committee on Food Additives and Contaminants will consider under agenda item 7b comments regarding the Food Category System, which is the basic tool for the development of the General Standard on Food Additives .

Members of the International Margarine Association have read the description of the food categories with great attention.

The explanation of the different types of food covered by each subcategory of category 02.0 made us realize that some points needed further clarification in order to be thoroughly understood by the users of the GSFA.

We would suggest two amendments to be made along the following lines :

- The heading of category 02.0 “ Fats and Oils, and Fat Emulsions (type water-in-oil)” is in conflict with sub-category 02.2 which is called “ Fat Emulsions mainly of the type water-in-oil” and with the examples given in sub-category 02.3 , where most examples given are only oil-in-water type of emulsions.

Therefore we would like to suggest to call category 02.0 “ **Fats and Oils, and Fat Emulsions**” , deleting “(type water-in-oil)”.

Category 02.0 would then cover

- the full-fat products under 02.1 (heading unchanged for 02.1)
 - the fat emulsions mainly of the type water-in-oil under 02.2 (heading unchanged) including butter, margarine, blends , the ¾ and ½ fat products, reduced and low-fat products
 - the fat emulsions mainly of the type oil-in-water under 02.3, which should be called “Fat Emulsions mainly of the type oil-in-water, including mixed and / or flavoured products and fat emulsions” (heading changed).
 - the fat based counterparts of dairy-based desserts under 02.4 (heading unchanged).
- Having clarified the title of category 02.0 and the descriptors , a potential conflict further remains in categorising products like e.g.
 - a fat based substituted coffee milk (produced from non-fat milk solids by addition of vegetable fat) , that could be under 01.3.2 or 02.3
 - a dairy cream alternative, that could be under 01.4.4. or 02.3.

Falling under two different categories will lead to confusion in the interpretation of additives provisions. This confusion might be solved by adding for category 01.0 products (including the analogue products) : “ Only milkfat as fat basis”.

We do believe that these suggestions might help to clarify the category descriptors without changing the existing structure , and do hope that our comments will be taken into account.

IFMA's PROPOSAL FOR CATEGORY 02.0

02.0 FATS AND OILS, AND FAT EMULSIONS

02.1 Fats and oils essentially free from water

- 02.1.1. Butter oil, anhydrous milkfat, ghee
- 02.1.2. Vegetable oils and fats
- 02.1.3. Lard, tallow, fish oil, and other animal fats

02.2 Fat emulsions mainly of type water-in-oil

- 02.2.1. Emulsions containing at least 80% fat
 - 02.2.1.1. Butter and concentrated butter
 - 02.2.1.2. Margarine and similar products (e.g. butter-margarine blends)
- 02.2.2. Fat emulsions containing less than 80% fat (e.g. minarine)

02.3 Fat emulsions mainly of type oil-in-water, including mixed and /or flavoured products and fat emulsions

02.4 Fat-based desserts excluding dairy-based dessert products of food category 01.7