

# codex alimentarius commission

FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD HEALTH  
ORGANIZATION

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**Agenda Item 11 B**

**CX/FAC 02/13 – Add. 1**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

#### Thirty-fourth Session

Rotterdam, The Netherlands, 11-15 March 2002

### SPECIFICATIONS FOR THE IDENTITY AND PURITY OF FOOD ADDITIVES ARISING FROM THE 57TH JECFA MEETING

The following comments have been received from AAC and AMFEP.

#### **AAC (Association des Amidonneries de Céréales de l'Union Européene)**

As indicated in the item 11 (b) of the provisional agenda, The Specifications for the Identity and Purity of Food Additives Arising from the 57<sup>th</sup> JECFA meeting will be discussed at the CCFAC meeting in March.

In that framework, it is foreseen to discuss the recommendation of JECFA to divide the current monograph regarding the sixteen modified starches into smaller monographs because the present document is very long and changes to one specification requires revision of the entire monograph.

We would like to inform you that the European starch industry would like to bring its contribution to this work and is therefore currently thinking on the most appropriate way to divide this monograph. Although we are not able to provide you right now with a proposal, it should be made available early March.

#### **AMFEP (Association of Manufacturers of Fermentation Enzyme Products)**

With reference to CX/FAC 02/13, the Association of Manufacturers of Fermentation Enzyme Products (AMFEP) hereby wants to express its comments on the 'General specifications and considerations for enzyme preparations used in food processing' and 'Principles Governing the Establishment and Revision of Specifications' in FAO Food and Nutrition Paper 52 Add. 9.

AMFEP finds that the following changes should be made in the text:

#### 1. General specifications and considerations for enzyme preparations used in food processing'

- **Definition, page 37:**

The following would more correctly describe the situation:

Line 1 "biologically" should be changed to "*catalytically*".

Line 7-8 the text should be changed to read "... *insoluble in the processed food material by physical and/or chemical means*)."

- **Source materials, page 37:**

In line 18-19 the sentence "The reference or production strain number may be included in individual specifications" is inadequate.

AMFEP takes for granted that JECFA 57 has tried to summarize the latest considerations of JECFA 51 and JECFA 53 regarding microbial strain numbers in specifications. It is therefore regrettable that all the useful operational details have disappeared in the process, leaving the reader with only one not very helpful sentence. It does not indicate when such a number might be appropriate and without the earlier background information it is open for interpretation.

The essence of JECFA's earlier considerations should be included in the text.

This could be done in the form of the statement in JECFA 53 as well as in the previous specifications section that "*Identification at the strain level may impose unnecessary constraints on the development of production micro-organisms used to produce food-grade enzymes. In the case of a non-pathogenic, non-toxicogenic strain that belongs to a species that includes pathogenic and toxicogenic strains (e.g. Escherichia coli), there should be a requirement in the monograph that the strain be non-pathogenic and non-toxicogenic. Citation of a suitable strain number may be included by way of example.*"

At least the sentence should be expanded with the qualifying words " *.by way of example*".

- **Other considerations, page 38-39:**

Under Item 3 it is mentioned that 'an evaluation is required of the allergenic potential of the gene products encoded by inserted DNA'.

JECFA 57 has agreed that *this is not necessary if the DNA sequence of the enzyme is comparable to that coding for enzymes having a history of safe use in food. This should be included in the text.*

In fact enzyme proteins as such are not known as food allergens.

- **References, page 39:**

Most of the referenced guidelines for safety evaluation of food and food ingredients obtained through biotechnology were not made with enzymes in mind, and are therefore not particularly useful in the evaluation of enzymes.

To avoid irrelevant tests, it might be helpful to limit the list to those references which are pertinent to enzymes only.

## 2. General specifications and recommendations for enzyme preparations, Page 190-91:

As a purely editorial matter, the last two paragraphs of the text seem to be just alternative formulations of the same recommendation. One of these formulations should be selected and the other deleted.

AMFEP finds that the recommendation itself should be acted upon as soon as possible.