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ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS AND RELEVANT PROVISIONS OF THE GENERAL STANDARD FOR FOOD ADDITIVES (GSFA)

Report of the EWG on Alignment

This report of the electronic working group on the alignment of the food additive provisions of the commodity standards with the GSFA, led by Australia, and co-chaired by United States of America, was produced with the assistance of the following Codex members: Brazil, Canada, China, Ecuador, European Union, France, Greece, India, Iran, Japan, Malaysia, New Zealand, Norway, Spain, Republic of Korea, Singapore, Thailand, and the United Kingdom. Assistance was also provided by the following Codex observers organisations: International Glutamate Technical Committee, (IGTC) Calorie Control Council (CCC), Comité Européen des Fabricants de Sucre (CEFS), European Chemical Industry Council (CEFIC), European Specialty Food Ingredients Industries (ELC), International Council of Grocery Manufacturer Associations (ICGMA), International Food Additives Council (IFAC), and the Institute of Food Technologists (IFT).

Introduction

1. CCFA48 agreed to establish an EWG, led by Australia and co-chaired by the United States of America (USA), open to all Members and Observers and working in English only to (REP 16/FA, para. 52):
 - a) Prepare proposals for the alignment of the ten (10) standards for frozen fish products under food categories 9.2.1 and 9.2.2: *Quick Frozen Finfish, Uneviscerated and Eviscerated* (CODEX STAN 36-1981); *Quick Frozen Shrimps or Prawns* (CODEX STAN 92-1981); *Quick Frozen Lobsters* (CODEX STAN 95-1981); *Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* (CODEX STAN 165-1989); *Quick Frozen Fish Sticks (Fish Fingers), Fish portions and Fish Fillets-Breaded and in Batter* (CODEX STAN 166-1989); *Quick Frozen Fish Fillets* (CODEX STAN 190-1995); *Quick Frozen Raw Squid* (CODEX STAN 191-1995); *Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008); *Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing* (CODEX STAN 312-2014); and *Fresh and Quick Frozen Raw Scallop Products* (CODEX STAN 315-2014)
 - b) Develop guidelines for commodity committees to undertake work on alignment;
 - c) Consider the work that could not be addressed by the CCFA48 on:
 - food additive provisions of the GSFA that, according to the CCPFV, are not technologically justified in specific food categories covered by the *Standards for Certain Canned Citrus Fruits* (CODEX STAN 254-2007), *for Preserved Tomatoes* (CODEX STAN 13-1981), *for Processed Tomato Concentrates* (CODEX STAN 57-1981) and *for Table Olives* (CODEX STAN 66-1981).
 - the alignment of the provisions for ethylene diamine tetra acetates (INS 385, 386) in the *Standard for Canned Shrimps or Prawns* (CODEX STAN 37-1991) as requested by CCFFP34.

Progress since the 48th Session of the CCFA

2. During 2016, the EWG, through two rounds of comments on draft alignment text, completed the work for the following tasks:

- (i) Considered the application of the decision tree to the standards related to frozen fish and fish products being the *Standards for Quick Frozen Finfish, Uneviscerated and Eviscerated* (CODEX STAN 36-1981); *Quick Frozen Shrimps or Prawns* (CODEX STAN 92-1981); *Quick Frozen Lobsters* (CODEX STAN 95-1981); *Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* (CODEX STAN 165-1989); *Quick Frozen Fish Sticks (Fish Fingers), Fish portions and Fish Fillets-Breaded and in Batter* (CODEX STAN 166-1989); *Quick Frozen Fish Fillets* (CODEX STAN 190-1995); *Quick Frozen Raw Squid* (CODEX STAN 191-1995); *Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008); *Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing* (CODEX STAN 312-2014); and *Fresh and Quick Frozen Raw Scallop Products* (CODEX STAN 315-2014).
- (ii) Considered the alignment of the provisions for ethylene diamine tetra acetates (INS 385, 386) in the *Standard for Canned Shrimps or Prawns* (CODEX STAN 37-1991) as requested by CCFPP34, by applying the decision tree to the Standard.

3. Submissions were received on the 1st circular from: Brazil, Iran, Japan, Malaysia, New Zealand, Singapore, Thailand, the USA and ELC. Submissions were received on the 2nd circular from: Japan, Malaysia, New Zealand and ELC. Each set of comments were carefully considered and changes made to the draft alignment proposal wherever appropriate.

4. Work was also commenced on developing guidelines for commodity committees to undertake work on alignment.

Recommendations

5. It is recommended that the Committee:

- i) Notes the explanatory document which summarises issues and explanations for the EWG to consider in Appendix 1.
- ii) Supports the proposals contained in Appendices 2 and 3 for the revision of the relevant food categories of the GSFA, and of the food additive sections of the *Standards for Quick Frozen Finfish, Uneviscerated and Eviscerated* (CODEX STAN 36-1981); *Quick Frozen Shrimps or Prawns* (CODEX STAN 92-1981); *Quick Frozen Lobsters* (CODEX STAN 95-1981); *Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* (CODEX STAN 165-1989); *Quick Frozen Fish Sticks (Fish Fingers), Fish portions and Fish Fillets-Breaded and in Batter* (CODEX STAN 166-1989); *Quick Frozen Fish Fillets* (CODEX STAN 190-1995); *Quick Frozen Raw Squid* (CODEX STAN 191-1995); *Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008); *Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing* (CODEX STAN 312-2014); and *Fresh and Quick Frozen Raw Scallop Products* (CODEX STAN 315-2014).
- iii) Supports the work that was not addressed at CCFA48 in Appendix 4 on food additive provisions of the GSFA that, according to the CCPFV, are not technologically justified in specific food categories covered by the *Standards for Certain Canned Citrus Fruits* (CODEX STAN 254-2007), *for Preserved Tomatoes* (CODEX STAN 13-1981), *for Processed Tomato Concentrates* (CODEX STAN 57-1981) and *for Table Olives* (CODEX STAN 66-1981)
- iv) Supports the proposals contained in Appendix 5 for the revision of the EDTA provisions in Table 1 and 2 of the GSFA to align with the *Standard for Canned Shrimps or prawns* (CODEX STAN 37-1991).

List of Appendices

1. Explanatory Document: Questions, comments and chair's proposals for the EWG
2. Proposed amendments to the food additive provisions of the Codex commodity standards for frozen fish standards
3. Proposed amendments to Table 1 and 2 of the GSFA relating to frozen fish standards
4. Proposed amendments to Table 1 and 2 of the GSFA in relation to the alignment of the commodity standards identified by the committee on processed fruits and vegetables (CCPFV)
5. Proposed amendments to the GSFA due to alignment of EDTA provisions of CODEX STAN 37-1991

EXPLANATORY DOCUMENT - ISSUES ARISING FROM THE E-WORKING GROUP DISCUSSIONS IN RELATION TO THE FROZEN FISH AND FISH PRODUCTS

Introduction

This document provides an explanation of the key individual issues arising from the eWG comments on the 1st and 2nd circulated 2016 drafts in relation to the alignment of the following Codex Commodity Standards Related to Frozen Fish Products:

- *Standards for Quick Frozen Finfish, Uneviscerated and Eviscerated (CODEX STAN 36-1981);*
- *Quick Frozen Shrimps or Prawns (CODEX STAN 92-1981);*
- *Quick Frozen Lobsters (CODEX STAN 95-1981);*
- *Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh (CODEX STAN 165-1989);*
- *Quick Frozen Fish Sticks (Fish Fingers), Fish portions and Fish Fillets-Breaded and in Batter (CODEX STAN 166-1989);*
- *Quick Frozen Fish Fillets (CODEX STAN 190-1995);*
- *Quick Frozen Raw Squid (CODEX STAN 191-1995);*
- *Live and Raw Bivalve Molluscs (CODEX STAN 292-2008);*
- *Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing (CODEX STAN 312-2014); and*
- *Fresh and Quick Frozen Raw Scallop Products (CODEX STAN 315-2014).*

In each case the approach that has been proposed by the chair is outlined.

Key individual issues

1. Is it reasonable that all the GSFA phosphate permissions in Table 1, and food category 09.2.1 (adopted in 2012) in Table 2 should be permitted for CS 92-1981, CS 95-1981, CS 165-1989 and CS 190-1995, since GSFA provisions were adopted years later than the various Codex Standards? The additional phosphates in the GSFA are 338, 342(i),(ii), 450(vi), (ix).

Chair's proposal: that for alignment purposes all phosphate provisions in the GSFA should apply to CS 92-1981, CS 95-1981, CS 165-1989 and CS 190-1995 provided that the alignment takes into account the specific functional classes required for alignment with each commodity standard (see further explanation in note 9 below). As a general principle, it is proposed that where a group additive is listed in the GSFA, the alignment should be extended to all additives within the group with the appropriate functional class – see "Working Principles" in Appendix 3. This principle also applies to points 2 and 3, below.

2. Is it reasonable that all the GSFA sulfites listed in Table 1 and food category 09.2.1 (adopted in 2006) be listed for CS 92-1981 and CS 95-1981, since GSFA provisions were adopted years later than the Codex Standards? The additional sulphites in the GSFA are 220, 222, (228, not for CS 95-1981) and 539. Note that INS 227 and INS 228 were removed from the GSFA (REP 16/FA, Appendix VIII, Part B).

Chair's proposal: that for alignment purposes all sulfite provisions in the GSFA should apply to CS 92-1981 and CS 95-1981 provided that the alignment takes into account the specific functional classes required for alignment with each commodity standard. See general explanation in point 1, above. Sulfites INS 227 and 228 need to be removed from the alignment entries for Tables 1 and 2 of the GSFA.

3. Can the provision for ascorbyl palmitate (304) in CS 165-1989, be made consistent with the GSFA (Table 1 and food category 09.2.1 (adopted in 2001) in Table 2) to ascorbyl esters which includes both ascorbyl palmitate (304) and ascorbyl stearate (305)?

Chair's proposal: align ascorbyl palmitate (304) in CS 165-1989 to ascorbyl esters (304, 305) in the GSFA. See general explanation in point 1 above.

4. It was initially thought that note 37 in the GSFA needed to be amended to make it explicit that the provision relates only to minced fish flesh, due to alignment with CS 165-1989. This has also been addressed in the USA report dealing with CS 166-1989 (e.g. new note 61). However it was later realised that the current note 37 is appropriate for the alignment of the sodium alginate provision in CS 165-1989, since it relates to the all products conforming to the standard and not limited to minced fish flesh. Therefore, note 37 cannot be replaced by a new note 37. The earlier “new note 37” in the 1st circular needs to be replaced with a different new note number (now called BB).

Japan made a comment on the 2nd circular that note 37 should be removed from the entry for sodium alginate in food category 09.2.1 since CS 190-1995 also has provisions for sodium alginate, not just CS 165-1989. Removing the note would reduce confusion.

Chair’s proposal: Note 37 has been removed from the entry for sodium alginate in food category 09.2.1. A new note has been written which was earlier called “new note 37” but now called BB.

5. Both sodium citrate and potassium citrate are listed in CS 165-1989, as acidity regulators. There is no explicit listing of sodium citrate or potassium citrate in the GSFA, but there are entries for sodium citrates (INS 331) and potassium citrates (INS 332).

Chair’s proposal: The listing of the parent INS (331 and 332) implies that the intent is to include all specific additives under the parent INS. However, only those additives that have been assigned an INS Number and a JECFA ADI are included in the GSFA. Disodium monohydrogen citrate (INS 331(ii)) has not been evaluated by JECFA. Therefore, it should not be included in the alignment. The alignment can be carried out for sodium dihydrogen citrate (INS 331(i)) and trisodium citrate (INS 331(iii)). Since both potassium dihydrogen citrate (332(i)) and tripotassium citrate (332(ii)) have been assigned ADIs by JECFA, the alignment should be carried out for both of these additives. This has implications for aligning provisions in Table 2 (e.g. 331(i) and 331(iii) are already listed in 09.2 so sodium citrate does not need to be added to 09.2.1 due to alignment with CS 165-1989).

6. Potassium ascorbate (INS 303) was included in Section 4 of CODEX STANs 36-1981, 95-1981, 165-1989 and 190-1995. However, potassium ascorbate was removed from the GSFA at CCFA47 as it did not have JECFA specifications (REP15/FA paras. 129-130 and Appendix VIII, Part B). Therefore, potassium ascorbate has not been included in the GSFA as part of the alignment. This is consistent with the USA alignment report relating to CODEX STAN 166-1989.

Chair’s proposal: Not include potassium ascorbate in the alignment work

7. It is noted that there are some existing notes in the GSFA (Table 1 and 2) that exclude foods that comply with various commodity standards (e.g. notes 305, 306 etc). The alignment work and the operation of the decision tree suggest making new explicit notes along the lines of XSxxx (e.g. XS315) using box C of the decision tree. Is it appropriate to replace such existing notes with new XS notes?

Chair’s proposal: Replace existing notes which exclude products conforming to certain Codex commodity standards in the GSFA with alignment notes of the type XSxxx when appropriate.

8. The current note 29 states for non-standardized food only, while the current note 331 states for general use in non-standardized foods only. Both notes are listed against a number of food additive provisions in food category 09.2.1 and 09.2.2 in Table 2 and their relevant entries in Table 1. It is suggested that with the various exclusion notes XSxxx added to the entries there is no longer any need for these notes. Is this argument accepted?

New Zealand noted that the GSFA EWG is also considering non-standardized foods; being note 22 (for use in non-standardised smoked fish products only) linked to food category 9.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms). The two issues seem similar and so the conclusions from one should assist the resolution of the other. It is important to have consistency of approach for the treatment of non-standardized foods.

Japan commented that note 331 is similar to note 29 and it suggests it also be removed in food categories 09.2.1 and 09.2.2 (linked to CS 166-1989), for the same reasons.

Chair’s proposal: To remove notes 29 and 331 against the entries mentioned above, for the reasons explained.

9. The phosphate alignment provisions added for food category 09.2.1 due to CS 315-2014 have needed to be fully listed out when they have the functional class of humectant or sequestrant as per the Standard (new note CC). The phosphate provisions due to CS 92-1981, CS 95-1981 and CS 165-1989 have needed to be listed when they have the functional class of humectant (new note DD). The reason they have needed to be individually listed is that not all the phosphates listed in the GSFA have the functional class of humectant or sequestrant, which are the classes listed in the Codex Standards.

New Zealand asked whether the EWG can consider if all phosphates have the function of humectant and sequestrant, since this would simplify notes CC and DD. This may be outside the remit of the alignment EWG, but is it something that could be considered by the GSFA EWG?

Chair's proposal: Changes made for the reason given above.

10. The Thailand submission noted that phosphoric acid (INS 338) has the functional classes of acidity regulator, **antioxidant** and sequestrant (in Table 1 of the GSFA). All phosphates (including 338) have provisions in food category 09.2.1. CS 292-2008 permits any antioxidant listed in food category 09.2.1 to be permitted for any raw frozen molluscs. The question raised is does phosphoric acid (338) require its own provision as an antioxidant for raw frozen molluscs since it can have the function of an antioxidant or when it is listed with the other phosphates in food category 09.2.1 it is performing as a different functional class, such as acidity regulator or sequestrant?

Chair's proposal: Because the provisions of phosphoric acid are part of the phosphates group in food category 09.2.1 it is not deemed appropriate to consider it separately as an antioxidant when the other phosphates are not. Therefore the note BB is not appropriate to replace the current XS292 provided for phosphates.

11. Section E (amendments to food category 09.2.1) in Appendix 3. Japan proposed that note 61 (for use in minced fish only) and note 257 (for use in shrimps and prawns only) should be retained for the citric acid provisions in Table 1 and 2. The argument is that the current provisions in the GSFA allow for use in non-standardized minced fish, and shrimps and prawns. This appears to relate to the provisions for non-standardized products compared to limiting to only standardized products linked to standards. Note 61 has been replaced by note BB. Note 257 is relevant to CS 92-1981. But non-standardized products have not been addressed.

Chair's proposal: No change unless EWG agree that notes 61 and 257 need to be retained to ensure provisions exist for non-standardized products.

12. General statement. Notes have not been written against every food additive to indicate a provision exists in a commodity standard as it would make the GSFA too unwieldy. Provisions can be taken to exist for products captured by the food commodity unless a prohibition or qualification is required in which case a note is written. Therefore a number of suggested notes have not been written.
13. Several comments were received indicating that the text for "New Note 299" for the phosphates provision in food category 09.2.2 as a result of alignment with CS 166-1989 was too long and difficult to read. Suggestions were made that only the INS numbers be retained in the revised note, and that the use level and functional effect be placed ahead of the list of phosphates. A revised note based on these suggestions is as follows:

New Note 299: For use in non-standardized food; and for use at 400 mg/kg as phosphorous singly or in combination in breaded or batter coating in accordance with in products conforming to the standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989) as follows: the following phosphates for use as humectants at 2200 mg/kg as phosphorous, INS 339(i), 339(ii), 339(iii), 340(i), 340(ii), 340(iii), 341(i), 341(ii), 341(iii), 450(i), 450(ii), 450(iii), 450(v), 450(vii), 451(i), 451(ii), 452(i), 452(ii), 452(iii), 452(iv), 452(v), and 542; and the following phosphates for use as raising agents in bread and batter coatings only at 440 mg/kg as phosphorous, INS 339(i), 340(iii), 341(i), 341(ii), 341(iii), 450(i), 450(ii), 450(iii), 450(v), 450(vi), 450(vii), 450(ix), 452(i), 452(ii), 452(iii) and 452(iv).

Chair's proposal: Incorporate the suggested revisions to New Note 299. Also revise other long notes pertaining to phosphates in the GSFA in a similar manner (e.g. Note DD and Note EE resulting from alignment with CS 165-1989).

14. The current working principles for the alignment process (see Appendix 3) indicate that, in general, only adopted GSFA provisions are considered for the alignment process with commodity standards. However, under certain circumstances, such as if the commodity standard is revised to only include a general reference to the GSFA, draft and proposed draft provisions may be considered for alignment. In the alignment exercise for CS 166-1989, for which a general reference to the GSFA is being proposed, three provisions in the step process were taken into consideration during the alignment process. For two of these provisions, Annatto extracts, norbixin-based (INS 160b(ii)) in food category 09.2 and Annatto extracts, bixin-based (INS 160b(i)) in food category 09.2.2, notes were added to indicate use levels permitted in foods conforming to the commodity standard, but the provisions were kept at the current step level so as to allow the CCFA to discuss use levels for non-standardized food at a future meeting. For the third provision, Caramel I – plain caramel (INS 150a) in food category 09.2.2, both CS 166-1989 and the draft GSFA provision indicate use at GMP, as INS 150a is a Table Three additive with a Not Specified JECFA ADI. The provision also contains a note limiting its use to bread and batter coatings only, which is consistent with CS 166-1989. While the initial recommendation to the EWG was to maintain the provision for INS 150a in draft, as there is no need to discuss the use level in non-standardized foods (since it would also be GMP), the EWG may consider adopting this provision so that the use of INS 150a in foods conforming to CS 166-1989 would be immediately reflected in the GSFA and not need to wait until the draft provision comes up for discussion by CCFA.

Chair's proposal: As part of the alignment process for CS 166-1989, the GSFA provision for Caramel I – plain caramel in food category 09.2.2 should be adopted.

15. Pertaining to alignment with CS 166-1989, Japan has recommended that Note C166 be revised to reflect that the Carotenoids (INS 160a(i), 160a(iii), 160e, and 160f) and beta-Carotenes, vegetable (INS 160a(ii)) are permitted in CS 166-1989 singly or in combination at a use level of 100 mg/kg in breaded or batter coatings. Although INS 160f is not listed in CS 166-1989, as indicated in the First Circular to the EWG, INS 160f is being included as it is a colour that is part of the Carotenoids group listing in the GSFA, and we are not aware of a reason to exclude it. A revised note taking into account Japan's suggestion is listed, below:

Note C166: For use in breaded or batter coatings in products conforming to the standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989), singly or in combination: Carotenoids (beta-Carotenes, synthetic (INS 160a(i)), beta-Carotenes, *Blakeslea trispora* (INS 160a(iii)), Carotenal, beta-apo-8' (INS 160e), and Carotenoic acid, ethyl ester, beta-apo-8' (INS 160f)) and beta-Carotenes, vegetable (INS 160a(ii)).

Chair's proposal: The revised note including the "singly or in combination" language should be incorporated.

16. For several provisions related to CS 166-1989, Japan made the comment that it was more appropriate to maintain Note 41 (For use in breading or batter coatings only) rather than replace it with Note 63 (For non-standardized food and for breaded or batter coatings in food conforming to the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989)) as the use of Note 63 would actually broaden the permitted use in non-standardized food beyond breaded or batter coatings. Japan noted a similar situation for Note 61 (For use in minced fish only), and a proposed revision to Note 61 termed "New Note 61" as it appeared in the first circular. The comment made by Japan makes sense, as the use of Note 41 or Note 61 could, depending upon the circumstances of the original provision, take into account in a simpler way the use of the additive in both the non-standardized and standardized foods.

Chair's proposal: As warranted on a case by case basis (see changes made in Appendix 3), maintain Note 41 and Note 61 where it is warranted.

17. In considering the general reference to the text for CS 166-1989, it was realized that the initial general reference was too permissive, as not all functional effects listed in the original general reference are permitted for use in all products conforming to CS 166-1989 (some additives are permitted for all products, but some are only permitted for products containing minced fish flesh, or for breaded or batter coatings). The general reference to the GSFA in the first circular was as follows:

Original text from first circular: Acidity regulators, antioxidants, colours, emulsifiers, flavour enhancers, humectants, raising agents and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 09.2.2 (Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

We propose to change the proposed general reference to the GSFA in CS 166-1989 with the following text to take into account the use of additives in minced fish flesh and breaded or batter coatings as listed in the commodity standard:

Proposed new text: Antioxidants and humectants (for use in all products conforming to CODEX STAN 166-1989); acidity regulators and thickeners (for minced fish flesh only); and colours, emulsifiers, flavour enhancers, raising agents, and thickeners (for breaded or batter coatings) used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 09.2.2 (Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

Chair's proposal: Incorporate the new proposed text for the general reference to the GSFA into CODEX STAN 166-1989.

18. Several GSFA notes (Notes 22, 37, 63, 177 and 201) specifically include a reference to “non-standardized food” in addition to the food subject to the relevant Codex commodity standard(s). The intent of these notes is to specify inclusions that apply to the relevant standardized products. As it was unclear to some Delegations whether the notes also applied to non-standardized products, the specific inclusion of “non-standardized food” was added to clarify that the provision also applied to these products. The EWG is requested to comment as to whether: (1) the inclusion of “non-standardized food” in these notes is necessary for clarity; or (2) it is implicitly understood that the note applies to “non-standardized foods.”

Japan supported the inclusions of the term “non-standardized food” in the notes to avoid misunderstanding. No other comments were received.

Chair's proposal: To include specific reference to “non-standardized food” for clarity to the notes for 22, 37, 63, 177 and 201. It is recommended that all future notes include this term for consistency.

19. Section J (proposed amendments to CS 315-2014) in Appendix 2. Japan noted in the 2016 amendment of CS 315-2014 that phosphates (in section 4.2 of the Standard) can be used as acidity regulators, humectants, sequestrants and stabilizers, so these functional classes need to be added into the amendment. This amendment came from REP 16/FFP para. 51 which stated that “The Committee agreed to: (i) inform CCFA that the phosphates INS 342(i) and (ii), and INS 343(i)-(iii) in the *Standard for Fresh and Quick Frozen Raw Scallop Products* (CODEX STAN 315-2014) act as acidity regulators and stabilizers; and (ii) to modify the Standard to reflect these additional functional classes.

Chair's proposal: Make the changes as proposed to include acidity regulator and stabilizer in alphabetical order in section J of Appendix 2 as CS 315-2014 has the functional classes for the phosphate provisions as Humectant/Sequestrant/Acidity regulator/Stabilizer.

20. Section C (amendments to food category 09.1.2) in Appendix 3. Japan provided comments on the 1st circular which proposed to retain current notes 304 (excluding live bivalve molluscs) and 242 (for use as an antioxidant only) and delete proposed new note AA (for use as an antioxidant for raw chilled shucked mollusks conforming to CS 292-2008) for a number of antioxidants in food category 09.1.2. The reason given was to avoid redundancy and ensure consistency between the GSFA and commodity standards. The GSFA currently permits these food additives in food category 09.1.2, as antioxidants but excludes use for live bivalve molluscs. Japan provided comments on the 2nd circular which included further explanation for their original request. This included an example of where non-standardized product needs to meet the requirements of food category 09.1.2 as an antioxidant. This is the use of sodium erythorbate as an antioxidant for use in non-standardized products, which is fresh crab to avoid discolouration. Fresh crab is captured in the food category 09.1.2 (fresh mollusks, crustaceans, and echinoderms) but not CS 292-2008 (*Standard for Live and Raw Bivalve Molluscs*). The provision was added to food category 09.1.2 by the CAC in 2015 (noted from CX/FA 15/47/7 page 6) but not to CS 292-2008.

Chair's proposal: Make the suggested changes as there are established needs for non-standardized product to also meet these provisions (example provided by Japan).

Comments why suggested changes not made

21. Pertaining to the alignment of CS 166-1989, Japan made a number of recommendations to the 1st circular to add additional notes to take into account the functional effect of an additive based on its listed use in CS 166-1989. An example of this is their proposed Note YC (For use as an emulsifier in breaded or batter coatings in products conforming to the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter (CODEX STAN 166-1989)) rather than a more general note like Note 63 (For non-standardized food and for breaded or batter coatings in food conforming to the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989)) that does not take into account the functional effect of the additive.

Chair's proposal: While Japan is technically correct in the application of the proposed notes that incorporate the functional effect of the additive as listed in CS 166-1989, we propose that, in general, these type of more specific notes that incorporate functional effect not be added. The reasoning is that the addition of notes incorporating functional effect use in the commodity standard could result in the creation of many more notes without adding additional safety information. In addition, for consistency, if such notes are included here, the CCFA would need to go back and add these types of notes to all standards that have already been aligned with the GSFA. In some cases, as with New Note 210 for the phosphates, we agree that the inclusion of functional effects is necessary because not all phosphates have the same functional effect. In addition, it is our hope that the inclusion of the permitted functional classes pertaining to specific products (e.g. minced fish flesh) in the general reference to the GSFA in the commodity standard (as discussed in the previous section above) would also satisfy Japan's desire to include the functional effects as pertaining to the use in the commodity standard.

Notes relating to the alignment request from CCFFP34 regarding the provisions for ethylene diamine tetra acetates (INS 385, 386) in the Standard for Canned Shrimps or Prawn (CODEX STAN 37-1991).

The alignment of the EDTA provisions for the CODEX STAN 37-1991 (recently updated in 2016) with the GSFA was requested but not a full alignment of the other food additives.

Such full alignment could be conducted as part of any future alignment work to complete all the other fish commodity standards, if requested by the CCFA49 or future meetings.

The proposed changes due to the EDTA alignment for CS 37-1991 have been kept separate; they are found in Appendix 4.

Appendix 2

PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE CODEX COMMODITY STANDARDS FOR FROZEN FISH STANDARDS

The following amendments to the Food Additive Provisions are proposed.

New text is indicated in **bold/underline**. Text to be removed is indicated in ~~strikethrough~~.

A. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR QUICK FROZEN FINFISH, UNEVICERATED AND ENVICERATED (CODEX STAN 36-1981)

The following amendments to Section 4 of the *Standard for Quick Frozen Finfish, Uneviscerated and Eviscerated* (CODEX STAN 36-1981) are proposed.

4. FOOD ADDITIVES

Antioxidants used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

~~Only the use of the following additives is permitted.~~

Antioxidants

INS Number	Additive Name	Maximum Level in Final Product
300	Ascorbic acid	GMP
301	Sodium ascorbate	GMP
303	Potassium ascorbate	GMP

B. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR QUICK FROZEN SHRIMPS OR PRAWNS (CODEX STAN 92-1981)

The following amendments to Section 4 of the *Standard for Quick Frozen Shrimps or Prawns* (CODEX STAN 92-1981) are proposed.

4. FOOD ADDITIVES

Acidity regulators, antioxidants, colours, humectants and preservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

~~Only the use of the following additives is permitted.~~

Acidity Regulators

INS Number	Additive Name	Maximum Level in Product
330	Citric acid	GMP
<u>Humectants – Moisture/Water Retention Agents</u>		
INS Number	Additive Name	Maximum Level in Product
339(i)	Sodium dihydrogen phosphate	2200 mg/kg as phosphorus, singly or in combination
339(ii)	Disodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
340(i)	Potassium dihydrogen phosphate	
340(ii)	Dipotassium hydrogen phosphate	
340(iii)	Tripotassium phosphate	
341(i)	Calcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium phosphate	
450(i)	Disodium diphosphate	
450(ii)	Trisodium diphosphate	
450(iii)	Tetrasodium diphosphate	
450(v)	Tetrapotassium diphosphate	
450(vii)	Calcium dihydrogen diphosphate	

451(i)	Pentasodium triphosphate	
451(ii)	Pentapotassium triphosphate	
452(i)	Sodium polyphosphate	
452(ii)	Potassium polyphosphate	
452(iii)	Sodium calcium polyphosphate	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
542	Bone phosphate	
Antioxidants		
INS Number	Additive Name	Maximum Level in Product
300	Ascorbic acid (L-)	GMP
Colours		
INS Number	Additive Name	Maximum Level in Product
124	Ponceau 4R	30 mg/kg in heat-treated products only
Preservatives		
INS Number	Additive Name	Maximum Level in Product
221	Sodium sulphite	100 mg/kg in the edible part of the raw product, or 30 mg/kg in the edible part of the cooked product, singly or in combination, expressed as SO ₂
223	Sodium metabisulphite	
224	Potassium metabisulphites	
225	Potassium sulphite	

C. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR QUICK FROZEN LOBSTERS (CODEX STAN 95-1981)

The following amendments to Section 4 of the *Standard for quick frozen lobsters* (CODEX STAN 95-1981) are proposed.

4. FOOD ADDITIVES

Antioxidants, humectants and preservatives used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CODEX STAN 192-1995) in food category 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

Only the use of the following additives is permitted.

Humectants – Moisture/Water Retention Agents		
INS Number	Additive Name	Maximum Level in Product
339(i)	Sodium dihydrogen phosphate	2200 mg/kg as phosphorus, singly or in combination
339(ii)	Disodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
340(i)	Potassium dihydrogen phosphate	
340(ii)	Dipotassium hydrogen phosphate	
340(iii)	Tripotassium phosphate	
341(i)	Calcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium phosphate	
450(i)	Disodium diphosphate	
450(ii)	Trisodium diphosphate	
450(iii)	Tetrasodium diphosphate	
450(v)	Tetrapotassium diphosphate	
450(vii)	Calcium dihydrogen diphosphate	
451(i)	Pentasodium triphosphate	
451(ii)	Pentapotassium triphosphate	

452(i)	Sodium polyphosphate	
452(ii)	Potassium polyphosphate	
452(iii)	Sodium calcium polyphosphate	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
542	Bone phosphate	
Preservatives		
INS Number	Additive Name	Maximum Level in Product
221	Sodium sulphite	100 mg/kg in the edible part of the raw product, or in 30 mg/kg in the edible part of the cooked product, singly or in combination, expressed as SO ₂
223	Sodium metabisulphites	
224	Potassium metabisulphites	
225	Potassium sulphite	
228	Potassium bisulphite (for use in the raw product only)	
Antioxidants		
INS Number	Additive Name	Maximum Level in Product
300	Ascorbic acid (L-)	GMP
301	Sodium ascorbate	
302	Potassium ascorbate	

D. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR QUICK FROZEN BLOCKS OF FISH FILLETS, MINCED FISH FLESH AND MIXTURES OF FILLETS AND MINCED FISH FLESH (CODEX STAN 165-1989)

The following amendments to Section 4 of the *Standard for Quick frozen blocks of fish fillets, minced fish flesh and mixtures of fillets and minced fish flesh* (CODEX STAN 165-1989) are proposed.

4. FOOD ADDITIVES

Acidity regulators, antioxidants, humectants and thickeners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CODEX STAN 192-1995) in food category 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

Only the use of the following additives is permitted.

INS Number	Additive Name	Maximum Level in Product
Humectants – Moisture/Water Retention Agents		
339(i)	Sodium dihydrogen phosphate	2-200 mg/kg as phosphorus, singly or in combination
339(ii)	Disodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
340(i)	Potassium dihydrogen phosphate	
340(ii)	Dipotassium hydrogen phosphate	
340(iii)	Tripotassium phosphate	
341(i)	Calcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium phosphate	
450(i)	Disodium diphosphate	
450(ii)	Trisodium diphosphate	
450(iii)	Tetrasodium diphosphate	
450(v)	Tetrapotassium diphosphate	
450(vii)	Calcium dihydrogen diphosphate	
451(i)	Pentasodium triphosphate	

451(ii)	Pentapotassium triphosphate	
452(i)	Sodium polyphosphate	
452(ii)	Potassium polyphosphate	
452(iii)	Sodium calcium polyphosphate	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
542	Bone phosphate	
401	Sodium alginate	GMP
Antioxidants		
300	Ascorbic acid (L-)	
301	Sodium ascorbate	GMP
302	Potassium ascorbate	
304	Ascorbyl palmitate	1 000 mg/kg
In Minced Fish Flesh Only		
Acidity Regulators		
330	Citric acid	
331	Sodium citrate	GMP
332	Potassium citrate	
Thickeners		
412	Guar gum	
410	Carob bean gum	
440	Pectins	
466	Sodium carboxymethyl cellulose	GMP
415	Xanthan gum	
407	Carrageenan	
407a	Processed Eucheuma Seaweed (PES)	
461	Methyl cellulose	

E. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR QUICK FROZEN FISH STICKS (FISH FINGERS), FISH PORTIONS AND FISH FILLETS – BREADED OR IN BATTER (CODEX STAN 166-1989)

The following amendments to Section 4 of the *Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter* (CODEX STAN 166-1989) are proposed.

4. FOOD ADDITIVES

Antioxidants and humectants (for use in all products conforming to CODEX STAN 166-1989); acidity regulators and thickeners (for minced fish flesh only); and colours, emulsifiers, flavour enhancers, raising agents, and thickeners (for breaded or batter coatings) used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 09.2.2 (Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

Only the use of the following additives is permitted.

INS Number	Additive Name	Maximum Level in Product
Humectants – Moisture/Water Retention Agents		
339(i)	Sodium dihydrogen phosphate	
339(ii)	Disodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
340(i)	Potassium dihydrogen phosphate	

INS Number	Additive Name	Maximum Level in Product	
340(ii)	Dipotassium hydrogen phosphate	2200 mg/kg as phosphorus, singly or in combination	
340(iii)	Tripotassium phosphate		
341(i)	Calcium dihydrogen phosphate		
341(ii)	Calcium hydrogen phosphate		
341(iii)	Tricalcium phosphate		
450(i)	Disodium diphosphate		
450(ii)	Trisodium diphosphate		
450(iii)	Tetrasodium diphosphate		
450(v)	Tetrapotassium diphosphate		
450(vii)	Calcium dihydrogen diphosphate		
451(i)	Pentasodium triphosphate		
451(ii)	Pentapotassium triphosphate		
452(i)	Sodium polyphosphate		
452(ii)	Potassium polyphosphate		
452(iii)	Sodium calcium polyphosphate		
452(iv)	Calcium polyphosphate		
452(v)	Ammonium polyphosphate		
542	Bone phosphate		
404	Sodium alginate		GMP
Antioxidants			
300	Ascorbic acid	GMP	
301	Sodium ascorbate		
303	Potassium ascorbate		
304	Ascorbyl palmitate	1 g/kg	
In Addition, for Minced Fish Flesh Only			
Acidity Regulators			
330	Citric acid	GMP	
331	Sodium citrate		
332	Potassium citrate		
Thickeners			
412	Guar gum	GMP	
410	Carob bean (Locust bean) gum		
440	Pectins		
466	Sodium carboxymethyl cellulose		
415	Xanthan gum		
407	Carrageenan and its Na, K, NH ₄ salts (including Furcelleran)		
407a	Processed Eucheuma Seaweed (PES)		
461	Methyl cellulose		
Food Additives for Breaded or Batter Coatings			
Raising Agents			
339(i)	Sodium dihydrogen phosphate		
340(iii)	Tripotassium phosphate		
341(i)	Calcium dihydrogen phosphate		
341(ii)	Calcium hydrogen phosphate		
341(iii)	Tricalcium phosphate		

INS Number	Additive Name	Maximum Level in Product	
450(i)	Disodium diphosphate	440 mg/kg as phosphorus, singly or in combination	
450(ii)	Trisodium diphosphate		
450(iii)	Tetrasodium diphosphate		
450(v)	Tetrapotassium diphosphate		
450(vi)	Dicalcium diphosphate		
450(vii)	Calcium dihydrogen diphosphate		
452(i)	Sodium polyphosphate		
452(ii)	Potassium polyphosphate		
452(iii)	Sodium calcium polyphosphate		
452(iv)	Calcium polyphosphate		
500	Sodium carbonates		GMP
501	Potassium carbonates		
503	Ammonium carbonates		
Flavour Enhancers			
621	Monosodium glutamate	GMP	
622	Monopotassium glutamate		
Colours			
160b(i)	Annatto extracts bixin-based	25 mg/kg expressed as bixin or norbixin	
160b(ii)	Annatto extract (norbixin-based)		
150a	Caramel I (plain)	GMP	
160a(i)	β -carotene (Synthetic)	100 mg/kg singly or in combination	
160a(ii)	beta-Carotenes, vegetable		
160a(iii)	beta-Carotenes, Blakeslea trispora		
160e	β -apo-carotenal		
Thickeners			
412	Guar gum	GMP	
410	Carob bean (Locust bean) gum		
440	Pectins		
466	Sodium carboxymethyl cellulose		
415	Xanthan gum		
407	Carrageenan and its Na, K, NH ₄ salts (including Furcelleran)		
407a	Processed Euchema Seaweed (PES)		
461	Methyl cellulose		
400	Alginic acid		
401	Sodium alginate		
402	Potassium alginate		
403	Ammonium alginate		
404	Calcium alginate		
463	Hydroxypropyl cellulose		
464	Hydroxypropyl methylcellulose		
465	Methylethylcellulose		
Emulsifiers			
471	Monoglycerides of fatty acids	GMP	
322	Lecithins		
Modified Starches			

INS Number	Additive Name	Maximum Level in Product
1401	Acid-treated starches	GMP
1402	Alkaline-treated starches	
1404	Oxidized starches	
1410	Monostarch phosphate	
1412	Distarch phosphate esterified with sodium trimetaphosphate; esterified with phosphorus oxychloride	
1414	Acetylated distarch phosphate	
1413	Phosphated distarch phosphate	
1420	Starch acetate esterified with acetic anhydride	
1422	Acetylated distarch adipate	
1440	Hydroxypropyl starch	
1442	Hydroxypropyl starch phosphate	

F. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR QUICK FROZEN FISH FILLETS (CODEX STAN 190-1995)

The following amendments to Section 4 of the *Standard for Quick frozen fish fillets* (CODEX STAN 190-1995) are proposed.

4. FOOD ADDITIVES

Antioxidants and humectants used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CODEX STAN 192-1995) in food category 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

Only the use of the following additives is permitted.

Humectants – Moisture/Water Retention Agents		
INS Number	Additive Name	Maximum Level in Product
339(i)	Sodium dihydrogen phosphate	2200 mg/kg as phosphorus, singly or in combination
339(ii)	Disodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
340(i)	Potassium dihydrogen phosphate	
340(ii)	Dipotassium hydrogen phosphate	
340(iii)	Tripotassium phosphate	
341(i)	Calcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium phosphate	
450(i)	Disodium diphosphate	
450(ii)	Trisodium diphosphate	
450(iii)	Tetrasodium diphosphate	
450(v)	Tetrapotassium diphosphate	
450(vii)	Calcium dihydrogen diphosphate	
451(i)	Pentasodium triphosphate	
451(ii)	Pentapotassium triphosphate	
452(i)	Sodium polyphosphate	
452(ii)	Potassium polyphosphate	
452(iii)	Sodium calcium polyphosphate	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
542	Bone phosphate	
401	Sodium alginate	
Antioxidants		
INS Number	Additive Name	Maximum Level in Product
301	Sodium ascorbate	GMP
302	Potassium ascorbate	

G. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR QUICK FROZEN RAW SQUID (CODEX STAN 191-1995)

No amendments to Section 4 of the *Standard for Quick frozen raw squid* (CODEX STAN 191-1995) are proposed, since no food additives are permitted in these products.

H. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR LIVE AND RAW BIVALVE MOLLUSCS (CODEX STAN 292-2008)

No amendments to PART I – LIVE BILVALVE MOLLUSCS Section 1.4 of the *Standard for live and raw bivalve molluscs* (CODEX STAN 292-2008) are proposed, since no food additives are permitted in these products.

No amendments to PART II – RAW BILVALVE MOLLUSCS Section 2.4 of the *Standard for live and raw bivalve molluscs* (CODEX STAN 292-2008) are proposed since the entries already reference the *General Standard for Food Additives* (CODEX STAN 192-1995) and so the Standard has already been aligned.

I. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR LIVE ABALONE AND FOR RAW FRESH CHILLED OR FROZEN ABALONE FOR DIRECT CONSUMPTION OR FOR FURTHER PROCESSING (CODEX STAN 312-2013)

No amendments to PART I – LIVE ABALONE Section I.4 or PART II – RAW FRESH CHILLED OR FROZEN ABALONE Section II-4 of the *Standard for live abalone and for raw fresh chilled or frozen abalone for direct consumption or for further processing* (CODEX STAN 312-2013) are proposed, since no food additives are permitted in these products.

J. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR FRESH AND QUICK FROZEN RAW SCALLOP PRODUCTS (CODEX STAN 315-2014)

No amendments to Section 4.1 of the *Standard for fresh and quick frozen raw scallop products* (CODEX STAN 315-2014) are proposed, since no food additives are permitted in these products.

The following amendments to Section 4.2 of the *Standard for fresh and quick frozen raw scallop products* (CODEX STAN 315-2014) are proposed.

4.2 Quick Frozen Scallop Meat and Quick Frozen Roe-on Scallop Meat Processed With Phosphates
Acidity regulators, humectants, sequestrants and stabilizers used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms) and its parent food categories are acceptable for use in foods conforming to this Standard.

Humectant / Sequestrant/ Acidity Regulator/ Stabilizer

INS	Additive name	Maximum Level
338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i),(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii); 451(i),(ii); 452(i)-(v); 542	Phosphates	2200 mg/kg as phosphorus

PROPOSED AMENDMENTS TO TABLE 1 AND 2 OF THE GSFA RELATING TO FROZEN FISH PRODUCTS

At CCFA46, the Committee reached consensus that there are two types of restrictions for Table 3 food additives in the Codex commodity standards. The first is a restriction to a certain functional class. In this case it is considered that all Table 3 additives in that functional class are acceptable. The second is the situation where a particular Codex commodity standard lists individual food additives and it is considered that only certain Table 3 additives in that functional class are acceptable.

In certain cases, as is the case for all commodity standards considered in this document, the food category (09.1 and 09.2) and the relevant broader food categories are listed in the Annex to Table 3 of the GSFA. Therefore, any Table 3 additive allowed for use in food conforming to the commodity standards included under the broader food categories (including the relevant sub-categories) must be listed in Table 1 and Table 2 of the GSFA. Consequently, there is no need to revise Section 2 of Table 3 of the GSFA.

Working Principles

The general reference to the GSFA that is to be included in the commodity standard (Appendix 2) needs to take into account the fact that there are limitations due to the listing of specific additives in the commodity standard. Therefore, when applying the provisions in the commodity standard to the GSFA for alignment:

- A new provision for an additive is added to the GSFA only if there is a provision for that additive in the commodity standard, but currently no provision for that additive in the GSFA in the relevant food category. According to Box G of the Decision Tree a provision is added by use of a Note to limit the use of products conforming to the commodity standard unless evidence of a technical reason otherwise (i.e. evidence justifying the need for non-standardised products).
- Only adopted GSFA additive provisions are considered for alignment with the commodity standards at this time. However, draft and proposed draft GSFA additive provisions are considered if:
 - The commodity standard is revised to include only a general reference to the GSFA, and the use of these additives listed in the standardized food would not be recorded elsewhere.¹
 - The GSFA food additive provision needs to be revised to include appropriate note(s) to describe the use of the additive in the relevant commodity standard(s) (e.g. to exclude food products subject to the relevant commodity standard, to indicate a different use level in food products subject to the relevant commodity standard). The rationale for this is the following: Some GSFA food categories that include the relevant commodity standard(s) also include non-standardized food products. Therefore, CCFA still needs to discuss the use of these food additives in non-standardized foods. As such, these draft and proposed draft food additive provisions are maintained at their current step. The new note(s) associated with these draft and proposed draft food additive provisions address the alignment with the relevant commodity standard(s), and will be retained when CCFA discusses the food additive provisions in the future.
- An appropriate note is associated with the relevant GSFA additive provision to include a limitation from the commodity standard. For example, the “XS###” Notes are used to denote the exclusion of the commodity standard from the GSFA provision (i.e. there is a provision in the GSFA for the additive, but the additive is not listed in the commodity standard).
- If a commodity standard lists an individual additive that is included under a “group” additive in the GSFA (e.g. sulfites, ascorbyl esters in the current work), and the individual additives in the group that have the same functional class(es) as the additive listed in the relevant commodity standard are expected to be appropriate for the use specified in the relevant commodity standard, then the alignment should include all the individual additives with the appropriate functional class(es) in the group.²

¹ This approach was taken in the alignment of the food additive provisions in the *Standard for Bouillons and Consommés* (CODEX STAN 117-1981; see CX/FA 15/47/6). CCFA47 agreed to align several draft food additive provisions in the GSFA with the food additive provisions in the commodity standard because the commodity standard was revised to include only a general reference to the GSFA, and the use of these additives in the standardized food would not be recorded elsewhere (i.e. azorubine, curcumin, quinoline yellow, sucrose esters of fatty acids, tartrazine, and tocopherols). These aligned draft GSFA provisions were put forward for adoption (REP 15/FA, Appendix VII, Part F) and were adopted by the 38th Codex Alimentarius Commission (CAC38) at Step 8 (REP 15/CAC, Appendix III).

² This approach was taken in the alignment of polysorbates in the *Standard for Chocolate and Chocolate Products* (CODEX STAN 87-1981) with GSFA food category 05.1.4 (Cocoa and chocolate products). The commodity standard

The recommendations for alignment should be to amend the GSFA provisions in Tables 1 and 2, rather than *add* provisions (the latter applies only to the situation described in the first bullet point). There can only be one provision in the GSFA for a given food category for an additive. Therefore, the recommendations are to amend (revise) existing GSFA provisions to take into account the provisions in the commodity standard. As such, the recommendations with the proposed revisions to the GSFA are presented in a single table, with the same data each in Table 1 and Table 2 format. This presentation would eliminate any confusion or misinterpretation as to the final provision in the GSFA.

New text is indicated in **bold/underline**. Text to be removed is indicated in ~~strike through~~.

The Codex Standards for frozen fish and fish products are included in the following food categories in the GSFA:

CODEX STAN 36-1981 corresponds to food category 09.2.1

CODEX STAN 92-1981 corresponds to food category 09.2.1

CODEX STAN 95-1981 corresponds to food category 09.2.1

CODEX STAN 165-1989 corresponds to food category 09.2.1

CODEX STAN 166-1989 corresponds to food category 09.2.2

CODEX STAN 190-1995 corresponds to food category 09.2.1

CODEX STAN 191-1995 corresponds to food category 09.2.1

CODEX STAN 292-2008 corresponds to food categories 09.1.2 and 09.2.1

CODEX STAN 312-2014 corresponds to food categories 09.1.2 and 09.2.1

CODEX STAN 315-2014 corresponds to food categories 09.1.2 and 09.2.1

Food category 09.1.2 is a sub-category of the broader food category 09.1 (Fresh fish and fish products, including mollusks, crustaceans, and echinoderms), which is, in turn, a sub-category of the parent food category 09.0 (Fish and fish products, including mollusks, crustaceans and echinoderms). Therefore, the alignment of these commodity standards must also take into account the provisions in the GSFA in food categories 09.0 and 09.1.

Food category 09.2.1 is a sub-category of the broader food category 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms), which is, in turn, a sub-category of the parent food category 09.0 (Fish and fish products, including mollusks, crustaceans and echinoderms). Therefore, the alignment of these commodity standards must also take into account the provisions in the GSFA in food categories 09.0 and 09.2.

Food category 09.2.2 is a sub-category of the broader food category 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms), which is, in turn, a sub-category of the parent food category 09.0 (Fish and fish products, including mollusks, crustaceans and echinoderms). Therefore, the alignment of these commodity standards must also take into account the provisions in the GSFA in food categories 09.0 and 09.2.

Proposed amendments to the food additive provisions in Table 1 of the GSFA: (alphabetical order)

Acesulfame potassium: Functional class: Flavour enhancer, Sweetener				
INS 950				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	200 mg/kg	144, 188, & XS311, XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315	Endorse

specified a single polysorbate (INS 435) for use as an emulsifier. CCFA48 discussed inclusion of the other polysorbates with the functional class emulsifier, and revised the relevant GSFA note associated with polysorbates in food category 05.1.4 accordingly (CX/FA 16/48/6). The aligned provision for polysorbates was put forward for adoption (REP 16/FA, Appendix VII, Part G) and was adopted by CAC39 (REP 16/CAC, Appendix III).

Acetic acid, glacial: Functional class: acidity regulator, preservative				
INS 260				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Acetic and fatty acid esters of glycerol: Functional class: Emulsifier, Sequestrant, Stabilizer				
INS 472a				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16, 29 & <u>XS166</u>	Endorse

Acetylated distarch phosphate: Functional class: Emulsifier, Stabilizer, Thickener				
INS 1414				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Agar: Functional class: Bulking agent, Carrier, Emulsifier, Gelling Agent, Glazing agent, Humectant, Stabilizer, Thickener				
INS 406				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	3, 53 & 29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS166</u>	Endorse

Alginic acid: Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener				
INS 400				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	16, & 331, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks,	GMP	41 & 332	Endorse

	crustaceans, and echinoderms			
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Allura red AC: Functional class: Colour INS 129				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	300 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Ammonium alginate: Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener INS 403				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
<u>09.2.2</u>	<u>Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms</u>	<u>GMP</u>	<u>63</u>	Endorse

Ammonium carbonate: Functional class: acidity regulator, raising agent INS 503(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41	Endorse

Ammonium hydrogen carbonate: Functional class: acidity regulator, raising agent INS 503(ii)				
Food category No	Food category	Max level	Notes	Recommendation
<u>09.2.2</u>	<u>Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms</u>	<u>GMP</u>	<u>63</u>	Endorse

Annatto extracts, bixin-based: Functional class: Colour INS 160b(i)				
DRAFT provision				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	50 mg/kg	8 & <u>E166</u>	revise and retain provision at Step 4

Annatto extracts, norbixin-based: Functional class: Colour				
INS 160b(ii)			DRAFT provision	
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	100 mg/kg	185, <u>A166</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	revise and retain provision at Step 4

Ascorbic acid, L-: Functional class: Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant				
INS 300				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	304, 305 & 242, <u>AA</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	306 & 307, <u>New Note 306</u> , <u>CC</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Ascorbyl esters:				
INS 304 Ascorbyl palmitate: Functional Class: Antioxidant				
INS 305 Ascorbyl stearate: Functional Class: Antioxidant				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	1000 mg/kg	10, <u>CC</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Aspartame: Functional class: Flavour enhancer, Sweetener				
INS 951				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	300 mg/kg	144, 191, & XS311, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS166</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Brilliant blue FCF: Functional class: colour				
INS 133				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	500 mg/kg	4, & 16, <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	500 mg/kg	95, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	500 mg/kg	16 & <u>XS166</u>	Endorse

Butylated hydroxyanisole: Functional class: Antioxidant INS 320				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	200 mg/kg	15, &-180, <u>CC</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	200 mg/kg	15, 180 & <u>XS166</u>	Endorse

Butylated hydroxytoluene: Functional class: Antioxidant INS 321				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	200 mg/kg	15, &-180, <u>CC</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	200 mg/kg	15, 180 & <u>XS166</u>	Endorse

Calcium alginate: Functional class: Antifoaming agent, Bulking agent, Carrier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener INS 404				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
<u>09.2.2</u>	<u>Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms</u>	<u>GMP</u>	<u>63</u>	Endorse

Calcium ascorbate: Functional class: Antioxidant INS 302				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	304, 305 & 242, <u>AA</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	308, <u>CC</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	139 & <u>XS166</u>	Endorse

Calcium carbonate: Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer INS 170(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16 & <u>XS166</u>	Endorse

Calcium chloride: Functional class: firming agent, stabilizer, thickener INS 509				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Calcium lactate: Functional class: acidity regulator, emulsifying salt, firming agent, flour treatment agent, thickener INS 327				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Canthaxanthin: Functional class: Colour INS 161g				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	35 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Caramel I – plain caramel: Functional class: colour INS 150a				
DRAFT Provision				
Food category No	Food category	Max level	Notes	Recommendation
<u>09.2.2</u>	<u>Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms</u>	<u>GMP</u>	<u>41</u>	Endorse (rather than retain at Step 7)

Caramel III – ammonia caramel: Functional class: colour				
INS 150c				
Food category No	Food category	Max level	Notes	Recommendation
09.1	Fresh fish and fish products, including mollusks, crustaceans, and echinoderms	30,000 mg/kg	4, 16, <u>XS292, XS312, XS315</u>	Endorse
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	30,000 mg/kg	XS311, <u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Caramel IV – sulfite ammonia caramel: Functional class: Colour				
INS 150d				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	30,000 mg/kg	95, & XS311, <u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Carmines: Functional class: Colour				
INS 120				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	500 mg/kg	4, & 16, <u>XS292, XS312, XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	100 mg/kg	95, & 178, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	500 mg/kg	16, 95, 178 & <u>XS166</u>	Endorse

Carob bean gum: Functional class: Emulsifier, Stabilizer, Thickener				
INS 410				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	37 <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Carotenes, beta-, vegetable: Functional class: colour				
INS 160a(ii)				
Food category No	Food category	Max level	Notes	Recommendation
<u>09.2.2</u>	<u>Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms</u>	<u>100 mg/kg</u>	<u>C166</u>	Endorse

Carotenoids: Functional class: colour				
INS 160a(i),a(iii),e,f				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	100 mg/kg	4, & 16, <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	100 mg/kg	95, & XS311, <u>C166</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Carrageenan: Functional class: Emulsifier, Stabilizer, Thickener				
INS 407				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	37 & 332, <u>BB</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Citric acid: Functional class: Acidity regulator, Antioxidant, Colour retention agent, Sequestrant				
INS 330				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	304, 305 & 242, <u>AA</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	61 & 257, <u>BB</u> , <u>CC</u> , <u>XS36</u> , <u>XS95</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Citric and fatty acid esters of glycerol: Functional class: Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer				
INS 472c				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	304, & 305, <u>AA</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>CC</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16 29 & <u>XS166</u>	Endorse

Dextrins, roasted starch: Functional class: Carrier, Emulsifier, Stabilizer, Thickener				
INS 1400				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	3, 53 & 29, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	29 <u>XS166</u>	Endorse

Disodium 5'-guanylate: Functional class: Flavour enhancer				
INS 627				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	309 & <u>XS166</u>	Endorse

Disodium 5'-inosinate: Functional class: Flavour enhancer				
INS 631				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	309 & <u>XS166</u>	Endorse

Disodium 5'-ribonucleotides: Functional class: Flavour enhancer				
INS 635				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	309 & <u>XS166</u>	Endorse

Erythorbic acid (isoascorbic acid): Functional class: Antioxidant				
INS 315				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	308 & 310, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	139 & <u>XS166</u>	Endorse

Ethylene diamine tetra acetates:				
INS 385 Calcium disodium ethylene diamine tetra acetate: Functional class: Antioxidant, Colour retention agent, Preservative,				
INS 386 Disodium ethylene diamine tetra acetate: Functional class: Antioxidant, Colour retention agent, Preservative, Sequestrant, Stabilizer				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	75 mg/kg	21, <u>CC</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	75 mg/kg	21 & <u>XS166</u>	Endorse

Fumaric acid: Functional class: acidity regulator				
INS 297				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Gellan gum: Functional class: Stabilizer, Thickener				
INS 418				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	29- <u>XS166</u>	Endorse

Glycerol: Functional class: humectant, thickener				
INS 422				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Grape skin extract: Functional class: colour				
INS 163(ii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	500 mg/kg	16 & <u>XS166</u>	Endorse

Guar gum: Functional class: Emulsifier, Stabilizer, Thickener INS 412				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	37 & 73, <u>BB</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Gum Arabic (Acacia gum): Functional class: Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener INS 414				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	16, & 334, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16, 331 & <u>XS166</u>	Endorse

Hydroxypropyl cellulose: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener INS 463				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	16, & 334, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Hydroxypropyl methyl cellulose-: Functional class: Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener INS 464				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	16, & 334, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Hydroxypropyl starch: Functional class: Emulsifier, Stabilizer, Thickener INS 1440				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Indigotine (indigo carmine): Functional class: Colour INS 132				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and	300 mg/kg	95, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> ,	Endorse

	echinoderms		<u>XS292, XS312, XS315</u>	
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Karaya gum: Functional class: Emulsifier, Stabilizer, Thickener INS 416				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	<u>29, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMAP	<u>29 XS166</u>	Endorse

Konjac flour: Functional class: Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener INS 425				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	<u>16, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	<u>41, 325, 332 & XS166</u>	Endorse

Lactic and fatty acid esters of glycerol: Functional class: Emulsifier, Sequestrant, Stabilizer INS 472b				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	<u>29, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	<u>16 29 & XS166</u>	Endorse

Lecithin: Functional class: Antioxidant, Emulsifier INS 322(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	<u>304, & 305, AA, XS312, XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	<u>29, CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>	Endorse

Magnesium carbonate: Functional class: acidity regulator, anticaking agent, colour retention agent INS 504(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16 & <u>XS166</u>	Endorse

Magnesium chloride: Functional class: Colour retention agent, Firming agent, Stabilizer INS 511				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	29 <u>XS166</u>	Endorse

Magnesium hydroxide: Functional class: acidity regulator, colour retention agent INS 528				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16 & <u>XS166</u>	Endorse

Magnesium hydroxide carbonate: Functional class: acidity regulator, anticaking agent, carrier, colour retention agent INS 504(ii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16 & <u>XS166</u>	Endorse

Malic acid, DL-: Functional class: acidity regulator INS 296				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Mannitol: Functional class: Anticaking agent, Bulking agent, Humectant, Stabilizer, Sweetener, Thickener INS 421				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	29 <u>XS166</u>	Endorse

Methyl cellulose: Functional class: Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener INS 461				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	37 & 332, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Methyl ethyl cellulose: Functional class: Emulsifier, Foaming agent, Stabilizer, Thickener INS 465				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Microcrystalline cellulose (cellulose gel): Functional class: Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener INS 460(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	16, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41, 325, 332 & <u>XS166</u>	Endorse

Monosodium L-glutamate: Functional class: Flavour enhancer INS 621				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Nitrous oxide: Functional class: Antioxidant, Foaming agent, Packaging gas, Propellant				
INS 942				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	304, 305 & 242, <u>AA</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	308, <u>CC</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Oxidised starch: Functional class: Emulsifier, Stabilizer, Thickener				
INS 1404				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Pectins: Functional class: Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener				
INS 440				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	16 & 37, <u>BB</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Phosphates: Functional class: acidity regulator, antioxidant, emulsifier, firming agent, flour treatment agent, humectant, preservative, raising agent, sequestrant, stabilizer, thickener				
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				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	2200 mg/kg	33, <u>DD</u> , <u>EE</u> , <u>XS36</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	2200 mg/kg	33 & 299 <u>New Note 299</u>	Endorse

Polydextroses: Functional class: Bulking agent, Glazing agent, Humectant, Stabilizer, Thickener				
INS 1200				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Ponceau 4R (Cochineal red A): Functional class: Colour				
INS 124				
Food category No	Food category	Max level	Notes	Recommendation
<u>09.2.1</u>	<u>Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms</u>	<u>30 mg/kg</u>	<u>FF</u> , <u>XS36</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	<u>Endorse</u>

09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	500 mg/kg	16, 95 & <u>XS166</u>	Endorse
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Potassium alginate: Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener INS 402				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	<u>29, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
<u>09.2.2</u>	<u>Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms</u>	<u>GMP</u>	<u>63</u>	Endorse

Potassium chloride: Functional class: Firming agent, Flavour enhancer, Stabilizer, Thickener INS 508				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	<u>29, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Potassium dihydrogen citrate: Functional class: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer INS 332(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	GMP	<u>BB, F166, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Powdered cellulose: Functional class: Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener INS 460(ii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	<u>16 & 334, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16 & 334 <u>XS166</u>	Endorse

Processed eucheuma seaweed (PES): Functional class: Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener INS 407a				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	37 & 332, <u>BB</u> , <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse

Pullulan: Functional class: glazing agent, thickener INS 1204				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Riboflavins: Functional class: Colour INS 101(i),(ii),(iii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	1000 mg/kg	95, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	300 mg/kg	16 & <u>XS166</u>	Endorse

Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium: Functional class: Anticaking agent, Emulsifier, Stabilizer INS 470(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	71 & 29, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16, 29 71 & <u>XS166</u>	Endorse

Salts of oleic acid with calcium, potassium and sodium: Functional class: Anticaking agent, Emulsifier, Stabilizer INS 470(ii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36</u> , <u>XS92</u> , <u>XS95</u> , <u>XS165</u> , <u>XS190</u> , <u>XS191</u> , <u>XS292</u> , <u>XS312</u> , <u>XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks,	GMP	16 29 & <u>XS166</u>	Endorse

	crustaceans, and echinoderms			
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Sodium acetate: Functional class: acidity regulator, preservative, sequestrant INS 262(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Sodium alginate: Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener INS 401				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	37, & 332, <u>XS36, XS92, XS95, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	240 <u>New Note 210</u> & 332	Endorse

Sodium ascorbate: Functional class: Antioxidant INS 301				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>	Endorse
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	GMP	306 & 307, <u>New Note 306, CC, XS92, XS191, XS312, XS315</u>	Endorse

Sodium carboxymethyl cellulose (cellulose gum): Functional class: Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener INS 466				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	37 & 332, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Sodium dihydrogen citrate: Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer INS 331(i)				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	GMP	<u>BB, F166, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Sodium DL-malate: Functional class: acidity regulator, humectant				
INS 350(ii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Sodium erythorbate (sodium isoascorbate): Functional class: antioxidant				
INS 316				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	308, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>	Endorse

Sodium fumarates: Functional class: acidity regulator				
INS 365				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Sodium gluconate: Functional class: Sequestrant, Stabilizer, Thickener				
INS 576				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	GMP	<u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Sodium lactate: Functional class: acidity regulator, antioxidant, bulking agent, emulsifier, emulsifying salt, humectant, thickener				
INS 325				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	41 & <u>XS166</u>	Endorse

Sulfites:				
INS 220, 221, 223, 224 Functional class: Antioxidant, bleaching agent, flour treatment agent, preservative				
INS 222, 225 Functional class: Antioxidant, preservative				
INS 539 Functional class: antioxidant, sequestrant				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	100 mg/kg	44, <u>AA, XS312, XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including	100 mg/kg	44 & 139, <u>CC, GG, XS36, XS165,</u>	Endorse

	mollusks, crustaceans, and echinoderms		<u>XS190, XS191, XS312, XS315</u>	
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Sunset yellow FCF: Functional class: colour				
INS 110				
Food category No	Food category	Max level	Notes	Recommendation
09.1.2	Fresh mollusks, crustaceans, and echinoderms	300 mg/kg	4, & 16, <u>XS292, XS312, XS315</u>	Endorse
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	300 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	300 mg/kg	16 & <u>XS166</u>	Endorse

Tara gum: Functional class: Gelling agent, Stabilizer, Thickener				
INS 417				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29 & 73, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	29 73 & <u>XS166</u>	Endorse

Thiodipropionates: Functional class: antioxidant				
INS 388, 389				
Food category No	Food category	Max level	Notes	Recommendation
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	200 mg/kg	15, 46 & <u>XS166</u>	Endorse

Tragacanth gum: Functional class: Gelling agent, Stabilizer, Thickener				
INS 413				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>	Endorse
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	GMP	16, 29 & <u>XS166</u>	Endorse

Tricalcium citrate: Functional class: Acidity regulator, Emulsifying salt, Firming agent, Sequestrant, Stabilizer INS 333(iii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	GMP	<u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Tripotassium citrate: Functional class: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer INS 332(ii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	GMP	<u>BB, F166, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Trisodium citrate: Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer INS 331(iii)				
Food category No	Food category	Max level	Notes	Recommendation
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	GMP	<u>BB, F166, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Xanthan gum: Functional class: Gelling agent, Stabilizer, Thickener INS 415				
Food category No	Food category	Max level	Notes	Recommendation
09.2.1	Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms	GMP	<u>37, BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>	Endorse

Proposed amendments to food additive provisions in Table 2 of the GSFA: food category numerical order

Food category 09.1 Fresh fish and fish products, including mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
Caramel III – ammonia caramel	150c	30,000 mg/kg	4, 16, <u>XS292, XS312, XS315</u>

Food category 09.1.2 Fresh mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
Ascorbic acid, L-	300	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>
Brilliant blue FCF	133	500 mg/kg	4, & 16, <u>XS292, XS312, XS315</u>
Calcium ascorbate	302	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>
Carmines	120	500 mg/kg	4, & 16, <u>XS292, XS312, XS315</u>
Carotenoids	160a(i),a(iii),e,f	100 mg/kg	4, & 16, <u>XS292, XS312, XS315</u>
Citric acid	330	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>
Citric and fatty acid esters of glycerol	472c	GMP	304, & 305 <u>AA, XS312, XS315</u>
Erythorbic acid (isoascorbic acid)	315	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>
Lecithin	322(i)	GMP	304, & 305 <u>AA, XS312, XS315</u>
Nitrous oxide	942	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>
Sodium ascorbate	301	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>
Sodium erythorbate (sodium isoascorbate)	316	GMP	304, 305 & 242, <u>AA, XS312, XS315</u>
Sulfites	220-225, 539	100 mg/kg	44, <u>AA, XS312, XS315</u>

Food category 09.1.2 Fresh mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
Sunset yellow FCF	110	300 mg/kg	4, & 16, <u>XS292, XS312, XS315</u>

Food category 09.2 Processed fish and fish products, including mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
Acesulfame potassium	950	200 mg/kg	144, 188, & XS311, <u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>
Annatto extracts, norbixin based (DRAFT provision)	160b(ii)	100 mg/kg	185, <u>A166, XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Aspartame	951	300 mg/kg	144, 191, & XS311, <u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>
Caramel III – ammonia caramel	150c	30,000 mg/kg	<u>XS311, XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>
Caramel IV – sulfite ammonia caramel	150d	30,000 mg/kg	95, & XS311, <u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>
Carotenoids	160(a(i),a(iii), e,f)	100 mg/kg	95, & XS311, <u>C166, XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>
Potassium dihydrogen citrate	332(i)	GMP	<u>BB, F166, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Sodium ascorbate	301	GMP	306 & 307, <u>New Note 306, CC, XS92, XS191, XS312, XS315</u>
Sodium dihydrogen citrate	331(i)	GMP	<u>BB, F166, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Sodium gluconate	576	GMP	<u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>
Tricalcium citrate	333(iii)	GMP	<u>XS36, XS92, XS95, XS165, XS166, XS190, XS191, XS292, XS312, XS315</u>
Tripotassium citrate	332(ii)	GMP	<u>BB, F166, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Trisodium citrate	331(iii)	GMP	<u>BB, F166, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>

Food category 09.2.1 Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
Acetic and fatty acid esters of glycerol	472a	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Acetylated distarch phosphate	1414	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Agar	406	GMP	3, 53 & 29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Alginic acid	400	GMP	16 & 334, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Allura red AC	129	300 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Ammonium alginate	403	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Ascorbic acid, L-	300	GMP	306 & 307, <u>New Note 306, CC, XS190, XS191, XS312, XS315</u>
Ascorbyl esters	304, 305	1000 mg/kg	10, <u>CC, XS36, XS92, XS95, XS190, XS191, XS312, XS315</u>
Brilliant blue FCF	133	500 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Butylated hydroxyanisole	320	200 mg/kg	15, & 180, <u>CC, XS36, XS92, XS95, XS165,</u>

Food category 09.2.1 Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
			<u>XS190, XS191, XS312, XS315</u>
Butylated hydroxytoluene	321	200 mg/kg	15, &-180, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>
Calcium alginate	404	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Calcium ascorbate	302	GMP	308, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>
Calcium carbonate	170(i)	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Canthaxanthin	161g	35 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Carmines	120	100 mg/kg	95, &-178, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Carob bean gum	410	GMP	37, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Carrageenan	407	GMP	37, &-332, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Citric acid	330	GMP	61 &-257, <u>BB, CC, XS36, XS95, XS190, XS191, XS312, XS315</u>
Citric and fatty acid esters of glycerol	472c	GMP	29, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>
Dextrins, roasted starch	1400	GMP	3, 53 &-29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Disodium 5'-guanylate	627	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Disodium 5'-inosinate	631	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Disodium 5'-ribonucleotides	635	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Erythorbic acid (isoascorbic acid)	315	GMP	308 &-340, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>
Ethylene diamine tetra acetates	385, 386	75 mg/kg	21, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>
Gellan gum	418	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Guar gum	412	GMP	37 &-73, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Gum arabic (Acacia gum)	414	GMP	16 &-334, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Hydroxypropyl cellulose	463	GMP	16 &-334, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Hydroxypropyl methyl cellulose	464	GMP	16 &-334, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Hydroxylpropyl starch	1440	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Indigotine (indigo carmine)	132	300 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Karaya gum	416	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Konjac flour	425	GMP	16, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Lactic and fatty acid acid esters of glycerol	472b	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Lecithin	322(i)	GMP	29, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>
Magnesium chloride	511	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>

Food category 09.2.1 Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
Mannitol	421	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Methyl cellulose	461	GMP	37, & 332, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Methyl ethyl cellulose	465	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Microcrystalline cellulose (cellulose gel)	460(i)	GMP	16, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Monosodium L-glutamate	621	GMP	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Nitrous oxide	942	GMP	308, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>
Oxidised starch	1404	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Pectins	440	GMP	16 & 37, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
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	2200 mg/kg	33, <u>DD, EE, XS36, XS191, XS292, XS312</u>
Polydextroses	1200	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
<u>Ponceau 4R (Cochineal red A)</u>	<u>124</u>	<u>30 mg/kg</u>	<u>FF, XS36, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Potassium alginate	402	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Potassium chloride	508	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Powdered cellulose	460(ii)	GMP	16 & 334, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Processed eucheuma seaweed (PES)	407a	GMP	37 & 332, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Riboflavins	101(i),(ii),(iii)	1000 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium	470(i)	GMP	71 & 29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Salts of oleic acid with calcium, potassium and sodium	470(ii)	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Sodium alginate	401	GMP	37, & 332, <u>XS36, XS92, XS95, XS191, XS292, XS312, XS315</u>
Sodium carboxymethyl cellulose (cellulose gum)	466	GMP	37 & 332, <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>
Sodium erythorbate (sodium isoascorbate)	316	GMP	308, <u>CC, XS36, XS92, XS95, XS165, XS190, XS191, XS312, XS315</u>
Sulfites	220-225, 227, 228, 539	100 mg/kg	44 & 139, <u>CC, GG, XS36, XS165, XS190, XS191, XS312, XS315</u>
Sunset yellow FCF	110	300 mg/kg	95, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Tara gum	417	GMP	29 & 73, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>

Food category 09.2.1 Frozen fish, fish fillets, and fish products including mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
Tragacanth gum	413	GMP	29, <u>XS36, XS92, XS95, XS165, XS190, XS191, XS292, XS312, XS315</u>
Xanthan gum	415	GMP	37 <u>BB, XS36, XS92, XS95, XS190, XS191, XS292, XS312, XS315</u>

Food category 09.2.2 Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
Acetic acid, glacial	260	GMP	41 & <u>XS166</u>
Acetic and fatty acid esters of glycerol	472a	GMP	16, 29 & <u>XS166</u>
Agar	406	GMP	29 & <u>XS166</u>
Alginic acid	400	GMP	41 & 332
<u>Ammonium alginate</u>	<u>403</u>	<u>GMP</u>	<u>63</u>
<u>Ammonium hydrogen carbonate</u>	<u>503(ii)</u>	<u>GMP</u>	<u>63</u>
Annatto extracts, bixin-based (DRAFT provision)	160b(i)	50 mg/kg	8 & <u>E166</u>
Brilliant blue FCF	133	500 mg/kg	16 & <u>XS166</u>
Butylated hydroxyanisole	320	200 mg/kg	15, 180 & <u>XS166</u>
Butylated hydroxytoluene	321	200 mg/kg	15, 180 & <u>XS166</u>
<u>Calcium alginate</u>	<u>404</u>	<u>GMP</u>	<u>63</u>
Calcium ascorbate	302	GMP	139 & <u>XS166</u>
Calcium carbonate	170(i)	GMP	16 & <u>XS166</u>
Calcium chloride	509	GMP	41 & <u>XS166</u>
Calcium lactate	327	GMP	41 & <u>XS166</u>
<u>Caramel I – plain caramel</u>	<u>150a</u>	<u>GMP</u>	<u>41</u>
Carmines	120	500 mg/kg	16, 95, 178 & <u>XS166</u>
<u>Carotenes, beta-, vegetable</u>	<u>160a(ii)</u>	<u>100 mg/kg</u>	<u>C166</u>
Citric and fatty acid esters of glycerol	472c	GMP	16 29 & <u>XS166</u>
Dextrins, roasted starch	1400	GMP	29 <u>XS166</u>
Disodium 5'-guanylate	627	GMP	309 & <u>XS166</u>
Disodium 5'-inosinate	631	GMP	309 & <u>XS166</u>
Disodium 5'-ribonucleotides	635	GMP	309 & <u>XS166</u>
Erythorbic acid (isoascorbic acid)	315	GMP	139 & <u>XS166</u>
Ethylene diamine tetra acetates	385, 386	75 mg/kg	21 & <u>XS166</u>
Fumaric acid	297	GMP	41 & <u>XS166</u>
Gellan gum	418	GMP	29 <u>XS166</u>
Glycerol	422	GMP	41 & <u>XS166</u>
Grape skin extract	163(ii)	500 mg/kg	16 & <u>XS166</u>
Gum Arabic	414	GMP	16, 331 & <u>XS166</u>
Karaya gum	416	GMP	29 <u>XS166</u>
Konjac flour	425	GMP	41, 325, 332 & <u>XS166</u>
Lactic and fatty acid esters of glycerol	472b	GMP	16, 29 & <u>XS166</u>
Magnesium carbonate	504(i)	GMP	16 & <u>XS166</u>
Magnesium chloride	511	GMP	29, <u>XS166</u>
Magnesium hydroxide	528	GMP	16 & <u>XS166</u>
Magnesium hydroxide carbonate	504(ii)	GMP	16 & <u>XS166</u>
Malic acid, DL-	296	GMP	41 & <u>XS166</u>
Mannitol	421	GMP	29, <u>XS166</u>
Microcrystalline cellulose (cellulose gel)	460(i)	GMP	41, 325, 332 & <u>XS166</u>

Food category 09.2.2 Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms			
Food additive	INS	Maximum Level	Notes
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	2200 mg/kg	33 & 299 <u>New Note 299</u>
Ponceau 4R (cochineal red A)	124	500 mg/kg	16, 95 & <u>XS166</u>
<u>Potassium alginate</u>	<u>402</u>	<u>GMP</u>	<u>63</u>
Potassium chloride	508	GMP	41 & <u>XS166</u>
Powdered cellulose	460(ii)	GMP	16 & 334 <u>XS166</u>
Pullulan	1204	GMP	41 & <u>XS166</u>
Riboflavins	101(i), 101(ii), 101(iii)	300 mg/kg	16 & <u>XS166</u>
Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium	INS 470(i)	GMP	16, 29, 71 & <u>XS166</u>
Salts of oleic acid with calcium, potassium and sodium	INS 470(ii)	GMP	16, 29 & <u>XS166</u>
Sodium acetate	262(i)	GMP	41 & <u>XS166</u>
Sodium alginate	401	GMP	210 <u>New Note 210</u> & 332
Sodium DL-malate	350(ii)	GMP	41 & <u>XS166</u>
Sodium fumarates	365	GMP	41 & <u>XS166</u>
Sodium lactate	325	GMP	41 & <u>XS166</u>
Sunset yellow FCF	110	300 mg/kg	16 & <u>XS166</u>
Tara gum	417	GMP	29 , 73 & <u>XS166</u>
Thiodipropionates	388, 389	200 mg/kg	15, 46 & <u>XS166</u>
Tragacanth gum	413	GMP	16, 29 & <u>XS166</u>

Notes to the General Standard for Food Additives

AA: For use as an antioxidant for non-standardized food and for raw chilled shucked mollusks conforming to the *Standard for Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008).

BB: For non-standardized food and for minced fish flesh only in products conforming to the *Standard for Quick Frozen Blocks of Fish Fillets, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* (CODEX STAN 165-1989).

CC: For use as an antioxidant for raw frozen molluscs only, conforming to the *Standard for Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008).

DD: For use on Quick Frozen Scallop Meat and Quick Frozen Roe-on Scallop Meat Processed with Phosphates conforming to the *Standard for Fresh and Quick Frozen Raw Scallop Products* (CODEX STAN 315-2014) as follows: the following phosphates at 2200 mg/kg as phosphorus for use as humectants, INS 339(i), INS 339(ii), INS 339(iii), INS 340(i), INS 340(ii), INS 340(iii), INS 341(i), INS 341(ii), INS 450(iii), INS 450(v), INS 450(vii), INS 451(i), INS 451(ii), INS 452(i), INS 452(ii), INS 452(iii), INS 452(iv), INS 452(v), and INS 542; and the following for use as sequestrants, INS 338, INS 339(i), INS 339(ii), INS 339(iii), INS 340(i), INS 340(ii), INS 340(iii), INS 341(i), INS 450(i), INS 450(ii), INS 450(iii), INS 450(v), INS 450(vi), INS 450(vii), INS 451(i), INS 451(ii), INS 452(i), INS 452(ii), INS 452(iii), INS 452(iv), and INS 452(v).

EE: For use in non-standardized food; and in products conforming to the *Standard for Quick Frozen Shrimps or Prawns* (CODEX STAN 92-1981); *Quick Frozen Lobsters* (CODEX STAN 95-1981); *Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* (CODEX STAN 165-1989); and *Quick Frozen Fish Fillets* (CODEX STAN 190-1995) as humectants at 2200 mg/kg as phosphorous: INS 339(i), INS 339(ii), INS 339(iii), INS 340(i), INS 340(ii), INS 340(iii), INS 341(i), INS 341(ii), INS 450(iii), INS 450(v), INS 450(vii), INS 451(i), INS 451(ii), INS 452(i), INS 452(ii), INS 452(iii), INS 452(iv), INS 452(v), and INS 542.

FF: For use in heat-treated products conforming to the *Standard for Quick Frozen Shrimps and Prawns* (CODEX STAN 92-1981).

GG: For use in products conforming to the *Standard for Quick Frozen Shrimps and Prawns* (CODEX STAN 92-1981) and the *Standard for Quick Frozen Lobsters* (CODEX STAN 95-1981): Sulfur dioxide (INS 220), Sodium sulfite (INS221), Sodium hydrogen sulfite (INS 222), Sodium metabisulfite (INS 223), Potassium metabisulfite (INS 224), Potassium sulfite (INS 225) and Sodium thiosulfate (INS 5239) as preservatives at 100 mg/kg in the edible part of the raw product, or 30 mg/kg in the edible part of the cooked product.

A166: Except for use in breading or batter coatings in products conforming to the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter (CODEX STAN 166-1989) only at 25 mg/kg as norbixin.

C166: For use in breaded or batter coatings in products conforming to the standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989), singly or in combination: Carotenoids (beta-Carotenes, synthetic (INS 160a(i)), beta-Carotenes, *Blakeslea trispora* (INS 160a(iii)), Carotenal, beta-apo-8' (INS 160e), and Carotenoic acid, ethyl ester, beta-apo-8'- (INS 160f) and beta-Carotenes, vegetable (INS 160a(ii)).

E166: Except for use in breading or batter coatings in products conforming to the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter (CODEX STAN 166-1989) only at 25 mg/kg as bixin.

F166: For non-standardized foods and for use in minced fish flesh only in products conforming to the standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989).

XS36: Excluding products conforming to the *Standard for Quick Frozen Finfish, Uneviscerated and Eviscerated* (CODEX STAN 36-1981).

XS92: Excluding products conforming to the *Standard for Quick Frozen Shrimps and Prawns* (CODEX STAN 92-1981).

XS95: Excluding products conforming to the *Standard for Quick Frozen Lobsters* (CODEX STAN 95-1981).

XS165: Excluding products conforming to the *Standard for Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* (CODEX STAN 165-1989).

XS166: Excluding products conforming to the *Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter* (CODEX STAN 166-1989).

XS190: Excluding products conforming to the *Standard for Quick Frozen Fish Fillets* (CODEX STAN 190-1995).

XS191: Excluding products conforming to the *Standard for Quick Frozen Raw Squid* (CODEX STAN 191-1995).

XS292: Excluding products conforming to the *Standard for Live and Raw Bivalve Molluscs* (CODEX STAN 291-2008).

XS312: Excluding products conforming to the *Standard for Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing* (CODEX STAN 312-2013).

XS315: Excluding products conforming to the *Standard for Fresh and Quick Frozen Raw Scallop Products* (CODEX STAN 315-2014).

Note 63: For non-standardized food and **for** breaded or batter coatings in food conforming to the standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989).

Note 177: For non-standardized food and **for** minced fish flesh and breaded or batter coatings conforming to the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets -Breaded or in Batter (CODEX STAN 166-1989).

New Note 210: For non-standardized food and **for use as a humectant** in products fish filets and minced fish flesh conforming to the standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989); **and for use as a thickener in breading or batter coatings for products conforming to the standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989).**

New Note 299: **For use in non-standardized food; and** for use at 400 mg/kg as phosphorous singly or in combination in breaded or batter coating in accordance with **in products conforming to the** standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166-1989): **the following phosphates for use as humectants at 2200 mg/kg as phosphorous, INS 339(i), 339(ii), 339(iii), 340(i), 340(ii), 340(iii), 341(i), 341(ii), 341(iii), 450(i), 450(ii), 450(iii), 450(v), 450(vii), 451(i), 451(ii), 452(i), 452(ii), 452(iii), 452(iv), 452(v), and 542; and the following phosphates for use as raising agents in bread and batter coatings only at 440 mg/kg as phosphorous, INS 339(i), 340(iii), 341(i), 341(ii), 341(iii), 450(i), 450(ii), 450(iii), 450(v), 450(vi), 450(vii), 450(ix), 452(i), 452(ii), 452(iii) and 452(iv).**

New Note 306: Excluding products conforming to the *Standard for Dried Shark Fins* (CODEX STAN 189-1993), the *Standard for Crackers from Marine and Freshwater Fish, Crustaceans and Molluscan Shellfish* (CODEX STAN 222-2001), **and** the *Standard for Boiled Dried Salted Anchovies* (CODEX STAN 136-2003); ~~the Standard for Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing (CODEX STAN 312-2013), and the Standard for Fresh and Quick Frozen Raw Scallop Products (CODEX STAN 315-2014).~~

SECTION 2 OF TABLE 3 OF THE GSFA

In the case of the *Quick Frozen Finfish, Uneviscerated and Eviscerated* (CODEX STAN 36-1981); *Quick Frozen Shrimps or Prawns* (CODEX STAN 92-1981); *Quick Frozen Lobsters* (CODEX STAN 95-1981); *Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* (CODEX STAN 165-1989); *Quick Frozen Fish Sticks (Fish Fingers), Fish portions and Fish Fillets-Breaded and in Batter* (CODEX STAN 166-1989); *Quick Frozen Fish Fillets* (CODEX STAN 190-1995); and *Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008), the intention of the commodity committee had been to allow only certain Table 3 additives. Since the broader food categories 09.1 (Fresh fish and fish products, including mollusks, crustaceans and echinoderms) and 09.2 (Processed fish and fish products, including mollusks, crustaceans and echinoderms) are listed in the Annex to Table 3 of the GSFA, any Table 3 additive allowed for use in food conforming to the commodity standards included under the broader food categories (including food categories 09.1.2 and 09.2.2) must be listed in Table 1 and Table 2 of the GSFA. Consequently, there is no need to revise Section 2 of Table 3 of the GSFA.

Appendix 4

PROPOSED AMENDMENTS TO TABLE 1 AND 2 OF THE GSFA IN RELATION TO THE ALIGNMENT OF THE COMMODITY STANDARDS IDENTIFIED BY THE COMMITTEE ON PROCESSED FRUITS AND VEGETABLES (CCPFV)

1. The 45th session of the CCFA (2013) noted requests from CCPFV26 (2013) to ask the EWG on Alignment to consider specific food additive provisions in the GSFA that, according to CCPFV26, were not technologically justified in the specific GSFA food categories covered by certain commodity standards (REP 13/FA paras. 29, 30 and 35). However, the mandate of the EWG on Alignment established at CCFA45 (2013) did not include these requests (REP 13/FA, para. 51), and it was proposed that this work be carried out by the EWG on Alignment established at CCFA47 (CX/FA 15/47/6, para. 8). CCFA47 (2015) agreed to include these requests as part of the mandate of the EWG on Alignment established for CCFA48 (2016) (REP 15/FA, para. 58). CCFA48 (2016) prepared proposals aligning the provisions identified by CCPFV26 with the GSFA (CX/FA 16/46/6, Appendix 6), but did not have time to discuss them. CCFA48 (2016) agreed to consider these proposals as part of the mandate of the EWG on Alignment established for CCFA49 (2017) (REP 16/FA, para. 52(ii)(c)). The information contained in CX/FA 16/48/6, Appendix 6 is reproduced below.

2. CCPFV26 requested that the EWG on Alignment consider the GSFA for the following additives that, according to the CCPFV, were not technologically justified in the specific GSFA food categories covered by the following commodity standards (REP 13/FA, para. 35):

- the *Standard for Certain Canned Citrus Fruits* (CODEX STAN 254-2007): sodium diacetate (INS 262(ii)) and tartrates (INS 334; 335(i), (ii); 336(i), (ii); 337) in food category 04.1.2.4 (Canned or bottled (pasteurized) fruit);
- the *Standard for Preserved Tomatoes* (CODEX STAN 13-1981): sodium diacetate (INS 262(ii)) and tartrates (INS 334; 335(i), (ii); 336(i), (ii); 337) in food category 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds); and
- the *Standard for Table Olives* (CODEX STAN 66-1981): adipates (INS 355-357, 359), sodium diacetate (INS 262(ii)), aluminium ammonium sulfate (INS 523), and propylene glycol alginate (INS 405) in food category 04.2.2.3 (Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce).

3. CCFA47 also included the *Standard for Processed Tomato Concentrates* (CODEX STAN 57-1981) as part of the mandate of the current EWG (REP 15/FA, para. 58). The report of the 26th CCPFV indicated that it was not possible to include a general reference to the GSFA in this commodity standard, as only a limited number of acidity regulators were technologically justified for use in the product conforming to this standard, and agreed to inform CCFA accordingly (REP 13/FA, para. 114). CCPFV based the justification for the inclusion of the specific acidity regulators in the *Standard for Processed Tomato Concentrates* on the justification for specific acidity regulators in the *Standard for Preserved Tomatoes* (REP 13/FA, Appendix VI, Part III). Therefore, the issues of alignment of the food additive provisions in the *Standard for Preserved Tomatoes* with food category 04.2.2.4 would apply to the *Standard for Processed Tomato Concentrates*.

An analysis of the food additive provisions identified by CCPFV in each of these commodity standards with the GSFA follows.

New text is indicated in **bold/underline**. Text to be deleted is indicated in ~~strikethrough~~.

A. Standard for Certain Canned Citrus Fruits (CODEX STAN 254-2007)

This commodity standard contains a general reference to the GSFA:

“Acidity regulators and firming agents used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 04.1.2.4 (Canned or bottled (pasteurized) fruit) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.”

The CCPFV has requested that CCFA prepare recommendations for the draft GSFA provisions for sodium diacetate (INS 262(ii)) and tartrates (INS 334; 335(i), (ii); 336(i), (ii); 337) in food category 04.1.2.4 that, in CCPFV’s view, were not technologically justified (REP 13/FA, para. 35).

Tables 1 and 2 of the GSFA

It is proposed to amend Table 1 of the GSFA as follows:

Sodium diacetate: Functional class: acidity regulator, preservative, sequestrant INS 262(ii) DRAFT provision				
Food category No	Food category	Max level	Notes	Recommendation
04.1.2.4	Canned or bottled (pasteurized) fruit	GMP	<u>XS254</u>	Add New Note XS254 and retain at Step 7

Tartrates: Functional class: acidity regulator, antioxidant, emulsifying salt, flavour enhancer, sequestrants, stabilizer INS 334, 335(ii), 337 * DRAFT provision				
Food category No	Food category	Max level	Notes	Recommendation
04.1.2.4	Canned or bottled (pasteurized) fruit	1300 mg/kg	45, <u>XS254</u>	Add New Note XS254 and retain at Step 7

* The following specific additives that were included under the group "tartrates" were revoked from listing in the GSFA due to absence of JECFA specifications: monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)), and dipotassium tartrate (INS 336(ii)) (REP 15/FA, para. 129 and Appendix. VIII, Part B).

NOTES:

Note 45: As tartaric acid.

XS254: Excluding products conforming to the *Standard for Certain Canned Citrus Fruits* (CODEX STAN 254-2007).

It is proposed to amend Table 2 of the GSFA as follows:

Food category 04.1.2.4 Canned or bottled (pasteurized) fruit			
Food additive	INS	Maximum Level	Notes
Sodium diacetate (DRAFT provision)	262(ii)	GMP	<u>XS254</u>
Tartrates (DRAFT provision)	334, 335(ii), 337 *	1300 mg/kg	45, <u>XS254</u>

* The following specific additives that were included under the group "tartrates" were revoked from listing in the GSFA due to absence of JECFA specifications: monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)), and dipotassium tartrate (INS 336(ii)) (REP 15/FA, para. 129 and Appendix. VIII, Part B).

NOTES:

Note 45: As tartaric acid.

XS254: Excluding products conforming to the *Standard for Certain Canned Citrus Fruits* (CODEX STAN 254-2007).

Section 2 of Table 3

In the case of the *Standard for Certain Canned Citrus Fruits*, it is clear that the intention of CCPFV is allow all Table 3 additives with the functional classes of acidity regulator and firming agent.

Although not within the scope of the current eWG, but for consistency with the approach taken in the alignment of other commodity standards with the GSFA, the eWG may wish to consider recommending that Section 2 of Table 3 be amended to include the listing of the *Standard for Certain Canned Citrus Fruits* (CODEX STAN 254-2007).

Therefore, it is proposed to add the following to Section 2 of the Annex to Table 3 of the GSFA:

04.1.2.4	Canned or bottled (pasteurized) fruit
	Acidity regulators and firming agents listed in Table 3 are acceptable for use in foods conforming to the standard.
Codex standard	<i>Standard for Certain Canned Citrus Fruits</i> (CODEX STAN 254-2007)

B. Standard for Preserved Tomatoes (CODEX STAN 13-1981) and Standard for Processed Tomato Concentrates (CODEX STAN 57-1981)

These two commodity standards are considered together because CCPFV based the justification for the inclusion of the specific acidity regulators in the *Standard for Processed Tomato Concentrates* on the justification for specific acidity regulators in the *Standard for Preserved Tomatoes* (REP 13/PFV, Appendix VI, Part III). Both commodity standards include products that are covered by food category 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds). However, the *Standard for Processed Tomato Concentrates* also includes food products that are covered by food categories 04.2.2.5 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)) and 04.2.2.6 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable deserts and sauces, candied vegetables) other than food category 04.2.2.5) (REP 13/PFV, Appendix VI Part III).

The *Standard for Preserved Tomatoes* (CODEX STAN 13-1981) contains a specific list of additives that function as acidity regulators:

INS No.	Food Additive	Maximum Level
300	Ascorbic acid, L-	GMP
330	Citric acid	GMP
331(i)	Sodium dihydrogen citrate	GMP
331(iii)	Trisodium citrate	GMP
332(i)	Potassium dihydrogen citrate	GMP
332(iii)	Tripotassium citrate	GMP
333(iii)	Tricalcium citrate	GMP
380	Triammonium citrate	GMP
507	Hydrochloric acid	GMP
514(i)	Sodium sulfate	GMP
515(i)	Potassium sulfate	GMP
575	Glucono delta-lactone	GMP
577	Potassium gluconate	GMP
578	Calcium gluconate	GMP
580	Magnesium gluconate	GMP

This standard also contains a general reference to the GSFA for firming agents:

“Firming agents listed in Table 3 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds) are acceptable for use in foods conforming to this standard.”

The *Standard for Processed Tomato Concentrates* (CODEX STAN 57-1981) contains the same list of acidity regulators as the *Standard for Preserved Tomatoes* (CODEX STAN 13-1981, above).

CCPFV has requested that CCFA prepare recommendations for the draft GSFA provisions for sodium diacetate (INS 262(ii)) and tartrates (INS 334; 335(i), (ii); 336(i), (ii); 337) in food category 04.2.2.4 that, in CCPFV's view, were not technologically justified (REP 13/FA, para. 35).

Tables 1 and 2 of the GSFA

It is proposed to amend Table 1 of the GSFA as follows:

Sodium diacetate: Functional class: acidity regulator, preservative, sequestrants				
INS 262(ii) DRAFT provision				
Food category No	Food category	Max level	Notes	Recommendation
04.2.2.4	Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	GMP	<u>XS13 & XS57</u>	Add New Notes XS13 & XS57 and retain at Step 7

Tartrates: Functional class: acidity regulator, antioxidant, emulsifying salt, flavour enhancer, sequestrants, stabilizer				
INS 334, 335(ii), 337 * DRAFT provision				
Food category No	Food category	Max level	Notes	Recommendation
04.2.2.4	Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	10,000 mg/kg	45, <u>XS13 & XS57</u>	Add New Notes XS13 & XS57 and retain at Step 7

* The following specific additives that were included under the group "tartrates" were revoked from listing in the GSFA due to absence of JECFA specifications: monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)), and dipotassium tartrate (INS 336(ii)) (REP 15/FA, para. 129 and Appendix VIII, Part B).

NOTES:

Note 45: As tartaric acid.

XS13: Excluding products conforming to the *Standard for Preserved Tomatoes* (CODEX STAN 13-1981).

XS57: Excluding products conforming to the *Standard for Processed Tomato Concentrates* (CODEX STAN 57-1981).

It is proposed to amend Table 2 of the GSFA as follows:

Food category 04.2.2.4 Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds			
Food additive	INS	Maximum Level	Notes
Sodium diacetate (DRAFT provision)	262(ii)	GMP	<u>XS13 & XS57</u>
Tartrates (DRAFT provision)	334, 335(ii), 337 *	10,000 mg/kg	45, <u>XS13 & XS57</u>

* The following specific additives that were included under the group "tartrates" were revoked from listing in the GSFA due to absence of JECFA specifications: monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)), and dipotassium tartrate (INS 336(ii)) (REP 15/FA, para. 129 and Appendix VIII, Part B).

NOTES:

Note 45: As tartaric acid.

XS13: Excluding products conforming to the *Standard for Preserved Tomatoes* (CODEX STAN 13-1981).

XS57: Excluding products conforming to the *Standard for Processed Tomato Concentrates* (CODEX STAN 57-1981).

Section 2 of Table 3

In the case of the Codex *Standard for Preserved Tomatoes* and the *Standard for Processed Tomato Concentrates*, it is clear that the intention of the CCPFV is allow only certain Table 3 additives.

Although not within the scope of the current eWG, but for consistency with the approach taken in the alignment of other commodity standards with the GSFA, the eWG may wish to consider recommending that:

- Section 2 of Table 3 be amended to include the listing of the *Standard for Preserved Tomatoes (CODEX STAN 13-1981)* and *Standard for Processed Tomato Concentrates (CODEX STAN 57-1981)*;
- consequentially, Table 3 could be amended to reflect the specific food additives in these commodity standards; and
- the specific list of additives used as acidity regulators that currently appears in these commodity standards could be replaced by a general reference to the GSFA, with the concurrence of the CCPFV.

Therefore, noting that the *Standard for Preserved Tomatoes* (CODEX STAN 13-1981) corresponds to food category 04.2.2.4, and that the *Standard for Processed Tomato Concentrates* (CODEX STAN 57-1981) corresponds to food categories 04.2.2.4, 04.2.2.5, and 04.2.2.6, **it is proposed to add the following to Section 2 of the Annex to Table 3 of the GSFA:**

04.2.2.4	Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds)
	All firming agents listed in Table 3 and certain other Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to the standards.
Codex standards	Standard for Preserved Tomatoes (CODEX STAN 13-1981)
	Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to the standard.
Codex standards	<i>Standard for Processed Tomato Concentrates</i> (CODEX STAN 57-1981)

04.2.2.5	Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)
	Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards.
Codex standards	<i>Standard for Processed Tomato Concentrates</i> (CODEX STAN 57-1981)

04.2.2.6	Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable deserts and sauces, candied vegetables) other than food category 04.2.2.5)
	Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards.
Codex standards	<i>Standard for Processed Tomato Concentrates</i> (CODEX STAN 57-1981)

Consequentially, it is proposed that Table 3 be amended to reflect the specific food additives in CODEX STAN 13-1981 and CODEX STAN 57-1981: *

INS No	Additive	Functional Class	Year adopted	Acceptable, in foods conforming to the following commodity standards
300	Ascorbic acid, L-	Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant	1999	<u>CS13-1981, CS57-1981,</u> CS88-1981, CS89-1981, CS96-1981, CS97-1981, CS98-1981
330	Citric acid	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	1999	<u>CS13-1981, CS57-1981</u>
331(i)	Sodium dihydrogen citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	<u>CS13-1981, CS57-1981,</u> CS89-1981, CS96-1981, CS97-1981, CS98-1981
331(iii)	Trisodium citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	<u>CS13-1981, CS57-1981,</u> CS89-1981, CS96-1981, CS97-1981, CS98-1981
332(i)	Potassium dihydrogen citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	<u>CS13-1981, CS57-1981</u>
332(iii)	Tripotassium citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	<u>CS13-1981, CS57-1981</u>

INS No	Additive	Functional Class	Year adopted	Acceptable, in foods conforming to the following commodity standards
333(iii)	Tricalcium citrate	Acidity regulator, Emulsifying salt, Firming agent, Sequestrant, Stabilizer	1999	<u>CS13-1981, CS57-1981</u>
380	Triammonium citrate	Acidity regulator	1999	<u>CS13-1981, CS57-1981</u>
507	Hydrochloric acid	Acidity regulator	1999	<u>CS13-1981, CS57-1981</u>
514(i)	Sodium sulfate	Acidity regulator	1999	<u>CS13-1981, CS57-1981</u>
515(i)	Potassium sulfate	Acidity regulator	1999	<u>CS13-1981, CS57-1981</u>
575	Glucono delta-lactone	Acidity regulator, Raising agent, Sequestrant	1999	<u>CS13-1981, CS57-1981, CS89-1981, CS98-1981</u>
577	Potassium gluconate	Acidity regulator, Sequestrant	1999	<u>CS13-1981, CS57-1981</u>
578	Calcium gluconate	Acidity regulator, Firming agent, Sequestrant	1999	<u>CS13-1981, CS57-1981</u>
580	Magnesium gluconate	Acidity regulator, Firming agent, Flavour enhancer	1999	<u>CS13-1981, CS57-1981</u>

* The above entries include revisions to the INS (REP 15/FA, Appendix XII) and the corrections to Table 3 regarding the alignment of the five meat commodity standards (REP 15/FA, Appendix VII, Part G).

Consequently, the specific list of additives with the functional class of acidity regulator in the two relevant standards could be replaced by a general reference to the GSFA, with the concurrence of the CCPFV, as follows:

Standard for Preserved Tomatoes (CODEX STAN 13-1981)

“Acidity regulators and firming agents listed in Table 3 of the General Standard for Food Additives (CODEX STAN 192-1995) for use in food category 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds) are acceptable for use in foods conforming to this standard.”

Standard for Processed Tomato Concentrates (CODEX STAN 57-1981)

“Acidity regulators listed in Table 3 of the General Standard for Food Additives (CODEX STAN 192-1995) for use in food categories 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds), 04.2.2.5 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)), and 04.2.2.6 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g. vegetable deserts and sauces, candied vegetables) other than food category 04.2.2.5)) are acceptable for use in foods conforming to this standard.”

C. Standard for Table Olives (CODEX STAN 66-1981)

This commodity standard contains a general reference to the GSFA:

“Acidity regulators, antioxidants, colour retention agents (table olives darkened with oxidation only), firming agents, flavour enhancers, preservatives, and thickeners (table olives with stuffing only) used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 04.2.2.3 (Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.”

CCPFV has requested that CCFA prepare recommendations for the draft GSFA provisions for adipates (INS 355-357, 359), sodium diacetate (INS 262(ii)), and propylene glycol alginate (INS 405); and the adopted provision for aluminium ammonium sulfate (INS 523) in food category 04.2.2.3 that, in CCPFV’s view, were not technologically justified (REP 13/FA, para. 35).

Tables 1 and 2 of the GSFA

It is proposed to amend Table 1 of the GSFA as follows:

Adipates: Functional class: acidity regulator INS 355 * DRAFT provision				
Food category No	Food category	Max level	Notes	Recommendation
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce	50,000 mg/kg	1 & XS66	Add New Note XS66 and retain at Step 7

* The following specific additives that were included under the group "adipates" were revoked from listing in the GSFA due to absence of JECFA specifications: ammonium adipates (INS 359) (REP 14/FA, para. 56 and Appendix XII Part B); and sodium adipates (INS 356) and potassium adipates (INS 357) (REP 15/FA, para. 129 and Appendix VIII, Part B).

Aluminium ammonium sulfate: Functional class: Acidity regulator, colour retention agent, firming agent, raising agent, stabilizer INS 523				
Food category No	Food category	Max level	Notes	Recommendation
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce	520 mg/kg	6, 245, 296 & XS66	Endorse

Propylene glycol alginate: Functional class: Bulking agent, carrier, emulsifier, foaming agent, gelling agent, stabilizer, thickener INS 405* DRAFT provision				
Food category No	Food category	Max level	Notes	Recommendation
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce	6000 mg/kg	XS66	Add New Note XS66 and retain at Step 7

Sodium diacetate: Functional class: acidity regulator, preservative, sequestrant INS 262(ii) * DRAFT provision				
Food category No	Food category	Max level	Notes	Recommendation
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce	GMP	XS66	Add New Note XS66 and retain at Step 7

NOTES:

Note 1: As adipic acid.

Note 6: As aluminium.

Note 245: For use in pickled vegetables only.

Note 296: Except for use in perilla in brine at 780 mg/kg.

~~XS66:~~ Excluding products conforming to the *Standard for Table Olives* (CODEX STAN 66-1981).

It is proposed to amend Table 2 of the GSFA as follows:

Food category 04.2.2.3 Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce			
Food additive	INS	Maximum Level	Notes
Adipates (DRAFT provision)	355 *	50,000 mg/kg	1 & XS66
Aluminium ammonium sulfate	523	520 mg/kg	6, 245, 296 & XS66

Food category 04.2.2.3 Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce			
Food additive	INS	Maximum Level	Notes
Propylene glycol alginate (DRAFT provision)	405	6000 mg/kg	XS66
Sodium diacetate (DRAFT provision)	262(ii)	GMP	XS66

* The following specific additives that were included under the group "adipates" were revoked from listing in the GSFA due to absence of JECFA specifications: ammonium adipates (INS 359) (REP 14/FA, para. 56 and Appendix XII Part B); and sodium adipates (INS 356) and potassium adipates (INS 357) (REP 15/FA, para. 129 and Appendix VIII, Part B).

NOTES:

Note 1: As adipic acid.

Note 6: As aluminium.

Note 245: For use in pickled vegetables only.

Note 296: Except for use in perilla in brine at 780 mg/kg.

XS66: Excluding products conforming to the *Standard for Table Olives* (CODEX STAN 66-1981).

Section 2 of Table 3

In the case of the *Standard for Table Olives*, it is clear that the intention of CCPFV is allow all Table 3 additives with the listed functional classes.

Although not within the scope of the current eWG, but for consistency with the approach taken in the alignment of other commodity standards with the GSFA, the eWG may wish to consider recommending that Section 2 of Table 3 be amended to include the listing of the *Standard for Table Olives* (CODEX STAN 66-1981).

Therefore, it is proposed to add the following to Section 2 of the Annex to Table 3 of the GSFA:

04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine or soybean sauce
	Acidity regulators, antioxidants, colour retention agents (table olives darkened with oxidation only), firming agents, flavour enhancers, preservatives, and thickeners (table olives with stuffing only) listed in Table 3 are acceptable for use in foods conforming to the standard.
Codex standard	<i>Standard for Table Olives</i> (CODEX STAN 66-1981)

PROPOSED AMENDMENTS TO THE GSFA DUE TO ALIGNMENT OF EDTA PROVISIONS OF THE STANDARD FOR CANNED SHRIMPS OR PRAWNS (CODEX STAN 37-1991)

CCFA48 (2016) noted the request from CCFFP34 to ask the EWG on Alignment to align the provision for ethylene diamine tetra acetates (INS 385, 386) in food category 09.4 (Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans and echinoderms) with that in the *Standard for Canned Shrimps or Prawns* (CODEX STAN 37-1981) (REP 16/FFP, para. 56(b)(i)). CCFA48 agreed to include this request as part of the mandate of the current EWG on alignment (REP 15/FA, para. 52(ii)(c), second bullet).

The *Standard for Canned Shrimps or Prawns* (CODEX STAN 37-1981) lists the use of calcium disodium ethylene diamine tetra acetate (INS 385) and disodium ethylene diamine tetra acetate (INS 386) as sequestrants at 250 mg/kg.

New text is indicated in **bold/underline**. Text to be removed is indicated in ~~strikethrough~~.

PROPOSED AMENDMENTS TO TABLE 1 AND 2 OF THE GSFA

It is proposed to amend Table 1 of the GSFA as follows:

Ethylene diamine tetra acetates: Functional class: Antioxidant, colour retention agent, preservative, sequestrants, stabilizer				
INS 385, 386				
Food category No	Food category	Max level	Notes	Recommendation
09.4	Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans and echinoderms	340 mg/kg	21, <u>GG</u>	Endorse

Note 21: As anhydrous calcium disodium ethylene diamine tetra acetate.

GG: Except for use in products conforming to the *Standard for Canned Shrimps or Prawns* (CODEX STAN 37-1981) at 250 mg/kg.

It is proposed to amend Table 2 of the GSFA as follows:

Food category 09.4 Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans and echinoderms			
Food additive	INS	Maximum Level	Notes
Ethylene diamine tetra acetates	385, 386	340 mg/kg	21, <u>GG</u>

Note 21: As anhydrous calcium disodium ethylene diamine tetra acetate.

GG: Except for use in products conforming to the *Standard for Canned Shrimps or Prawns* (CODEX STAN 37-1981) at 250 mg/kg.