



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

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Discussion Paper on the Management of CCFA Work

Prepared by the China and the United States of America, with assistance of Australia

Background

1. The 70th Session of the Executive Committee of the Codex Alimentarius Commission (CCEXEC70) recommended that all committees consider the need to develop an approach for the management of their work similar to that used by the Codex Committee on Food Hygiene (CCFH).¹ CCFH has formulated a forward workplan which includes criteria and weighting values to be applied when considering new work proposals for that committee.² In response to the request from CCEXE, the 48th session of the Codex Committee on Food Additives (CCFA48) agreed to develop a discussion paper defining broader strategies on how CCFA could prioritize its future work, in particular the General Standard on Food Additives (GSFA) and also taking into account specific food additive issues. China, the host country of CCFA, and the United States of America, the Chair of the Working Group on GSFA, were tasked to prepare this discussion paper for consideration by CCFA49.³

2. According to the Procedural Manual (25th Ed., 2016), the work of CCFA includes:

- to establish or endorse acceptable maximum levels for individual food additives;
- to prepare priority lists of food additives for risk assessment by the Joint FAO/WHO Expert Committee on Food Additives (JECFA);
- to assign functional classes to individual food additives;
- to recommend specifications of identity and purity for food additives for adoption by the Commission;
- to consider methods of analysis for the determination of additives in food; and
- to consider and elaborate standards or codes for related subjects such as the labelling of food additives when sold as such.

3. In alignment with the Codex Strategic Plan 2014-2019, all Codex committees, including CCFA, should establish new and review existing Codex standards, based on priorities of the Codex Alimentarius Commission (CAC), as well as proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.

Existing Workload of CCFA

4. Based on the above, CCFA has several standing subject matter topics on its Agenda each year, including:

- Matters pertaining to the Food Additive Provisions of the *General Standard for Food Additives* (GSFA);
- Alignment of the food additive provisions of commodity standards and relevant provisions of the GSFA;
- Matters specific to food additives referred to CCFA by other Committees, including endorsement of maximum levels for food additives;

¹ CX/FA 16/48/2, paras. 4 & 5.

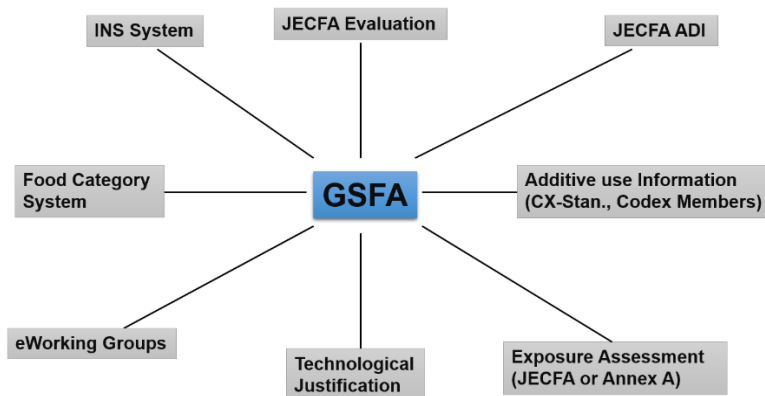
² REP 14/FH, paras 113, 114, & Appendix IX.

³ REP 16/FA, paras. 8-10.

- Consideration for adoption of the Specifications for the Identity and Purity of Food Additives from recent JECFA meetings;
- Revision of the *International Numbering System (INS) for Food Additives* (CAC/GL 36-1989); and
- Develop Priority List of Substances proposed for evaluation by JECFA.

5. At its annual Session, CCFA also discusses “other” subject matter topics that are not included under the above topics. These “other” topics are not standing subject matters, and will vary from Session to Session as decided by the previous CCFA. For instance, CCFA48 discussed proposed draft revisions to the *General Standard for the Labelling of Food Additives When sold As Such* (CODEX STAN 107-1981); specifically, CCFA48 discussed revisions to sections of CODEX STAN 107-1981 that pertain to flavourings.

Workload on matters pertaining to the provisions of the GSFA



6. CCFA has been tasked with developing the GSFA as the single authoritative Codex Standard for the use of food additives. Pertaining to this mandate and in the context of criteria in the Codex Procedural Manual and in the Preamble to the GSFA, CCFA has utilized the step process to populate the various food categories in the GSFA with provisions for the safe and technologically justified use of food additives. Currently there are 1823 draft and proposed draft food additive provisions in the step process for 145 food additives in 208 food categories. In addition to existing provisions currently in the step process, on average 50 to 100 proposals for new food additives provisions to be entered into the step process will be received by CCFA annually. Work on this topic is conducted by a standing EWG and a physical working group which meets for two days prior to each session of CCFA.

7. While considering the existing draft and proposed draft food additives provisions currently in the step process, CCFA has identified some “outstanding issues” that must be resolved before work on corresponding provisions can be completed. Work on these outstanding issues have required the formation of a separate electronic working group (EWG) or discussion paper. Current “outstanding issues” include:

- Use of Table 3 food additives in the production of wine;
- Use of nitrates and nitrites;
- Use of colours and sweeteners.

8. It is worth mentioning that among these outstanding issues, only the use of Table 3 food additives in the production of wine, and the use of nitrates and nitrites, are the subject of active EWGs or discussion papers. Although the use of colours and sweeteners have been the subject of previous EWGs and discussion papers, no clear decision or consensus has been reached. There are approximately 1200 provisions for colours and sweeteners in the step process for the GSFA.

Workload on Alignment

9. Alignment with corresponding commodity standards is taken into account by CCFA when considering the draft and proposed draft GSFA food additive provisions that are currently in the step process. However, this work does not address alignment of existing adopted provisions in the GSFA. Since CCFA44, the Committee has placed more focus on the alignment of food additive provisions of commodity standards and relevant provisions of the GSFA to solve the problem of inconsistency of food additive provisions between commodity standards and the GSFA. It is agreed that the current task of the Alignment work is to focus on the standards developed by inactive committees. Thus during the last three sessions, the CCFA has considered the alignment of food additive provisions in commodity standards under the purview of committees that have been adjourned sine die. CCFA has aligned the food additive provisions in 5 meat commodity standards, the commodity standard for bouillons and consommés, 4 commodity standards for chocolate and chocolate products, and 1 fish standard with provisions in the GSFA. This alignment was conducted using the decision tree designed by the Committee.⁴ The agenda for the CCFA49 includes the alignment of 15 additional Commodity Standards (this includes some that were not considered at the 2016 meeting due to time constraints). Work on this topic is conducted by a standing EWG and a physical working group which meets each session of CCFA.

10. The list of standards on the Codex website indicates which committee is responsible for each commodity standard.⁵ In addition, Annex C of the GSFA links the commodity standard number and food category, and the GSFA provisions in each food category can then be determined. From the analysis at the beginning of this work, for adjourned sine die commodity committees there are 10 commodity standards in 5 food categories that remain to be aligned with the GSFA (being CCFFP (9 commodity standards corresponding to 4 GSFA food categories) and CCNMW (1 commodity standard corresponding to 1 GSFA food category)). For commodity committees that are working by correspondence there are 36 commodity standards corresponding to 16 food categories that remain to be aligned with the GSFA (being CCMMP (33 commodity standards corresponding to 13 GSFA food categories), CCCPL (2 and 2) and CCS (1 and 1)). There are numerous commodity standards that remain to be aligned with the GSFA that are the subject of active commodity committees with physical meetings.

Workload on matters referred by other committees and consideration for adoption of the Specifications for the Identity and Purity of Food Additives from recent JECFA meetings

11. Work on these topics is handled during the plenary of each CCFA session. Although these are standing subject matter topics on CCFA's Agenda, the specific matters of discussion and amount of CCFA resources necessary to consider these topics varies. Experience from previous CCFA meetings indicates that these matters can either be addressed in their entirety at each Session or are referred to other standing topics (i.e., matters pertaining to GSFA food additive provisions) to be addressed at a later CCFA Session under that topic (i.e., do not require the formation of a separate EWG and/or discussion paper). However, these topics may occasionally require the formation of a separate EWG or discussion paper for specific complex issues.

Workload on revision of the INS (CAC/GL 36-1989) and development of a priority list of substances for evaluation by JECFA

12. Work on revisions to the INS is conducted by a standing EWG and a physical working group which meets each session of CCFA. Work on the development of the priority list of substances for evaluation by JECFA is conducted by a physical working group which meets each session of CCFA. Although these are standing subject matter topics on CCFA's Agenda, the specific matters of discussion and amount of CCFA resources necessary to consider these topics varies. Experience from previous CCFA meetings indicates that these matters can be addressed in their entirety at each Session.

Workload on "other" topics

13. These are topics that fall within the mandate of CCFA but do not fit into the standing subject matter topics discussed above, as the topic does not pertain to food additives for which provisions will be added to the GSFA. The specific matters vary from Session to Session, but in previous years have included discussions on secondary food additives, flavourings, labeling, etc. Experience from previous CCFA meetings indicates that these matters take multiple Sessions to address, cannot be referred to other standing topics, and therefore often require the formation of a separate EWG and/or discussion paper.

⁴ FA/47 CRD 3 Annex 1

⁵ <http://www.fao.org/fao-who-codexalimentarius/standards/list-standards/>

Proposed Work Plan for 2017-2022

14. In proposing a work plan for 2017-2022, it is noted that the main work of CCFA pertains to developing the GSFA to be the single authoritative Codex Standard for the use of food additives – most work conducted by the Committee is in support of this function. Thus CCFA is proposed to continue the approach of focusing the majority of the Committee's resources on the general work of the GSFA and Alignment, and that resources dedicated to other topics be commensurate to their impact on these two main topics. For instance, to maximize JECFA's impact on the GSFA, substances placed on the JECFA priority list should be limited to food additives and should not include substances that are not included in the GSFA (such as processing aids).

15. Proposals for work plans for each of the topics tasked to CCFA are discussed below.

Work plan for matters pertaining to the provisions of the GSFA

16. For the general work on the GSFA, it is noted that since CCFA47, the Committee has considered the remaining draft and proposed draft provisions in the first half of the GSFA (i.e., food categories (FCs) 01.0 through 08.4) as a group. Considering the provisions in the first half of the GSFA as a group has allowed the Committee to identify those provisions for which consensus can be reached after minimal discussion, and also to identify specific "outstanding issues" pertaining to provisions which require further discussion. It is expected that the Committee will complete its work on those provisions in the first half of the GSFA without "outstanding issues" at the current Session (CCFA49). Therefore, this discussion paper proposes that CCFA continue this approach by next discussing the remaining provisions in the second half of the GSFA (FCs 09.0 through 16.0) as a group. Based upon previous experience with this approach, it is expected that the Committee can complete its work on the remaining provisions for which no "outstanding issues" are identified by CCFA52.

17. However, criteria are necessary to prioritize CCFA's work on "outstanding issues" for specific provisions that require either the formation of a separate EWG or discussion paper. This includes the current "outstanding issues" mentioned previously in this document, as well as potential new issues identified by the Committee at the CCFA49, and future issues identified by the Committee when discussing provisions in the second half of the GSFA. The criteria discussed in the "Criteria for Beginning New Work" section of this discussion paper would be applicable to prioritizing "outstanding issues" for specific provisions that require either a separate EWG or discussion paper.

Work plan for Alignment

18. For alignment, currently the Chair of the EWG on Alignment recommends groups of commodity standards subject to adjourned commodity committees for alignment at each CCFA session. The alignment EWG utilizes the decision tree on alignment to process its work. Considering the alignment work of the food additive provisions in the commodity standards of adjourned commodity committees, the standards of CCFFP (corresponding to Food Category 09.2.5 & 09.4), CCVP (corresponding to Food Category 12.10) and CCNMW (corresponding to Food Category 14.1.1; no additives) remain for alignment.

19. CCFA has already determined that the active committees (with physical meetings), including CCNFSDU, CCFFV, CCFO, CCPFV, and CCCSH, are responsible for alignment (the CCFA49 Alignment EWG is developing guidance on alignment for active commodity committees). Active commodity committees should provide their recommendations for alignment to CCFA via the endorsement procedure outlined in the Procedural Manual.

20. However, some "active" committees are currently working by correspondence only (e.g., CCS (corresponding to Food Category 11), CCCPL (corresponding mainly to Food Category 06.1 & 06.2; 4.2.1.1 for pulses) and CCMMP (corresponding to Food Category 1.0)). To determine a workplan for Alignment beyond the food additive provisions in the commodity standards of adjourned commodity committees, CCFA must first determine whether the alignment work for commodity standards of "correspondence" committees should be undertaken by those committees, or if CCFA would unilaterally take on this alignment work. This problem might be solved with the Commission's decision on how the committees working by correspondence is going to work in future⁶.

⁶ REP17/EXEC 1 para.32-33

Work plan for Matters Referred by other committees and consideration for adoption of the Specifications for the Identity and Purity of Food Additives from recent JECFA meetings

21. The specific issues pertaining to these topics vary from Session to Session. Experience from previous CCFA meetings indicates that issues pertaining to these topics can either be addressed in their entirety at each Session or are referred to standing EWGs (e.g., endorsement of food additive provisions in commodity standards may be referred to the EWG on alignment etc.) to be addressed at a later CCFA Session under that topic. Currently there are no issues pertaining to these topics that require the formation of a separate EWG or discussion paper. Should issues that require either a separate EWG or discussion paper be identified for these topics in the future, criteria discussed in the “Criteria for Beginning New Work” section of this discussion paper would be applicable to prioritizing CCFA’s examination of those issues.

Work plan for revision of the INS (CAC/GL 36-1989) and development of a priority list of substances for evaluation by JECFA

22. Experience from previous CCFA meetings indicates that these matters can be addressed in their entirety at each Session. However, if specific complex issues within these topics are raised in the future that require the formation of an additional separate EWG or discussion paper, the criteria discussed in the “Criteria for Beginning New Work” section of this discussion paper would be applicable to prioritizing CCFA’s examination of those issues.

Work plan for “other” topics

23. The specific issues pertaining to these topics vary from Session to Session. Experience from previous CCFA meetings indicate that these issues take multiple Sessions to address, cannot be referred to a standing EWGs, and therefore often require the formation of a separate EWG and/or discussion paper. The criteria discussed in the “Criteria for Beginning New Work” section of this discussion paper would be applicable to prioritizing CCFA’s examination of these “other” topics.

General Summary

24. Based upon the discussion above, the following table summarizes the major work and its work load, and based on the work load and the working speed, as well as the complexity of each work, the expected time to complete the work.

Work	Description	Work Load	Current Speed of Work	Session to Finish
GSFA – general work	Consideration of food additive provisions in the step process or addition to the step process	1823 provisions (including provisions for colours and sweeteners)	250-350 provisions/year on average	By CCFA52
GSFA – “outstanding issues”	Use of Table 3 food additives in the production of wine	6 to 11 provisions	Dependent on progress at CCFA49	--
	Use of nitrates and nitrites	33 provisions	Dependent on progress at CCFA49	--
	Provisions with Note 161	403 provisions	Not currently under discussion	--
Alignment	Alignment of food additive provisions in commodity standards and those in GSFA	10/36 commodity standards for adjourned/ correspondence committees	5 commodity standards/year on average	CCFA51 for adjourned committees, CCFA58 for correspond*
Matters referred by other Committees	Endorsement of food additive provisions in commodity standards, etc.	Depend on request	Matters are addressed at each session or referred to GSFA EWG	
Specifications for the identity and purity of food additives	Adoption of specifications for the identity and purity of food additives	Depend on result from JECFA meetings	Decisions are made on the adoption in each session	--
INS	Revision of International Numbering System for food additives	Depend on request	Solve all requests in each session	--
Priority list for	Develop Priority List of	Depend on	Develop the priority	--

Work	Description	Work Load	Current Speed of Work	Session to Finish
JECFA evaluation	Substances proposed for evaluation by JECFA	request and data availability	list in each session	
"Other" topics	Matters pertaining to secondary food additives, flavourings, etc.	Depend on topic	Topics that result in formation of separate EWG or discussion paper should be ranked against criteria for prioritization	--

* Working process with correspondence committees to be determined

25. The criteria discussed below for beginning new work would be applicable to prioritizing "outstanding issues" that require either a separate EWG or discussion paper as well as other new work not directly related to provisions in the GSFA, but still within the mandate of CCFA.

Criteria for prioritization of topics and beginning new work

26. The work plan above mentions the use of ranking criteria for CCFA to prioritize work on certain issues. Besides the on-going work of the Committee discussed above, proposals for new work related to food additives may be brought to CCFA. The proposals for new work and issues as mentioned in the above work plan could be screened to allow CCFA to consider whether to begin the new work or not, taking into consideration that topics taken on by CCFA should be relevant to developing the GSFA to be the single authoritative Codex Standard for the use of food additives, and prioritized to balance the efficient use of CCFA resources with the risk to public health and/or impact on trade for each issue.

27. The criteria presented below is an initial proposal to allow CCFA to screen and prioritize new work and certain issues discussed in the work plan section of this document.

Criterion	Rating
Is the topic relevant to developing the GSFA to be the single authoritative Codex Standard for the use of food additives?	Yes/No If "no" discard proposal If yes" proceed to next question
Can the topic be addressed through one of the existing EWGs (EWG on GSFA, Alignment, INS, JECFA priority list)?	Yes/No If "yes" refer to Chair of relevant EWG for prioritization If "no" proceed to next question
Is there a risk to public health?	Global Risk: 10 Regional Risk: 5 No Risk: 0
Impact on international food trade	Global Trade Impact: 10 Regional Trade Impact: 5 No trade impact: 0
Area of Use- Whether the related food additives are widely used in GSFA food categories?	More than 10 categories (including 10): 5 Between 5 categories and 10 categories (including 5): 2 Less than 5 categories: 0
Whether the related food additives are used in the high consumption food categories?	Yes: 5 No: 0

28. Negative answer to the first question will directly lead to denial of the new work proposal. The answer to the second question will determine if a new EWG or discussion paper is necessary. Once the first two questions are addressed the overall rating result of the remaining questions will be used to prioritize the proposal.

Recommendation

29. CCFA will maintain a forward-looking work plan that will include revision of existing standards and new work proposals. The CCFA plenary will consider the work plan when new work or issues are raised to determine if CCFA will begin the new work or defer items of lower priority for a future session when the completion of agenda items would allow the addition of new work items. CCFA is invited to consider the above ranking criteria to help in reaching a decision on whether to take on new work or additional issues or to defer those issues to a later session.

30. In addition to the current content of the Committee, if time is available (e.g. Wednesday lunch time), various side events could be considered, for instance, presentations sharing experience of food additive regulation in different countries and regions, workshop on the risk assessment principles for food additives, introduction on how to propose a new provision of food additive in GSFA, etc. This will help the communication among delegates and enhance the exchange of information on management of food additives in different countries and regions, while encouraging the developing countries to be more activate in CCFA and other Codex occasions, which could attach more value to the CCFA committee in future.

31. The Committee is invited to consider the discussion paper.