

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 1, 2, 3a, 3b, 4a, 4b, 5a, 5b, 6, 7, 8, and 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES Fifty-Fourth Session

Comments of Burundi

Agenda item 1: ADOPTION OF THE AGENDA

Comment: Burundi supports the agenda Item as circulated.

Agenda item 2: MATTERS REFERRED BY THE CODEX ALIMENTARIUS COMMISSION AND OTHER SUBSIDIARY BODIES

Comment: Burundi takes note of matter arising from CAC46 and CCEXEC85.

Agenda item 3a: MATTERS OF INTEREST ARISING FROM FAO/WHO AND FROM THE 96TH AND 97TH MEETINGS OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA) RESPECTIVELY

Actions required as a result of changes in acceptable daily intake (ADI) status and other toxicological recommendations from JECFA in **CX/FA 24/54/3 Annex 1 and Annex 2**.

Comment: Burundi notes and accepts the reaffirmed ADI of 0– 40mg/kg bw for aspartame and reaffirmed ADI “not specified” for Titanium dioxide by JECFA.

Rationale: The food additives were adequately evaluated as safe for use in the recommended amount by JECFA as the scientific advisor to CODEX.

Agenda item 3a add.1: MATTERS RELATED TO AZODICARBONAMIDE (INS 927A)

Comment: Burundi is in agreement with the deletion of azodecarbamide (INS 927a) from GSFA.

Agenda item 3b: PROPOSED DRAFT SPECIFICATIONS FOR IDENTITY AND PURITY OF FOOD ADDITIVES ARISING FROM THE 96TH AND 97TH JECFA MEETINGS RESPECTIVELY

Comment: Burundi agrees with the specification designated as “Full” for food additives listed in annex1 and subsequently recommends their adoption at step 5/8.

Agenda item 4a: ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS

Comment: Burundi supports the endorsement of the food additives provisions as in annex1 and as forwarded by the 7th session of the Codes Committee on spices and culinary herbs REP 24 SCH) related to th standard for dried or deshydrated roots, rhizomes and bulbs)-tumeric (for adoption by CAC47).

Rationale: This work is fully aligned with the Codex procedural manual.

Agenda item 4b: ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS: REPORT OF THE EWG ON ALIGNMENT

Comment: Burundi appreciates the work undertaken chaired by Canada and co-chaired by USA and Japan. Burundi supports the adoption of alignment of the commodity standards to CXS 192-1995 as proposed by EWG including proposed consequential changes to table 1, 2 and 3 of GSFA.

Rationale: The products in both standards have a relationship of 1:1 with the GSFA hence standardized. The new category in GSFA (01.7) accommodates flavoured fermented milks which contain ingredients other than milk.

Appropriate exclusion notes have been provided in the GSFA Tables reflecting the food additives provisions in the commodity standards.

Agenda item 5a: GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE ELECTRONIC WORKING GROUP

Position: Burundi appreciates the work undertaken agrees with the final EWG proposals and takes note of the following:

1. **Use of steviol glycosides (sweeteners) in FC 07.1** and its sub-categories: Adoption of Steviol Glycosides as a sweetener at 350 mg/kg with Note 26 and Note 477 s proposed by the EWG
2. **Food Category 07.1 (Bread and ordinary bakery wares):**

Burundi supports the proposed Alternative Note including the elaboration of the term plain bread: **“Some Codex Members allow use of additives with sweetener and colour function in this Food Category while others consider that this Food Category includes only “plain products”. For the purpose of this Food Category, “plain” refers to products without additives that have sweetener or colour functions.”**

With the adoption of the proposed note as indicated above, Burundi supports the horizontal approach of replacement of Note 161 with the alternative note.

3. Propylene Glycol (PG) – EAC proposes to hold PG at 3000 ppm in parent category 14.1.4. and ask that JECFA update its safety assessment and intake estimates. Note 127 "on an as consumed basis" and Note 131 "for use as a flavour carrier only" should be added.

CX/FA 23/53/7 Propylene Glycol – The following paper provides justification to reduce the pharmacodynamics uncertainty factor, increasing the ADI from 25 to 62.5 mg/kg bw/d. “Lewis, A.S., S.R. Boomhower, C.M. Marsh, M.M. Jack. 2024. Considerations for Deriving a Safe Intake of Propylene Glycol. Food and Chemical Toxicology. 5:186:114460 doi: 10.1016/j.fct.2024.114460”

Agenda item 5b: GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS

General Standard for Food Additives (GSFA): Proposals for new and/or revision of food additive provisions (replies to CL 2023/46-FA)

Comment: Burundi supports the proposed list except for the proposal by: -

- Peru- food additives in FC: 04.1.2.5 - Jams, jellies, marmalades
- FIVS -Metatartaric acid INS 353, in grape wine (14.2.3) at GMP

It is recommended that the proposal from Peru regarding FC: 04.1.2.5 for jams, jellies, and marmalades be referred to the working group on alignment. The FIVS's proposal should be revised to a numerical ML.

Rationale: Metatartaric acid INS 353 has a numerical ADI (Group ADI= 0-30 mg/kg b/w) and, therefore, cannot be considered at the GMP level in the GSFA. It is not normal for the CCFA to consider additives with numerical ADI at GMP levels.

The commodity standards CXS 296-2009- Standards for jams, jellies and marmalades contain food additive provisions related to FC 04.1.2.5, and therefore, the working group on alignment can best address this.

Agenda item 6: PROPOSED DRAFT REVISION TO THE CLASS NAMES AND THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CXG 36-1989)

Proposed draft revision to the Class Names and the International Numbering System for Food Additives (CXG 36-1989)

Issue 1: To consider the additions to the *Class Names and International Numbering System for Food Additives* (CXG 36-1989) as presented in the annex in document CX/FA24/54/9.

Comment: Burundi supports the inclusion of the additives in the INS list as presented in the annex of document CX/FA 24/54/9.

Rationale: Members, who proposed the inclusion of the additives on the INS list, showed that they are permitted for use in their countries. The text of CL 2023/45-FA specified that requests for the inclusion of new additives may

be made by Codex members that authorize the additive for use in that country. Justifications for use were also provided and agreed to by the eWG.

Agenda item 6 add.1: PROPOSED DRAFT REVISION TO THE CLASS NAMES AND THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CXG 36-1989) - COMMENTS AT STEP 3 (REPLIES TO CL 2024/23-FA)

Issue 2: Whether or not to include the function of carrier for sodium ascorbate (INS 301).

Comment: Burundi does not support the inclusion of sodium ascorbate in the function of carrier.

Rationale: INS 301 already contains the function of antioxidant and cannot thus be inert as required for a carrier.

Issue 3: Whether or not to include phycocyanin produced by bacteria for use as a blue colour.

Comment: Burundi does not supports the inclusion of phycocyanin produced by bacteria in the INS list at this stage.

Rationale: The additive's official name is not substantiated, and its use is not authorized in the proposing country. The circular letter (CL 2023/45- FA) included a condition of approval of the additive in the requesting country.

Agenda item 7: PROPOSALS FOR ADDITIONS AND CHANGES TO THE PRIORITY LIST OF SUBSTANCES PROPOSED FOR EVALUATION BY JECFA

Comment: Burundi supports the priority lists and ranking based on consumer health risks, international trade concerns and data availability.

Rationale: The ranking should prioritise food additives that are of major concern in relation to consumer's safety and health, facilitate fair trade and where data has been provided.

Agenda item 8: DISCUSSION PAPER ON DIVERGENCE BETWEEN THE GENERAL STANDARD FOR FOOD ADDITIVES (GSFA), CODEX COMMODITY STANDARDS AND OTHER TEXTS – IDENTIFICATION OF OUTSTANDING ISSUES

Comment: Burundi recognizes the need to protect the work that has already been undertaken considering the time and resources invested. Additionally, alignment work is still ongoing, and more lessons may be learned as work progresses. It is premature at this point to undertake holistic revision of the procedural manual especially considering that CCFA has previously recognized the complex nature of alignment. It would be appropriate to consider minor amendments as proposed in option 2 of strengthening reference to GSFA by commodity committees as well as eliminating any provision that negates the principle of having GSFA as the single most authoritative document. Upon completion of alignment work, then a comprehensive revision of procedural manual may be considered.

Agenda item 9: DISCUSSION PAPER ON THE DEVELOPMENT OF A STANDARD FOR BAKER'S YEAST

Comment: Burundi agrees to the revised project document CX/FA 24/54/12 Appendix 1 and supports the development of a standard for baker's yeast as a new work for approval by CAC47.

Rationale: The current data related to baker's yeast production volumes supports international trade. Further the discussion paper also highlights the issue of consumer safety.