

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda item 4

CX/LAC 22/22/4

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME FAO/WHO COORDINATING COMMITTEE FOR LATIN AMERICA AND THE CARIBBEAN

22nd Session

Virtual

24 – 28 October 2022

### ALIGNMENT OF FOOD ADDITIVE PROVISIONS IN CCLAC REGIONAL STANDARDS WITH THE GENERAL STANDARD ON FOOD ADDITIVES

Codex members and observers wishing to submit comments on this document should do so as instructed in CL 2022/51/LAC available on the Codex webpage/ [Circular Letters 2022](#).

#### Background

1. The 51st Session of the Codex Committee on Food Additives (CCFA51, 2019) endorsed an updated forward work plan for alignment of food-additive provisions in commodity standards, including three regional standards developed by the FAO/WHO Coordinating Committee for Latin America and the Caribbean (CCLAC).
2. CCLAC21 (2019) discussed alignment of food additive provisions in the [Regional Standard for Culantro Coyote \(CXS 304R-2011\)](#), [Regional Standard for Lucuma \(CXS 305R-2011\)](#) and [Regional Standard for Yacon \(CXS 324R-2017\)](#) with the *General Standard for Food Additives* (GSFA) (CXS 192-1995), and agreed that a Circular Letter (CL) be issued with detailed information on the background and the potential options for alignment of the food additive provisions in order to facilitate decision-making at CCLAC22.
3. Based on the decision at CCLAC21, CL 2020/56/LAC was distributed to request comments on possible options for the alignment of the food additive provisions in these standards on 1<sup>st</sup> October 2020, followed by the revised version of the CL with multiple extensions of the deadline, until 30<sup>th</sup> September 2021 (Appendix I and II).
4. Three Members, namely Chile, Ecuador and Peru, submitted their comments in response to the CL, which are attached as Annex I (original language only).

#### Summary of comments and proposed way forward

##### *Regional Standard for Culantro Coyote (CXS 304R-2011)*

5. While one Member was of the view that, due to lack of information, it was not possible to choose one specific option, two Members supported Option 1 “no food additives are allowed for the commodity”.

6. Therefore, it is proposed that a revision of the standard be made to include a provision indicating that “No food additives are permitted in foods conforming to this standard.” and CCLAC revert to CCFA accordingly.

##### *Regional Standard for Lucuma (CXS 305R-2011)*

7. One Member did not choose one specific option due to absence of domestic production.

8. While one Member supported Option 1 “no food additives are allowed for the commodity”, the other Member opted for Option 2 “develop a list of food additives which are permitted in this commodity”, giving the possibility for submittal of a list of food additives and technical justifications for the use of food additives from other Members.

9. Hence, Members who wish to include food additives in the *Regional Standard for Lucuma* (CXS 305R-2011) are invited to submit a list of food additives and technical justifications for the use of those food additives, which would lead to the revision of the food additive provisions in the standard. In such a situation, CCLAC would then need to inform CCFA of the list of food additives together with technical justifications. In case no proposals for food additives are submitted, it is proposed that a revision of the standard be made to include a provision indicating that “*No food additives are permitted in foods conforming to this standard.*” and CCLAC revert to CCFA accordingly.

*Regional Standard for Yacon* (CXS 324R-2017)

10. One Member did not choose a specific option due to absence of domestic production.

11. While one Member supported Option 1 “no food additives are allowed for the commodity”, the other Member opted for Option 3 “develop a list of food additives which are permitted in this commodity”, giving the possibility for submittal of a list of food additives and technical justifications for the use of food additives from other Members.

12. Hence, Members who wish to include food additives in the *Regional Standard for Yacon* (CXS 324R-2017) are invited to submit a list of food additives and technical justifications for the use of those food additives, which would lead to the revision of the food additive provisions in the standard. In such a situation, CCLAC would then need to inform CCFA of the list of food additives together with technical justifications. In case no proposals for food additives are submitted, no revisions are needed to be made in the standard. CCLAC should revert to CCFA accordingly.

### **Recommendation**

13. CCLAC is invited to consider the abovementioned proposals, together with any additional information received in response to CL 2022/51/LAC, and revert to CCFA with a recommendation for the alignment of the food additive provisions in the [Regional Standard for Culantro Coyote \(CXS 304R-2011\)](#), [Regional Standard for Lucuma \(CXS 305R-2011\)](#) and [Regional Standard for Yacon \(CXS 324R-2017\)](#) with the *General Standard for Food Additives* (GSFA) (CXS 192-1995). If and where needed a list of food additives to be included in the standard(s) together with the related technical justifications should also be provided to CCFA.

## Relationship of Regional Standards Developed by CCLAC and the General Standard for Food Additives (CXS 192-1995; GSFA)

| Standard  | Current food additive provisions          | Food additives permitted in GSFA   | Options   |
|---|---|--|---|
| CXS304R-2011<br>Regional Standard for Culantro Coyote | No reference to Food Additive Provisions. | Culantro coyote belongs to "Food category No. 04.2.1.1 Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds", in which some food additives are permitted with the condition of "for use in edible fungi and fungus products only" (see Appendix II). | <p><b>Option 1:</b> No food additives are permitted in culantro coyote.</p> <ul style="list-style-type: none"> <li>Revise the standard to indicate that "<i>No food additives are permitted in foods conforming to this standard.</i>"</li> </ul> <p><b>Option 2:</b> Food additives are acceptable for use in accordance with GSFA in <i>Culantro coyote</i>.</p> <ul style="list-style-type: none"> <li>Revise the standard to indicate that "<i>Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard</i>"</li> <li>Request CCFA to revise Note 262 to permit the food additives in Food Category 04.2.1.1 for use in culantro coyote. In this case, technical justification for the use of food additives should be submitted to CCFA.</li> </ul> <p><b>Option 3:</b> Develop a list of food additives which are permitted in this commodity.</p> <ul style="list-style-type: none"> <li>Revise the standard to include the food additives.</li> <li>Technical justification for the use of food additives should be submitted to CCFA.</li> </ul> |
| CXS305R-2011<br>Regional Standard for Lucuma          | No reference to Food Additive Provisions. | Lucuma belongs to "Food category No. 04.1.1.1 Untreated fresh fruit", in which no food additives are provided as of now.   | <p><b>Option 1:</b> No food additives are permitted in lucuma.</p> <ul style="list-style-type: none"> <li>Revise the standard to indicate that "<i>No food additives are permitted in foods conforming to this standard.</i>"</li> </ul> <p><b>Option 2:</b> Develop a list of food additives which are permitted in this commodity.</p> <ul style="list-style-type: none"> <li>Revise the standard to include food additives.</li> <li>Technical justification for the use of food additives should be submitted to CCFA.</li> </ul>   |

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| <p>CXS324R-2017</p> <p>Regional Standard for Yacon</p> | <p><b>“8. FOOD ADDITIVES.</b></p> <p>This Standard applies to yacon as identified in Food Category 04.2.1.1 Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed and nuts and seeds, and therefore <u>no food additives is allowed in accordance with the provisions of the General Standard for Food Additives (CXS 192-1995).”</u></p> | <p>Yacon belongs to “Food category No. 04.2.1.1 Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds”, in which some food additives are permitted with the condition of “for use in edible fungi and fungus products only” (see Appendix II).</p> | <p><b>Option 1:</b> No food additives are permitted in yacon.</p> <p><b>Option 2:</b> Food additives are acceptable in accordance with GSFA for use in yacon.</p> <ul style="list-style-type: none"> <li>• Revise the standard to indicate that “<i>Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard</i>”</li> <li>• Request CCFA to revise Note 262 to permit the food additives in Food Category 04.2.1.1 for use in yacon. In this case, technical justification for the use of food additives should be submitted to CCFA.</li> </ul> <p><b>Option 3:</b> Develop a list of food additives which are permitted in this commodity.</p> <ul style="list-style-type: none"> <li>• Revise the standard to include the food additives.</li> <li>• Technical justification for the use of food additives should be submitted to CCFA.</li> </ul> |
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## Food Additives Permitted for Food Category No. 04.2.1.1 in the General Standard for Food Additives (CXS 192-1995)

| <b>Food Category No. 04.2.1.1</b> |           | <b>Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds</b> |           |           |
|-----------------------------------|-----------|---|-----------|-----------|
| Additive                          | INS       | Year Adopted  | Max Level | Notes     |
| ACETIC ACID, GLACIAL              | 260       | 2013  | GMP       | 262 & 263 |
| ASCORBIC ACID, L-                 | 300       | 2013  | 500 mg/kg | 262       |
| CITRIC ACID                       | 330       | 2013  | GMP       | 262 & 264 |
| LACTIC ACID, L-, D- and DL-       | 270       | 2013  | GMP       | 262 & 264 |
| SODIUM DIHYDROGEN CITRATE         | 331 (i)   | 2015  | GMP       | 262       |
| TRISODIUM CITRATE                 | 331 (iii) | 2015  | GMP       | 262       |

Note 262 For use in edible fungi and fungus products only.

Note 263 Except for use in pickled fungi at 20 000 mg/kg.

Note 264 Except for use in sterilized fungi at 5 000 mg/kg: citric acid (INS 330) and lactic acid (INS 270), singly or in combination.

**GENERAL COMMENTS**

| COMMENT   | MEMBER / OBSERVER |
|---|-------------------|
| <p>Chile agradece a la secretaria del Codex, por la recopilación de la información detallada sobre las normas regionales de productos, sus antecedentes y las posibles opciones para armonizar las disposiciones sobre aditivos alimentarios a fin de facilitar la adopción de una decisión en la 22.<sup>a</sup> reunión del CCLAC.</p> <p>A continuación, se presentan los comentarios específicos para las normas regionales de culantro, lúcuma y yacón, que, aunque actualmente no se cuenta con la justificación técnica para respaldar la solicitud, se ha realizado un análisis crítico en base a los antecedentes disponibles.</p> | Chile             |
| <p>Ecuador agradece la oportunidad de comentar el documento "SOLICITUD DE OBSERVACIONES RELATIVAS A LA ARMONIZACIÓN DE LAS DISPOSICIONES SOBRE ADITIVOS ALIMENTARIOS Y EL PLAN DE ARMONIZACIÓN DE LAS NORMAS REGIONALES ELABORADAS POR EL CCLAC", y con relación a la formulación de comentarios sobre las tres normas regionales, el país expresa lo siguiente.</p>  | Ecuador           |

**SPECIFIC COMMENTS****Regional Standard for Culantro Coyote (CXS 304R-2011)**

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| <p>Esta Norma no incluye ninguna referencia a las disposiciones sobre aditivos alimentarios.</p> <p>Este producto pertenece a la categoría del Sistema de Clasificación de Alimentos 4.2.1.1, esta categoría contiene, para todos los aditivos, la Nota 262 "Para uso en hongos comestibles y productos de hongos solamente". Por lo que, no están mencionados aditivos para el culantro coyote. La opinión de Chile es que al ser productos frescos no se debiese permitir el agregado de aditivos, por lo que se apoya la opción 1.</p> <p><i>Opción 1: Confirmar que no se permite ningún aditivo alimentario en este producto e insertar un texto a tal efecto en la norma regional para el culantro coyote.</i></p>   | Chile   |
| <p>La Norma regional para el culantro coyote (CXS 304 R-2011), debido a la falta de información sobre la adición o no de aditivos en el culantro a nivel local, como país nos limitamos a no optar por una de las 3 opciones planteadas.</p>   | Ecuador |
| <p><b><u>Se debe adoptar la OPCIÓN 1</u></b></p> <p>"no se permiten aditivos alimentarios en el alimento regulado por esta norma".</p> <p>La categoría de alimentos 4.2.1.1. corresponde a Hortalizas (incluidos hongos y setas, raíces y tubérculos, legumbres y leguminosas y áloe vera), algas marinas y nueces y semillas <b><u>frescas no tratadas</u></b></p> <p>No es necesario que se excluya el culantro coyote de la categoría 4.2.1.1. de la NGAA (CXS 192.1985) en virtud de que los aditivos alimentarios considerados en esta categoría de alimentos aplica a hongos comestibles solamente de acuerdo a lo precisado en la Nota 262 que a la letra señala <b><u>"Para uso en hongos comestibles y productos de hongos solamente"</u></b></p> <p>Adicionalmente a ello se observa que las Notas 263 y 264 de la categoría 4.2.1.1. de la NGAA no deberían estar consignadas en esta categoría de alimentos y deberían considerarse en las categorías 4.2.2.3 (Hortalizas (incluidos hongos y setas, raíces y tubérculos, legumbres y leguminosas y áloe</p> | Peru    |

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| vera) y algas marinas en vinagre, aceite, salmuera o salsa de soja) y 4.2.2.4 (Hortalizas (incluidos hongos y setas, raíces y tubérculos, legumbres y leguminosas y áloe vera) y algas marinas en conserva, en latas o frascos (pasterizadas) o en bolsas de esterilización) respectivamente. |  |
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### Regional Standard for Lucuma (CXS 305R-2011)

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| <p>Esta Norma no incluye ninguna referencia a las disposiciones sobre aditivos alimentarios.</p> <p>Dado que esta norma no hace referencia al uso de aditivos alimentarios, Chile apoya la posibilidad de dar la oportunidad que los miembros que justifiquen fuertemente el uso de algún aditivo alimentario en este alimento lo puedan hacer, por lo que se apoya la opción 2.</p> <p><i>Opción 2: Elaborar una lista de los aditivos alimentarios permitidos en este producto y revisar la norma en consecuencia. En ese caso, debería presentarse al CCFA la justificación técnica respecto al uso de los aditivos alimentarios.</i></p> | Chile   |
| La Norma regional para la lúcuma (CXS 305R-2011), cómo país, no tenemos producción de lúcuma, razón por lo cual nos limitamos en no escoger entre una de las dos opciones  | Ecuador |
| <p><b>Se debe adoptar la OPCIÓN 1</b></p> <p>“no se permiten aditivos alimentarios para el alimento regulado por esta norma”</p> <p>La categoría de alimentos 04.1.1.1 corresponde a <b>Frutas frescas no tratadas</b></p>   | Peru    |

### Regional Standard for Yacon (CXS 324R-2017)

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| <p>Esta Norma incluye una disposición sobre aditivos alimentarios, que establece que no se permite el uso de aditivos alimentarios de acuerdo con las disposiciones de la Norma general.</p> <p>Esta norma ya menciona que no se permite el uso de aditivos, pero contradice lo que indica la Norma general para los aditivos alimentarios (NGAA). Por lo que, dado el avance en la tecnología y si algún miembro del CCLAC tiene alguna justificación contundente del uso de algún aditivo para soportar el transporte y la manipulación del alimento y llegar en buen estado al lugar de destino, Chile apoya la opción 3.</p> <p><i>Opción 3: Elaborar una lista de los aditivos alimentarios cuyo uso está permitido en este producto. En cuanto a los aditivos alimentarios no incluidos en la categoría de alimentos 04.2.1.1 de la NGAA, debería presentarse al CCFA la justificación técnica respecto a su uso</i></p> | Chile   |
| La Norma regional para el yacón (CXS 324R-2017), cómo país, no tenemos producción de yacón, razón por lo cual nos limitamos en no escoger entre una de las tres opciones.  | Ecuador |
| <p><b>Se debe adoptar la OPCIÓN 1</b></p> <p>“no se permiten aditivos alimentarios en el alimento regulado por esta norma”</p> <p>La categoría de alimentos 4.2.1.1. corresponde a Hortalizas (incluidos hongos y setas, raíces y tubérculos, legumbres y leguminosas y áloe vera), algas marinas y nueces y semillas <b>frescas no tratadas</b>.</p> <p>No es necesario que se excluya el yacón de la categoría 4.2.1.1. de la NGAA (CXS 192.1985) en virtud de que los aditivos alimentarios considerados en esta categoría de alimentos aplica a hongos comestibles solamente de acuerdo a lo precisado en la Nota 262 que a la letra señala <b>“Para uso en hongos comestibles y productos de hongos solamente”</b></p>  | Peru    |

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| <p>Adicionalmente a ello se observa que las Notas 263 y 264 de la categoría 4.2.1.1. de la NGAA no deberían estar consignadas en esta categoría de alimentos y deberían considerarse en las categorías 4.2.2.3 (Hortalizas (incluidos hongos y setas, raíces y tubérculos, legumbres y leguminosas y áloe vera) y algas marinas en vinagre, aceite, salmuera o salsa de soja) y 4.2.2.4 (Hortalizas (incluidos hongos y setas, raíces y tubérculos, legumbres y leguminosas y áloe vera) y algas marinas en conserva, en latas o frascos (pasterizadas) o en bolsas de esterilización) respectivamente.</p> |  |
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