

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

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Agenda Item 7 D

CX/FAC 02/8

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fourth Session

Rotterdam, The Netherlands, 11-15 March 2002

DRAFT REVISED ANNEX TO TABLE 3 OF THE GSFA

The following comments have been received from Argentina, European Community, Japan and ISDI

ARGENTINA (Spanish version only)

OBSERVACIONES REALIZADAS POR ARGENTINA AL APÉNDICE 111 CONSIDERANDO EXCLUSIVAMENTE LAS CATEGORÍAS CORRESPONDIENTES A CARNES Y PRODUCTOS CÁRNEOS, PESCADOS Y PRODUCTOS DE LA PESCA Y HUEVOS

Para las categorías mencionadas con anterioridad se realizan las observaciones que se listan a continuación , los items no mencionados implican que no hay objeciones a la propuesta realizada

El hecho de que determinados aditivos no estén autorizados por nuestra legislación implica una solicitud de revisión de la justificativa tecnológica para su uso.

El hecho de que determinados aditivos no estén contemplados, no implica una objeción de USO.

ADIPATES

Adipic Acid	INS: 355	Sodium Adipate	INS: 356
Potassium Adipate	INS: 357	Ammonium Adipate	INS: 359

Function: Acidity Regulator, Fitting Agent, Raising Agent

Egg-based desserts (e.g., custard) 30000 mg/kg

Observaciones: no contemplado en la legislación Argentina para los **finés** descriptos precedentemente

AGAR

Agar

INS: 406

Function: Bulking Agent, Emulsifier, Filler, Stabilizer, Thickener

08.1 Fresh meat, poultry, and game

GMP

Observaciones: no contemplado en la legislación Argentina para los **fines** descriptos precedentemente

09.2.2 Frozen battered fish, fish filets, and fish products,

GMP

09.2.3 Frozen minced and creamed fish products, including
mollusks, crustaceans, and echinoderm

GMP

Observaciones: Solo autorizado para productos congelados obtenidos de recortes de pescado,
pescado desmenuzado o pulpa **de** pescado

OBSERVACIONES REALIZADAS POR ARGENTINA AL APÉNDICE M CONSIDERANDO EXCLUSIVAMENTE LAS CATEGORÍAS CORRESPONDIENTES A CARNES Y PRODUCTOS CÁRNEOS, PESCADOS Y PRODUCTOS DE LA PESCA Y HUEVOS

09.2.5 Smoked, dried, fermented, and/or salted fish and fish echinoderms GMP

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

10.2.1 Liquid egg products GMP

10.2.2 Frozen egg products GMP

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

CAROB BEAN GUM

Carob Bean Gum INS: 410

Function- Emulsifier, Stabilizer, Thickener

10.2.2 Frozen egg products GMP

10.2.3 Dried and/or heat coagulated egg products GMP

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

CARRAGEENAN

Carrageenan INS- 407

Function-. Emulsifier, Filler, Stabilizer, Thickener

08.1 Fresh meat, poultry, and game GMP

OBSERVACIONES REALIZADAS POR ARGENTINA AL APÉNDICE 111
CONSIDERANDO EXCLUSIVAMENTE LAS CATEGORÍAS CORRESPONDIENTES A
CARNES Y PRODUCTOS CÁRNEOS, PESCADOS Y PRODUCTOS DE LA PESCA Y
HUEVOS

Observaciones: no autorizado en la legislación Argentina y MERCOSUR para los fines descriptos precedentemente

09.2.5 Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms GMP

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

10.2.1 Liquid egg products GMP
 10.2.2 Frozen egg products GMP

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

DISODIUM GUANYLATE 5'

Disodium Guanylate, 5' INS- 627

Function: Flavour enhancer

08.1 Fresh meat, poultry, and game GMP

Observaciones: no autorizado en la legislación Argentina y MERCOSUR para los fines descriptos precedentemente

DISODIUM INOSINATE, 5'

Disodium inosinate, 5' INS: 631

Function-. Flavour Enhancer

08.1 Fresh meat, poultry, and game GMP

OBSERVACIONES REALIZADAS POR ARGENTINA AL APÉNDICE 111
CONSIDERANDO EXCLUSIVAMENTE LAS CATEGORÍAS CORRESPONDIENTES A
CARNES Y PRODUCTOS CÁRNEOS, PESCADOS Y PRODUCTOS DE LA PESCA Y
HUEVOS

Observaciones: no autorizado en la legislación Argentina y MERCOSUR para los fines descriptos precedentemente

EDTAs

Calcium Disodium Ethylene diamine Tetra **INS-. 385**

Acetate Disodium Ethylene diamine Tetra Acetate **INS: 386**

Function: Antioxidant, Preservative, Sequestrant

09.2.4.1 Cooked fish and fish products 50 mg/kg Note 21

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente.

GALLATE, PROPYL

Gallate, Propyl **INS: 310**

Function- Antioxidant

09.2.1 Frozen fish, fish filets, and **fish** products, including mollusks, crustaceans, and echinoderms 1 000 mg/kg Note 1 1 1

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente.

GELLAN GUM

Gellan Gum **INS: 418**

Function: Thickener, Stabilizer

08.1 Fresh meat, poultry, and game

GMP

**OBSERVACIONES REALIZADAS POR ARGENTINA AL APÉNDICE M
CONSIDERANDO EXCLUSIVAMENTE LAS CATEGORÍAS CORRESPONDIENTES A
CARNES Y PRODUCTOS CÁRNEOS, PESCADOS Y PRODUCTOS DE LA PESCA Y
HUEVOS**

Observaciones: no autorizado en la legislación Argentina y MERCOSUR para los fines descriptos precedentemente

09.1 Fresh fish and fish products, including mollusks, crustaceans, and echinoderms GMP

Observaciones: no autorizado en la legislación Argentina para los fines descriptos precedentemente

102.1 Liquid egg products GMP

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

GUAR GUM

Guar Gum INS- 412

Function- Bulking Agent, Emulsifier, Stabilizer, Thickener

10.2.1 Liquid egg products GMP 10.2.2 Frozen egg products GMP

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

GUM ARABIC

Gum Arabic INS- 414

Function- Bulking Agent, emulsifier, Filler, Stabilizer, Thickener

10.2.1 Liquid egg products GMP

10.2.2 Frozen egg products GMP

OBSERVACIONES REALIZADAS POR ARGENTINA AL APÉNDICE 111
CONSIDERANDO EXCLUSIVAMENTE LAS CATEGORÍAS CORRESPONDIENTES A
CARNES Y PRODUCTOS CÁRNEOS, PESCADOS Y PRODUCTOS DE LA PESCA Y
HUEVOS

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

MICROCRYSTALLINE CELLULOSE

Microcrystalline Cellulose INS: 4601

Function- Anticaking Agent, Bulking Agent, Emulsifier, Foaming Agent, Stabilizer, Thickener

10.2.1	Liquid egg products	GMP
10.2.2	Frozen egg products	GMP

Observaciones: no contemplado en la legislación Argentina para los fines descriptos precedentemente

MONOAMMONIUM GLUTAMATE, L

Monoammonium Glutamate, L- INS: 624

Function: Flavour Enhancer

08.1	Fresh meat, poultry, and game	GMP
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Observaciones: no autorizado en la legislación Argentina y MERCOSUR para los fines descriptos precedentemente

EUROPEAN COMMUNITY

The European Community agrees with the Annex to Table 3 as it is proposed and urges CCFAC to propose it for adoption at step 8 by the Codex Alimentarius Commission.

JAPAN

Proposed Uses of Table 3 Additives in Food Categories or Individual Food Items listed in the Annex to Table 3 (Appendix 2).

In related to this matter, we would appreciate it most if you would show us the current version of Table2 at least at the next meeting of CCFAC. We convince that showing the up-dated Table 2 would facilitate the discussion at the next meeting.

The second comment is in regard to the Codex International Numbering System, Item 4 of part B of CL 2001/13-FAC. In this regard, Japan would like to submit proposal to add following three food colours to the

Codex INS: Gardenia blue, Purple corn colour and Red cabbage colour. Of course, we have affirmed that these food additives fulfill the criteria for inclusion to the INS as agreed at the 22nd session of the CCFAC.

Proposed uses of Table 3 Additives in Food Categories or Individual Food items listed in the Annex to Table 3

In this document, we use the current food category system, however, please bear in mind that we prefer using another food category system, which are proposed in para 21 d) of CX/FAC 02/6, in particular, regarding the categories of 06.4.1 and 06.4.2.

We assigned the proposed category of 06.4.1 to the current category of 06.4.1 and also assigned the proposed category of 06.4.3 to the current category of 06.4.2.

Acetic Acid, Glacial

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and---	GMP	do
09.2	Processed fish and fish products,	...GMP	do
12.2	Herbs, spices, seasoning (Including	...GMP	do
14.1.5	Coffee, coffee substitutes, tea,	...GMP	do

Agar

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Alginic Acid

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles--- Food category	GMP	Addition of
09.2	Processed fish and fish products	...GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.2.1	Canned or bottled fruit juice	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Ammonium Chloride

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
08.1	Fresh meat, poultry and game	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Ascorbic Acid

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Beet Red

Food Cat. No.	Food Category	Max Level	Comments
12.1	Salt GMP New proposal		

Calcium Carbonate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products As Calcium	10g/kg	New proposal
06.2	Flours and starches	10g/kg	do
06.4.1	Fresh pastas and noodles and like	10g/kg	do
06.4.2	Pre-cooked or dried pastas and...	10g/kg	do
09.2	Processed fish and fish products,...	10g/kg	do
12.2	Herbs, spices, seasoning (Including...	10g/kg	do
14.1.5	Coffee, coffee substitutes, tea,...	10g/kg	do

Calcium Chloride

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products As Calcium	10g/kg	New proposal
09.2	Processed fish and fish products,...	10g/kg	do
12.2	Herbs, spices, seasoning (Including...	10g/kg	do
14.1.5	Coffee, coffee substitutes, tea,...	10g/kg	do

Calcium Lactate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products As Calcium	10g/kg	New proposal
09.1	Fresh fish and fish products, Including...	10g/kg	do
09.2	Processed fish and fish products,...	10g/kg	do
12.2	Herbs, spices, seasoning (Including...	10g/kg	do
14.1.5	Coffee, coffee substitutes, tea,...	10g/kg	do

Calcium Ribonucleotides, 5'-

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and...	GMP	do

Caramel Colour Class ?

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Carbon Dioxide

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Carob Bean Gum

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	Addition of Food
	Category		
10.2.1	Liquid egg products Category (as proposed to the 32nd CCFAC in Feb.2000)	GMP	Addition of Food

Carrageenan

Food Cat. No.	Food Category (example of food items)	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles---	GMP	do
06.6	Batters GMP New proposal, e.g. Wheat-base batter mix		
09.2	Processed fish and fish products,...	GMP	New proposal
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Citric Acid

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles ---	GMP	do
06.4.2	Pre-cooked or dried pastas and---	GMP	do
08.1	Fresh meat, poultry and game	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	Delete Note51
14.1.5	Coffee, coffee substitutes, tea,...	GMP	New proposal

Citric and Fatty Acid Esters of Glycerol

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
09.1	Fresh fish and fish products, -----	GMP	do
09.2	Processed fish and fish products,...	GMP	Delete Note16
12.2	Herbs, spices, seasoning (Including...	GMP	Delete Note51

Curdlan

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodle and----	GMP	New proposal
0.6.4.2	Pre-cooked or dried pastas and---	GMP	do

Dextrins, White and Yellow, Roasted Starch

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
09.2	Processed fish and fish products,...	GMP	do

Disodium Inosinate, 5'-

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and...	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	Delete Note51
14.1.5	Coffee, coffee substitutes, tea,...	GMP	New proposal

Disodium Ribonucleotides, 5'-

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and...	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	Delete Note51
14.1.5	Coffee, coffee substitutes, tea,...	GMP	New proposal

Disodium guanylate, 5'-

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	Delete Note51
14.1.5	Coffee, coffee substitutes, tea,...	GMP	New proposal

Erythritol

Food Cat. No.	Food Category	Max Level	Comments
01.2	Fermented and renneted milk e.g., yogurt, lactic products... acid drinks	40g/kg	New proposal
01.4.1	Pasteurized cream e.g. cream puff, butter cream, fat cream	New proposal	
01.4.2	Sterilized, UHT, whipping...	600g/kg	do
09.2	Processed fish and fish products e.g., "Chinmi"	200g/kg	New proposal
11.1	Refined sugar and ,...	1000g/kg	New proposal
12.2	Herbs, spices, seasonings, and condiments	200g/kg	do
14.1.1.1	Natural mineral waters...	20g/kg	do
14.1.2.1	Canned or bottled fruit juice	20g/kg	do
14.1.2.3	Concentrates for fruit juice	20g/kg	do
14.1.5	Coffee, coffee substitutes, tea...	40g/kg	do

Fumaric acid

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do

14.1.5 Coffee, coffee substitutes, tea,... GMP do

Gellan Gum

Food Cat. No.	Food Category	Max Level	Comments
1.2.1.2	Fermented milks, (plain), not heat- treated... Food Category (as proposed to the 32 nd CCFAC in	GMP treated	Addition of Feb.2000)
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Glucono Delta-Lactone

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Glycerol

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	Delete Note51

Glycerol Monoacetate

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Guar Gum

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles---	GMP	do
06.4.2	Pre-cooked or dried pastas and...	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	Delete Note51

Gum Arabic

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Isomalt

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	50g/kg	New proposal
09.2	Processed fish and fish products	100g/kg	do
11.3	Sugar solutions and syrups...	GMP	do
11.4	Other sugars and syrups...	GMP	do
13.1	Infant formulae... 100g/kg	Propose Max level	
13.2	Food for young children	100g/kg	do
14.1.2.1	Canned or bottled fruit juice	300g/kg	??? ????????
14.1.2.3	Concentrates for fruit juice	300g/kg	do

14.1.3.1	Canned or bottled fruit nectar	300g/kg	do
14.1.3.3	Concentrates for fruit nectar	300g/kg	do
14.1.5	"Coffee, coffee substitutes, tea..."	300g/kg	do

Karaya Gum

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Konjac Flour

Food Cat. No.	Food Category	Max Level	Comments
1.2.1.2	Fermented milks (plain), not heat-treated...	GMP	Addition of Food
	proposed to the 32nd CCFAC in Feb. 2000)	Category (as	
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Lactitol

Food Cat. No.	Food Category	Max Level	Comments
01.2	Fermented and renneted milk products	30g/kg	New proposal
01.4	Cream and the like	30g/kg	do
04.2.2.7	Fermented vegetable	10g/kg	do
09.2	Processed fish and fish products	20g/kg	do
14.1.5	"Coffee, coffee substitutes, tea..."	30g/kg	do

Lactic Acid

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles ---	GMP	do
06.4.2	Pre-cooked or dried pastas and---	GMP	do

Lecithin

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles---	GMP	do
09.1	Fresh fish and fish products, ----	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...)	GMP	Delete Note51
14.1.5	Coffee, coffee substitutes, tea,...	GMP	New proposal

Magnesium Carbonate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	0.5%	New proposal, Add Note 'as residual level'
09.2	Processed fish and fish products,...	0.5%	do
12.2	Herbs, spices, seasoning (Including... residual level,' and Delete Note51	0.5%	Add Note 'as

Malic Acid (DL-)

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Maltitol and Maltitol Syrups

Food Cat. No.	Food Category	Max Level	Comments
01.2	Fermented and renneted milk ---	50g/kg	New proposal
01.4.1	Pasteurized cream 300g/kg	do	
01.4.2	Sterilized, UHT, whipping..."	300g/kg	do
04.2.2.7	Fermented vegetable products "tsukemono"	100g/kg	do, e.g. for
12.2	Herbs, spices, seasoning (Including... seasonings	50g/kg	do, e.g. as
14.1.1.1	Natural mineral waters...	200g/kg	do
14.1.2.1	Canned or bottled fruit juice	200g/kg	do
14.1.2.3	Concentrates for fruit juice	200g/kg	do
14.1.5	Coffee, coffee substitutes, tea, ... coffee drinks	100g/kg	do, e.g. canned

Mannitol

Food Cat. No.	Food Category	Max Level	Comments
12.2	Herbs, spices, seasoning (Including... e.g. as seasonings	60g/kg	New proposal

Mono- and Diglycerides

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles ---	GMP	New proposal

Monosodium Glutamate, L-

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and---	GMP	New proposal
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	Delete Note51
14.1.5	Coffee, coffee substitutes, tea,...	GMP	New proposal

Pectins (amidated and non-amidated)

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles ---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (including	GMP	do

Potassium Carbonate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles ---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (including---	GMP	do

14.1.5	Coffee, coffee substitutes, tea,...	GMP	do
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Potassium Chloride

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Silicon Dioxide (Amorphous)

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.2	Flours and starches	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Sodium Acetate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles ---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Sodium Ascorbate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.2	Flours and starches level	GMP	Revise Max
06.4.1	Fresh pastas and noodles,...	GMP	do
06.4.2	Pre-cooked or dried pastas and...	GMP	do
08.1	Fresh meat, poultry and game	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Sodium Alginate

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	New proposal

Sodium Carbonate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.2	Flours and starches	GMP	do
06.4.1	Fresh pastas and noodles ---	GMP	do
06.4.2	Pre-cooked or dried pastas and---	GMP	do
08.1	Fresh meat, poultry and game	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do

Sodium Carboxymethyl Cellulose

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles ---	20000mg/kg	New proposal

Sodium Citrate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal

Sodium erythorbate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal

Sodium fumarate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...)	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Sodium Gluconate

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.2	Pre-cooked or dried pastas and...	GMP	do
09.1	Fresh fish and fish products, Including...	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including... seasoning)	GMP	do, e.g., "dashi"
14.1.5	Coffee, coffee substitutes, tea,...	GMP	New proposal

Sodium Hydrogen Carbonate

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles ---	GMP	New proposal
6.4.2	Pre-cooked or dried pastas e.g. alkaline preparation for pre-cooked noodle	GMP	New proposal,

Sodium Lactate (solution)

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles ---	GMP	do
06.4.2	Pre-cooked or dried pastas and---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do

Sodium Malate, D, L-

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.4.1	Fresh pastas and noodles ---	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do
Sorbitol (including Sorbitol syrup)			
Food Cat. No.	Food Category	Max Level	Comments
01.4.1	Pasteurized cream 200g/kg e.g.,cream puff, butter cream, fat cream	New proposal	
01.4.2	Sterilized, UHT, whipping..."	200g/kg	do
04.2.2.7	Fermented vegetable products e.g., "tsukemomo"	70g/kg	New proposal
06.4.1	Fresh pastas and noodles...	35 g/kg	do, e.g.,fresh "Udon", fresh Chinese noodle
06.4.2	Pre-cooked or dried pastas... "Udon"	35g/kg	do, e.g., boiled
09.2	Processed fish and fish products,...	GMP	New proposal
12.2	Herbs, spices, seasoning (including---	GMP	Delete Note5 l
14.1.2.1	Canned or bottled fruit juice	14g/kg	New proposal
14.1.2.3	Concentrates for fruit juice	14g/kg	do
14.1.5	Coffee, coffee substitutes, tea,...	GMP	do
Thaumatococcus			
Food Cat. No.	Food Category	Max Level	Comments
01.2	Fermented and renneted milk-----	GMP	New proposal
04.2.2.7	Fermented vegetable products "tsukemomo"	GMP	do. e.g. for
13.2	Food for young children peach-dessert	GMP	do, e.g.
14.1.2.1	Canned or bottled fruit juice	GMP	do
14.1.5	Coffee, coffee substitutes, tea, ... coffee drinks	GMP	do, e.g. for canned
Tragacanth Gum			
Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	GMP	New proposal
Trisodium Citrate			
Food Cat. No.	Food Category	Max Level	Comments
04.2.2.7	Fermented vegetable products	GMP	New proposal
06.2	Flours and starches	GMP	do
08.1	Fresh meat, poultry and game...	GMP	do
09.2	Processed fish and fish products,...	GMP	do
12.2	Herbs, spices, seasoning (Including...	GMP	do
Xanthan Gum			
Food Cat. No.	Food Category	Max Level	Comments

04.2.2.7	Fermented vegetable products			GMP	New proposal
06.4.1	Fresh pastas and noodles----	GMP	do		
06.4.2	Pre-cooked or dried pastas and...			GMP	do
09.2	Processed fish and fish products,...			GMP	do
12.2	Herbs, spices, seasoning (Including...			GMP	do
14.1.5	Coffee, coffee substitutes, tea,...			GMP	do

Xylitol

Food Cat. No.	Food Category	Max Level	Comments
01.2	Fermented and renneted milk products	30g/kg yogurt	New proposal, e.g.,
01.4	Cream and the like	30g/kg	do
04.2.2.7	Fermented vegetable	10g/kg	do
14.1.5	Coffee, coffee substitute, tea... tea drinks	30g/kg	do, e.g., coffee &

ISDI (International Special Dietary Foods Industries)

Category 13.3 represents *Dietetic foods intended for special medical purposes, including those for infants and young children*, therefore, additives without ADI listed in Table 3 are authorised for the whole category i.e. adults **and** infants and young children. For this reason ISDI, in previous comments, has been requesting changes in the Food categorisation system and suggested that Category 13.3 be divided into two subcategories.

13.3.1: Dietetic foods for special medical purposes intended for adults

13.3.2: Dietetic foods for special medical purposes intended for infants and young children only

ISDI welcomes and supports the Discussion paper on the relationship between Codex Commodity Standards and the Codex General Standard for food Additives, including consideration of the Food Category System (CX/FAC 02/6) prepared by the drafting working group lead by the US delegation and which proposes the changes described above.

In order to exclude all infants and young children from the table 3 of the GSFA, category 13.3.2 should be added to the list of the annex of table 3. In that case additives without ADI will not automatically be authorised for dietetic foods for special medical purposes intended for infants and young children. As for categories 13.1 and 13.2, specific provisions for this category must then be included in the tables 1 and 2 of the GSFA Codex. This proposal allows a limitation of the additive use for infants and young children not in good health.

- **Draft Food Additive Provisions in the Codex General Standard for Food Additives (Alinorm 01/12A, Appendix III)**

ISDI welcomes the opportunity to comment on Food additives as listed in Appendix III of Alinorm 01/12A which have been advanced to Step 6 by the extraordinary 49th Session of the Executive Committee of the Codex Alimentarius Commission (additives uses marked by a *). ISDI also wishes herewith to :

- Comment on other Food Additives at Step 6 of the procedure
(Alinorm 01/12A, Appendix IV)
- Request additional uses for certain food additives included in the following table.

ISDI comments are based on provisions already existing in different legislations. ISDI has considered each additive one by one and only for the category 13 (dietetic products). Each request refers to a national legislation or to provisions adopted in Commodity Standards, which should be transferred into GSFA. The mentioned legislations are: Infant formula (CODEX STAN 72-1981), Follow-up formula (CODEX STAN 156-1987), Canned baby foods (CODEX STAN 73-1981), Processed cereal-based foods for infants and young children (CODEX STAN 74-1981), EU Directives 94/35/EC on sweeteners for use in foodstuffs, 94/36/EC on colours for use in foodstuffs, 95/2/EC on food additives other than colours and sweeteners and the US legislation.

ISDI believes there is no need for the use of colours in foods intended for infants and young children **in good health**. ISDI proposes to delete all colours for categories 13.1 and 13.2. This in accordance with the European legislation where the use of colours is prohibited for foods for infant and young children in good health as mentioned in Annex II of the Council Directive 94/36/EC on colours for use in foodstuffs.

<p>Additives at Step 6 of the Procedure Alinorm 01/12A Appendix III & IV</p>
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AGAR: INS 406 (in Table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6*
13.2	GMP		-	6*

ACESULFAME POTASSIUM: INS 950

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	450		Products for infants and young children should be excluded	6
13.4	450		Agree EU directive	6
13.5	500		REQUESTED at 1000mg/kg EU directive	6
13.6	2000		Agree EU directive	6

ACETIC ACID, GLACIAL: INS 260 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2.	5000		REQUESTED at GMP EU Directive	6

ACETIC AND FATTY ACID ESTERS OF GLYCEROL: INS 472a (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	5000		Agree EU Directive	6

ACETYLATED DISTARCH ADIPATE: INS 1422 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	25000		Level in accordance with Codex Standard 156-1987 Singly or in combination in hydrolyzed protein and/or amino acid acid-based follow-on formulae only Singly or in combination for soy based products	6
13.2	60000		Agree Codex Standard 73-1981	6

ACETYLATED DISTARCH PHOSPHATE: INS 1414 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	25000		Agree Codex Stan 72-1981: Singly or in combination 500mg/kg for soy based formulae only 2500mg/kg for hydrolysed protein and/or amino acid- based infant formulae only	6
13.2	60000		Agree Codex Standard 73-1981	6

ALGINIC ACID: INS 400 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	300		-	6
13.2	5000		Agree EU directive: 500 mg/kg	6

ALITAME: INS 956

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.5	300		-	6

ALLURA RED AC: INS 129

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50	Products for infants and young children are excluded	Agree EU directive	6
13.4	50		Agree EU directive	6
13.5	300		-	6
13.6	300		Agree EU directive	6

ALPHA-AMYLASE (ASPERGILLUS ORYZAE): INS 1100 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		-	6

AMMONIUM ALGINATE: INS 403 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	300		-	6
13.2	5000		-	6

AMMONIUM CARBONATE: INS 503i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree Codex Stan 74-1991	6

AMMONIUM HYDROGEN CARBONATE: INS 503ii (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree Codex Stan 74-1991	6

ANNATTO EXTRACTS: INS 160b

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.6	GMP		-	6

ASCORBIC ACID: INS 300 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		Agree Codex Stand 156-1987	6
13.2	3000		Agree Codex Stand 74-1991 & 73-1981: 500mg/kg	6

ASCORBYL ESTERS: INS 304 and 305

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.4			REQUESTED at GMP EU directive	
13.5			REQUESTED at GMP	

			EU directive	
13.6	500	As ascorbyl stearate	REQUESTED at GMP EU Directive on additives	6*

ASPARTAME: INS 951

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	800	Recommendation of the quality Control WG: 1000	Agree EU directive	6
13.4	800		REQUESTED at 1000mg/kg EU directive	6
13.5	2000		Agree EU directive: 1700mg/kg	6
13.6	5500		Agree EU directive	6

AZORUBINE: INS 122

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded EU directive	6
13.4	50		Agree EU directive	6
13.5	300		Agree	6
13.6	300		Agree EU directive	6

BEET RED: INS 162 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		DELETION REQUESTED	6
13.2	GMP		DELETION REQUESTED	6
13.3			REQUESTED at 20mg/kg for infants over one year Opinion of the EU Scientific Committee for Food December 1996	

BENZOATES: INS 210, 211, 212, 213

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	1500	Infants and young Children are excluded	Agree EU directive	6
13.4	1500		Agree EU directive	6
13.5	2000		Agree	6
13.6	1000	As benzoic acid	REQUESTED at 2000 mg/kg EU Directive on additives	6*

BHA: Butylated Hydroxyanisole: INS 320

Cat	Levels (mg/kg)	Note	ISDI position	Step
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13.6	400		Agree EU directive	6
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BHT: Butylated Hydroxytoluene: INS 321

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.6	400		Agree EU directive	6

BRILLIANT BLACK PN: INS 151

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded EU directive	6
13.4	50		Agree EU directive	6
13.5	300		Agree	6
13.6	300		Agree EU directive	6

BRILLIANT BLUE FCF: INS 133

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded	6
13.4	50		Agree EU directive	6
13.5	300		Agree	6
13.6	300		Agree EU directive	6

BROWN HT: INS 155

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded EU directive	6
13.4	50		Agree EU directive	6
13.5	300		Agree	6
13.6	300		Agree EU directive	6

CALCIUM ACETATE: INS 263 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree EU directive	6

CALCIUM ALGINATE: INS 404 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	300		-	6
13.2	5000		Agree EU directive: 500 mg/kg	6

CALCIUM ASCORBATE: INS 302 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		Agree Codex Stand 156-1987	6
13.2	3000		Agree EU directive: 300 mg/kg	6

CALCIUM CARBONATE: INS 170i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		Agree Codex Standards 73-1981 & 74-1981	6

CALCIUM CITRATE: INS 333 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		Agree EU directive	6

CALCIUM HYDROXIDE: INS 526 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stand 72-1981 & 156-1987	6
13.2	GMP		Agree EU Directive	6

CALCIUM LACTATE: INS 327 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree EU directive	6

CARAMEL COLOUR, CLASS I: INS 150a (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		DELETION REQUESTED	6
13.2	GMP		DELETION REQUESTED	6
13.3			REQUESTED at GMP Products for infants and young children should be excluded EU directive	
13.4			REQUESTED at GMP EU directive	
13.5			REQUESTED at GMP EU directive	
13.6			REQUESTED at GMP EU directive	

CARAMEL COLOUR, CLASS III: 150c

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3			REQUESTED at GMP Products for infants and young children should be excluded EU directive	
13.4			REQUESTED at GMP EU directive	
13.5			REQUESTED at GMP EU directive	
13.6			REQUESTED at GMP EU directive	

CARAMEL COLOUR, CLASS IV: E150d

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3			REQUESTED at GMP Products for infants and young children should be excluded EU directive	
13.4			REQUESTED at GMP EU directive	
13.5			REQUESTED at GMP EU directive	
13.6			REQUESTED at GMP EU directive	

CARBON DIOXIDE: INS 290 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1			REQUESTED at GMP EU directive	

13.2			REQUESTED at GMP EU directive	
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CARMINES: INS 120

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	50	Excluding products for infants and young children	Agree	6
13.4	50		Agree EU directive	6
13.5	300		-	6
13.6	300		Agree EU directive	6

CAROB BEAN GUM: INS 410 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	10000		Agree EU directive	6
13.2	20000		EU directive: 10000mg/kg	6

CAROTENES, VEGETABLE : INS 160aii

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	GMP	Products for infants and young children are excluded	REQUESTED at 30mg/kg for infants over one year Opinion of the EU Scientific Committee for food December 1996	6
13.4	GMP		Agree EU directive	6
13.5	GMP		Agree EU directive	6
13.6	GMP		Agree EU directive	6

CAROTENOIDS: INS 160ai, 160f, 160e

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded EU directive	6
13.4	50		Agree EU directive	6
13.5	300		Agree EU directive	6
13.6	300		Agree EU directive	6

CARRAGEENAN: INS 407 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	3000		Codex Stand 72-1981: 30mg/kg for regular formulae 1000mg/kg in hydrolysed protein and/or amino acid- based liquid infant formulae. EU Directive: 300mg/kg	6
13.2	GMP		-	6

CASTOR OIL: INS 1503

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.6	GMP		-	6

CHLOROPHYLLS: INS 140 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		DELETION REQUESTED	6
13.2	GMP		DELETION REQUESTED	6
13.3			REQUESTED at 20mg/kg for infants over one year Opinion of the EU Scientific Committee for Food December 1996	

CHLOROPHYLLS, COPPER COMPLEXES: INS 141i, 141ii

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.0	GMP		DELETION REQUESTED	6
13.1	GMP		DELETION REQUESTED	6
13.2	GMP		DELETION REQUESTED	6
13.3	GMP		Agree EU directive	6
13.4	GMP		Agree EU directive	6
13.5	GMP		Agree EU directive	6
13.6	GMP		Agree EU directive	6

CITRIC ACID: INS 330 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stand 72-1981 & 156-1987	6
13.2	25000		REQUESTED at GMP EU directive	6

CITRIC AND FATTY ACID ESTERS OF GLYCEROL: INS 472c (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1			REQUESTED at 7500mg/kg EU directive	
13.2	5000		Agree EU directive	6

CURCUMIN: INS 100i

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded EU directive	6
13.4	50		Agree EU directive	6
13.5	300		-	6
13.6	300		Agree EU directive	6

CYCLAMATES: INS 952

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	1300	As cyclamic acid	REQUESTED at 1600mg/kg EU directive	6
13.4	1300		EU directive: 400mg/kg	6
13.5	1300		Agree	6
13.6	1250		EU directive: 500mg/kg	6

DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL: INS 472e

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.3	GMP	Products for infants and young children are excluded	REQUESTED From birth onwards in products in liquid formulae containing hydrolysed proteins, peptides or amino acids in conformity with the conditions set in the US legislation	6
13.4	GMP		Agree EU directive	6
13.5	GMP		Agree EU directive	6
13.6	GMP		Agree EU directive	6

DISTARCH PHOSPHATE: INS 1412 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
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13.1	25000		Agree Codex Stan 72-1981: 500mg/kg for soy based formulae 2500mg/kg for hydrolysed protein and/or amino acid- based infant formulae only	6
13.2	60000		Agree Codex Stan 73-1981	6

ERYTHROSINE: INS 127

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.6	300		-	6

FAST GREEN FCF: INS 143

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.6	GMP		-	6*

GELLAN GUM: INS 418 (in Table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6*
13.2	GMP		-	6*

GLUCONO DELTA-LACTONE: INS 575 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2			REQUESTED at 5000mg/kg EU directive for biscuits and rusks	

GRAPE SKIN EXTRACT: INS 163ii

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	GMP	Products for infants and young children are excluded	REQUESTED at 20mg/kg for infants over one year Opinion of the EU Scientific Committee for Food December 1996	6
13.4	GMP		-	6
13.5	GMP		-	6
13.6	GMP		-	6

GUAR GUM: INS 412 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	10000		Agree EU directive: 10000mg/kg for special formulae	6
13.2	20000		EU directive: 10000 mg/kg	6

GUM ARABIC: INS 414 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	10000	Carry over from nutrient preparations	-	6
13.2	20000		Agree EU directive Gluten free cereal-based foods	6

HYDROCHLORIC ACID: INS 507 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree EU directive	6

HYDROXYPROPYL STARCH: INS 1440 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	25000		Agree Codex Stan 72-1981 In hydrolysed protein and/or amino acid acid-based infant formulae	6
13.2	60000		Agree Codex Stan 73-1981	6

INDIGOTINE: INS 132

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded EU directive	6
13.4	50		Agree EU directive	6
13.5	300		-	6
13.6	300		Agree EU directive	6

IRON OXIDES: INS 172i, 172ii, 172iii

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.0	GMP		DELETION REQUESTED	6
13.1	GMP		DELETION REQUESTED	6
13.2	GMP		DELETION REQUESTED	6
13.3	GMP		Products for infants and young children should be excluded EU directive	6
13.4	GMP		Agree EU directive	6
13.5	GMP		Agree	6

13.6	GMP		Agree EU directive	6
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ISOMALT: INS 953 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		-	6

KARAYA GUM: INS 416 (in table 3))

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6*
13.2	GMP		-	6*

KONJAC FLOUR: INS 425 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6*
13.2	GMP		-	6*

LACTIC ACID (L-, D-and DI-): INS 270 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stan 72-1981 Form L(+) ONLY	6
13.2	15000		Agree Codex Stan 74-1981 Form L(+) ONLY	6

LACTIC AND FATTY ACID ESTERS OF GLYCEROL: INS 472b (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	5000		Agree EU directive	6

LACTITOL: INS 966 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		-	6

LECITHIN: INS 322 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	3000 5000		Codex Stan 72-1981 & 156- 1987: 50000 mg/kg	6 6*
13.2	50000		Codex Stan 74-1981: 15000mg/kg	6

MAGNESIUM CARBONATE: INS 504i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		-	6

MAGNESIUM CHLORIDE: INS 511 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6

MAGNESIUM OXIDE: INS 530 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6

MALIC ACID (DL-): INS 296 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree EU directive	6

MALTITOL AND MALTITOL SYRUP: INS 965 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		-	6

MANNITOL: INS 421 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		-	6

MICROCRYSTALLINE CELLULOSE: INS 460i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6*
13.2	GMP		-	6*

MINERAL OIL: INS 905a

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.6	6000		-	6

MONO-AND DIGLYCERIDES: INS 471 (In table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	5000		Agree EU directive	6
13.2	15000		Agree Codex Stan74-1981	6

MONOSTARCH PHOSPHATE: INS 1410 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	50000		Agree EU directive	6

NITROGEN: INS 941 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1			REQUESTED at GMP EU directive	
13.2			REQUESTED at GMP EU directive	

NITROUS OXIDE: INS 942

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree EU directive	6
13.2	GMP		Agree EU directive	6
13.3			REQUESTED at GMP EU directive	
13.4			REQUESTED at GMP EU directive	
13.5			REQUESTED at GMP EU directive	
13.6			REQUESTED at GMP EU directive	

OXIDIZED STARCH : INS 1404 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	50000		Agree EU directive	6

OXYSTEARIN: INS 387

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.6	GMP		-	6*

PECTINS (AMIDATED AND NON-AMIDATED): INS 440 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	10000		Agree EU directive	6
13.2	20000		Agree EU directive	6

PHOSPHATED DISTARCH PHOSPHATE : INS 1413 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	60000		Codex Stan 72-1981: 500mg/kg for soy based formulae only 2500mg/kg for hydrolysed protein and/or amino acid- based infant formulae only	6
13.2	60000		Agree Codex Stan 73-1981	6

PHOSPHATES: INS 338, 339i, 339ii, 339iii, 340i, 340ii, 340iii, 341i, 341ii, 341iii, 342i, 342ii, 343ii, 343iii, 450i, 450iii, 450v, 450vi, 451i, 451ii, 452i, 452ii, 452iv, 452v, 542

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.0	1100		DELETION REQUESTED	6
13.1	1100	As phosphorus	REQUESTED at GMP EU directive In conformity with the limits set for P in composition criteria	6
13.2	1100	As phosphorus	Agree EU directive	6
13.3	1100	As phosphorus	REQUESTED at 5000mg/kg EU directive	6
13.4	1100	As phosphorus	REQUESTED at 5000mg/kg EU directive	6
13.5	1100	As phosphorus	-	6
13.6	1100	As phosphorus	REQUESTED at GMP EU directive	6

POLYDIMETHYLSILOXANE: INS 900a

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.0	50		-	6

POLYGLYCEROL ESTERS OF FATTY ACIDS : INS 475

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	5000		Products for infants and young children should be excluded EU directive	6
13.4	5000		Agree EU directive	6
13.6	GMP		Agree EU directive	6

POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID: INS 476

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	5000		-	6
13.4	5000		-	6

POLYSORBATES: INS 432, 433, 434, 435, 436

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	1000		Agree EU directive	6
13.4	1000		Agree EU directive	6
13.5	360mg/dos		-	6
13.6	790	Level based on the maximum recommended daily dose of 475 mg/dose, assuming one 600 mg tablet is consumed per day	REQUESTED at GMP EU directive	6

PONCEAU 4R: INS 124

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded	6
13.4	50		REQUESTED at GMP EU directive	6
13.5	300		-	6
13.6	300		REQUESTED at GMP EU directive	6

POTASSIUM ALGINATE: INS 402 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	300		Agree	6
13.2	5000		Agree EU directive: 500mg/kg	6

POTASSIUM ASCORBATE: INS 303 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		-	6
13.2	500	As the acid	-	6

POTASSIUM CARBONATE: INS 501i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stan 72-1981&156-1978	6
13.2	GMP		Agree Codex Stan 73-1981	6

POTASSIUM CHLORIDE: INS 508 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6

POTASSIUM DIHYDROGEN CITRATE: INS 332i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6*
13.2	GMP		Agree EU directive	6

POTASSIUM HYDROGEN CARBONATE: INS 501ii (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stand 72-1981&156-1987	6
13.2	GMP		Agree Codex Stan 74-1981&73-1981	6

POTASSIUM HYDROXIDE: INS 525 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stan 72-1981&156-1987	6
13.2	GMP		Agree EU directive	6

POTASSIUM LACTATE: INS 326 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree EU directive	6

PROCESSED EUCHEUMA SEAWEED: INS 407a (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	1000		-	6

PROPYLENE GLYCOL: INS 1520

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.6			REQUESTED at GMP US legislation	

PROPYLENE GLYCOL ALGINATE: INS 405

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1			REQUESTED at 200mg/kg	

			EU directive for special formula	
13.3	1200		Agree EU directive	6
13.4	1200		-	6
13.6	1000		Agree EU directive	6

QUINOLINE YELLOW: INS 104

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded EU directive	6
13.4	50		Agree EU directive	6
13.5	300		-	6
13.6	300		Agree EU directive	6

RIBOFLAVINES: INS 101i, 101ii

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.0	GMP		DELETION REQUESTED	6
13.1	GMP		DELETION REQUESTED	6
13.2	GMP		DELETION REQUESTED	6
13.3	GMP		Products for infants and young children should be excluded EU directive	6
13.4	GMP		Agree EU directive	6
13.5	GMP		Agree	6
13.6	GMP		Agree EU directive	6

SACCHARIN: INS 954

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	300		Agree EU directive: 200mg/kg	6
13.4	300		Agree EU directive: 240mg/kg	6
13.5	500		Agree EU Directive	6
13.6	1200		Agree EU directive	6

SILICON DIOXIDE (AMORPHOUS): INS 551 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	10000	Carryover from nutrient	Agree	6

		preparations	EU directive	
13.2	10000	Carryover from nutrient preparations	EU directive: 2000mg/kg	6

SODIUM ACETATE: INS 262i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree EU directive	6

SODIUM ALGINATE: INS 401 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	300		REQUESTED at 1000mg/kg EU directive for special formula	6
13.2	5000		EU directive: 500 mg/kg	6

SODIUM ASCORBATE: INS 301 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		-	6
13.2	3000		EU directive: 300 mg/kg	6

SODIUM CARBONATE: INS 500i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stan 72-1981&156-1987	6
13.2	GMP		Agree Codex Stan 73-1981	6

SODIUM CARBOXYMETHYL CELLULOSE: INS 466 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1			REQUESTED 10000 mg/kg EU directive for special formula	

SODIUM DIACETATE: INS 262ii

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	GMP		Agree EU directive	6

SODIUM DIHYDROGEN CITRATE: INS 331i (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		EU directive: 2000mg/kg	6*
13.2	GMP		Agree EU directive	6

SODIUM HYDROGEN CARBONATE: INS 500ii (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stan 72-1981&156-1987	6
13.2	GMP		Agree Codex Stan 73-1981&74-1981	6

SODIUM HYDROXIDE: INS 524 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stan 72-1981&156-1987	6
13.2	GMP		Agree EU Directive	6

SODIUM LACTATE: INS 325 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	
13.2	GMP		Agree EU directive	

SORBATES: INS 200, 201, 202, 203

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	1500	As sorbic acid	Agree Products for infants and young children should be excluded EU directive	6
13.4	1500	As sorbic acid	Agree EU directive	6
13.5	2000	As sorbic acid	-	6
13.6	2000	As sorbic acid	Agree EU directive	6

SORBITAN ESTERS OF FATTY ACIDS: INS 491, 492, 493, 494, 495

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	5000	Excluding foods for infants and young children	Agree EU directive	6
13.4	5000		Agree EU directive	6
13.5	GMP		-	6
13.6	GMP		Agree EU directive	6

SORBITOL (INCLUDING SORBITOL SYRUP): INS 420 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		-	6

STARCH ACETATE: INS 1420, 1421 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	50000		Agree EU directive	6

STARCH SODIUM OCTENYL SUCCINATE: INS 1450 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1			REQUESTED 20000 mg/kg EU directive for special formula	
13.2	50000		Agree EU directive	6

STEAROYL-2-LACTYLATES: INS 481i, 482i

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	2000		Products for infants and young children should be excluded EU directive	6
13.4	2000		Agree EU directive	6

SUCRALOSE: INS 955

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	400		Agree EU amendment on sweeteners	6
13.4	1250		Agree US legislation	6
13.5	800		-	6
13.6			REQUESTED at 2400 mg/kg EU amendment on sweeteners	

SUCROGLYCERIDES: INS 474

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.3	5000		Products for infants and young children should be	6

			excluded EU directive	
13.4	5000		Agree EU directive	6
13.6	GMP		Agree EU directive	6

SUCROSE ESTERS OF FATTY ACIDS: INS 473

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	5000		EU directive: 120mg/kg in hydrolysed protein and/or amino acid- formulae	6
13.2	5000		Agree	6
13.3	5000		Agree EU directive	6
13.4	5000		Agree EU directive	6
13.6	GMP		Agree EU directive	6

SUNSET YELLOW FCF: INS 110

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded	6
13.4	50		Agree EU directive	6
13.5	300		-	6
13.6	300		Agree EU directive	6

TARA GUM: INS 417 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	1000		-	6
13.2	GMP		-	6

TARTRATES: INS 334, 335i, 335ii, 336i, 336ii, 337

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.2	5000	As tartaric acid	Agree EU directive	6
13.3			REQUESTED at GMP EU directive	
13.4			REQUESTED at GMP EU directive	
13.6			REQUESTED at GMP EU directive	

TARTRAZINE: INS 102

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	50		DELETION REQUESTED	6
13.2	50		DELETION REQUESTED	6
13.3	50		Products for infants and young children should be excluded	6
13.4	50		Agree EU directive	6
13.5	300		-	6
13.6	300		Agree EU directive	6

TITANIUM DIOXIDE: INS 171 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		DELETION REQUESTED	6
13.2	GMP		DELETION REQUESTED	6

TOCOPHEROLS: INS 306, 307

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	30 10000		Codex Stand 156-1987: 30mg/kg	6 6*
13.2	1000		Agree Codex Stand 73-1981: 300mg/kg fat	6
13.3	1000		REQUESTED at GMP EU directive	6
13.4			REQUESTED at GMP level EU directive	
13.5			REQUESTED at GMP level EU directive	
13.6			REQUESTED at GMP level EU directive	

TRIPOTASSIUM CITRATE: INS 332ii (table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stan 72-1981&156-1987	6
13.2	GMP		Agree EU Directive	6

TRISODIUM CITRATE: INS 331iii (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		Agree Codex Stan 72-1981&156-1987	6
13.2	5000		Agree EU Directive	6

XANTHAN GUM: INS 415 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		EU directive in special formula: 1200 mg/kg	6*
13.2	20000		Agree EU directive Gluten free cereal-based foods	6

XYLITOL: E967 (in table 3)

Cat	Levels (mg/kg)	Note	ISDI position	Step
13.1	GMP		-	6
13.2	GMP		-	6