

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 4a, 4b, 5a, 5b and 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-third Session

(Comments of Uganda)

Agenda Item 4a

Uganda appreciates the work done by the EWG on the proposed Maximum Limits (MLs) established on a sound science based approach for the various food additives and processing aids as stated in the commodity standards.

Uganda supports the endorsement of food additives and processing aid as considered by maximum limits, technological justifications, ADI and their relevant notes. Therefore, we agree to the proposed set MLs for food additives and processing aids in the commodity standards as submitted by various Committees. This will regulate their safe use in the food industry thus facilitating fair trade in the process of protecting the safety and health of consumers of food products.

Agenda Item 4b

Uganda appreciates the work done by the EWG in accomplishing this heavy task on the alignment of the food additives provisions in the commodity standards.

Uganda appreciates the recommendations from the EWG on alignment to amend the names and descriptors of FC 01.4, and subcategories 01.4.1, 01.4.2 and 01.4.3 and the proposal that the work to be tabled to the CCFA for further consideration as new work.

Uganda, therefore, supports the amendment of the names and descriptors to be progressed as new work items for further consideration to next steps. The proposed amendments will be helpful to remove ambiguity thus facilitating ease interpretation of the GSFA.

Uganda also observes the concern from USA on Table 3 notes in considering them while identifying the specific function class consistent with aligning the provision in the commodity standard.

Uganda does not support the general inclusion of footnotes and suggests the inclusion of the notes in Table 3 if there are a variety of possible functional classes and if justified and supported based on the commodity, intended use, and intended consequence to be on a case-by-case basis. The suggested request from USA is a new approach that is contrary to procedure of considering new work as stipulated in the Codex procedural manual. Additionally, Uganda believes that developing a separate list of notes for Table 3 in the GSFA, similar to the existing list of notes for Tables 1 and 2 will lead to misinterpretation of the GSFA during use of the standard. Further, Uganda finds the current consideration of notes in Tables 1 and 2 only, sufficient since GSFA is very clear on the use of the tables during the standard use, " Unless otherwise specified, maximum use levels for additives in Tables 1 and 2 are set on the final product as consumed". Uganda therefore finds it relevant to include notes in tables 1 and 2 containing food additives with safety ADI evaluated with JECFA since the notes have a scientific evidence basis on applicability. Verses the new request to allow for insertion on notes in Table 3 that has food additives with limited JECFA ADIs acceptable for use in foods in general when used at quantum satis levels and GMP.

Agenda Item 5a

Uganda appreciates the work done on the adopted provisions for colours in Food Categories 01.0 through 03.0 and their subcategories with Note 161 associated with them and the draft proposed provisions for colours in FCs 01.0 through 03.0 and their subcategories.

Uganda notes the responses on the different circular letters and guidance/comments as eluded to by the EWG Chair on the alignment of food additives provisions with consideration of different notes.

Therefore, Uganda is in agreement with the EWG recommendations to progress the work to the next step with consideration to remove Note 161 on a case by case basis.

Agenda Item 5b

Uganda appreciates the work done by the EWG, hence Uganda supports work to proceed to the next step for consideration with an objection on the adoption of the proposed provision for the carotenoids.

Uganda's disagreement on the carotenoids provision is also backed up by the EWG recommendation on carotenoids not to consider the provisions since were not in line with section 1.1 of Codex Stan 192, and that JECFA-87 recommended removal of group ADI for carotenoids and establishment of a new individual ADI for INS 160e. Additionally, ADI for INS 160a(i), 160a(ii), 160a(iii), 160a(iv) and 160f could not be established due to lack of data.

Uganda therefore, proposes to first launch a call for more data on specific carotenoids and request to JECFA on undertaking the necessary safety re-evaluation to support for informed ADI for the respective individual carotenoid types.

Agenda Item 9

Uganda appreciates the work done by Brazils on the subject and acknowledge the recommendations in the discussion paper, with consideration of comments submitted by other Codex members and observers. However, Uganda does not support the use of trisodium citrate in fluid milk because its use alters the nature of the product, masking poor quality, misleads consumers and potential misuse by the food industry.

Given the fact that sedimentation issue in fluid milk is most prominent in one Codex region (CCLA), other options can be explored to solve the issue within the CCLAC region without use of the food additive in the fluid milk produced by other regions that do not have the sedimentation challenge.

Uganda therefore, agrees that the draft provision should be remained at step 7 until the subject is given the necessary consideration by all the Codex members and observers in various Codex regions in order to facilitate fair trade in safe and quality milks.

Uganda further retaliates that her milk does not have a problem of milk sedimentation, therefore, does not support the use of trisodium citrate as a food additive in prevention of sedimentation, coagulation and gelation, which is a common phenomenon that occurs during prolonged storage of UHT fluid milk.

Uganda therefore does not support with the justifications below;

1) The issue of sediment formation as a result of aggregation of K casein type of protein caused by structural changes due to high processing temperature is common in reconstituted UHT fluid milk and yet most of our processors are packing fresh UHT milk hence it is not of big concern to our industry as of now.

2) Sedimentation during storage can be reversed upon mixing by resuspending protein layer.

3) Most of the problems of sedimentation and gelation occur due to use of poor quality raw milk whose PH is above 6.65 and processing raw milk with low Heat coagulation temperature. Majority of our processors if not all currently process UHT milk from resazurin 6 which is the highest grade for it to withstand heat stability.

4) Sedimentation occurs during prolonged storage of UHT plain milk beyond six months and

violation of storage conditions especially storage of UHT milk above 30 degrees for a long

time. Most of Ugandan fluid milk has shelf life ranging between 3 months to 6months and with adherence to storage conditions and appropriate UHT processing conditions and recommended packaging material, sedimentation is not a likely problem neither has it been

identified during routine testing to necessitate use of trisodium citrate in stabilization of fluid milk during storage. Whereas it's use is technologically acceptable, it's likely misuse by industry players if allowed can cause more food safety issues as opposed to sensory alteration of milk that has undergone sedimentation.

Therefore, we should focus more on training and equipping industry players on how to prevent such problems during storage rather than give them a Lee way to use of chemical preservation whose usage we might not have capacity to control and monitor in the event that we allow it's usage.

Uganda, therefore do not support use of trisodium citrate because coagulation should be controlled by use of high quality raw milk and using appropriate heat treatment methods, followed by recommended packaging and storage conditions. Sedimentation is not a food safety issue of concern because it affects more of sensory properties, which can be reversed by physical mixing.

In addition to Uganda's comments submitted earlier in the Codex online commenting system, Uganda wishes to submit the following additional evidence to back her position of no addition of trisodium citrate in fluid milk.

Examining the potential of Trisodium Citrate (TSC) to alter or mask quality of raw fluid milk and UHT

pasteurized milk

i. Data from the Ugandan industries shows UHT milk sedimentation is not a problem. Additionally, the raw milk used for UHT has resazurin 6, grade 1 which has not shown any sedimentation even over long term storage.

ii. Trisodium citrate increases the ethanol stability of milk. Thus, a much higher concentration of ethanol is needed to get milk curdling in the alcohol test. Thus poor quality milk, to which trisodium citrate is added, can pass the ethanol test therefore, masking the bad quality.

iii. Due to its strong buffering capacity, trisodium citrate will facilitate unscrupulous milk dealers to mask poor quality in milk thus passing off low pH/low heat stability milk as good

quality milk.

iv. Both low and high ionic calcium can cause sedimentation. Thus, use of trisodium citrate is not necessarily a full proof solution to milk sedimentation.

v. The issue of UHT milk sedimentation can be addressed by adjusting to an appropriate UHT heating regime without addition of any additive.

vi. Trisodium citrate can be used as part of the cattle feeding/nutrition program as a prophylactic to help stem mastitis, which often substantially contributes to UHT milk sedimentation.

vii. Trisodium citrate is regarded as GRAS. However, it may be misused by unscrupulous industrial players thus compromising milk quality. Toxicological reports indicate no safety issues is with the food additive but quality issues are of concern.

viii. Current harmonized East African Community standards for raw milk and UHT pasteurised milk do not allow addition of any food additives in milk. These are regional standards adopted by all Partner States in East African Community.

ix. Key argument: TSC affects rheology of fluid milk – could interfere with results of routine platform tests conducted for raw fluid milk in Uganda and many other LMICs thus masking possible poor quality of milk.

x. Platform Tests

- 1) Appearance of milk: Milk should be free from any churned fat globules and/or any clots.
- 2) Clot-on-boiling test (acidic milk or mastitis milk). Typically, samples that fail this test might contain acid-producing bacteria and must be rejected.
- 3) Both low and high ionic calcium can cause sedimentation.
- 4) Reduction of sedimentation in UHT milk.