



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-sixth Session

DISCUSSION PAPER ON THE FUTURE WORK FOR CCFA

(Prepared by the Host Secretariat)

BACKGROUND

1. At its Fifty-fifth Session, the Codex Committee on Food Additives (CCFA55) considered a discussion paper on the future work of the Committee¹. It has been recalled that the *General standard for food additives* (GSFA, CXS 192-1995) remains the core of CCFA's work, supported by key pillars including the alignment of food additive provisions in commodity standards with the GSFA, the International Numbering System (INS) for food additives, and the priority list of substances proposed for evaluation by the Joint FAO/WHO Expert Committee on Food Additives (JECFA).
2. CCFA55 recognized the importance of proactively considering the future work of the Committee, particularly in light of progress made on current tasks, the evolving global food system, and the emergence of new food technologies that may give rise to novel food additive-related questions. CCFA55 noted that several other Codex committees had established systematic mechanisms for identifying and prioritizing future work, and agreed that further reflection on such approaches would be beneficial for CCFA.
3. CCFA55 therefore agreed to request that the Codex Secretariat issue a Circular Letter² to collect views from Members and Observers on possible future work of CCFA, including comments on FA55/CRD07, and requested the host Secretariat to prepare a discussion paper for consideration by CCFA56 based on the responses received.
4. This discussion paper has been prepared in response to that request. It summarizes and analyses the comments received through the Circular Letter and is intended to facilitate further discussion by CCFA56 on possible approaches to future work, within the existing mandate and Terms of Reference (ToRs) of the Committee.

OVERVIEW OF COMMENTS RECEIVED

5. Comments submitted by Members and Observers are available [here](#). Comments demonstrated broad support for maintaining the GSFA as the highest priority of CCFA. Many comments emphasized the importance of continuing to improve the clarity, consistency and usability of the GSFA, including issues related to the food category system and the increasing number of notes associated with GSFA provisions.
6. Members and Observers also raised a number of issues that have been discussed previously by CCFA, such as secondary food additives and processing aids, noting that practical and regulatory challenges persist in implementation.
7. In addition, comments referred to emerging developments related to new food sources and production systems, as well as to the role of the INS and the capacity of JECFA to support future work. Divergent views were expressed regarding the scope and readiness of possible new work in some of these areas.
8. Across the comments received, Members and Observers consistently highlighted the importance of taking into account the Committee's existing workload, available resources and the availability of scientific advice when considering future work.

¹ FA55/CRD07

² CL 2025/28-FA

DISCUSSION OF SPECIFIC ISSUES AND AREAS OF FUTURE WORK

I. General Standard for Food Additives (GSFA)

9. The comments received indicate that work related to the GSFA remains the central focus of CCFA, while also revealing differing views on how future improvements should be approached. Two main areas emerged as focal points of discussion: the food category system and the use of notes associated with GSFA provisions. Accessibility and usability were also raised as cross-cutting concerns.

i. Food category system

10. Comments highlighted persistent difficulties in identifying the appropriate food category for certain products, particularly where product formulation, processing technologies or consumption patterns have evolved. Several Members noted that some food category descriptors do not align well with commodity standards or newer types of food products, which may result in uncertainty when applying GSFA provisions. The discussion therefore focused on whether the current food category system continues to provide a sufficiently robust and coherent basis for GSFA implementation.

11. The food category system underpins the entire GSFA structure. Divergent interpretation of food categories may affect the correct application of permitted uses and maximum use levels, with implications for regulatory certainty, harmonized implementation and fair trade. At the same time, Members cautioned against reopening the entire food category system without a clear scope and justification, given the potential workload and complexity involved.

12. Based on the comments received, two broad approaches to future work are identified for consideration, either to undertake a comprehensive review of the GSFA food category system, with a view to systematically revising and updating food category descriptors across the GSFA; or without reopening the entire food category system, identify specific food categories that present implementation difficulties, including cases where alignment with product standards is problematic or where categories are widely considered in need of revision, and consider targeted modifications to those categories.

13. A comprehensive review could provide a coherent long-term solution and address structural issues across the GSFA, but would require significant time, coordination and technical input. A targeted approach could allow CCFA to address the most pressing issues in a more manageable manner, while maintaining overall structural stability, although it may not resolve broader systemic concerns.

ii. Notes associated with GSFA provisions

14. A substantial number of comments focused on the increasing number and diversity of notes associated with GSFA provisions. While recognizing that notes play an important role in clarifying scope and conditions of use, Members and Observers expressed concern that the proliferation of notes, as well as variations in wording and structure, may reduce clarity and increase the risk of divergent interpretation.

15. Notes are frequently relied upon by regulators and other users when implementing GSFA provisions. Inconsistent drafting or overlapping notes may unintentionally introduce restrictions beyond the intended scope of the underlying food category provisions, or obscure the relationship between different provisions. Several comments therefore questioned whether the current approach to notes remains fit for purpose and noted the potential benefits of greater consistency and rationalization.

16. Based on the comments received, the following directions for future work were suggested:

- (1) undertaking a systematic review of existing notes in the GSFA, with a view to identifying overlap, redundancy or inconsistencies;
- (2) considering whether different types of notes could be simplified or rationalized, in order to avoid an excessive number of note categories;
- (3) exploring the development of a more standardized format or drafting approach for notes, including consistent structure or syntax, to improve clarity and predictability.

iii. Accessibility and usability of the GSFA

17. Members noted that, as the GSFA continues to expand, its accessibility and usability for regulators and other users are becoming increasingly important. Difficulties were reported in navigating GSFA provisions and understanding the interaction between food categories, notes and permissions.

18. Based on the comments received, CCFA may consider practical measures to improve the accessibility and usability of the GSFA, such as enhanced digital presentation, explanatory materials or user guidance, while maintaining the GSFA as the single authoritative reference for food additive provisions.

II. International Numbering System (INS)

19. Comments highlighted differing views on the role and use of the International Numbering System (INS), particularly in jurisdictions where the assignment of an INS number is used as a reference point, or in some cases a prerequisite, for national authorization of food additives. Questions were raised regarding the timing of INS assignment in relation to JECFA evaluation and GSFA provisions, as well as the implications for the introduction of new food additives.

20. While the INS plays an important role in ensuring global consistency and clear identification of food additives, reliance on the INS within certain regulatory frameworks may influence the timing of national authorization processes, even where safety evaluations have been completed. These considerations raise questions as to whether the current understanding and use of the INS fully reflect its intended function within the Codex system.

21. Based on the comments received, it is suggested that CCFA focus future work on clarifying the role and function of the INS within the Codex framework, rather than modifying the INS system itself. This could include continued discussion of INS-related issues within existing mechanisms, i.e. the INS Electronic Working Group and In-session Working Group, and enhanced information-sharing among Members on national practices related to the use of INS numbers, with a view to improving mutual understanding and transparency.

III. Role of JECFA in supporting future work

22. Comments consistently emphasized the central role of JECFA in providing independent scientific advice to support CCFA's work. Members and Observers highlighted that JECFA evaluations underpin the scientific credibility of GSFA provisions, INS-related work and other CCFA outputs.

23. These views were expressed in recognition that any consideration of future work may have implications for the JECFA work programme and the availability of scientific advice. Several comments noted that uncoordinated or expanded requests could place pressure on limited scientific resources and affect the timeliness of evaluations.

24. Based on the comments received, it is suggested that CCFA, when considering possible future work, take into account at an early stage the likely need for JECFA input and the feasibility of such requests within existing evaluation programmes. Members and Observers may also be encouraged to coordinate, where appropriate, in proposing substances or topics for JECFA evaluation, and to share relevant national or regional risk assessment information to support the identification of potential candidates for re-evaluation, while recognizing that decisions on the JECFA work programme remain within FAO/WHO governance.

IV. Issues previously considered at CCFA

i. Secondary food additives

25. Comments indicated that secondary food additives continue to present challenges, as these substances are often managed indirectly, for example through notes associated with GSFA provisions. Members noted that differing interpretations and regulatory approaches persist across jurisdictions, reflecting a lack of common understanding of definitions and scope.

26. Inconsistent approaches to secondary food additives may affect regulatory clarity and harmonized implementation of food additive provisions. The absence of shared definitions or clear Codex guidance may also complicate enforcement and compliance, particularly in international trade.

27. Based on the comments received, it is suggested that CCFA consider, as a first step, collecting information on national definitions and regulatory practices related to secondary food additives. Such information could support a clearer understanding of the scope of the issue and inform any further discussion on whether additional Codex guidance or work may be warranted.

ii. Processing aids, including enzymes

28. Processing aids, including enzymes, are identified as an area where practical and regulatory challenges persist, despite existing Codex guidance such as the *Guidelines on substances used as processing aids* (CXG 75-2010). Comments referred to difficulties in applying existing guidance to new processing technologies and to ongoing questions regarding concepts such as carry-over and technological function.

29. Clear and consistent interpretation of guidance on processing aids is important to support harmonized implementation and to avoid unnecessary regulatory divergence. As food processing technologies continue to evolve, questions arise as to whether existing guidance remains sufficiently clear and comprehensive.

30. Based on the comments received, it is suggested that CCFA consider whether further clarification or review of existing guidance on processing aids, including enzymes, would be beneficial, taking into account implementation experience, technological developments and resource considerations.

V. Other emerging issues

31. Comments highlighted emerging issues related to new food sources and production systems, such as precision fermentation and cell-based foods, and their potential implications for food additives. These developments may give rise to novel food additives or new patterns of use, raising questions about the applicability of existing standards, while recognizing that existing Codex principles and frameworks continue to apply.

32. Views differed on the readiness for initiating specific new work in this area. Some comments emphasized the importance of monitoring developments, while cautioning against premature standard-setting in the absence of clearly identified needs.

33. Based on the comments received, it is suggested that CCFA continue to monitor emerging issues related to new food sources and production systems, and consider further action only if specific food additive-related needs are clearly identified, supported by Members, and within the Committee's mandate.

VI. Consideration of Approaches to Identifying Future Work

34. A number of comments referred to the question of how CCFA may identify and prioritize future work. In this regard, Members and Observers highlighted general principles that could guide the consideration of future work, including relevance to consumer health protection and fair practices in food trade, global applicability, coherence with the GSFA framework, and the availability of scientific advice, in particular from JECFA.

35. At the same time, comments did not indicate a clear need to establish a separate or dedicated mechanism or working group specifically for the purpose of prioritizing future work. Members and Observers noted that, once priority areas for future work are identified, several concrete work items may be initiated and progressed through existing CCFA procedures.

36. In this context, it was recognized that Members and Observers may continue to propose new work at any time, including through Circular Letters or under relevant agenda items, for consideration by the Committee when resources permit. On this basis, CCFA may wish to note the prioritization principles highlighted in the comments received, while continuing to consider proposals for future work within its existing procedures, without establishing a separate work stream on prioritization mechanisms.

NEXT STEPS AND RECOMMENDATIONS

37. In light of the views expressed by Members and Observers, and taking into account the discussions outlined in the preceding sections, as well as the ongoing work, workload and available resources, CCFA56 is invited to commence its consideration of the following recommendations and options, and to provide guidance on whether, and in what manner, further work should be undertaken:

Recommendation 1: To Initiate work to address implementation challenges in the GSFA food category system.

Given the central role of the food category system in the GSFA and the recurring implementation difficulties reported by Members, CCFA may wish to consider initiating work in this area through one of the following 3 options:

- **Option 1:** Establish a dedicated working group to undertake a comprehensive review of the GSFA food category system.
- **Option 2:** Establish a working group to conduct a targeted review of specific food categories that present well-documented implementation challenges.
- **Option 3:** Request Members and Observers to submit concrete examples of problematic food categories as a preliminary step, prior to deciding on the establishment and scope of a working group.

Recommendation 2: To Improve clarity and consistency of notes associated with GSFA provisions.

CCFA may consider establishing a working group or assigning the task to the GSFA EWG to initiate a systematic review of notes associated with GSFA provisions, with a view to improving clarity, consistency and usability.

Recommendation 3: To consider next steps on secondary food additives and processing aids.

Recognizing that practical and regulatory challenges related to secondary food additives and processing aids, including enzymes, continue to be reported, but that views differ on the readiness for further work, CCFA may wish to consider the following 2 options:

- **Option 1:** Request Members and Observers to submit information on national definitions, regulatory approaches and implementation challenges related to secondary food additives and processing aids.

And based on the information collected, consider whether additional Codex guidance or clarification is warranted.

- **Option 2:** Defer further work in this area until resources permit, while keeping the issue under review.