

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 2

CRD7

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-First Session

MATTERS REFERRED BY THE CODEX ALIMENTARIUS COMMISSION AND OTHER SUBSIDIARY BODIES

Comments of Canada, European Union, India, Indonesia, Kenya, Malaysia, Russian Federation, Senegal and GOED

Canada

Matters Referred by the Codex Alimentarius Commission and other subsidiary bodies (CX/FA 19/51/2 and CX/FA 19/51/2 Add. 1)

(a) Matters for action arising from CCSCH4:

Canada suggests minor revisions to the proposed generic statement for the alignment of food additive provisions in various Codex commodity standards on spices and culinary herbs, to ensure consistency with other Codex standards (note: new text is presented in **bold and underlined font**; text to be deleted is ~~strikethrough~~):

“Only certain Table 3 Anticaking agents may be used in the powdered form of the product in accordance with as indicated in Table 3 of the General Standards for Food Additives (CXS 192-1995) are acceptable for use in foods conforming to this Standard.”

It is expected that the conditions set out in column 5 of Table 3 will account for the limited use in powdered products.

(b) Matters for action arising from CCFA50:

(i) Review of all group food additives in the GSFA:

Canada supports the recommendation in CX/FA 19/51/2 Add.1.

Canada would like to request that the Committee consider if the re-evaluations of carotenoids (items 7-10 of Table of the Addendum) and orthophenylphenols (items 30-31) should be forwarded to the in-session working group on JECFA Priorities, for addition to the Priority List. If so, we request that the JECFA Secretariat also advise if data will need to be provided and supported by a Member in order to proceed with the evaluation.

Canada would also like to point out that there are currently three requests on the JECFA Priority List for steviol glycosides which may have an impact on the assessment by JECFA of the group steviol glycosides (i.e., item no. 90-91 of Table 1 of the Addendum).

(ii) Proposed amendments to the descriptors of FCs 14.1.4.2 and 14.1.5:

Canada is in general in agreement with the comments or proposed amendments provided by Brazil and the United States of America, which are mostly aligned with the original proposed amendments as reported in [Appendix I of CX/FA 18/50/2](#). Canada believes that the primary difference between these two food categories is that hot beverages are intended to be captured under FC 14.1.5 while FC 14.1.4.2 is used for all other water-based flavoured drinks, whether they be chilled or not.

Canada would like to propose the following amendments to the two descriptors, for consideration by CCFA51 (note: new text is presented in **bold and underlined font**; text to be deleted is ~~strikethrough~~).

14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades:

Include water-based flavoured drinks without added carbon dioxide, fruit and vegetable juice-based drinks (e.g. almond, aniseed, coconut-based drinks, and ginseng drink), fruit flavoured ades (e.g. lemonade, orangeade), squashes (citrus-based soft drinks), capile groselha, lactic acid beverage, ready-to-drink coffee and tea drinks with or without milk or milk (~~ready-to-drink iced or chilled products~~), and herbal-based drinks (**ready-to-drink iced or chilled products**, e.g. iced tea, fruit-flavoured iced tea, chilled canned cappuccino drinks) and “sports” drinks containing electrolytes. These beverages may be clear or contain particulated matter (e.g. fruit pieces), and may be unsweetened or sweetened with sugar or a non-nutritive high-intensity sweetener.

Includes so-called “energy” drinks that are non-carbonated and contain high levels of nutrients and other ingredients (e.g. caffeine, taurine, carnitine).

14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa:

Includes the ready-to-drink products (e.g. canned), and their mixes and concentrates **(hot ready-to-drink beverages, or mixes or concentrates for preparing hot coffee-, and hot tea-, or other cereal- and grain-based beverages), with or without milk**. Examples include: chicory-based hot beverages (postum), rice tea, mate tea, and mixes for hot coffee and **hot** tea beverages (e.g. instant coffee, powder for hot cappuccino beverages). Treated coffee beans for the manufacture of coffee products are also included. Ready-to-drink cocoa is included in category 01.1.4, and cocoa mixes in 05.1.1.

European Union

The European Union (EU) and its Member States would like to submit the following comments:

MATTERS ARISING FROM THE 41ST SESSION OF THE CODEX ALIMENTARIUS COMMISSION (CAC41) – B. MATTERS FOR ACTION

Considering the request of CAC41 to CCFA to clarify the operational procedure for the addition/removal of individual food additives under the same group heading and taking into account that the procedure followed for the inclusion of Rebaudioside A from multiple gene donors expressed in *Yarrowia lipolytica* (INS 960 b(1)) was not totally clear, the EU and its Member States submit the following considerations to CCFA. These considerations do not apply to the alignment between GSFA and commodity standards provisions.

Procedure for the addition/removal of individual food additives under the same group heading.

1. The procedures for consideration of the entry and review of food additive provisions in the GSFA are described in the procedural manual (p. 62-70 of the 26th edition).
2. The addition/removal of individual food additive provisions to/from the GSFA shall be subject to the procedure described on p. 70 of the Procedural Manual. This consideration applies irrespective of whether a food additive is or is not included under a group heading. As indicated in para. 1 on p. 67 of the Procedural Manual, « *Food additives that share a numerical group ADI will be considered as a group without further restrictions on the use of individual additives in that group. However, in some cases, restrictions on the use of individual additives in that group could be appropriate (e.g. because of public health concerns).* » (emphasis added). CCFA, as risk manager, has thus, based on the JECFA opinion, to confirm that an additive under consideration belongs to a group and to consider whether restrictions on the use of additives could be appropriate.
3. It is acknowledged that alignment is subject to a specific procedure since it deals with adopted provisions.

Transparency of decisions by the CCFA

CCFA adopts a large number of provisions at each of its meetings. In addition, some of these decisions are related to discussions under different points on the agenda.

The EU and its Member States submit the following proposals to ensure that decisions taken by the CCFA are made in a transparent manner and that these decisions are properly reflected in the report of the meetings:

1. Decisions on modifications of the GSFA related to discussions under different points on the agenda should be limited to issues which are actually on the agenda and are properly discussed, in principle following the steps procedure.
2. All proposals for changes of the GSFA should go for adoption by the CAC and should be reflected in the Appendixes of the reports of CCFA meetings.

MATTERS ARISING FROM OTHER SUBSIDIARY BODIES

A. Matters for information

24th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFIC24)

Food integrity, food authenticity and food fraud

The EU and its Member States appreciate that CCFICS informs other Codex committees on its work on food integrity, food authenticity and food fraud. The EU and its Member States agree that as noted in para. 7, such work might go beyond the mandate of CCFICS. This matter is relevant for CCFA and can be considered within

the discussion on agenda item 5e, as the paper CX/FA 18/50/10 linked, inter alia, adulteration of foods with food additive uses (see CX/FA 18/50/10, paras. 7, 18-19). Thus the EU and its Member States support coordination of work between CCFICS and CCFA on this matter in order to take into account a possible misuse of additives related to food integrity, authenticity and fraud.

B. Matters for action

The 4th Session of Codex Committee on Spices and Culinary Herbs (CCSCH4)

Proposed draft standard for dried or dehydrated ginger

CCSCH requested CCFA to clarify how to address processing aids under the Section 4 “Food additives”. The EU and its Member States observe that CCSCH refers to the use of calcium oxide and sulphur dioxide as bleaching agents (REP19/SCH, para. 36). It has to be noted that both substances are recognised as food additives (calcium oxide, INS 529 and sulfur dioxide, INS 220) and “bleaching agent” is a functional class of food additives defined by Codex (CAC 36-1989). Therefore, the EU and its Member States are of the view that, prior to considering this request, the appropriate status of the mentioned use (food additive or processing aid) has to be clarified.

India

B. MATTERS FOR ACTION

The 4th Session of Codex Committee on Spices and Culinary Herbs (CCSCH4)

Guidance on the alignment of food-additive provisions and alignment plan

Paragraph 13. CCSCH4 noted that only anticaking agents may be used in spices and culinary herbs and only in the powdered form of such products and therefore agreed to forward the following generic statement to CCFA for endorsement:

“Anticaking agents may be used in the powdered form of the product in accordance with Table 3 of the *General Standards for Food Additives* (CXS 192-1995).”

Comments: India supports the above recommendation, from CCSCH4 captured in paragraph 13 of document **CX/FA 19/51/2**.

Accordingly India proposes amendment in text under “Food Categories or Individual Food Items Excluded from the General Conditions of Table Three” in “Annex to Table Three” of General Standards For Food Additives (CXS 192- 1995) from “Food Category 12.2.1 Herbs and spices (EXCLUDING SPICES)” to “12.2.1 Herbs and spices (EXCLUDING SPICES and ANTICAKING AGENTS FOR HERBS)”.

Technological justification for the use of food additives

Paragraph 14. CCSCH4 agreed to inform CCFA that anticaking agents were used in the powdered form of culinary herbs with the purpose of maintaining the free-flowing physical characteristic of the product and that magnesium stearate (INS 470 (iii)) and amorphous silicon dioxide (INS 551) may be used in the powdered form and in accordance with good manufacturing practice (GMP).

Comments: India supports the above recommendation, from CCSCH4 captured in para 14 of document **CX/FA 19/51/2**. However India believes that this recommendation is now already captured in paragraph 13 wherein all the anticaking agents in Table 3 are permitted to be used in the powdered form of the product (Spices and culinary herbs), hence CCFA report may record the same appropriately.

Proposed draft standard for dried or dehydrated ginger

Paragraph 16. CCSCH4 agreed to request CCFA to clarify how processing aids could be addressed under the Section 4 “Food additives” in accordance with relevant provisions in the Codex Procedural Manual.

Comments: India believes that a standard statement has already been agreed by the committee as part of the ongoing alignment work, which can be used in this case as well.

“The processing aids used in products conforming to this standard should be consistent with the Guidelines of Substances used as Processing Aids (CAC/GL 75 – 2010).

Matters for action

The 50th Session of the Codex Committee on Food Additives (CCFA50)

Appendix I: Report on the review of all group food additives in the GSFA

Paragraph 10. In order to resolve all these issues, preliminary recommendations to all the respective group food additives are provided in the attached table. In general, for some food additives, if there are recommendations to JECFA, it is proposed that CCFA revisit these group food additives at a later stage.

Comments: India supports the recommendation.

Paragraph 11. In view of the fact that JECFA is going to re-evaluate two groups of food additives. (carotenoids and ortho –Phenylphenols) and have a general discussion on the use of the terms “group” ADI or PTWI as well as how to assign group ADIs at its next session, it is proposed that CCFA: (i) consider those relevant food additives at a later stage; and (ii) examine the appropriateness of:

- creating group heading for one category of group food additives (sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474));
- revisiting note for one category of group food additives (CYCLAMATES); and
- including notes for six categories of group food additives.

Comments: India supports the recommendation.

Paragraph 12. CCFA51 is invited to decide on the pragmatic follow-up actions.

Comments: India supports the recommendation.

Appendix II: Compilation of comments in response to CL 2018/29-FA “Request for comments on the proposed amendments to the descriptors of FCs 14.1.4.2 and 14.1.5”

1) India Comments:

Descriptors:

14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades, **enhanced waters containing herbs, cereal and grain beverages etc.:**

Include water-based flavoured drinks without added carbon dioxide, fruit and vegetable juice-based drinks (e.g. almond, aniseed, coconut-based drinks, and ginseng drink), **enhanced waters that may contain protein, fiber, herbal extracts etc.**, fruit flavouredades (e.g. lemonade, orangeade), squashes (citrus-based soft drinks), capile groselha, lactic acid beverage, ready-to-drink coffee and tea drinks with or without milk or milk (~~ready-to-drink iced or chilled products~~), and herbal-based drinks (e.g. iced tea, fruit-flavoured iced tea, chilled canned cappuccino drinks) and “sports” drinks containing electrolytes. These beverages may be clear or contain particulated matter (e.g. fruit pieces), and may be unsweetened or sweetened with sugar or a non-nutritive high-intensity sweetener. Includes so-called “energy” drinks that are non-carbonated and contain high levels of nutrients and other ingredients (e.g. caffeine, taurine, carnitine).

Rationale: India supports adoption of above descriptor for category 14.1.4.2 due to following reasons:

i) Addition of the above description will provide more clarity and rightly reflect new products in market. In India vitamin enriched flavoured water, oat-based drinks, herbal drinks are examples of enhanced, herbal and grain-based beverages. Such products are designed using water as major or base ingredient and therefore are classified under FC 14.1.4.2.

ii) In addition, India notes that products characterization (water-based products or tea/ coffee-based products) defines classification of products and not how products are served (hot or chilled). The proposed amendment as highlighted above rightly captures category and provides necessary flexibility to manufacturers to determine classification depending on characteristics of products they are offering. In the Indian subcontinent due to extreme weather conditions beverages which are served and sold in summer as chilled/ cold beverages are served hot in winter.

2) India Comments:

14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

Includes the ready-to-drink products (e.g. canned), and their mixes and concentrates (~~hot ready-to-drink beverages or mixes for preparing hot coffee and tea based beverages~~). Examples include: chicory-based hot beverages (postum), rice tea, mate tea, and mixes for hot coffee and tea beverages **with or without milk** (e.g. instant coffee, powder for hot cappuccino beverages). Treated coffee beans for the manufacture of coffee products are also included. Ready-to-drink cocoa is included in category 01.1.4, and cocoa mixes in 05.1.1

Rationale: India supports adoption of the above descriptor due to following reasons:

In India ready-to-serve tea or coffee based drink customarily contains milk which forms one of the largest beverage segments in the country. India notes that products characterization (water-based products or tea/

coffee based products) defines classification of products and not how products are served (hot or chilled). The proposed amendment as highlighted above rightly captures category and provides necessary flexibility to manufacturers to determine classification depending on characteristics of products they are offering.

MATTERS REFERRED BY THE 26th SESSION OF THE CODEX COMMITTEE ON FATS AND OILS

Technological justification for the use of emulsifiers in FC 02.1.2.

Paragraph 9. The committee is invited to consider the replies as presented in Appendix II to this document.

Comments: India supports the recommendation forwarded by Codex Committee on Fats and Oils (CCFO) and supports the adoption of emulsifiers mentioned in Appendix II, on the basis of technological justification provided by CCFO.

Indonesia

MATTERS ARISING FROM OTHER SUBSIDIARY BODIES

The 4th Session of Codex Committee on Spices and Culinary Herbs (CCSCH4)

Guidance on the alignment of food-additive provisions and alignment plan

Technological justification for the use of food additives

Indonesia comment:

- Indonesia does not support magnesium stearate as anticaking agents in spices and culinary herbs and only in the powdered form of such products.
- Indonesia proposes maximum level at 5000 mg/kg for silicon dioxide (INS 551). Rationale: This ML is enough for technological function.

Kenya

Matters referred by the Codex Alimentarius Commission and other subsidiary bodies

Matters for Action:

Issue 1: clarification on the operational procedure for the addition/removal of individual food additives under the same group heading (Para 5)

Comment: The food additive (Yarrowia lipolytica INS 960b (i)), was procedurally included in the GSFA.

Justification: In considering Yarrowia lipolytica (INS 960b (i)). The safety evaluation did not show any significant difference to negate its inclusion

Issue 2: Development of Guidelines for the management of (micro)biological foodborne crises/outbreaks by CCFH (Para 11).

Comment: Kenya supports this work by CCFH and considers it a timely guideline.

Justification: Take note while the CCFH work focuses on biological hazards in food safety, there is need to chemical hazards addressed. In our view, the use of food additives has potential of resulting food crises and thus CCFA should be interested in this work.

Issue 3: Request for guidance on the alignment of food-additive provisions and alignment plan (Para 13), Technological justification for the use of food additives (Para 14) and clarification on how processing aids should be used (Para 16) by CCSCH4.

Comment: Kenya agrees with the proposed text on the use of anticaking agents as it is consistent to the codex procedures for alignment of food additives in commodity standards to GSFA. We also accept the proposed technological justification provided by CCSCH. In regard to the guidance on the use of processing aid, Kenya proposes the following text for inclusion in the procedural manual, '*The processing aids used in products covered by this standard should comply with the guidelines for the use of processing aids (CAC/GL75/2010).*

Justification: The processing aid proposed text is already expected in the Codex Procedural Manual as indicated in the last paragraph on Food additive page 58 of the manual.

Malaysia

Matters for action

The 50th Session of the Codex Committee on Food Additives (CCFA50)

The proposed amendments to the descriptors of FCs 14.1.4.2 and 14.1.5

Malaysia's comment: Malaysia would like to propose the alternative description:

14.1.4.2 *Non carbonated water-based flavoured drinks, including punches and ades:*

*Include water-based flavoured drinks without added carbon dioxide, fruit and vegetable juice-based drinks (e.g. almond, aniseed, coconut-based drinks, and ginseng drink), fruit flavoured ades (e.g. lemonade, orangeade), squashes (citrus-based soft drinks), capolegroselha, lactic acid beverage, ready-to-drink coffee-based and tea-based drinks with or without milk **that cannot be included in category 14.1.5**, and herbal-based drinks (e.g. iced tea, fruit-flavoured iced tea, ~~chilled~~ canned ~~cappuccino-coffee-based~~ drinks) and "sports" drinks containing electrolytes. These beverages may be clear or contain particulated matter (e.g. fruit pieces), and may be unsweetened or sweetened with sugar or a non-nutritive high intensity sweetener. Includes so-called "energy" drinks that are non-carbonates and contain high levels of nutrients and other ingredients (e.g. caffeine, taurine, carnitine).*

14.1.5 *Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa*

*Includes the ready-to-drink products (e.g. canned), **with or without milk**, and their mixes and concentrates (**ready-to-drink beverages or mixes and concentrates to prepare coffee and tea beverages**). Examples include: chicory-based hot beverages (postum), rice tea, mate tea, ~~canned cappuccino drink~~ and mixes for ~~hot~~ coffee and tea beverages (e.g. instant coffee, powder for ~~hot~~ cappuccino beverages). Treated coffee beans for the manufacture of coffee products are also included. Ready-to-drink cocoa is included in category 01.1.4 and cocoa mixes in 05.1.1.*

Russian Federation

B. Matters for action

Matters arising from the 41-st session of the Codex Alimentarius Commission (CAC41): Food-additive provisions of the General Standard for Food Additives (GSFA)

The Russian Federation supports concerns related to the genetically modified strains of *Yarrowia lipolytica* (INS 960b(i)) obtained using different donors. Authorized-for-use strain producers should be assigned an individual code, ensuring that strains have not passed the mandatory safety assessment are not used in food industry.

The 4th Session of Codex Committee on Spices and Culinary Herbs (CCSCH4)

The Russian Federation agrees with opinion of CCSCH4 that only anticaking agents with the function of maintaining the free-flowing physical characteristic should be allowed in powdered form of culinary herbs in accordance with good manufacturing practice (GMP).

CX/FA 19/51/5 Agenda Item 4(a)

ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES

IN COMMODITY STANDARDS

The Russian Federation considers it possible to agree with endorsement of the food additive provisions forwarded by the 4th Session of the Codex Committee on Spices and Culinary Herbs (REP19/SCH) related to:

<ul style="list-style-type: none"> - Proposed draft standard for dried or dehydrated garlic (at Step 5/8); - Proposed draft standard for dried oregano (at Step 5); - Proposed draft standard for dried roots, rhizomes and bulbs – dried or dehydrated ginger (at Step 5); - Proposed draft standard for dried leaves - dried basil (at Step 5); - Proposed draft standard for dried floral parts - dried cloves (at Step 5). 	<p>Anticaking agents may be used in the powdered form of the product in accordance with Table 3 of the General Standard for Food Additives (CXS 192-1995).</p>
<ul style="list-style-type: none"> - Proposed draft standard for saffron (at Step 5). 	<p>No food additives are permitted in the products covered by this standard.</p>

Senegal

QUESTIONS CAC41 (demandant une action)

Dispositions relatives aux additifs alimentaires de la NGAA

À la quarante et unième session de la Commission, un membre s'est dit préoccupé par l'inclusion du rébaudioside A de donneurs de gènes multiples exprimé en *Yarrowia lipolytica* (SIN 960b(i)) dans la NGAA, et il a demandé des précisions concernant la procédure suivie à cet égard

Position : Sénégal s'aligne sur la position de l'UA : la procédure correcte a été suivie

Justification : L'additif alimentaire a d'abord été classé par ordre de priorité, évalué par le JECFA, auquel une DJA et un numéro INS ont été attribués, puis examiné par le CCFA pour inclusion dans la NGAA.

QUESTIONS SOUMISES PAR D'AUTRES ORGANES SUBSIDIAIRES

75ème session du Comité exécutif de la Commission du Codex Alimentarius (CCEXEC)

Question 1: Caractère transversal de la nouvelle proposition de travail du CCFH concernant des directives pour la gestion des crises / épidémies (micro) biologiques d'origine alimentaire

Position : Sénégal s'aligne sur la position de l'UA (*reconnait qu'il est très important pour la CAC de gérer les maladies d'origine alimentaire*)

Quatrième session du Comité du Codex sur les épices et les herbes culinaires (CCSCH4)

Question 1 : le CCSCH4 a noté que seulement les antiagglomérants peuvent être utilisés dans les épices et les herbes culinaires et uniquement sous forme de poudre de ces produits et a donc convenu de transmettre l'énoncé générique suivant au CCFA pour confirmation : ***“Les antiagglomérants peuvent être utilisés sous forme de poudre du produit conformément au tableau 3 de la Norme générale pour les additifs alimentaires (CXS 192-1995)”***

Position : Le Sénégal soutient l'approbation du texte proposé.

Justification : La justification technologique donnée est acceptable et conforme à la NGAA. Cette déclaration est compatible avec l'utilisation d'additifs alimentaires conformément au manuel de procédure du Codex.

Question 2 : le CCSCH4 est convenu d'informer le CCFA que le stéarate de magnésium (SIN 470(iii)) et la silice amorphe (SIN 551) peuvent être utilisés sous forme de poudre et conformément aux Bonnes Pratiques de Fabrication.

Position : le Sénégal soutient l'utilisation de ces agents antiagglomérants tels que proposée par le CCSCH4.

Justification : Le CCSCH a fourni la justification technologique tel que requis par le manuel de procédure du Codex.

CCFA50 : Examen de tous les additifs alimentaires de groupe dans la NGAA (CX/FA 19/51/2 Add.1)

À sa cinquantième session, le CCFA a souscrit à la recommandation de demander au Secrétariat du Codex, en consultation avec les Secrétariats du JECFA, d'entreprendre l'examen de tous les additifs alimentaires de groupe dans la NGAA et de préparer un document plus complet pour examen à la cinquante et unième session du CCFA y compris des propositions pour traiter la question.

Question : Le Comité **est invité à examiner** les recommandations dans les paragraphes 10-12 de l'annexe I.

Position : Le Sénégal adhère aux recommandations 10 et 11 de l'annexe 1.

GOED

The Global Organization for EPA and DHA Omega-3s (GOED), a recognized Codex Observer¹, represents the worldwide EPA and DHA omega-3 industry and was intimately involved in discussions about and adoption of the Standard for Fish Oils (CXS 329-2017).²

With respect to Agenda Item #2 CX/FA 19/51/2 Add.2 Matters Referred by the 26th Session of CCFO, specifically CCFO's request for CCFA to assist in the alignment of the food-additive provisions in the Standard for Fish Oils (CXS 329-2017) with the appropriate food-additive provisions in the General Standard for Food Additives (GSFA)(CXS 192-1995), it's not clear if CCFA will be seeking agreement to develop a proposal

¹ <http://www.fao.org/fao-who-codexalimentarius/about-codex/observers/observers/obs-list/en/>

² http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?ink=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCODEX%2BSTAN%2B329-2017%252FCXS_329e.pdf

similar to those for other Standards (e.g. Named Vegetable Oils, Named Animal Fats, etc...) found in Appendix I of CX/FA 19/51/2 Add.2 or if the alignment discussion will include the Standard for Fish Oils (CXS 329-2017).

Should the alignment discussion proceed without a written proposal, GOED requests the following comments be considered in order to align the Standard for Fish Oils (CXS 329-2017) and the GSFA (CXS 192-1995):

- Ascorbic acid, L- (INS 300) is listed in the Standard for Fish Oils (CXS 329-2017) with a Max Level of GMP, but not included in the GSFA (CXS 192-1995).

Ascorbyl Esters (INS 304, 305) are listed in both the Standard for Fish Oils (CXS 329-2017) and in the GSFA (CXS 192-1995), but the Max Levels are not aligned. In the Standard for Fish Oils (CXS 329-2017), the Max Level is 2500 mg/kg as ascorbyl stearate. In the GSFA (CXS 192-1995), the Max Level is 500 mg/kg as ascorbyl stearate.