

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 3(b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-First Session

PROPOSED DRAFT SPECIFICATION FOR IDENTITY AND PURITY OF FOOD ADDITIVES ARISING FROM THE 86TH JECFA MEETING

Comments of European Union, Ghana, Japan and Philippines, Senegal

European Union

The European Union (EU) would like to submit the following comments:

Recommendation to review the specifications designated as “Full” for the food additives listed in Annex 1

The EU would like to thank JECFA for preparing the draft specifications arising from the 86th JECFA meeting. The EU generally supports the adoption of the full specifications for substances listed in Annex 1.

However, in case of the draft specifications for INS 1205 Basic methacrylate copolymer the EU notes that the part ‘Definition’ includes the following sentence:

“Basic methacrylate copolymer is used as a coating and glazing agent for food supplements and foods for special medical purposes.”

The EU observes that such sentence is not usually included in the specifications. The EU notes that the GSFA provides for the provisions for the use of food additives in different foods. The EU further notes a common practice to include food additives with an ADI ‘not specified’ in Table 3 which permits their use in a wide variety of foods.

Thus, the EU believes that there are 2 issues which need to be considered:

1. Appropriateness of the sentence *“Basic methacrylate copolymer is used as a coating and glazing agent for food supplements and foods for special medical purposes.”* in the specifications taking into account that it is the GSFA that provides for the provisions for the use of food additives in foods.
2. Appropriateness of including INS 1205 in Table 3 if the aforementioned sentence was inserted in the specifications to indicate that the safety assessment (and an ADI ‘not specified’) is limited to its use as a coating and glazing agent for food supplements and foods for special medical purposes.

The EU would welcome the views and comments of the Committee and JECFA on those two issues.

Ghana

Position: Ghana supports JECFA’s recommendations for the adoption of the food additives specifications designated as “Full” as listed in Annex 1 of CXFA 19/51/4.

Rationale: The food additives have undergone all safety evaluations by JECFA.

Japan

While recognizing the detailed discussions on each of specifications at the 86th JECFA, Japan submits the following comments requesting review of the proposed draft specifications of citric and fatty acid esters of glycerol (INS 472c) and some flavouring agents to check if they appropriately reflect the products currently distributed and available in the market in the world.

Citric and fatty acid esters of glycerol (INS 472c : CITREM)

Products complying with the current INS 472c (“use of unsaturated fatty acids”, “Solubility” and “Total glycerol”) are commercially available at the present time. Japan proposes that information on what products are

commercially available and their compositions/characteristics shall be collected. Amendments to the specification of INS 472c shall be considered on a basis of analysis of the collected data.

Flavouring agents

- (1) Japan requests reconsideration of the specifications for 16 flavouring agents shown below and considered at the 86th JECFA meeting (listed in either Annex 1 or Annex 2 of CX/FA 19/51/4). It is because Japan recognizes some gaps between the JECFA specification (some items therein) and the commercially available products for each compound.

The 16 flavouring agents mentioned above are: Ethyl 2-methyl pentanoate (No.214), cis-3-Hexen-1-ol (No.315), d-Carvone (No.380.1), l-Carvone (No.380.2), Menthol (No.427), l-Menthyl l-lactate (No.433), Myrcene (No.1327), Maltol (No.1480), 2-pentylfuran (No.1491), 3-(2-Furyl)acrolein (No.1497), 3-(5-Methyl-2-furyl)-butanal (No.1500), 2-Furyl methyl ketone (No.1503), 3-Acetyl-2,5-dimethylfuran (No.1506), (2-Furyl)-2-propanone (No.1508), 4-(2-furyl)-3-buten-2-one (No.1511), and Furfuryl methyl ether (No.1520).

Below are some examples of gaps. The detailed proposal and data of evidence are included in an Annex.

A) In the specifications of some flavouring agents, such as Menthol (JECFA no. 427), refractive index and specific gravity values are described while these characteristics were tested at temperatures below the melting/solidification points of such compounds. For example, melting point for (-)-menthol is 41-44°C while measurement temperature for refractive index was 20°C.

B) Commercial products of some flavouring agents, such as Myrcene (JECFA no. 1327), are obtained through both organic synthesis and extraction from natural sources. Some commercial products from natural sources may be of lower purity than JECFA standard specifications.

- (2) Gap problems similar to the above are found in other flavouring agents.
- (3) Japan proposes that review of the existing JECFA specifications in future JECFA shall be based on appropriate data provided by various parts of the world in order to develop evidence-based specifications reflecting the global market situations. To collect these data, data calls should be utilized.
- (4) Japan is ready to submit necessary data in response to the data call on the above flavouring agents as well as on other flavouring agents with similar data gaps.

Supporting data is [here](#).

Philippines

The Philippines supports recommending for adoption of the specifications designated as “Full” for the following food additives:

1. Basic methacrylate copolymer (BMC) (INS 1205)
2. Cassia Gum (INS 427)
3. Erythrosine (INS 127)
4. Glycerol ester of wood rosin (INS 445(iii))
5. Indigotine (INS 132)
6. Lutein from *Tagetes erecta*(INS 161b(i))

Rationale:

As reported at the 86th JECFA meeting last 12-21 June 2018, the six (6) additives have been evaluated for safety and concluded that these additives do not present any health concern.

Philippines also supports the adoption of the specifications for the sixty-six (66) flavourings, including the twenty-four (24) flavourings with new specifications (N) and the forty-two (42) flavourings with existing specifications maintained (M). Based on the evaluation of these flavourings using the Procedure for the Safety Evaluation of Flavouring Agents as reported at the 86th JECFA meeting, and on the current estimated dietary exposure, it has been concluded that there is **No safety Concern** on the use of the said flavourings. **Senegal**

Contexte :

Lors de la 86^{ème} réunion du JECFA, de nouvelles normes pour les additifs alimentaires ont été élaborées :

-Les normes complètes pour 24 aromatisants ont été élaborées, les normes pour 5 aromatisants ont été révisées et les normes pour 45 aromatisants ont été maintenues

- Les normes complètes pour 6 additifs : **copolymère méthacrylate basique (SIN 1205)**, gomme de cassia (SIN 427), érythrosine (SIN 127), ester glycérolique de résine de bois (SIN 445(iii), indigotine (SIN 132) et lutéine de Tagetes erecta (SIN 161b(i)).

- Les normes provisoires pour 5 additifs alimentaires : copolymère méthacrylate anionique (SIN 1207), esters glycéroliques de l'acide citrique et d'acides gras (SIN 472c), amidons modifiés, copolymère méthacrylate neutre (SIN 1206), extrait de spiruline (SIN 134).

Il s'ensuit que le statut provisoire des normes pour la gomme de cassia a été retiré.

Question : le JECFA invite le CCFA51 à examiner les normes désignées comme « complètes » pour les additifs alimentaires inscrits dans l'Annexe 1 en vue de recommander leur adoption par la CAC42 en tant que normes Codex, en tenant compte des observations soumises.

Position: le Sénégal appuie les recommandations du JECFA concernant l'adoption des spécifications relatives aux additifs alimentaires qualifiées de « complètes », telles qu'énumérées à l'Annexe 1 du CXFA 19/51/4.

Justification: Les additifs alimentaires ont été soumis à une évaluation complète de leur innocuité par le JECFA.

