

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4(a) and 4(b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-third Session

ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS

(Comments of China and Paraguay)

PART A: Comments to Agenda Item 4(a)

China

Regarding the proposed draft regional standard for cooked rice wrapped in plant leaves which was forwarded by the 22nd session of FAO/WHO Coordinating Committee for Asia. In order to avoid confusion and to better align with functional classes of food additives listed in food category 06.7 in Tables 1 and 2 of the GSFA, China would like to propose the following change in the food additive section in the draft commodity standard, and the text to be removed is indicated in ~~strike through~~:

~~Acidity regulator, antioxidant, Colours, preservative and stabilizer used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 06.7 "Pre-cooked or processed rice products, including rice cakes (Oriental type only)" and acidity regulators, antioxidants, colours, preservatives, stabilizers, emulsifiers, flavor enhancers and thickeners as indicated in Table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in foods conforming to this Standard.~~

Paraguay

Paraguay apoya las disposiciones del Anexo I del Documento con relación a los Comités del Codex sobre Frutas y Hortalizas frescas, Especies y Hierbas Culinarias y del Comité Coordinador FAO/OMS para América Latina y el Caribe.

PART B: Comments to Agenda Item 4b

China

China would like to thank Australia, the United States of America and Japan for chairing the electronic working group on alignment and preparing the working document. And China is willing to provide the following comments:

Appendix 6

China understand the heavy workload of alignment of the food additive provisions of commodity standards and the GSFA, and believe it is necessary to avoid new diverge on food additive provisions between the GSFA and commodity standards, especially commodity standards to be developed in future, which may result in a never-ending list of alignment. And keeping the principle in mind that GSFA should be the single reference point for food additives in the Codex Alimentarius, China would like to propose:

I. To consider the following changes to the Procedural Manual:

1. Relations between commodity committees and general subject committees (Page 49-50 in the 27th edition of the Procedural Manual).

The food additive section in *Relations Between Commodity Committees and General Subject Committees* is suggested to be replaced by texts proposed by the Ewg in Annex 2, Appendix 6 CX/FA 23/53/6

2. Format for codex commodity standards (Page 56-57 in the 27th edition of the Procedural Manual).

Food Additives

This section should **only** contain a general reference to the corresponding sections of the *General Standard for Food Additives* which should take the following form:

“[Food Additive functional class] used in accordance with Tables 1 and 2 of the General Standard of Food Additives in food category x.x.x.x [food category name] or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.”

~~Exceptions from, or addition to, the General Standard for Food Additives that are necessary for its interpretation with respect to the product concerned should be justified fully, and should be restricted where possible. In cases where it is necessary to explicitly list food additives in a commodity standard, the names of the additives/functional classes permitted and, where appropriate, the maximum amount permitted in the food should be prepared in accordance with guidance given in the section on Food Additives in the *Relations between Commodity Committees and General Subject Committees*, and should follow a tabulation, viz:~~

~~*“INS number, name of additive, maximum level (in percentage or mg/kg) grouped by functional classes.”*~~

This section should contain the following reference to the *Guidelines for the use of flavourings* (CAC/GL 66-2008), as appropriate:

“The flavourings used in products covered by this standard should comply with the Guidelines for the use of flavourings (CAC/GL 66-2008).”

In this section, provisions for processing aids should also be included.

3. Procedure for consideration of the entry and review of food additive provisions in the general standard for food additives (Page 64-65 in the 27th edition of the Procedural Manual)

Is the food additive used in standardized food?

~~The Committee on Food Additives, asks the relevant Codex commodity committee to consider the functional classes of additives, additives and their technological justification for the commodity and to refer back this information by the next available session. In light of this information, the Committee on Food Additives recommends appropriate conditions of use based on proposals of the commodity committee.~~

~~In certain cases, however, it may be appropriate for the Codex commodity committee to develop a list of food additives with associated functional classes and acceptable maximum use levels that would be forwarded to the Committee on Food Additives for endorsement and, ultimately, incorporation into the *General Standard for Food Additives*. The development of such food additive lists should be consistent with the principles used in the development of the *General Standard for Food Additives*. However, the development of food additive lists in commodity standards should be restricted as much as possible. For example, an additive may be listed in a commodity standard if it is needed to achieve a technical effect that is not achievable by the use of other additives of the same functional class. Additives may also be listed in a commodity standard if there is a need, based on a safety assessment, to limit the use of the additive. Justification for such exceptions should be provided by the Codex commodity committees to the Committee on Food Additives for consideration.~~

~~If the Codex commodity committee has been adjourned, the Committee on Food Additives may revise the food additive provisions in commodity standards under the purview of the adjourned committee, as necessary.~~

The Committee on Food Additives would consider any proposed revision in light of the principles of technological justification for the use of additives as indicated in Section 3.2 of the Preamble of the *General Standard for Food Additives*. These revisions, once adopted by the Commission, would be incorporated into the *General Standard for Food Additives*.

II. CCFA to be the only committee to discuss food additive provisions

To follow the approach in other general subject committees, e.g. CCCF or CCMAS. And it is suggested that through the amendment to the Procedural Manual, CCFA to be the only committee which discuss food additive provisions, by considering proposals for new work or revision of the adopted maximum use level of food additives in the GSFA.

In conclusion, China would like to suggest the above amendments to the Procedural Manual. And we welcome more discussion pertaining to the wording in the Procedural Manual, as well as the role of commodity committees in discussing food additive provisions in CCFA in future.