codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 7 C **CX/FAC 02/7**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS
Thirty-fourth Session
Rotterdam, The Netherlands, 11-15 March 2002

TABLE 1 OF THE DRAFT GSFA

The following comments have been received from Cuba, Canada, Brazil, Australia, Spain, Poland, Japan, IFAC, IADSA, IBFAN, ENCA and European Community.

CUBA

PART B:

1. Draft Food Additives Provisions in Table 1 of the Codex General Standard for Food Additives at step 6.

We are in agreement with the vast majority of the maximum levels appearing in Table 1. However, having regard to the extent of their use in different food categories and their ADI values, the maximum levels for the following additives seem to us too high:

- Acesulfame potassium (INS=950) in: sweets (3500 mg/kg), in fine confectionery products (2000 mg/kg) and imitation chocolate products (2500 mg/kg).

- Aspartame (INS=951) in: ice creams and yoghurt (3000 mg/kg), in bread and bakery wares (4000 mg/kg) and in fruit juices and nectars (2000 mg/kg).

- Benzoates (INS=210, 211, 212 and 213) in: canned or bottled fruit juices (2100 mg/kg), canned or bottled vegetable juices (2000 mg/kg) and canned or bottled fruit nectars (2000 mg/kg).

- Erythrosine (INS=127) in ice creams and yoghurt (300 mg/kg), in flavoured drinks (300 mg/kg), bakery wares and breakfast cereals (300 mg/kg).

- Saccharine (INS=954) in sweets (3000 mg/kg), carbonated drinks (500 mg/kg).

- Sulphites (INS=220, 221, 222, 223, 224, 225, 227, 228 and 539) in jellies and marmalades (3000 mg/kg), imitation chocolate products (2000 mg/kg), processed comminuted meat (500 mg/kg), soups (1000 mg/kg), canned or bottled fruit juices (600 mg/kg) and canned or bottled vegetable juices (500 mg/kg).

CANADA

In response to Recommendation F in Conference Room Document 1 (Report of the *Ad Hoc* Working Group on the Codex General Standard for Food Additives {GSFA}), Canada offers the following comments.

Aluminum ammonium sulfate

04.2.2.3 Vegetables and seaweed in vinegar, oil, brine or soy sauce
Canadian *Food and Drug Regulations* permit the use of aluminum ammonium sulfate as a firming agent in pickles and relishes at levels consistent with good manufacturing practice (GMP). Under these *Regulations*, when an additive is permitted at *good manufacturing practice*, "the amount of the food additive added to a food in manufacturing and processing shall not exceed the amount required to accomplish the purpose for which the additive is permitted to be added to that food" (Section B.01.044).

Canadian food manufacturing respondents indicated that, although they have used aluminum ammonium sulphate in pickles and relishes in the past, none of them are using this particular firming agent today in their products. When used, this additive is employed at levels of up to approximately 185 ppm, depending upon the product.

06.2 Flours and Starches
The Canadian *Food and Drug Regulations* permit the use of aluminum ammonium sulfate as a raising agent in baking powder at levels consistent with good manufacturing practice. Since baking powder is used in the home and since its use by consumers is beyond the reach of the Canadian *Food and Drug Regulations*, it is inappropriate to specify a finite maximum level of use for aluminum ammonium sulphate in finished foods to which baking powder containing this substance is added. Therefore, from a Canadian perspective, we believe it is unnecessary to list this substance in this category to accommodate the use of aluminum ammonium sulphate in baking powder, an intermediate commodity not appearing in the Codex Food Category System.

10.4 Egg-based Desserts
The Canadian *Food and Drug Regulations* permit the use of aluminum ammonium sulfate in unstandardized foods at levels consistent with good manufacturing practice. The Canadian food industry has identified meringue powder as the unstandardized food where this additive is used at a level of use of 0.2%.

16.0 Composite Foods
If this listing is intended to accommodate Canada's provision for the use of this additive as a pH-adjusting agent/firming agent in unstandardized foods, recent industry information does not reveal any uses in this generalized area.

Ascorbyl esters

11.4 Other Sugars and Syrups
11.5 Table-top sweeteners, including those containing high/density sweeteners
Ascorbyl esters are not permitted in these food categories in Canada and, therefore, we cannot provide justification for such use.

BRAZIL

Draft Food Additive Provisions in Table 1 of the Codex General Standard for Food Additives at Step 6 (para. 65 and Appendix IV).

The Committee agreed that several maximum levels for food additives in specific food categories be held at Step 6 for additional comment and consideration at the 34 th CCFAC.

A) **ADJUVANT -** Brazil suggests that the adjuvant function should be clearly defined and then included in the Codex Table of Functional Classes, Definitions and Technological Functions (Alpha-Amylase, Aluminium Silicate, BHT, Carbon dioxide, Carnauba wax, Dioctyl sodium sulfosuccinate, Mineral oil, Polyglycerol esters of fatty acids, Polysorbates, Propylene glycol, Propylene glycol alginate, Sucrose esters of fatty acids, Sulphites, Tartrates).

ADDITIVES WITH TOXICOLOGICAL MONOGRAPH NOT PREPARED: Bromelain, Nitrogen, Papain, and Sodium Sesquicarbonate.

B) As accorded by CCFAC previous meetings, Brazil requests that additives having GMP entries, and also, those having numerical ADI, to be established the maximum numerical level:

ADDITIVE	**INS**	**MAX LEVEL MG/KG**	**FOOD CAT. NO.**	*BRAZIL COMMENTS*
ACESULFAME POTASSIUM	950	GMP	01.2, 01.3.2, 01.4, 01.5.1, 01.6.1, 02.3, 04.1.2.10,04.2.2.7, 07.1, 09.4, 12.2, 12.3, 14.1.5, 14.2.4, 14.2.5, 14.2.6.1	Numerical IDA Specify the maximum numerical level.
ADIPATES	355,356,357 , 359	GMP	01.2.1, 02.2.1.2, 14.2.1	Numerical IDA Specify the maximum numerical level.
ALITAME	956	GMP	11.2	Numerical IDA Specify the maximum numerical level.
ALLURA RED AC	129	GMP	02.1.3, 02.2.1.2	Numerical IDA Specify the maximum numerical level.
ALUMINIUM AMMONIUM SULPHATE	523	GMP	04.2.2.3, 06.2	Numerical IDA Specify the maximum numerical level.
ANNATTO EXTRACTS	160b	GMP	04.1.2.4, 04.1.2.6, 07.1, 14.1.2.1, 14.1.2.3, 14.1.3.1	Numerical IDA Specify the maximum numerical level.
ASCORBYL ESTERS	304	GMP	06.4.2	Numerical IDA Specify the maximum numerical level.
ASPARTAME	951	GMP	01.3.2; 01.4.1; 01.4.2; 01.4.3; 01.5.1; 01.5.3; 01.6.1; 02.3; 04.1.2.1, 14.1.5	Numerical IDA Specify the maximum numerical level.
AZORUBINE	122	GMP	14.1.2.1, 14.1.2.2	Numerical IDA Specify the maximum numerical level.
BRILHANT BLUE FCF	133	GMP	02.1.3, 02.2.1.2, 14.2.1	Numerical IDA Specify the maximum numerical level.
CANTHAXANTHIN	161g	GMP	01.1.2, 01.6, 01.7, 02.0, 03.0, 04.1.2.4, 04.1.2.6, 04.1.2.8, 04.1.2.9, 04.1.2.11, 04.2.2.3, 05.1, 05.4, 06.4.2, 06.5, 06.6, 07.0, 08.4, 09.2.1, 09.2.4.3,	Numerical IDA Specify the maximum numerical level.

			09.2.5, 09.3.3, 10.4, 11.1, 11.2, 12.2, 14.1.4.1, 15.1, 16.0	
CARNAUBA WAX	903	GMP	04.1.1.2, 04.1.2, 04.2.1.2, 12.6, 14.1.2.1	Numerical IDA Specify the maximum numerical level.
CASTOR OIL	1503	GMP	05.1, 05.3, 05.4	Numerical IDA Specify the maximum numerical level.
CURCUMIN		GMP	02.2.1.1, 02.2.2, 04.2.2.2, 04.2.2.5, 7.1, 08.4, 16.0	Numerical IDA Specify the maximum numerical level.
CYCLAMATES	952	GMP	01.2, 11.2	Numerical IDA Specify the maximum numerical level.
DIOCTYL SODIUM SULFOSUCCINATE	480	GMP	01.3.1	Numerical IDA Specify the maximum numerical level.
ERYTROSINE	127	GMP	02.1.3, 02.2.1.2, 08.4, 14.2.6.2	Numerical IDA Specify the maximum numerical level.
INDIGOTINE	132	GMP	02.1.3, 02.2.1.2	Numerical IDA Specify the maximum numerical level.
IRON OXIDES	172i, 172ii, 172iii	GMP	01.1.2, 01.2.2, 01.3.2, 01.4, 01.5.2, 01.6.4, 01.6.5, 01.7, 02.2.1.2, 02.4, 03.0, 04.1.2.4, 04.1.2.5, 04.1.2.7, 04.1.2.8, 04.1.2.9, 04.2.2.4, 04.2.2.6, 05.1.2, 05.2, 05.4, 06.3, 06.5, 07.2, 15.2, 16.0	Numerical IDA Specify the maximum numerical level.
NISIN	234	GMP	04.2.2.4	Numerical IDA Specify the maximum numerical level.
PHOSPHATIDIC ACID, AMMONIUM SALT	442	GMP	01.1.2, 01.4, 04.2.2.3, 07.1.1	Numerical IDA Specify the maximum numerical level.
POLYOXYETHYLENE STEARATES	430, 431	GMP	14.2.3	Numerical IDA Specify the maximum numerical level.
PROCESSED EUCHEUMA SEAWEED	407a	GMP	01.4.102.2.1.1, 09.2.3, 12.2, 14.2.3	Numerical IDA Specify the maximum numerical level.
PROTEASE (A. ORYZAE VAR.)	1101i	GMP	06.1, 14.1.2.1, 14.1.5, 14.2.3	Numerical IDA Specify the maximum numerical level.
RED 2G	128	GMP	14.2.6	Numerical IDA Specify the maximum numerical level.
SACCHARIN	954	GMP	01.2.2	Numerical IDA Specify the maximum numerical level.
SODIUM	541i, 541ii	GMP	05.2	Numerical IDA

ALUMINIUM PHOSPHATES				Specify the maximum numerical level.
SODIUM DIACETATE	262ii	GMP	04.1.2.3, 04.1.2.4, 04.2.2.3, 04.2.2.4, 13.2	Numerical IDA Specify the maximum numerical level.
SORBITAN ESTERS OF FATTY ACIDS	491, 492, 493, 494, 495	GMP	13.5, 13.6, 14.2.3	Numerical IDA Specify the maximum numerical level.
SUCROGLYCERIDES	474	GMP	04.1.1.2, 13.6	Numerical IDA Specify the maximum numerical level.
SUCROSE ESTERS OF FATTY ACIDS	473	GMP	01.4.2, 01.4.4, 04.1.1.2, 07.1, 09.4, 13.6	Numerical IDA Specify the maximum numerical level.
SUNSET YELLOW FCF	110	GMP	02.1.3, 02.2.1.2, 14.1.2.1, 14.1.2.2	Numerical IDA Specify the maximum numerical level.
TARTRATES	334, 335i, 335ii, 336i, 336ii, 337	GMP	01.2.1, 01.6.2, 01.6.3, 01.6.5, 01.6.6, 02.1, 02.2.1.1, 02.2.2, 02.4, 06.2, 06.4.1, 12.6.3, 12.6.4, 14.2.4, 14.2.5	Numerical IDA Specify the maximum numerical level.
TARTRAZINE	102	GMP	02.1.3, 02.2.1.2, 14.1.2.1, 14.1.2.2, 14.2.1	Numerical IDA Specify the maximum numerical level.

C) Brazil requests to be justified the technological function in fresh and frozen products once consumers may be mislead about the identity or quality of food according to Alinorm 01/12.

ADDITIVE	**INS**	**MAX LEVEL MG/KG**		**FOOD CAT. NO.**	*BRAZIL COMMENTS*
ACETIC ACID, GLACIAL	260	GMP	04.2.1, 04.2.2.1, 08.1.1	Fresh vegetables, and nuts and seeds; frozen vegetables; fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category.
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or decorations for fruits, vegetables, meat or fish)
ACETIC AND FATTY ACID ESTERS OF GLYCEROL	472a	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category.
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
ACETYLATED DISTARCH PHOSPHATE	1414	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category.
ALLURA RED AC	129		08.1.2,	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category.
ALLURA RED AC	129		08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
ANNATTO EXTRACTS	160b		08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)

ANNATTO EXTRACTS	160b	10	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category.
ASCORBIC ACID	300	500	04.1.1	Fresh fruit	Justify the technological need in this category.
ASCORBIC ACID	300	500	04.2.1	Fresh vegetables, and nuts and seeds	Justify the technological need in this category.
ASCORBIC ACID	300	2000	08.1	Fresh meat, poultry, and game	Justify the technological need in this category.
ASCORBIC ACID	300	200	09.1	Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category.
AZORUBINE	122	500	08.0	Meat and meat products, including poultry and game	Specify the category. Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
AZORUBINE	122	500	09.1.2	Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
BEET RED	162		08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
BHA	320	100	08.1	Fresh meat, poultry, and game	Justify the technological need in this category.
BHT	321	100	08.1	Fresh meat, poultry, and game	Justify the technological need in this category.
BRILLIANT BLACK	151	500	08.0	Meat and meat products, including poultry and game	Specify the category. Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
BRILLIANT BLUE FCF	133	500	08.0 09.1.2	Meat and meat products, including poultry and game, Fresh mollusks, crustaceans and echinoderms	Specify the category. Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
BROWN HT	155	500	08.0 09.1.2	Meat and meat products, including poultry and game, Fresh mollusks, crustaceans and echinoderms	Specify the category. Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CALCIUM ASCORBATE	302	GMP 400	09.1 09.2.1	Fresh fish and fish products, including mollusks, crustaceans and echinoderms Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and	Justify the technological need in this category.

				echinoderms	
CALCIUM CHLORIDE	509	4000	04.2.2.1	Frozen vegetables	Justify the technological need in this category.
CALCIUM CHLORIDE	509	15000	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category.
CALCIUM CITRATE	333	GMP	04.2.2.1, 08.1.2, 09.1, 09.2.1	-	Justify the technological need in this category
CALCIUM GLUCONATE	578	1000	04.2.2.1	Frozen vegetables	Justify the technological need in this category
CALCIUM HYDROXYDE	526	1000	04.2.2.1	Frozen vegetables	Justify the technological need in this category
CALCIUM HYDROXYDE	526	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
CALCIUM LACTATE	327	6000	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
CALCIUM OXIDE	526	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
CALCIUM SULPHATE	516	3500	04.2.2.1	Frozen vegetables	Justify the technological need in this category
CANTHAXANTHIN	161g	100	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
CANTHAXANTHIN	161g	GMP	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
CARAMEL COLOUR, CLASS I	150a	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
CARAMEL COLOUR, CLASS I	150a	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CARMINES	120	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CARMINES	120	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
CAROB BEAN GUM	410	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
CAROTENES,	160aii	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category

VEGETABLE					
CAROTENES, VEGETABLE	160aii	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CAROTENOIDS	160ai, e, f	1000	08.1.2, 09.1.1	Fresh meat, poultry, and game, comminuted; Fresh fish	Justify the technological need in this category
CAROTENOIDS	160ai, e, f	300	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CHLOROPHYLLS	140	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CHLOROPHYLLS, COPPER COMPLEXES	141i, 141ii	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CITRIC ACID	330		04.2.1, 04.2.2.1	Fresh vegetables, and nuts and seeds; Frozen vegetables	Justify the technological need in this category
CITRIC ACID	330	2000	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
CITRIC ACID	330	GMP	09.1 09.2.1	Fresh fish and fish products, including mollusks, crustaceans and echinoderms Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category.
CITRIC AND FATTY ACID ESTERS OF GLICEROL	330	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CITRIC AND FATTY ACID ESTERS OF GLICEROL	330	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category.
CURCUMIN	100i	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
CURCUMIN	100i	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
DIACETYLTARTARI	472e	GMP	08.1.1,	Fresh meat, poultry, and game, whole pieces or	Justify the technological need in this category

C AND FATTY ACID ESTERSOF GLICEROL			09.1	cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
DIACETYLTARTARIC AND FATTY ACID ESTERSOF GLICEROL	472e	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category.
ERYTHORBIC ACID	315	GMP	04.1.1, 04.2.2.1	Fresh fruit; Frozen vegetables	Justify the technological need in this category.
ERYTHORBIC ACID	315	500 GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
ERYTHROSINE	127	300	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category.
FAST GREEN FCF	143	100	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological function in this category
GLYCEROL	422	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
GLYCEROL	422	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
GRAPE SKIN EXTRACT	163ii	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
GUAR GUM	412	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
GUM ARABIC	414	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
GUM ARABIC	414	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products,	Justify the technological need in this category

				including mollusks, crustaceans, and echinoderms	
HYDROXYPROPIL CELLULOSE	463	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
HYDROXYPROPIL METHIL CELLULOSE	463	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
HYDROXYPROPIL METHYL CELLULOSE	464	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
HYDROXYPROPIL METHYL METHIL CELLULOSE	464	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
HYDROXYPROPIL STARCH	1440	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
HYDROXYPROPIL STARCH	1440	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
INDIGOTINE	132	GMP	08.0	Meat and meat products, including poultry and game,	Specify the category. Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
IRON OXIDES	172i, 172ii, 172iii	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
ISOMALT	953	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)

ISOMALT	953	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
LACTIC ACID (L-,D- AND DI-)	270	GMP	04.2.1, 04.2.2.1	Fresh vegetables, and nuts and seeds; Frozen vegetables	Justify the technological need in this category
LACTIC ACID (L-,D- AND DI-)	270	6000	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	270	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
LACTIC AND FATTY ACID ESTERS OF GLYCEROL	270	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
LECITHIN	322	GMP	04.2.2.1	Frozen vegetables	Justify the technological need in this category
LECITHIN	322	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
LECITHIN	322	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
MAGNESIUM CARBONATE	504i	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
MAGNESIUM CARBONATE	504i	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
MAGNESIUM CHLORIDE	511	2260 GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)

MAGNESIUM CHLORIDE	511	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
MAGNESIUM HYDROGEN CARBONATE	504ii	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
MAGNESIUM HYDROGEN CARBONATE	504ii	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
MAGNESIUM HYDROXIDE	528	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
MAGNESIUM HYDROXIDE	528	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
MALIC ACID	296	GMP	04.2.1, 04.2.2.1	Fresh vegetables, and nuts and seeds; Frozen vegetables	Justify the technological need in this category
METHIL CELLULOSE	461	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
METHIL CELLULOSE	461	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
METHIL ETHIL CELLULOSE	465	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
METHIL ETHIL CELLULOSE	465	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and	Justify the technological need in this category

				echinoderms	
MICROCRYSTALLINE CELLULOSE	460I	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
MICROCRYSTALLINE CELLULOSE	460I	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
MINERAL OIL	905a	200	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
MONO- AND DIGLYCERIDES	471	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
MONO- AND DIGLYCERIDES	471	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
MONOSODIUM GLUTAMATE, L-	621	GMP	04.2.2.1	Frozen vegetables	Justify the technological need in this category
MONOSODIUM GLUTAMATE, L-	621	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
NITRATES	251	146	08.1	Fresh meat, poultry, and game	Justify the technological need in this category
NITITES	249	134	08.1	Fresh meat, poultry, and game	Justify the technological need in this category
OXIDIZED STARCH	1404	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
OXIDIZED STARCH	1404	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
PAPAIN	1101ii	GMP	08.1	Fresh meat, poultry, and game	Justify the technological need in this category
PECTINS	440	20000	04.2.2.1	Frozen vegetables	Justify the technological need in this category
PECTINS	440	5000	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
PHOSPHATES	338 a 452v	200	04.1.2.1, 04.2.2.1	Frozen fruit; Frozen vegetables	Justify the technological need in this category
PHOSPHATES	338 a 452v	GMP	08.1	Fresh meat, poultry, and game	Justify the technological need in this category

PHOSPHATES	338 a 452v	GMP	09.1.1	Fresh fish	Justify the technological need in this category
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000 10000	08.0, 09.0	Meat and meat products, including poultry and game; Fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category
POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID	476	5000	08.0, 09.0	Meat and meat products, including poultry and game; Fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category
PONCEAU 4R	124	GMP	08.1, 09.1.2	Fresh meat, poultry, and game; Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
PONCEAU 4R	124	500	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
POTASSIUM ALGINATE	402	5000	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
POTASSIUM ASCORBATE	303	GMP	04.1.1	Fresh fruit	Justify the technological need in this category
POTASSIUM ASCORBATE	303	1000	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
POTASSIUM CHLORIDE	508	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
POTASSIUM DIHYDROGEN CITRATE	508	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
POTASSIUM DIHYDROGEN CITRATE	508	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
POTASSIUM HYDROXIDE	525	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
POTASSIUM	326	20000	08.1	Fresh meat, poultry, and game	Justify the technological need in this category

LACTATE					
POWDERED CELLULOSE	460ii	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
POWDERED CELLULOSE	460ii	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
PROCESSED EUCHUMA SEAWEED	407a	5000	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
PROPYLENE GLYCOL ALGINATE	405	10000	04.1.2.1	Frozen fruit	Justify the technological need in this category
PROTEASE (A. ORYZAE VAR.)	1101i	GMP	08.1	Fresh meat, poultry, and game	Justify the technological need in this category
QUINOLINE YELLOW	104		08.0, 09.1.2	Meat and meat products, including poultry and game; Fresh mollusks, crustaceans and echinoderms	Specify the category. Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
RED 2G	128	25	08.1.2	Fresh meat, poultry, and game comminuted	Justify the technological need of artificial color in fresh meat
RIBOFLAVINES	101i, 101ii	GMP	08.0, 09.1.2	Meat and meat products, including poultry and game; Fresh mollusks, crustaceans and echinoderms	Specify the category. Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
SACCHARIN	954	500	04.2.2.1	Frozen vegetables	Justify the technological need in this category
SALTS OF MYRISTIC, PALMITIC & STEARIC ACIDS (NH4, Ca, K, Na)	470	GMP	04.2.2.1	Frozen vegetables	Justify the technological need in this category
SALTS OF MYRISTIC, PALMITIC & STEARIC ACIDS (NH4, Ca, K, Na)	470	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)

SALTS OF MYRISTIC, PALMITIC & STEARIC ACIDS (NH4, Ca, K, Na)	470	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SALTS OF OLEIC ACID (Ca, K, Na)	470	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
SALTS OF OLEIC ACID (Ca, K, Na)	470	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SODIUM ACETATE	262i	GMP	04.2.1, 08.1.1	Fresh vegetables, and nuts and seeds; Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
SODIUM ALGINATE	411	15000	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
SODIUM ALGINATE	411	8000	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
SODIUM ALGINATE	411	5000	09.2.1	Frozen fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SODIUM ASCORBATE	301	GMP	04.1.1, 04.2.2.1	Fresh fruit; Frozen vegetables	Justify the technological need in this category
SODIUM ASCORBATE	301	500	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
SODIUM ASCORBATE	301	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
SODIUM ASCORBATE	301	200	09.1	Fresh fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SODIUM ASCORBATE	301	5000	09.2.1	Frozen fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SODIUM CARBONATE	500i	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
SODIUM CARBOXYMETHYL CELLULOSE	466	15000	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
SODIUM	466	GMP	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category

CARBOXYMETHYL CELLULOSE					
SODIUM CARBOXYMETHYL CELLULOSE	466	GMP	09.1	Fresh fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
SODIUM DIHYDROGEN CITRATE	331i	GMP	04.2.1, 04.2.2.1	Fresh vegetables, and nuts and seeds; Frozen vegetables	Justify the technological need in this category
SODIUM DIHYDROGEN CITRATE	331i	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
SODIUM DIHYDROGEN CITRATE	331i	GMP	08.1.2, 09.1, 09.2.1	Fresh meat, poultry, and game, comminuted Fresh fish and fish products, including mollusks, crustaceans, and echinoderms; Frozen fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SODIUM DIHYDROGEN CITRATE	331i	GMP	09.2.1	Frozen fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SODIUM ERYTHORBATE	316	GMP	04.2.2.1 09.1	Frozen vegetables Fresh fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SODIUM ERYTHORBATE	316	1500	09.2.1	Frozen fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SODIUM HYDROGEN CARBONATE	500ii	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
SODIUM HYDROXIDE	524	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
SODIUM LACTATE	325	GMP	04.2.1	Fresh vegetables, and nuts and seeds	Justify the technological need in this category
SODIUM LACTATE	325	20000	08.1	Fresh meat, poultry, and game	Justify the technological need in this category
SODIUM SESQUICARBONATE	500iii	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category
SORBATES	200/ 201	1000	01.1.1	Milk and buttermilk	Justify the technological need in this category
SORBATES	200/ 201	1000	04.1.1	Fresh fruit	Justify the technological need in this category

SORBATES	200/ 201	1000	04.1.2.1	Frozen fruit	Justify the technological need in this category
SORBATES	200/ 201	2000	09.2.1	Frozen fish and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SORBITOL	420	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
SORBITOL	420	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SUCRALOSE	955	150	04.1.2.1	Frozen fruit	Justify the technological need in this category
SULPHITES	220/228	500	04.1.2.1	Frozen fruit	Justify the technological need in this category
SULPHITES	220/228	450	08.1.2	Fresh meat, poultry, and game, comminuted	Justify the technological need in this category
SULPHITES	220/228	200	09.1.2, 09.2.1	Fresh mollusks, crustaceans and echinoderms; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
SUNSET YELLOW FCF	110	500	08.1, 09.1.1	Fresh meat, poultry, and game; Fresh fish	Justify the technological need in this category
SUNSET YELLOW FCF	110	500	09.1.2, 09.2.1	Fresh mollusks, crustaceans and echinoderms; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
TARA GUM	417	GMP	08.1.2 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
TARTARIC, ACETIC & FATTY ACID ESTERS OF GLYCEROL (MIXED)	472f	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
TARTARIC, ACETIC & FATTY ACID ESTERS OF GLYCEROL (MIXED)	472f	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category

TARTRATES	334/337	1300	04.1.1, 04.1.2.1	Fresh fruit; Frozen fruit	Justify the technological need in this category
TARTRATES	334/337	GMP	08.0	Meat and meat products, including poultry and game	Justify the technological need in this category
TARTRAZINE	102	500	08.0, 09.1.2	Meat and meat products, including poultry and game; Fresh mollusks, crustaceans and echinoderms	Specify the category. Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
TARTRAZINE	102	500	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
TBHQ	319	100	08.1	Fresh meat, poultry, and game	Justify the technological need in this category
TITANIUM DIOXIDE	171	GMP	08.1.1, 09.1.2	Fresh meat, poultry, and game, whole pieces or cuts Fresh mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
TRAGACANTH GUM	413	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts; Fresh fish and fish products, including mollusks, crustaceans and echinoderms	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
TRAGACANTH GUM	413	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
TRIPOTASSIUM CITRATE	332ii	GMP	08.1.1	Fresh meat, poultry, and game, whole pieces or cuts	Justify the technological need in this category and note 16 (For use in glaze, coatings or **decorations** for fruits, vegetables, meat or fish)
TRIPOTASSIUM CITRATE	332ii	GMP	08.1.2, 09.1, 09.2.1	Fresh meat, poultry, and game, comminuted; Fresh fish and fish products, including mollusks, crustaceans, and echinoderms; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
XANTHAN GUM	415	GMP	09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category
XYLITOL	967	GMP	08.1.1, 09.1	Fresh meat, poultry, and game, whole pieces or cuts;	Justify the technological need in this category and note 16 (For use in glaze, coatings or

				Fresh fish and fish products, including mollusks, crustaceans and echinoderms	**decorations** for fruits, vegetables, meat or fish)
XYLITOL	967	GMP	08.1.2, 09.2.1	Fresh meat, poultry, and game, comminuted; Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Justify the technological need in this category

D) Brazil requests to be justified the technological need in this category (inadequate or no recommended use):

ADDITIVE	**INS**	**MAX LEVEL MG/KG**		**FOOD CAT. NO.**	*BRAZIL COMMENTS*
ALLURA RED AC	129	50	13.1, 13.2, 13.3	Infant formulae and follow-on formulae; Weaning foods for infants and growing children; Dietetic foods intended for special medical purposes, including those for infants and young children	No recommended use of artificial color for this category. Justify the technological need in this category.
AZORUBINE	122	50	13.1, 13.2, 13.3	Infant formulae and follow-on formulae; Weaning foods for infants and growing children; Dietetic foods intended for special medical purposes, including those for infants and young children	No recommended use of artificial color for this category. Justify the technological need in this category.
BENZOYL PEROXIDE	928	1000, GMP	01.6.2.1, 01.8	Total ripened cheese, includes rind; Whey and whey products, excluding whey cheeses	According to JECFA, on the 55º meeting (2000), additional uses could not be evaluated because information on toxicity and intake was not available.
BRILLIANT BLACK PN	151	50	13.1, 13.2, 13.3	Infant formulae and follow-on formulae; Weaning foods for infants and growing children; Dietetic foods intended for special medical purposes, including those for infants and young children	No recommended use of artificial color for this category. Justify the technological need in this category.
BROWN HT	155	50	13.1, 13.2,	Infant formulae and follow-on formulae; Weaning foods for infants and growing children;	No recommended use of artificial color for this category. Justify the technological need in this

			13.3	Dietetic foods intended for special medical purposes, including those for infants and young children	category.
INDIGOTINE	132	50	13.1, 13.2, 13.3	Infant formulae and follow-on formulae; Weaning foods for infants and growing children; Dietetic foods intended for special medical purposes, including those for infants and young children	No recommended use of artificial color for this category. Justify the technological need in this category.
LACTITOL	966	GMP	13.1, 13.2	Infant formulae and follow-on formulae; Weaning foods for infants and growing children	Specify the maximum numerical level. Important: high level of 50g/day has effect diuretic and laxative.
MANITOL	421	GMP	13.1, 13.2	Infant formulae and follow-on formulae; Weaning foods for infants and growing children	Specify the maximum numerical level. Important: high level of 20g/day has effect diuretic and laxative.
PONCEAU 4R	124	50	13.1, 13.2, 13.3	Infant formulae and follow-on formulae; Weaning foods for infants and growing children; Dietetic foods intended for special medical purposes, including those for infants and young children	No recommended use of artificial color for this category. Justify the technological need in this category.
QUINOLINE YELLOW	104	50	13.1, 13.2, 13.3	Infant formulae and follow-on formulae; Weaning foods for infants and growing children; Dietetic foods intended for special medical purposes, including those for infants and young children	No recommended use of artificial color for this category. Justify the technological need in this category
SORBITOL	420	GMP	13.1, 13.2	Infant formulae and follow-on formulae; Weaning foods for infants and growing children	Specify the maximum numerical level. Important: high level of 50g/day has effect diuretic and laxative.
SUNSET YELLOW FCF	110	50	13.1, 13.2, 13.3	Infant formulae and follow-on formulae; Weaning foods for infants and growing children; Dietetic foods intended for special medical purposes, including those for infants and young children	No recommended use of artificial color for this category. Justify the technological need in this category.
TARTRAZINE	102	50	13.1, 13.2, 13.3	Infant formulae and follow-on formulae; Weaning foods for infants and growing children; Dietetic foods intended for special medical purposes, including those for infants and young children	No recommended use of artificial color for this category. Justify the technological need in this category.

E) Justify Note:

N.º NOTE	NOTE	COMMENTS
12	Carryover from flavouring substances	Carry-over principle
16	For use in glaze, coatings or decorations for fruit, vegetables, meat or fish	Glazing agent ?? Decorations of fresh and frozen products?? Use of lecithin for decorations of meat and fish??
18	Added level; residue not detected in ready-to-eat food	Processing aid ???
29	Reporting basis not specified	Maximum level unit should be expressed in **mg/kg** as for the other food cat.
36	Residual level	Processing aid ???
65	Carryover from nutrient preparations	Carry-over principle
67	Carryover from use in casings	Carry-over principle
83	Excluding foods for infants and young children	Inconsistent due is used for category 13.3 (Dietetic foods intended for special medical purposes, including those for infants and young children). Brazil requests to subdivide this category.
88	Carryover from the ingredient	Carry-over principle
98	For dust control	Must be function of additive.

THE PRINCIPLE RELATING TO THE CARRY-OVER OF FOOD ADDITIVES INTO FOODS

4. SPECIAL CONDITIONS

4.1 An additive carried over into a particular food in a significant quantity or in an amount sufficient to perform a technological function in that food as a result of the use of raw materials or other ingredients in which this additive was used, **shall be treated and regarded as an additive to that food**, and shall be provided for in the Section on Food Additives of the applicable Codex Standard.

F) Justify the high limit of use and the technological need:

	BENZOATES	210 - 213		14.1.1.2	Table waters and soda waters;	Justify the technological need in this category
	CALCIUM ALUMINIUM SILICATE	556	GMP	14.1.2.1, 14.2.3	Canned or bottled (pasteurized) fruit juice; Wines	Justify the technological need in this category (anticaking agent)
-	HYDROCHLORIC	507	GMP	06.2	Flours and starches	Justify the technological need in this

	ACID					category
USA	INDIGOTINE	132	GMP	02.1.3	Lard, tallow, fish oil, and other animal fats	Justify the technological function in this category
USA	INDIGOTINE	132	GMP	02.2.1.2	Margarine and similar products (e.g. butter-margarine blends)	Justify the technological function in this category
USA, Canada	POLYVINYLPYRROLIDONE	1201	-	-	14.2.1, 14.2.2, 14.2.3	Justify the note 36 (Residual level) in this category.
-	POTASSIUM ASCORBATE	303	300	06.2	Flours and starches	Justify the technological need in this category
-	PROPYLENE GLYCOL	1520	200000	04.1.2.8	Fruit preparations, including pulp, purees, fruit toppings and coconut milk	Justify the maximum level of 200000 mg/kg for this category
-	PROPYLENE GLYCOL	1520	200000	04.1.2.11	Fruit fillings for pastries	Justify the maximum level of 200000 mg/kg for this category
USA	PROPYLENE GLYCOL	1520	240000	05.0	Confectionery	Justify the maximum level of 240000 mg/kg for this category
USA	PROPYLENE GLYCOL	1520	970000	12.2	Herbs, spices, seasonings (including salt substitutes), and condiments (e.g. seasoning for instant noodles)	Justify the maximum level of 970000 mg/kg for this category
-	PROPYLENE GLYCOL	1520	200000	14.1.4.3	Concentrates (liquid or solid) for drinks	Justify the maximum level of 200000 mg/kg for this category
FIL-IDF	SORBATES	200/ 201	1000	01.1.1	Milk and buttermilk	Justify the technological need in this category
-	SORBATES	200/ 201	10000	08.4	Edible casings (e.g., sausage casings)	Justify the maximum level of 10000 mg/kg for this category
	STEARYL TARTRATE	483	5000	01.7, 02.4, 04.1.2.9, 04.2.2.6, 06.5, 07.0, 10.4	-	Justify the technological function in this category. According to JECFA, was evaluated as flour treatment agent only, the maximum numerical level of 500 mg/kg flour.
USA	SUNSET YELLOW FCF	110	GMP	02.1.3	Lard, tallow, fish oil, and other animal fats	Justify the technological function in this category
USA	SUNSET YELLOW FCF	110	GMP	02.2.1.2	Margarine and similar products (e.g. butter-margarine blends)	Justify the technological function in this category

G) Brazilian requests:

Brazil	AMARANTH	123	100	01.6.4.2	flavoured	Brazil requests the deletion of this category
Brazil	AMARANTH	123	100	12.9	Protein products	Brazil requests the deletion of this category
Brazil	ANNATTO EXTRACTS	160b	GMP	04.1.2.11	Fruit fillings for pastries	Brazil requests the maximum numerical level of 200 mg/kg (As bixin)
Brazil	ANNATTO EXTRACTS	160b	GMP	06.6	Batters (e.g., for breading or batters for fish or poultry)	Brazil requests the maximum numerical level of 20 mg/kg (As bixin)
Brazil	ANNATTO EXTRACTS	160b	GMP	11.1	White and semi-white sugar, fructose, glucose, xylose, sugar solutions	Brazil requests the deletion of this category
Brazil	ANNATTO EXTRACTS	160b	GMP	11.2	Other sugars and syrups (e.g., brown sugar, maple syrup)	Brazil requests the deletion of this category
Brazil	ANNATTO EXTRACTS	160b	GMP	12.9	Protein products	Brazil requests the deletion of this category
Brazil	ANNATTO EXTRACTS	160b	GMP	13.6	Food supplements	Brazil requests the maximum numerical level of 100 mg/kg (As bixin)
Brazil	ANNATTO EXTRACTS	160b	GMP	14.2.1	Beer and malt beverages	Brazil requests the deletion of this category
Brazil	ANNATTO EXTRACTS	160b	GMP	14.2.3	wines	Brazil requests the maximum numerical level of 10 mg/kg (As bixin)
Brazil	AZORUBINE	122	500	07.1.2	Crackers, excluding sweet crackers	Brazil requests the maximum numerical level of 50 mg/kg
Brazil	AZORUBINE	122	500	07.1.3	Other ordinary bakery products (e.g., bagels, pita, English muffins)	Brazil requests the maximum numerical level of 50 mg/kg
Brazil	BHA	320	All entries	-	ALL CATEGORIES	An amendment to Table 1, requested by Brazil in response to CL 1999/15 FAC, was omitted in the revised Table 1. At this opportunity, Brazil would like to submit again the proposal of including the note 15 (fat or oil basis).
Brazil	BHT	321	All entries	-	ALL CATEGORIES	An amendment to Table 1, requested by Brazil in response to CL 1999/15 FAC, was omitted in the revised Table 1. Brazil would like to submit again the proposal of including the note 15 (fat or oil basis).
Brazil	CARMINES	120	GMP	02.1	Fats and oils essentially free from water	Brazil requests the maximum numerical level of 500 mg/kg for this category
Brazil	CARMINES	120	GMP	02.2	Fat emulsions mainly of type water-in-oil	Brazil requests the maximum numerical level of 500 mg/kg for this category
Brazil	CARMINES	120	GMP	02.3	Fat emulsions other than food category 02.2, including mixed and/or flavoured	Brazil requests the maximum numerical level of 500 mg/kg for this category

					products based on fat emulsions	
Brazil	CARMINES	120	GMP	04.1.2.11	Fruits filling for pastries	Brazil requests the maximum numerical level of 300 mg/kg for this category
Brazil	CARMINES	120	GMP	06.4.2	Pre-cooked or dried pastas and noodles and like products	Brazil requests the deletion of this category
Brazil	CARMINES	120	GMP	14.1.2.1	Canned or bottled(pasteurized) fruit juice	Brazil requests the maximum numerical level of 100 mg/kg for this category
Brazil	CARMINES	120	GMP	14.1.3.1	Canned or bottled(pasteurized) fruit nectar	Brazil requests the maximum numerical level of 100 mg/kg for this category
Brazil	CARMINES	120	GMP	14.2.1	Beer and malt beverages	Justify the technological need in this category. Inconsistent due to note 85 (except for use in **cooler** at 1000 mg/kg). Beverages like cooler belong to subcategory 14.2.3.2.
Brazil	CARMINES	120	GMP	14.2.3.1	Still wine	Brazil requests the maximum numerical level of 200 mg/kg for this category
Brazil	CARMINES	120	GMP	14.2.3.2	Sparkling and semi-sparking wines	Brazil requests the maximum numerical level of 200 mg/kg for this category
Brazil	CARMINES	120	GMP	14.2.3.3	Fortified wine and liquor wine	Brazil requests the maximum numerical level of 200 mg/kg for this category
Brazil	CAROTENOIDS	160ai,e,f	GMP	06.4.2	Pre-cooked or dried pastas and noodles and like products	Brazil requests the deletion of this category
Brazil	CURCUMIN	100i	GMP	02.2.1.1	Butter and concentrated butter	Brazil suggests the maximum numerical level of 500 mg/kg for this category
Brazil	CURCUMIN	100i	GMP	02.3	Fat emulsions other than category 02.2, including mixed and/or flavoured products based on fat emulsions	Brazil suggests the maximum numerical level of 500 mg/kg for this category
Brazil	CURCUMIN	100i	GMP	04.1.2.11	Fruit fillings for pastries	Brazil suggests the maximum numerical level of 150 mg/kg for this category
Brazil	CURCUMIN	100i	GMP	06.4.2	Pre-cooked or dried pastas and noodles and like products	Brazil requests the maximum numerical level of 500 mg/kg for this category
Brazil	CURCUMIN	100i	GMP	06.6	Batters (e.g., for breading or batters for fish or poultry)	Brazil requests the maximum numerical level of 20 mg/kg for this category
Brazil	CURCUMIN	100i	GMP	14.1.2.1	Canned or bottled(pasteurized) fruit juice	Brazil requests the substitution of GMP for the maximum numerical level of 100 mg/kg
Brazil	CURCUMIN	100i	GMP	14.1.3.1	Canned or bottled(pasteurized) fruit nectar	Brazil requests the substitution of GMP for the maximum numerical level of 100 mg/kg

Brazil	CURCUMIN	100i	GMP	14.2.1	Beer and malt beverages	Justify the technological need in this category. Inconsistent due to note 85 (except for use in **cooler** at 1000 mg/kg). Beverages like cooler belongs to Subcategory 14.2.3.2.
Brazil	CURCUMIN	100i	GMP	14.2.3.1	Still wine	Brazil requests the maximum numerical level of 200 mg/kg
Brazil	CURCUMIN	100i	GMP	14.2.3.2	Sparkling and semi-sparkling wine	Brazil suggests the maximum numerical level of 200 mg/kg for this category
Brazil	CURCUMIN	100i	GMP	14.2.3.3	Fortified wine and liquor wine	Brazil suggests the maximum numerical level of 200 mg/kg for this category
Brazil	CYCLAMATES	952	500	11.2	Other sugars and syrups (e.g., brown sugar, maple syrup)	Brazil accepts the maximum numerical level of 500 mg/kg and suggests to move from step 3 to step 6
Brazil	NITRATES	251 & 252	37	01.6	Cheese	Brazil requests the maximum numerical level of 50 mg/kg for this category
Brazil	NITROUS OXIDE	942	GMP	All entries	-	Include Note 59 (use as packing gas)
-	POLYGLYCEROL ESTERS OF FATTY ACIDS	475	9000	12.6.1	Sauces and like products	Brazil suggests the maximum numerical level of 10000 mg/kg for this category and removing the categories 12.6.1; 12.6.2. & 12.6.3.
-	STEAROYL-2-LACTYLATES	481i 482i	4500	06.4.2	Pre-cooked and dried pastas and noodles and like products	Brazil requests the maximum numerical level of 5000 mg/kg for this category
Brazil	TARTRATES	334/337	3000	14.1.4	water-based flavoured drinks, including “sport” or “electrolyte” drinks and particulate drinks	An amendment to Table 1 requested by Brazil in response to CL 1999/15 FAC was omitted in the revised Table 1 .At this opportunity Brazil would like to submit again the following new proposed limits use: 5000 mg/kg
Brazil	TBHQ	319	ALL LIMITS	-	ALL CATEGORIES	An amendment to Table 1 requested by Brazil in response to CL 1999/15 FAC was omitted in the revised Table 1 .At this opportunity Brazil would like to submit again the following new proposed limits should refer to note 15 (fat or oil basis)
Brazil	TOCOPHEROLS	306, 307	ALL LIMITS	-	ALL CATEGORIES	An amendment to Table 1 requested by Brazil in response to CL 1999/15 FAC was

						omitted in the revised Table 1 .At this opportunity Brazil would like to submit again the following new proposed limits should refer to note 15 (fat or oil basis)

AUSTRALIA

At the 33rd Session of the Codex Committee on Food Additives and Contaminants, the Committee agreed with the recommendation of the Working Group that several maximum levels for food additives in specific food categories be held at Step 6 for additional comments and consideration at the 34th CCFAC. Australia wishes to submit the following comments in relation to the above.

The Australian position remains focussed on requesting GMP permissions where there is no safety concern, particularly if JECFA has considered the additive and set an ADI of 'not specified'.

The main priorities for food additives in wine are:

The levels for malic and lactic acid. The levels proposed (1mg/kg) are unacceptable. A GMP level for malic, lactic and citric acid is requested.

For consistency between wine, sparkling wine and fruit wine, the level for tartaric acid should also be set at Good Manufacturing Practice (GMP). However, the US level of 11,000 mg/kg is preferred to the 9000 mg/kg as proposed at Step 6.

The proposed level of ascorbic acid in wine at 200 mg/kg is too low, and as the JECFA ADI is 'not specified' a numerical ADI is not required. The level should be set at GMP.

Tannins also have a JECFA ADI of 'not specified' and should be permitted in wine at GMP levels. 3000mg/kg is within the bounds of use in Australia.

Carbon dioxide is permitted to GMP levels in wine but *note 60* restricts levels if used as a carbonating agent in finished wine to 39.2 mg/kg which is not acceptable. Australia considers that a GMP level should be set.

Australia committed to supply data on phosphates in wine (Alinorm 01/12A). Australian regulations permit ammonium and calcium phosphates as additives to GMP levels in wine and also allow for phosphates as processing aids supplying microbial nutrients for fermentation. The proposed permission in cooler type products at 12,000 mg/kg versus lower levels in wine and fruit wine with no level proposed for wine is questioned. Preliminary data suggest the range in Australia of phosphate in wine is 500-1000 mg/L, but the chemistry and nomenclature of the phosphates require review.

SPAIN

1. Draft Food Additive Provisions in Table 1 of the Codex General Standard for Food Additives at Step 6 (Appendix IV)

As a general comment and in order to maintain the position defended by the Spanish authorities on other occasions, it is proposed that the following categories be removed:

16.0 Composite foods
12.8 Yeast and like products

Acesulfame potassium INS 950

Since this is an additive with a numerical ADI, maximum use levels should be set for all food groups for which GMP is authorized.

The proposed maximum levels for: Chewing gum: 5000 (EU 2000), Confectionery: 3500 (EU 1000) and Cocoa products: 2500 (EU 500), can be regarded as high. Its use in so broad a category as that of 7.1 Bread and ordinary bakery wares is not justified and it would be advisable to remove this category.

Glacial acetic acid INS 260

In view of the fact that category 12.8 has been removed from the Food Categories of the General Standard for Food Additives (GSFA), this category should be removed.

Acetic and fatty acid esters of glycerol INS 472 a

This use of this additive, in broad categories such as 08.1.2 and 09.2.1., for purposes other than glazing, covering or decoration should not be included.

This comment also applies to 12.8.

Acetylated distarch phosphate INS 1414

The use in fresh products such as those contemplated in categories 08.1.2 and 09.2.1, of additives with a thickening, emulsifying, stabilizing effect and bulking agent, is not technologically justified. Their use in other subcategories in which they might be necessary must be adjusted.

Adipates INS 355, INS 357

Maximum levels of use must also be established in all food groups for which GMP is authorized, since this is a group of additives with numerical ADI.

Allura red INS 129

The use of colorants in the categories 07.1 Bread and ordinary bakery wares, 08.1.1. Fresh meat and 08.1.2. Fresh meat, comminuted, is not technologically justified and neither is it desirable from the point of view of health.

Amaranth INS 123

In view of the ADI of this colorant, some justifications for its should be asked for (desserts, all types of fish, breakfast cereals, confectionery).

Annatto INS 160 b

The use of colorants in the categories: 07.1 bread and ordinary bakery wares, 08.1.1. Fresh meat and 08.1.2. Fresh meat, comminuted, is not technologically justified and neither is it desirable from the point of view of health. The GMP use levels should be reconsidered in order to assign numerical levels, since the ADI for this additive is very low.

Azorrubine INS 122

We do not find the use of colorants in infant formulae (category 13.1) justified, nor in follow-on formulae (13.2 and 13.3).

Aspartame INS 951

The use of sweeteners should be limited in foodstuffs intended for children.

In category 13.3 these products should be discontinued for children and young people.

Benzoates INS: 210 to 213

The proposal to discontinue the use of the benzoates in specific food product categories can be accepted, although Mustard should be maintained since this product requires the use of a preservative.

Category 14.2.1 Beer and malt beverages should not be removed since some types of beer require benzoates.

Category 14.2.3 Wines should not be removed since some types of wine require the use of preservatives.

Category 14.2.0 [?6].2 Spirituous beverages containing less than 15% alcohol should not be removed.

BHA INS 320

The low ADI of this additive (0.5 mg/Kg per day) justifies a serious re-examination of so broad a use as that proposed in the GSFA.

The use of BHA should be re-examined in, among others, the following product categories, and should be discontinued if not justified:
03.1, 04.1.2.9, 06.3, 07.1.1, 07.1.3, 07.1.4, 07.2.1, 07.2.2, 08.1, 08.2, 09.2.1, 09.2.2.

In general, if the use of BHA is authorized in intermediate products, there exists no justification for its use in finished products in which the former have been used. According to the carry-over principle, the antioxidant will be present in the final product in a proportionate quantity.

BHT INS 321

The same comments as those made in respect of BHA, apply also for this additive.

Brilliant black PN INS 151, Brilliant blue PN INS 151, Brilliant Blue FCF INS 133, Brown HT INS 155, Carmines INS

In categories 13.1, 13.2 and 13.3 (infants), the use of colorants should not be authorized. Removal is to be recommended.

Neither do we find the use on the surface of fresh fruit (04.1.1.2) justified.

Canthaxanthin INS 161 g

The low ADI of this additive (0.05 mg/Kg weight per day) makes a reduction necessary of the broad use which is proposed in food products, in view of the risk of the intake to guarantee the safety of consumers being exceeded.

There exist other colorants in the market which are capable of producing the same effect as Canthaxanthin, so that the broad use proposed in the GSFA is not justified.

Carotenoids INS 160

As they are listed under carotenoids without specific numbering, the various colorants covered by this name must be included. Therefore, since some of them have an ADI assigned to them, the GMP levels (in those food categories which are not surface treatment) should be replaced by maximum use levels.

In our opinion the new level proposed for categories 2.1 and 2.3 is not technologically justified.

Curcumin INS 100

We do not find its use in category 05.1 (Cocoa and chocolate) justified. The same applies for the proposed GMP level.

The same comments apply for category 16.0, a category which should not exist as such.

The comments made in respect of those food categories for which GMP is authorized apply here also, as well as the comments made in respect of categories 13.1, 13.2 and 13.3: Foodstuffs intended for infants.

Cyclamates INS 952

The use of this sweetener should be limited to foodstuffs of low calorific value or without added sugars.

Moreover, its use in foodstuffs intended for special nutritional uses is justified.

Due to its ADI and its present toxicological “status”, its use should not be permitted in the broad range of products as proposed in the GSFA.

Furthermore, the levels of use which appear to be very high should be re-examined.

Erythorbic acid INS 315

It is not considered justified to use this additive in the following categories: 02.1, 02.2.1.1, 04.1.1., 04.2.1.3, 04.2.2.1, 14.1.2.1, 14.1.3.1, 14.1.5 and 14.2.3.

Due to its low ADI, the GMP use levels should be defined as a numerical value and should not be higher than is necessary to produce the intended technological effect.

Erythrosine INS 127

In view of its low ADI, the use of this colorant should be limited to those food products in which its use is absolutely necessary.

The list of products proposed in the GSFA is considered excessive and constitutes a consumer health hazard.

Indigotine INS 132

Its use is not justified in category 0.2.1.3, nor the GMP level.

The use of colorants in categories 13.1, 13.2 and 13.3 should not be considered.

Nisin INS 234

The use of antibiotics in food products must be reduced to a minimum and these should only be used in very concrete cases and at the lowest possible levels.

The level assigned to categories 01.6.4 and 07.2 is considered too high.

In addition, in a category as broad as “fine bakery wares” its use is not justified.

Nitrates INS: 251 and 252

In fresh meat (08.1) and frozen meat (08.2.3) the presence of Nitrates is not justified. In categories 9.8.2.1.1 and 08.3.1.1 we find the proposed levels very high, especially when compared with the contents of note 30 which refers to residual nitrate.

Nitrites INS: 249 and 250

For categories 08.2.1.1 and 08.2.1.2 the proposed residual levels are very high and should be re-examined. The same comments apply for categories 09.2.5 and 09.3.3.

In the category 08.2.3 frozen meat the residual presence of Nitrites is not justified.

Phosphates

The list of food products in which the use of these additives is authorized, is considered too extensive.

The use of these additives should not be permitted in fresh products such as: 08.1 Fresh meat and 09.1.1 Fresh fish.

Moreover, in the group 07.0 Bakery wares, bread and ordinary bakery wares should be excluded.

Polydextrose INS 1200

The use of this additive in the category 02.2.1.1 Butter and concentrated butter should not be permitted, and neither in the category 11.3 Honey.
The presence of a bulking agent in these non-processed products could constitute fraud.

Ponceau 4R INS 124

Its use in categories 05.1 and 11.1 could be misleading for the consumer.

In view of the assigned numerical ADI, the GMP levels must be replaced by maximum levels.

Just as with other colorants, its use in the categories 13.1, 13.2 and 13.3 should not be considered.

Category 16.0 must be excluded.

Saccharine

Such extensive use as has been proposed for this additive should be re-examined.

The use of sweeteners should be limited to products with a low calorific value or without added sugars and to other products such as preserved fish or fruit in which its use is justified.

Moreover, the levels of use proposed for categories 05.2 and 05.3 are considered very high.

Sulphites

In view of its low ADI, the use of these additives should be limited to products in which its presence is essential.
It is not considered technologically justified to use these additives in product categories such as: 01.2.1.2, 01.6.4.1, 04.1.1.2, 07.1.1, 07.1.3, 07.1.4 among others.

POLAND

Alinorm 01/12A, para. 64 and Appendix III

We have comments to Appendix II:

- ***Aluminium ammonium sulphate (E 523)*** **–** we do not accept using this food additive to the following food categories:
  - 04.2.2.6 – vegetable and nut and seed pulps and preparations (e.g. vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5;
  - 09.2.4 – cooked and/or fried fish and fish products, including molluscs, crustaceans and echinoderms;
- ***Beeswax white and yellow (E 901)***
  Candelilla wax (E 902)
  Carnauba wax (E 903)
  Shellac (E 904)

Poland does not agree with usage of the food additives mentioned above to coffee-beans. Coffee-beans belong to un-processed food category which, in accordance with Polish law, is not permitted to use any food additives to.

- ***Benzoates: E 210, E 211, E 212, E 213***

Polish legislation does not permit to use these food additives to the following food categories:

- 01.7 – Dairy-based desserts (e.g. ice milk, pudding, fruit or flavoured yoghurt);
- 12.5 – Soups and broths.

JAPAN

In this document, we use the current food category system, however, please bear in mind that we prefer using another food category system, which are proposed in para 21 d) of CX/FAC 02/6, in particular, regarding the categories of 06.4.1 and 06.4.2.
We assigned the proposed category of 06.4.1 to the current category of 06.4.1 and also assigned the proposed category of 06.4.3 to the current category of 06.4.2.

Aluminium Ammonium Sulphate

Food Cat. No.	Food Category	Max Level	Comments
07.1.2	Crackers, excluding sweet... category	10000mg/kg	Addition of Food
07.1.3	Other ordinary bakery products... category	10000mg/kg	Addition of Food
07.1.4	Bread-type products, including... category	10000mg/kg	Addition of Food
07.1.5	Steamed breads and buns category	10000mg/kg	Addition of Food
07.2	Fine bakery wares category	10000mg/kg	Addition of Food

Annatto Extracts

Food Cat. No.	Food Category	Max Level	Comments
01.1.2	Dairy-based drinks, flavoured...	50mg/kg	Add Note No.9 (total bixin or norbixin) (as proposed to the 31st CCFAC in Feb. 1999)
07.2	Fine bakery wares	15mg/kg	Addition of Food Category, Add Note No.9 (as proposed to the 31st CCFAC in Feb. 1999)
09.2.1	Frozen fish, fish fillets, and...	10mg/kg	Add Note No.9 (as proposed to the 31st CCFAC in Feb. 1999)
09.2.3	Frozen minced and creamed fish products...	10mg/kg	Add Note No.9 (as proposed to the 31st CCFAC in 1999)
12.6.1	Emulsified or clear sauces_	30mg/kg	Revision of Max Level from 10mg/kg? Add Note No.9 (as proposed to the 31st CCFAC in Feb.1999)
12.6.3	Mixes for sauces and gravies	20mg/kg	Revision of Max Level

	from 10mg/kg;Add Note No.9 (as proposed to the 31st CCFAC in Feb. 1999)		

Ascorbyl Esters

Food Cat. No.	Food Category	Max Level	Comments
06.4.2	Pre-cooked or dried pastas and noodles and -----	20mg/kg	Revise Max from GMP

Beeswax, White and Yellow

Food Cat. No.	Food Category	Max Level	Comments
05.3	Chewing Gum Use: Bulking Agent	100,000mg/kg	New proposal

Candelilla Wax

Food Cat. No.	Food Category	Max Level	Comments
05.3	Chewing Gum Use: Bulking Agent	100,000mg/kg	New proposal

Carnauba Wax

Food Cat. No.	Food Category	Max Level	Comments
05.3	Chewing Gum Use: Bulking Agent	100,000mg/kg	New proposal

Carotenes, Vegetable

Food Cat. No.	Food Category	Max Level	Comments
15.1	Snacks-potato from 25mg/kg (e.g. potato chips) (as proposed to the 31st CCFAC in Feb. 1999)	GMP	Revision of Max Level

Chlorophylls, Copper Complexes

Food Cat. No.	Food Category	Max Level	Comments
04.2.2.3	Vegetable in vinegar, oil or brine copper) and revision of Max level /kg (as proposed to the 31st CCFAC in Feb. 199	100mg/kg from 500 mg	Add Note No.62 (as
05.1	Cocoa products and chocolate products CCFAC in Feb. 1999)	30mg/kg	Add No.62 (as copper) (as proposed to the 31st
05.2	Sugar-based	700mg/kg	Check the basis of Max

	confectionery,...		Level. We propose 20mg
	/kg as copper which corresponds to about 650 and 480mg/kg as Chlorophylls, Copper Complexes and Chlorophyllins, Copper Complex Sodium Salt, respectively. (as proposed to the 31st CCFAC in Feb. 1999)		
05.3	Chewing gum	700mg/kg	Check the basis of Max Level. We propose 50mg
	/kg as copper which corresponds to about 1,620mg/kg and 1,200 mg/kg as Chlorophylls, Copper Complexes and Chlorophyllins, Copper Complex Sodium Salt, respectively. (as proposed to the 31st CCFAC in Feb. 1999)		
07.2.1	Cakes, cookies and pies ?as proposed for "Namagashi" to the 31st CCFAC in Feb. 1999	6.4mg/kg	Add No.62 (as copper)

Grape Skin Extract

Food Cat. No.	Food Category	Max Level	Comments
01.7	Dairy-based desserts	GMP	Revision of Max Level from 100mg/kg (as proposed to the 31st CCFAC in Feb. 1999)
03.0	Edible ices, including sherbet...	GMP	Revision of Max Level from 100mg/kg (as proposed to the 31st CCFAC in Feb. 1999)

Microcrystalline Wax

Food Cat. No.	Food Category	Max Level	Comments
05.3	Chewing gum (step8) (Similar level to BEES WAX & CANDELILLA WAX)	150,000mg/kg	Revision of Max Level from 20,000mg/kg

Nitrates

Food Cat. No.	Food Category	Max Level	Comments

14.2.6.2*	Spirituous beverage containing less than 15% alcohol*	73mg/kg	Note 30 should read "as NO_3 ion"(delete "residual") for this particular use (correction)

* Revised Food Category No and Name as agreed by the 33rd CCFAC meeting:
14.2.4 Wines (other than grape)

Phosphates

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pasts and noodles---	2000mg/kg	New proposal As phosphorus

Propylene Glycol

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pasts and noodles---	20000mg/kg	New proposal for use on fresh noodle
		12000mg/kg	do for use on won ton

Propylene Glycol Alginate

Food Cat. No.	Food Category	Max Level	Comments
01.1.2	Dairy-based drinks, flavoured and e.g., Lactic acid beverage	...GMP	Revise Max level
06.4.1	Fresh pasts and noodles---	10000mg/kg	New proposal
06.4.2	Pre-cooked or dried pastas and---	1000mg/kg	do

Sucrose Esters of Fatty Acids

Food Cat. No.	Food Category	Max Level	Comments
06.4.1	Fresh pastas and noodles---	2000mg/kg	New proposal
06.4.2	Pre-cooked or dried pastas and---	2000mg/kg	do

IFAC (International Food Additives Council)

The Phosphates Committee of the International Food Additives Council (IFAC) an NGO participant in the work of the Codex Alimentarius has followed with interest and actively supports the development of the General Standard for Food Additives (GSFA).

As requested by the Chair of the Working Group, Dr. Keefe, we circulated drafts of the proposed standard to our members with a request for comments as part of the quality audit of this extremely valuable project and a few have been received.

Our Phosphates Committee expresses its gratitude to you, Dr. Keefe and associates and the members of the WG on the GSFA, in completing the considerable amount of work on phosphates. We suggest a few minor changes to Appendix IV at Step 6 of the procedure. They are attached in Table 1 format. We request they be incorporated into Alinorm 01/12A Appendix IV.

IFAC Recommendations for Amendments to
Draft Alinorm 01/12A Appendix IV - Pages 99-101

Food Category No.	***Food Category***	***Max Level (mg/kg P)***
0.1.1.1.1	Milk and buttermilk	1500 mg/kg (Recommend adding "including UHT milk" to category description)
01.7	Dairy based desserts (including pudding)	10,500 mg/kg
01.5.3	Milk and cream powder	1400 mg/kg
04.2.1.3	Peeled, cut or shredded fresh vegetables, and nuts and seeds	5600 mg/kg
06.6	Batters (e.g., breading for fish or poultry)	5600 mg/kg
10.2.1	Liquid egg products (whole eggs) Liquid egg products (egg whites)	14700 mg/kg 8800 mg/kg (create separate subcategories or combine at the 14700 mg/kg level)

IADSA (International Alliance of Dietary/Food Supplement Associations)

Please find attached the submission of IADSA, the International Alliance of Dietary/Food Supplement Associations, of additives and their maximum levels for the proposed inclusion in the General Standard on Food Additives.

LIST 1

PROPOSED NEW LEVELS FOR ADDITIVES

ALREADY APPROVED FOR USE IN FOOD SUPPLEMENTS IN THE GSFA

Additive	INS/E Number	Codex Table	JECFA ADI	Maximum level required by Industry for use in Food Supplements	Comments
Ascorbyl esters		1 + 2	0-1.25	QS, in accordance with GMP	Currently permitted at 500 mg/kg
Ascorbyl Palmitrate	304				
`2Ascorbyl Stearate	305				
Benzoates				2000 mg/l in liquid food supplements	
Benzoic acid	210	1 + 2	0-5		INS 210-213 currently permitted at 1000 mg/kg
Sodium benzoate	211	1 + 2	0-5		
Potassium benzoate	212	1 + 2	0-5		
Calcium benzoate	213	1 + 2	0-5		
Cyclamic acid and its sodium and calcium salts	952	1 + 2	0-11	400 mg/kg in liquid food supplements	Currently permitted at 1250 mg/kg as aluminium in food supplements

				500 mg/kg in solid food supplements	1250 mg/kg as syrus type or chewable (based on vitamins and/or minerals)
Polysorbates		1 + 2		QS for all polysorbates, in accordance with GMP	Currently permitted at 790 mg/kg
Polyoxyethylene (20) Sorbitan Monolaurate	432		0-25		
Polyoxyethylene (20) Sorbitan Monopalmitate	434		0-25		
Polyoxyethylene (20) Sorbitan Monostearate	435		0-25		
Polyoxyethylene (20) Sorbitan Tristearate	436		0-25		
Polyoxyethylene (20) Sorbitan Monoleate	433		0-25		
Sorbates		1 + 2			Currently permitted at 2000 mg/kg as Sorbic Acid
Potassium Sorbate	202		0-25		

LIST 2

ADDITIVES ALREADY INCLUDED WITHIN THE GSFA WHICH SHOULD BE PROPOSED FOR USE IN FOOD SUPPLEMENTS

Additive	INS/E Number	Codex Table	JECFA ADI	Maximum level required by Industry	
Copper complexes of chlorophylls and chlorophyllins		1			
Copper complexes of chlorophylls	141(i)		0-15	QS, in accordance with GMP	
Copper complexes of chlorophyllins	141(ii)		0-15	QS, in accordance with GMP	
Hydroxybenzoates, p-		1		2000 mg/l	
Ethyl p-hydroxybenzoate	214		0-10		
Propyl p-hydroxybenzoate	216		0-10		
Methyl p-hydroxybenzoate	218		0-10		
Iron Oxides		1			
Iron Oxide, Black	172i		0-0.5		
Iron Oxide, Yellow	172iii		0-0.5		
Iron Oxide, Red	172ii		0-0.5		
Phosphates		1		QS for all phosphates, in accordance with GMP	
(Ortho)phosphoric acid	338		MTDI 70		
Monosodium Othophosphate	339(i)		MTDI 70		
Disodium Orthophosphate	339(ii)		MTDI 70		
Trisodium Orthophosphate	339(iii)		MTDI 70		
Monopotassium Orthophosphate	340(i)		MTDI 70		
Dipotassium Orthophosphate	340(ii)		MTDI 70		
Tripotassium Orthophosphate	340(iii)		MTDI 70		
Monocalcium Orthophosphate	341(i)		MTDI 70		

Dicalcium Orthophosphate	341(ii)		MTDI 70		
Tricalcium Orthophosphate	341(iii)		MTDI 70		
Disodium diphosphate	450(i)		MTDI 70		
Tetrasodium diphosphate	450(iii)		MTDI 70		
Tetrapotassium diphosphate	450(v)		MTDI 70		
Dicalcium diphosphate	450(vi)		MTDI 70		
Pentasodium triphosphate	451(i)		MTDI 70		
Pentapotassium triphosphate	451(ii)		MTDI 70		
Sodium polyphosphate	452(i)		MTDI 70		
Potassium polyphosphate	452(ii)		MTDI 70		
Calcium polyphosphates	452(iv)		MTDI 70		
Propylene Glycol	1520	1	0-25	2000 mg/kg	
Riboflavin-5'-phosphate	101 (ii)	1	0-0.5	QS, in accordance with GMP (Check need)	
Tartrates		1		QS for all tartrates, in accordance with GMP	
Tartaric acid (L(+)-)	334		0-30		
Disodium tartrate	335(ii)		0-30		
Monosodium tartrate	335(i)		0-30		
Potassium Sodium Tartrate	337		0-30		
Tocopherols		1		QS, in accordance with GMP	
Tocopherol-rich extract (mixed tocopherol concentrate)	306		0-2		

IBFAN (International Baby Food Action Network)

As our main objective is that there is no hazard to health for the consumers we want to comment on food additives to foods for infants and young children like infant formulae, cereal based food and canned baby food.
"The Preamble to the GSFA establishes that the use of food additives is justified only when such use has an advantage, does not present a hazard to health to the consumer, does not mislead the consumer, and serves one or more of the technological functions set out from (a) through (d) below, and only where these objectives cannot be achieved by other means which are economically and technologically practicable"

- In this light we want to oppose the use of synthetic colors in all infant foods as they can trigger allergies f. ex. : brilliant blue banned in Switzerland and the EC countries or tartrazin
- We are opposed to the large variety of thickening agents, because they can mislead the parents on the nutritional value of the product and cause intestinal problems in babies or young children f. ex. Carrageenan or guar gum
- We oppose the use of sweeteners like aspartame in dietetic food for special medical purposes including those for infants and young children because of possible health risk to these very young consumers which already have health problems.

ENCA (European Network of Childbirth Associations)

Our main objective is that there is no hazard to health for the youngest consumers we want to bring in our comments on food additives to foods for infants and young children like infant formulae, cereal based food and canned baby food.
As the use of food additives is only justified when such use has an advantage, does not present a hazard to health to the consumer, does not mislead the consumer. (Preamble to the GSFA)

- We oppose the use of synthetic colors in all infant foods as they can trigger allergies f. ex. : brilliant blue banned in Switzerland and the EC countries or tartrazin
- We are opposed to the large variety of thickening agents, because they can mislead the parents on the nutritional value of the product and cause intestinal problems in babies or young children f. ex. guar gum or Carrageenan
- We oppose the use of sweeteners like aspartame in dietetic food for special medical purposes including those for infants and young children because of possible health risk to these very young consumers which already have health problems.

EUROPEAN COMMUNITY

Proposed Draft Food Additive Provisions in the Codex General Standard for Food Additives (ALINORM 01/12A, para 64 and Appendix III)

1. 33rd CCFAC forwarded all food additives at Step 3 (CL 2000/33-FAC, Appendix II) to the Commission for adoption at Step 5 by the Executive Committee (Alinorm 01/12 A, Appendix III). However, no discussion on the proposed levels and uses for food additives preceded this decision. So the first discussion on these provisions in CCFAC are to be held at Step 6.
2. 33rd CCFAC also decided that information on maximum levels at Step 5 not examined by the Committee should be retained. However, such an information is not attached to the report of the session, and therefore, not available after the session.
3. The European Community wishes that the first discussion in CCFAC on new proposals for use of food additives should take place already at Step 4[1] in order to verify that the new provisions fulfil the general criteria listed in the preamble of the GSFA.

[1] CAC Procedure Manual: Step 4 « The comments received are sent by the Secretariat to the subsidiary body or other body concerned which has the power to consider such comments and to amend the proposed draft standard. »

4. The European Community has made several specific comments on food additives listed in Table 1 (Appendix III). These comments are listed in the annex.

Appendix III

1. ADIPATES

INS: 355, 356, 357, 359 Function: Acidity regulator, firming agent, raising agent

Adipates are proposed for different types of desserts (categories 2.4, 4.1.2.9, 6.5, 10.4.) with a maximum level 30 000 mg/kg. The EC strongly questions the need for such high levels and draws the attention of the Committee to the same proposed uses at step 6 (Alinorm 01/12 A, Appendix IV) with a level of 10 000 mg/kg.

2. AGAR

INS: 406 Function: Bulking agent, emulsifier, filler, stabiliser, thickener

Agar is a food additive listed in Table 3 of GSFA as JECFA has allocated it an ADI "non specified". Therefore, the use of agar is permitted in foods in general at the level of GMP except in the food categories and individual food items listed in Annex to Table 3.

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed. The EC would also question the need of a stabiliser or thickener in products such as surface treated or peeled and cut fresh fruit (cat. 4.1.1.2 and 4.1.1.3), frozen vegetables (cat. 4.2.2.1), fresh meat (cat. 8.1) etc. Furthermore, agar is proposed for infant formulae, follow-on formulae and weaning foods (cat. 13.1 and 13.2). As the use of additives in foods for infants and young children should be as limited as possible, whether the additives have a numerical ADI or ADI "non-specified", proposed uses for all additives with these functions should be examined at the same time, in order not to permit an unnecessarily high number of such additives. In addition, the EC questions the need for this additive in category 2.1 fats and oils essentially free from water and the coherence with the corresponding commodity standards.

3. ALGINIC ACID

INS: 400 Function: Bulking agent, emulsifier, stabiliser, thickener

POTASSIUM ALGINATE

INS: 402 Function: Emulsifier, stabiliser, thickener

SODIUM ALGINATE

INS: 401 Function: Bulking agent, emulsifier, stabiliser, thickener

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed.

The EC questions the need of a stabiliser or thickener in products such as surface treated fresh fruit (cat. 4.1.1.2) and surface treated fresh vegetables (cat. 4.2.1.2). The EC also questions the coherence between the proposed use in fats and oils essentially free from water (cat. 2.1) and the corresponding commodity standard for fats and oils. The EC also considers that use of potassium alginate in wines (cat. 14.2.3) is a processing aid use and should, therefore, not be contained in the GSFA.

4. AMARANTH

INS: 123 Function: Colour

Amaranth is proposed for use in protein products (cat. 12.9). Considering the low ADI of this substance (0,5 mg/kg b.w.) and the alternative colours that are already being proposed for this category in GSFA (e.g. azorubine or allura red), the entry does not seem justified.

5. AMMONIUM ALGINATE

INS: 403 Function: Emulsifier, stabiliser, thickener

CALCIUM ALGINATE

INS: 403 Function: Emulsifier, stabiliser, thickener

There is no need to use additives in dried pasta. Therefore, the entries for category 6.4.2 should be removed.

6. ANNATTO EXTRACTS

INS: 160b Function: Colour

Annatto extracts are proposed for decorations and toppings (cat. 5.4) at level of 1000 mg/kg. The EC questions the need of such high levels and draws the attention of the Committee to the same proposed uses at step 6 (Alinorm 01/12 A, Appendix IV) with a level of 30 mg/kg.

7. BEESWAX, WHITE AND YELLOW

INS: 901 Function: Bulking agent, glazing agent, release agent, stabiliser

The use of beeswax in decorations (cat. 5.4) with the level of 4000 mg/kg was adopted at step 8 by the 24th CAC. The EC therefore questions the need for higher level for the same use.

8. BEET RED

INS: 162 Function: Colour

The use of a red colour in basic foodstuffs such as whole grain (cat. 6.1) and refined sugar (cat. 11.1) seems unjustified and should not be permitted in GSFA.

9. BENZOATES

INS: 210, 211, 212, 213 Function: Preservative

The use of benzoates is proposed for so called coolers covered by several categories (cat. 14.2.1, 14.2.3, 14.2.6). As there is a new category 14.2.7 for aromatized alcoholic beverages, these uses should be transferred to this category. Consequently, no benzoates are needed in wines (cat. 14.2.3.) or spirituous beverages (cat. 14.2.6).

The use of benzoates is technically necessary only in alcohol-free beer delivered in kegs (cat. 14.2.1.) and its use should be limited to them. The level of 200 mg/kg in alcohol free beer is acceptable. A note should be added that the use is only for this type of beer.

The use of benzoates is also proposed for tabletop sweeteners (cat. 11.4) at GMP-level. The EC questions the need in such products and especially at such level.

10. BHA

INS: 320 Function: Antioxidant

BHT

INS: 321 Function: Antioxidant

The use of these antioxidants is proposed in cocoa products and chocolate products (cat. 5.1). The European Community questions the need for these additives in the said products and proposes their deletion.

Considering the very low ADI JECFA has allocated to BHT (0,3 mg/kg b.w), the uses proposed should be as restricted as possible. Therefore, the EC questions the proposed uses in categories 12.2 herbs and spices, 12.5 soups and broths and 12.6 sauces.

11. CALCIUM ACETATE

INS: 263 Function: Acidity regulator, preservative, stabiliser, thickener

The EC questions the need for this additive in refined sugar and raw sugars (cat. 11.1).

12. CANTHAXANTIN

INS: 161g Function: Colour

Considering the low ADI (0,03 mg/kg b.w) of this additive, the EC recommends its use should be as restricted as possible.

13. CARBON DIOXIDE

INS: 290 Function: Adjuvant, carbonating agent, packaging gas

Carbon dioxide has an ADI "non specified". Therefore, the uses proposed should be at GMP level.

14. CARNAUBA WAX

INS: 903 Function: Anticaking Agent, Adjuvant, Bulking Agent, Carrier Solvent, Glazing Agent, Release Agent

The use of carnauba wax in decorations (cat. 5.4) at the level of 4000 mg/kg has been adopted at step 8 by the 24th CAC. Therefore, the proposed use at higher level seems unjustified.

15. CAROB BEAN GUM

INS: 410 Function: Emulsifier, stabiliser, thickener

Carob bean gum is listed in Table 3. Its use is restricted only in food categories or individual food items listed in Annex to Table 3. Therefore, the entry for dried and/or heat coagulated egg products (cat. 10.2.3.) is unnecessary and should be deleted.

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed. The EC would also question the need of this additive in milk (cat. 1.1.1.1) and fats and oils essentially free from water (cat. 2.1).

16. CAROTENES, VEGETABLE

INS: 160aii Function: Colour

No colours, except silver and gold for decoration purposes, are permitted in cocoa and chocolate products (cat. 5.1) as described in the corresponding commodity standard. Therefore, the EC questions the need for the proposed use.

17. CAROTENOIDS

INS: 160a, 160ai, 160e Function: Colour

No colours, except silver and gold for decoration purposes, are permitted in cocoa and chocolate products (cat. 5.1) as described in the corresponding commodity standard. Therefore, the EC questions the need for the proposed use.

The use of carotenoids is proposed in fats and oils (cat. 2.1) at level of 1000 mg/kg. However, in the corresponding commodity standard the use of betacarotene is set at the level of 25 mg/kg. Therefore, the proposed use seems unjustified.

18. CARRAGEENAN

INS: 407 Function: Bulking agent, emulsifier, filler, stabiliser, thickener

PROCESSED EUCHEMA SEAWEED

INS: 407a

Function: Stabiliser, thickener

The EC would also question the need of a stabiliser or thickener in products such as surface treated or peeled and cut fresh fruit and fresh vegetables (cat. 4.1.1.2. 4.1.1.3, 4.2.1.2, 4.2.1.3), frozen vegetables (cat. 4.2.2.1), fresh meat (cat. 8.1) etc.

The EC would also question the use of these additives in fats and oils essentially free from water (cat. 2.1) and coherence with the corresponding commodity standards for fats and oils.

19. CHLOROPHYLLS, COPPER COMPLEXES

INS: 141ii Function: Colour

No colours, except silver and gold for decoration purposes, are permitted in cocoa and chocolate products (cat. 5.1) as described in the corresponding commodity standard. Therefore, the EC questions the need for the proposed use.

20. CYCLAMATES

INS: 952 Function: Flavour enhancer, sweetener

JECFA evaluated cyclamate in its 26th meeting and allocated it an ADI 11 mg/kg b.w. In addition the Scientific Committee on Food in the EU recently re-evaluated cyclamates and allocated it an ADI 7 mg/kg b.w. Therefore, the inclusion of cyclamates is justified in the GSFA.

However, the proposed uses in fruit juices and nectars (cat. 14.1.2.1 and 14.1.3.1) are not acceptable. Also the use in sugars (cat. 11.2) does not seem justified.

21. DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL

INS: 472e Function: Emulsifier, sequestrant, stabiliser

The technological need for this additive in plain cream (cat. 1.4) and in flours and starches (cat. 6.2) has to be justified. The EC questions the coherence between the proposed use in fats and oils essentially free from water (cat. 2.1) and the corresponding commodity standard for fats and oils.

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed.

22. DISODIUM GUANYLATE, 5'-

INS: 627 Function: Flavour enhancer

DISODIUM INOSINATE, 5'-

INS: 631 Function: Flavour enhancer

MONOAMMONIUM GLUTAMATE, L-

INS: 624 Function: Flavour enhancer

MONOSODIUM GLUTAMATE, L-

INS: 621 Function: Flavour enhancer

The use of flavour enhancers in fresh meat is not justified; therefore, these entries should be removed.

23. EDTAs

INS: 385, 386 Function: Antioxidant, preservative, sequestrant

The use is proposed in tabletop sweeteners. The EC questions the need for such an application.

24. FAST GREEN FCF

INS: 143 Function: Colour

JECFA evaluated fast green FCF in its 30th meeting and allocated an ADI 25 mg/kg. Therefore, the use proposed in food supplements should have a numerical maximum level instead of GMP.

25. FERROCYANIDES

INS: 535, 536, 538 Function: Anticaking agent

Ferrocyanides are proposed for use in wines (14.2.3). Potassium ferrocyanide is used in wine to eliminate high levels of iron and other metals (copper, lead…) by precipitation of insoluble ferrocyanides. These precipitates are eliminated by filtration from wine. Therefore, the EC considers this additive as a processing aid, which should not be contained in the GSFA.

26. GALLATE, PROPYL

INS: 310 Function: Antioxidant

The use of propyl gallate in fats and oils (cat.2.0) and in bakery wares (cat. 7.0) has already been adopted at step 8 by the CAC[2]. Those uses are more limited and with lower levels than proposed here. The EC doesn't see any justification to deviate from the already adopted provisions.

27. GELLAN GUM

INS: 418 Function: Thickener, stabiliser

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed. The EC would also question the need of a stabiliser or thickener in products such as surface treated or peeled and cut fresh fruit (cat. 4.1.1.2 and 4.1.1.3), frozen vegetables (cat. 4.2.2.1), fresh meat (cat. 8.1), fresh fish (cat. 9.1), fruit juices (cat. 14.1.2.1, 14.1.2.3), fruit nectars (cat. 14.1.3.1, 14.1.3.3) and wines (cat. 14.2.3) .

Furthermore, gellan gum is proposed for infant formulae, follow-on formulae and weaning foods (cat. 13.1 and 13.2). As the use of additives in foods for infants and young children should be as limited as possible, whether the additives have a numerical ADI or ADI "non-specified", proposed uses for all additives with these functions should be examined at the same time, in order not to permit an unnecessarily high number of such additives.

28. GUAR GUM

INS: 412 Function: Bulking agent, emulsifier, stabiliser, thickener

GUM ARABIC

INS: 414

Function: Bulking agent, emulsifier, stabiliser, thickener

There is no need to use additives in dried pasta. Therefore, the entry for these additives in category 6.4.2 should be removed.

29. HYDROXYBENZOATES, p-

INS: 214, 216, 218 Function: Preservative

P-Hydroxybenzoates are proposed for use in chewing gum. However, the low water activity of chewing gum ensures preservation of the product. For this reason this entry should be deleted.

The use is proposed in tabletop sweeteners (cat. 11.4). The EC questions the need for such an application.

The use is also proposed in fruit and vegetable nectars (14.1.3.). In line with the earlier comments made by the European Community, it is considered, in particular for pasteurised products that adequate heat treatment of these products in sealed containers is sufficient to ensure an acceptable shelf life. Consequently the EC considers it necessary to thoroughly review this listing, especially its technical necessity.

30. ISOPROPYL CITRATES

INS: 384 Function: Antioxidant, preservative, sequestrant

The use is proposed in vegetable oils and fats (cat. 2.1.2) at the level of 200 mg/kg. The corresponding commodity standard (CODEX-STAN 210-1999) sets down the level 100 mg/kg. Therefore, the higher level requested should be justified.

31. KARAYA GUM

INS: 416 Function: Bulking agent, emulsifier, thickener, stabiliser

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed. The EC would also question the need of a stabiliser or thickener in products such as surface treated or peeled and cut fresh fruit (cat. 4.1.1.2 and 4.1.1.3), frozen vegetables (cat. 4.2.2.1), fresh meat (cat. 8.1), fresh fish (cat. 9.1) etc.

Furthermore, karaya gum is proposed for infant formulae, follow-on formulae and weaning foods (cat. 13.1 and 13.2). As the use of additives in foods for infants and young children should be as limited as possible,

[2] Alinorm 01/12 Appendix III, Alinorm 01/41

whether the additives have a numerical ADI or ADI “non-specified”, proposed uses for all additives with these functions should be examined at the same time, in order not to permit an unnecessarily high number of such additives.

32. KONJAC FLOUR

INS: 425 Function: Emulsifier, thickener, stabiliser

The EC questions the need of a stabiliser or thickener in products such as milk (cat. 1.1.1.), butter (cat. 2.2.1.1), surface treated or peeled and cut fresh fruit (cat. 4.1.1.2 and 4.1.1.3), frozen vegetables (cat. 4.2.2.1), fresh meat (cat. 8.1), fresh fish (cat. 9.1) fruit juices (cat. 14.1.2.1, 14.1.2.3), fruit nectars (cat. 14.1.3.1, 14.1.3.3) and wines (cat. 14.2.3) .

Furthermore, konjac flour is proposed for infant formulae, follow-on formulae and weaning foods (cat. 13.1 and 13.2). As the use of additives in foods for infants and young children should be as limited as possible, whether the additives have a numerical ADI or ADI “non-specified”, proposed uses for all additives with these functions should be examined at the same time, in order not to permit an unnecessarily high number of such additives.

33. LECITHIN

INS: 322 Function: Antioxidant, emulsifier, stabiliser

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed. The EC also questions the need of lecithin in flours and starches (cat. 6.2).

Furthermore, lecithin is proposed for infant formulae and follow-on formulae (cat. 13.1) at the level of 5000 mg/kg. As the use of additives in foods for infants and young children should be as limited as possible, whether the additives have a numerical ADI or ADI “non-specified”, also the use levels should be as low as is technologically possible. Therefore, the EC would propose the level of 1000 mg/kg instead, which is sufficient to achieve desired effect.

34. MICROCRYSTALLINE CELLULOSE

INS: 460i Function: Anticaking agent, bulking agent, emulsifier, foaming agent, thickener, stabiliser

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed. The EC would also question the need of a stabiliser or thickener in products such as peeled and cut fresh fruit and vegetables (cat. 4.1.1.3 and 4.2.1.3), frozen vegetables (cat. 4.2.2.1), fruit juices (cat. 14.1.2.1, 14.1.2.3) and fruit nectars (cat. 14.1.3.1, 14.1.3.3) and considers that use in wines (cat. 14.2.3) is a processing aid use and should, therefore, not be contained in the GSFA.

Furthermore, microcrystalline cellulose is proposed for infant formulae, follow-on formulae and weaning foods (cat. 13.1 and 13.2). As the use of additives in foods for infants and young children should be as limited as possible, whether the additives have a numerical ADI or ADI “non-specified”, these proposed uses should be compared to overall use of additives in these categories in order not to permit any unnecessary use.

35. MICROCRYSTALLINE WAX

INS: 905ci Function: Anti-foaming agent, bulking agent, emulsifier, glazing agent

Microcrystalline wax is proposed for cacao and chocolate products (cat 5.1). The coherence with the corresponding commodity standard should be verified.

36. MINERAL OIL

INS: 905a Function: Adjuvant, antioxidant, glazing agent, humectant, release agent

MINERAL OIL (HIGH VISCOSITY)

INS: 905a Function: Glazing agent, release agent

In 1995, JECFA revised its 'Mineral Oil' specification and divided it into two groups: High viscosity and Medium-low viscosity, class I, class II and class III.

Mineral Oil (High viscosity) INS 905a, was given an ADI of 0-20 mg /kg in 1995 and the specification was published in FNP52 Add 3 (page 113).

Mineral Oil (Medium- and low viscosity, class I) INS 905a, was given a temporary ADI of 0-1 mg /kg in 1995 and the specification was published in FNP52 Add 3 (page 117). Revised 1998 FNP 52 Add 6 (p.89).

Mineral Oil (Medium- and low viscosity, class II) INS 905a, was given a temporary ADI of 0-0.1 mg /kg in 1995 and the specification was published in FNP52 Add 3 (page 117). Revised 1998 FNP 52 Add 6 (p.89).

Mineral Oil (Medium- and low viscosity, class III) INS 905a, was given a temporary ADI of 0-0.1 mg /kg in 1995 and the specification was also published in FNP52 Add 3 (page 117). Revised 1998 FNP 52 Add 6 (p.89).

Considering that only additives evaluated by JECFA and allocated a full ADI should be included in the GSFA, the EC would like to propose that only Mineral oil (high viscosity) be retained in the GSFA.

37. PECTIN (AMIDATED AND NON-AMIDATED)

INS: 440

Function: Emulsifier, thickener, stabiliser

The EC would also question the need of a stabiliser or thickener in fresh meat (cat. 8.1) or in wines (cat. 14.2.3). In addition, the proposed use in fats and oils essentially free from water (cat. 2.1) has to be verified in accordance with the corresponding commodity standard.

38. POLYDIMETHYLSILOXANE

INS: 900a Function: Anticaking agent, antifoaming agent

The use of additives in fresh meat (cat. 8.1.1) is not justified; therefore, this entry should be removed. The use is proposed in cider and perry at the level of 50 mg/kg. As the use of additive should be restricted to the lowest level necessary, the EC would propose the level of 10 mg/kg instead, which is sufficient to achieve desired effect.

39. POLYVINYLPYRROLIDONE

INS: 1201 Function: Adjuvant, emulsifier, glazing agent, stabiliser, thickener

This additive is proposed for use in wines (cat. 14.2.3) with a residual level of 60 mg/kg. The residual level would suggest that the substance is used as a processing aid. In any case, the EC questions the need for this substance in wine.

40. PONCEAU 4R

INS: 124 Function: Colour

The use of this colour is proposed for sweeteners including honey (cat. 11.0). The EC questions the need for red colouring in this food category.

41. POTASSIUM DIHYDROGEN CITRATE

INS: 332I Function: Acidity regulator, antioxidant, emulsifier, sequestrant, stabiliser

SODIUM DIHYDROGEN CITRATE

INS: 331I Function: Acidity regulator, antioxidant, emulsifier, sequestrant, stabiliser

The use is proposed in infant formulae and follow-on formulae at the level of GMP. The heating procedure for infant formulae or follow-on formulae made from cow's milk results in denaturation and aggregation of proteins. In extreme cases the result is a phase separation of fat and proteins. The addition of sodium or potassium citrate improves heat stability. During heat treatment casein in milk coagulates due to surplus ionised calcium. The addition of sodium or potassium citrate complexes free calcium ions, resulting in decreased coagulation. As this effect can be achieved with the level of 2g/l, the EC would like to propose the use level of 2 g/l (singly or in combination) instead of GMP.

42. SODIUM ALUMINOSILICATE

INS:554 Function: Anticaking agent

The EC questions the need for the proposed use of this additive in wines (cat. 14.2.3).

43. POWDERED CELLULOSE

INS: 460ii Function: Anticaking agent, bulking agent, emulsifier, thickener, stabiliser

Powdered cellulose is proposed for infant formulae, follow-on formulae and weaning foods (cat. 13.1 and 13.2). As the use of additives in foods for infants and young children should be as limited as possible, whether the additives have a numerical ADI or ADI “non-specified”, proposed uses for all additives with these functions should be examined at the same time, in order not to permit an unnecessarily high number of such additives.

The EC also questions the need of this additive in fruit juices (cat. 14.1.2.1, 14.1.2.3) and fruit nectars (cat. 14.1.3.1, 14.1.3.3) and considers that use in wines (cat. 14.2.3) is a processing aid use and should, therefore, not be contained in the GSFA.

44. PROPYLENE GLYCOL

INS: 1520 Function: Anticaking agent, adjuvant, antifoaming agent, carrier solvent, emulsifier, flour treatment agent, humectant, thickener, stabiliser

JECFA has evaluated propylene glycol in its 23rd meeting and set an ADI 25 mg/kg b.w. The proposed use in fresh vegetables (cat. 4.2.1) at the level of 50 g/kg does not seem justified. Furthermore, the propose use in tabletop sweeteners (cat. 11.4) should be justified and a numerical maximum level proposed.

45. SODIUM CARBOXYMEHTYL CELLULOSE

INS: 466 Function: Bulking agent, emulsifier, thickener, stabiliser

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed.

46. SODIUM DIACETATE

INS: 262ii Function: Acidity regulator, preservative, sequestrant

The coherence between proposed use in fats and oils (cat. 2.0) and the corresponding commodity standard should be verified.

47. SORBITAN ESTERS OF FATTY ACIDS

INS: 491, 492, 493. 494, 495 Functions: Emulsifier, Stabilizer

Generally the use of sorbitan esters of fatty acids is proposed for a large variety of products and in a number of the suggested applications for sorbitan esters of fatty acids the additive seems to be technically irrelevant. Examples are: dried vegetables (04.2.2.2), non-emulsified sauces (12.6.2) and water-based flavoured drinks (14.1.4)

It has to be kept in mind that sorbitan esters of fatty acids have been assigned an ADI of 25 mg/kg. This means that a child vastly exceeds the ADI after consuming a can (0.33 litre) of water-based flavoured drink (14.1.4).

For that reason a significant number of entries should be lowered in level or be deleted from the table in order to avoid ADI concerns. Apart from those mentioned above we suggest that that the proposed uses in egg products (10.2) and mixes for soups and broths (12.5.2) are also discussed in this light:

For emulsified sauces (e.g. mayonnaise, salad dressing – 12.6.1) the European Community is of the view that the level listed at step 6 (5000 mg/kg) corresponds to the technological need for this additive.

48. TANNIC ACID (TANNINS, FOOD GRADE)

INS: 181 Function: Colour

The JECFA evaluation with the result ADI "not specified" is only valid for "use as a filtering aid where the application of good manufacturing practice ensures that it is removed from food after use." In the view of the European Community, it is not valid for the use of tannic acid as a colouring agent. The listing should therefore be deleted.

49. TARA GUM

INS: 417 Function: Thickener, stabiliser

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed. The EC questions the need of a stabiliser or thickener in products such as milk (cat. 1.1.1), frozen vegetables (cat. 4.2.2.1), fresh meat (cat. 8.1.1), wines (cat. 14.2.3) etc.

The EC also questions the use of tara gum in fats and oils essentially free from water (cat. 2.1) and butter (cat. 2.2.1.1) and coherence with the corresponding commodity standards for fats and oils.

50. THAUMATIN

INS: 957 Function: Sweetener, flavour enhancer

The proposed use in sugars (cat. 11.2) should be justified.

51. TOCOPHEROLS

INS: 306, 307 Function: Antioxidant

The use is proposed in infant formulae and follow-on formulae (at. 13.1) at the level of 10 000 mg/kg. As the use of additives in foods for infants and young children should be as limited as possible, whether the additives have a numerical ADI or ADI "non-specified", the EC questions the need for this high level. In the EC the level of 10 mg/kg is permitted, as it is sufficient to achieve the desired effect.

52. TRAGACANTH GUM

INS: 413 Function: Bulking agent, emulsifier, thickener, stabiliser

There is no need to use additives in dried pasta. Therefore, the entry for category 6.4.2 should be removed. The EC would also question the need of a stabiliser or thickener in

products such as peeled and cut fresh fruit and vegetables (cat. 4.1.1.3 and 4.2.1.3) and frozen vegetables (cat. 4.2.2.1).

53. XANTHAN GUM

INS: 415 Function: Emulsifier, thickener, stabiliser

The EC questions the need of a stabiliser or thickener in products such as milk (cat. 1.1.1.) surface treated or peeled and cut fresh fruit and vegetables (cat. 4.1.1.2, 4.1.1.3, 4.2.1.2, 4.2.1.3), frozen vegetables (cat. 4.2.2.1), fresh meat (cat. 8.1), wines (cat. 14.2.3) etc. The EC also questions the coherence between the proposed use in fats and oils essentially free from water (cat. 2.1) and the corresponding commodity standard for fats and oils.

Furthermore, xanthan gum is proposed for infant formulae and follow-on formulae (cat. 13.1). As the use of additives in foods for infants and young children should be as limited as possible, whether the additives have a numerical ADI or ADI “non-specified”, proposed uses for all additives with these functions should be examined at the same time, in order not to permit an unnecessarily high number of such additives.