Guideline on avoiding future divergence of food additive provisions in the GSFA with Commodity Standards

Background
CCFA has agreed that the GSFA needs to be the single source of Codex food additive provisions. This requires the food additive provisions in commodity standards to be ‘aligned’, that is removed from the commodity standards and added to the GSFA with any relevant amendments or notes as required. This work is undertaken by a CCFA EWG using a decision tree approach and is ongoing. When commodity standards have been aligned a general reference is added to the food additives section of the commodity standard referring to the appropriate sections of the GSFA.

While Commodity Committees have the right to develop specific food additive lists for commodity standards and it is recognised that the food additive provisions may be revised as necessary in light of the risk assessment by JECFA or of changing technological need and justification for use (e.g. add or remove food additive provisions, amend functional classes, or alter conditions of use of the food additives), any changes to the food additive provisions applicable to commodity standards, which have already been aligned with the GSFA, should be done in the GSFA and not in the commodity standards to ensure that the GSFA stays current and is maintained as the single source of food additive provisions. Therefore it is recommended that if any changes are sought relating to food additive provisions by commodity committees such requests need to be made to CCFA so changes can be made to the GSFA, and if needed, changes to the general reference to the GSFA in the commodity standard.

This draft guidance document has been written with the aim to ensure there is no divergence of food additive provisions in the GSFA with commodity standards after alignment has been completed.

Commodity committees

Active commodity committees (with physical meetings)
A general reference to the GSFA should be maintained in commodity standards, which have been aligned with the GSFA. The commodity committee should make any request for the addition, removal or change to be introduced to the GSFA, for a food additive provision applicable to the commodity standard, directly to CCFA after considering the technological need and justification for use for each food additive.

Abolished commodity committee
The responsibility for new or changed food additive provisions rests with CCFA.

Adjourned commodity committees and active commodity committees (working by correspondence only)
• Adjourned commodity committees: It is the responsibility of CCFA to make new or changed food additive provisions.
• Active commodity committees (working by correspondence only): commodity committees working by correspondence, if they only work on a specific task (e.g. development of a standard), it is the responsibility of CCFA to make new or changed food additive provisions, unless the specific mandate for the committee includes the consideration of food additive provisions. In this latter case, the committee should work in conjunction with CCFA and be considered as an active commodity committee.

Technological justification
Where there is an active commodity committee relevant to the food additive provision under consideration, it is recognised that they are in the best position to decide on whether the use of a particular food additive is technologically justified in the commodities standards under their purview. Furthermore it is recognised that they have expertise to confirm the need, and where necessary, clarify the technological function(s) undertaken by each food additive(s). This important role will contribute to an understanding of the nature/purpose of the provisions.

Functional Class
It is long established practice to include a list of specific functional classes in the general reference to the GSFA within the commodity standards, as part of the alignment work. Where there is an active commodity committee, any suggestion to include a new or amended functional class should be made in consultation with CCFA.

A concise decision tree to facilitate understanding of this guidance is given below.

Consideration of new food additive provision(s)

Has the alignment been completed for the relevant commodity standard(s)?

Yes

Changes to food additive provisions through the GSFA¹

No

Further changes to the Commodity Standard possible in consultation with the CCFA

Is there an active Commodity Committee (with physical meetings) responsible for new or amended food additive provision(s)?

Yes

Commodity Committee
Does the Committee consider that there is a technological justification for the proposed new or amended food additive use(s)?

Yes

CCFA
Consideration of the new provision(s) by the CCFA leading to proposed amendment to the GSFA, as appropriate.

No

CCFA
(i) Consideration of technological justification for the proposed new or amended food additive use(s).
(ii) Consideration of other aspects of the new provision(s) leading to amendment to the GSFA, as appropriate.

Note 1:
Once the alignment of the commodity standard is complete, the commodity standard should maintain a general reference to the GSFA. The Commodity Committee should make any request for the addition, removal or change to be introduced to the GSFA, for a food additive provision applicable to the commodity standard, directly to CCFA after considering the technological need and justification for use for each food additive. As a consequence, the general reference to the GSFA in the commodity standard may need to be updated.