CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

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

Agenda Item 4(b) **CX/FA 21/52/6[1]**

April 2021

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-second Session

ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS: REPORT OF THE EWG ON ALIGNMENT

The EWG on Alignment was chaired by Australia and co-chaired by the United States of America and Japan. The members of the EWG were Argentina, Brazil, Canada, China, Chile, Ecuador, Egypt, the European Union, India, Indonesia, Iran, Japan, Malaysia, New Zealand, Nigeria, Peru, the Republic of Korea, Senegal, Singapore, South Africa, the United States of America, EFEMA, EU Specialty Food Ingredients, FIA, GOED, ICBA, IDF, IFAC, IFU, ISDI and NATCOL.

Alignment work undertaken in 2019

1. The 51st session of the CCFA (CCFA51) agreed to establish an Electronic Working Group (EWG), chaired by Australia and co-chaired by the United States of America (USA) and Japan, and working in English only, to consider (REP 19/FA para 58):

(i) the alignment of the following commodity standards listed in the forward workplan: with the assistance of IDF, the following milk and milk commodity standards including finishing the cheese standards: CXS 208-1999, CXS 221-2001, CXS 250-2006, CXS 251-2006, CXS 252-2006, CXS 273-1968, CXS 275-1973, CXS 278-1978 and CXS 283-1978; plus additional commodity standards CXS 19-1981, CXS 33-1981, CXS 210-1999, CXS 211-1999, CXS 256-2007, CXS 329-2017, CXS 326-2017, CXS 327-2017 and CXS 328-2017;

(ii) how future divergence of the GSFA and the commodity standards can be avoided as the commodity committees amend or develop new food-additive provisions; and

(iii) revision to the food additive section of the commodity standards as indicated CRD2 Annex 1 Part A to include tamarind seed polysaccharide (INS 437) under the appropriate functional class header with a maximum use level (ML) of Good Manufacturing Practice (GMP) (See CRD 2 –Recommendation 2).

Subsequent Alignment work undertaken in 2020

2. In accordance with CL 2020/34-FA and the additional email from the Codex Secretariat dated 29 July 2020, the EWGs established by CCFA51 were reconvened. The EWG on Alignment continued its work to report to CCFA52. The reconvened Alignment EWG was chaired by Australia and co-chaired by the United States of America and Japan, and worked in English only. The reconvened EWG worked in 2020 on the following:

(i) The alignment of the following commodity Standards as listed in the forward workplan: with the assistance of IDF, to complete the milk and milk product commodity standards, being: CXS 207-1999, CXS 243-2003, CXS 253-2006, CXS 262-2006, CXS 281-1971, CXS 282-1971, CXS 288-1976, CXS 290-1995 and CXS 331-2017; and

(ii) the matter referred by CCEURO relating to alignment.

3. The alignment work included in this paper relates to the EWG activity undertaken only during 2019. The alignment work undertaken by the EWG in 2020 will be considered by a future session of the Committee.

Progress since the 51st Session of the CCFA

4. This report of the EWG has addressed the alignment as follows:

[1] The document is an updated version of CX/FA 20/52/6 Rev.1.

(i) Considered the application of the alignment decision tree[2] to propose amendments to these Codex Commodity Standards and to the GSFA: CXS 208-1999, CXS 221-2001, CXS 250-2006, CXS 251-2006, CXS 252-2006, CXS 273-1968, CXS 275-1973, CXS 278-1978 and CXS 283-1978 (CCMMP); CXS 19-1981, CXS 33-1981, CXS 210-1999, CXS 211-1999, CXS 256-2007 and CXS 329-201 (CCFO); and CXS 326-2017, CXS 327-2017 and CXS 328-2017 (CCSCH).

(ii) Developed a draft guidance document aimed to avoid the divergence of food additive provisions in Commodity Committee Standards and the GSFA, after alignment has been completed.

(iii) Considered the proposed revisions to the Table 3 of the GSFA related to the partial alignment of CXS 249-2006, CXS 273-1968, CXS 275-1973 and CXS 288-1978 to include tamarind seed polysaccharide (INS 437) as indicated in CRD2 Annex 1 Part A from CCFA51.

5. A summary of the issues and questions arising from the work of the EWG is at Appendix 1. This Appendix also provides an explanation for the Chair's proposed approach for each of the key issues that were identified.

6. Appendices 2, 3, 4, 5 and 6 address the requests that were made of the EWG for the consideration of the CCFA.

List of Appendices

1. Explanatory Document: Questions, comments and summaries of submissions received and chair's proposals for the EWG

2. Proposed amendments to the food additive provisions of the Codex Commodity Standards for milk and milk products and Tables 1, 2 and 3 of the GSFA relating the relevant food categories

3. Proposed amendments to the food additive provisions of the Codex Commodity Standards for fats and oils, and Tables 1, 2 and 3 of the GSFA relating to relevant fats and oils food categories

4. Proposed amendments to the food additive provisions of the Codex commodity Standards for spices and culinary herbs and to the GSFA relating to relevant herbs and spices food categories

5. Proposed amendments to Table 3 of the GSFA related to aligning tamarind seed polysaccharide provisions of CXS 243-2006, CXS 273-1968, CXS 275-1973 and CXS 288-1976

6. Development of a guidance document aimed to avoid the divergence of food additive provisions in Commodity Committee Standards and the GSFA, after alignment has been completed

[2] http://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CCFA_e.pdf

Appendix 1

EXPLANATORY DOCUMENT – QUESTIONS, COMMENTS AND CHAIR'S PROPOSALS

PART A: SUMMARY OF CHAIR'S PROPOSALS IN FINAL CIRCULARS

Part A separates out the issues to be discussed by the virtual Working Group on Alignment in June 2021, and those for information and explanation only.

For discussion

Key issues requiring consideration by the Committee, initially *via* the Alignment virtual WG

Issue 1 – Development of Table 3 notes

This matter was a central issue identified and discussed by the EWG during the CCFA53 alignment work (planned to be considered at the March 2022 meeting). But it is considered important to discuss and seek resolution if possible at the PWG and plenary at this CCFA52 meeting as it has important ramifications for current and future (CCFA53) alignment work.

The USA strongly believes that all Table 3 additives used in food categories not included in the Annex to Table 3 for both standardized and non-standardized foods should be captured in Table 3. This relates to the current proposed alignment proposals to add provisions for Table 3 additives into Tables 1 and 2 not Table 3 so that complicated condition notes in commodity standards can be maintained by adding such detailed notes into Tables 1 and 2. The USA proposal to add notes to column 5 of entries in Table 3 and therefore to have a separate list of notes for Table 3, similar to the existing list of notes for Tables 1 & 2 has received support and is therefore proposed for consideration. This type of notes might be different with the existing CS notes contained in Table 3, though these could be absorbed into new Table 3 notes. The USA proposal for a change in approach is to help simplify entries in Table 3, to comply with the GSFA preamble and limit potential confusion in future understanding how Table 3 operates. The proposal is to ensure provisions for food additives that are listed in Table 3 for food categories not listed in the annex to Table 3 are not added to Tables 1 and 2 as this will cause confusion in how Table 3 and the annex to Table 3, and the GSFA operates. If there is support for the proposal then there would need to have consideration about how this would be developed and who would do this, noting the USA offer to assist (potentially as new future work?).

Unfortunately since this has not been discussed or agreed by CCFA, it is not something that has been done as part of the current alignment work. From checking there does not appear to be any examples in CCFA52 alignment work. However, there was an earlier example where changes were made to Tables 1 and 2 and not to Table 3. This was in CX/FA 19/51/6 for CCFA51 (2019 meeting), where amendments were considered by the EWG, the PWG and plenary, and then made to the GSFA due to alignment. This is detailed in item 20 of Appendix 1 of the alignment document, CX/FA 19/51/6.

If the USA proposal is supported then changes to the earlier (and future CCFA53) alignment work will be required. It is considered that this is not a simple exercise but would take some time and effort, over and above that noted in the current and future alignment work that would likely involve additional new work. It certainly has ramifications for the CCFA53 alignment work, where proposed amendments have been made to Tables 1 and 2, and not Table 3 using the suggested option of Table 3 new notes.

Issue 2 – Proposed amendments to Codex Standard titles list in Annex C of GSFA

The Alignment EWG recommendation to amend the list of Codex Standards in the tables in Annex C of the GSFA to assist in clarifying which food category number is relevant to CXS 283-1978 is proposed for CCFA consideration, discussion and hopefully decision. It is proposed to remove the entry for CXS 283-1978 with the title "Cheese (unripened, including fresh cheese) – See also CXS 221-2001" and food category number 01.6.1 to limit the confusion. The proposed request to the Codex secretariat is copied below.

More information relating to the proposed amendment is provided in item 3 below.

Standard No	Codex Standard Title	Food Cat. No.
283-1978	Cheese (ripened, including mould ripened)	01.6.2.1
~~283-1978~~	~~Cheese (unripened, including fresh cheese) – See also CODEX STAN 221-2001~~	~~01.6.1~~

Issue 3 – Should the general processing aid sentence be added to all cheese commodity standards, or all dairy standards?

The Alignment EWG recommends that the standard processing aid sentence "Processing aids used in products conforming to this standard should be consistent with the *Guidelines on Substances used as Processing Aids* (CXG 75-2010)" be added to CXS 278-1978 and CXS 283-1978 since they both refer to processing aids in the standard. The further question is should this same sentence also be added to all other cheese standards since various processing aids are used in their production, or even for all dairy standards?

Information and explanation only

Summary of other issues (the numbering is consistent with the more detailed entries in Part B)

(1) Functional class tables are added to CCMMP commodity standards that currently do not have them, to achieve consistency.

(2) It is proposed to not add entries for food additives into the GSFA for chemicals that have an INS number but do not have a JECFA specification, or are not part of a group JECFA specification.

(4) Amendments have been updated to reflect updates to the GSFA since the initial work on alignment commenced in the 1st circular for CCMMP and CCFO standards (due to CX/FA 19/51/2 Add. 2). For CCFO standards this has also included additional functional classes needing to be added to the standard paragraph added into the commodity standard referring to the GSFA, after alignment has been completed. These have sometimes been in addition to what was originally in the standard.

Some proposed notes have been split (item 7), while others have been combined (item 29). The explanation and justification for the changes are provided below.

(6) Discussion on why very long detailed notes related to phosphate provisions are required, and alternatives approaches are not considered appropriate.

(11) Amendments were not made related to draft provisions for CCMMP alignment for the sweetener aspartame-acesulfame salt, since they are draft provisions and are more likely to be dealt with during GSFA EWG considerations via the step process. For CCSCH alignment a similar issue arose related to the same sweetener, with a similar suggested outcome, being to recommend the GSFA EWG consider these issues.

(12) It will be a recommendation that the Codex secretariat be asked to investigate the name of the food additive for INS 554 in the GSFA and make changes as required to use the preferred name "sodium aluminium silicate" rather than the old name "sodium alumino silicate". The same changes to CXS 36-1989 are proposed as well.

(13) Remove the proposed entries for provisions for ascorbic acid, L- (INS 300) and sodium ascorbate (INS 301) in Tables 1 and 2 for alignment of CXS 251-2006 and add the provisions into Table 3.

(14) Replace the current note 209 with the exclusion note XS251, which say the same thing to be consistent with the earlier approaches of alignment and the EWG for GSFA. The same issue applied for replacing note 215 with the exclusion note XS256.

(15) Continue the policy not to make additional notes relating to functional class for entries in Table 3, to limit Table 3 becoming too long or complicated.

Add new entries for lysozyme and paprika oleoresin to Table 3 due to alignment with CXS 283-1978.

(16) Not add entries for turmeric due to alignment since there is no JECFA specification for it, or a group specification for curcumins that includes turmeric, consistent with earlier policy.

(17) The question of why 'rind' and even the column of 'surface/rind treatment' is needed for the functional class tables for the *standards for Cream Cheese* (CXS 275-1975) and *Cottage Cheese* (CXS 273-1968) was considered since these cheeses do not have a rind or are not surface treated. The conclusion was to stay with the standard form of functional class tables for all cheese standards for consistency, as a request from the industry, so no change was proposed.

(18) It was decided to keep the phrase "expressed as phosphorous" within note L275 related to phosphate provisions even though these provisions include note 33 ("As phosphorous") to be consistent with earlier notes and ensure clarity.

(19) The alignment work for the CCFO standards have been conducted assuming there are non-standardised products.

(20) The usual approach of using notes was used to differentiate between provisions for the colour carotenes, beta-vegetable (INS 160a(ii)) with the GSFA food category 02.1.3 (ML 1000 mg/kg) and the commodity standards CXS 19-1981 and CXS 211-1999 (at the lower ML of 25 mg/kg). These MLs were noted as quite disparate but no conclusion for the differences were identified.

(23) A new note was written ensuring the condition excluding food additive provisions for virgin and cold pressed oils when aligning CXS 19-1981 and CXS 210-1999 with food category 02.1.2 in the GSFA.

(27) It is agreed to keep the current entry in CXS 33-1981 that no additives are permitted in virgin olive oils to ensure clarity and certainty by not relying on the GSFA, even though the exclusion note XS33 is added to GSFA entries.

(24) It is proposed to remove draft provisions in Tables 1 and 2 of the GSFA when the same provisions are proposed consistent with alignment. However they have been kept in the documents for information only. It is noted this may differ from GSFA EWG recommendations.

(28) The standard paragraph referring to food additive provisions in the GSFA which is added to CXS 256-2006 due to alignment has been amended to ensure it picks up the intention of CCFO.

There have been occasions where no changes to the GSFA has been required due to alignment, since the commodity standard provision is identical to the current GSFA provision. No entries in the alignment documents have been made since ultimately only changes to the GSFA will be provided in the recommendations. However, sometimes entries have been provided for information only.

(34) It was decided to add entries to Tables 1 and 2 of the GSFA rather than amendments to Table 3 for anticaking agents in food category 12.2.1 due to alignment with CXS 328-2017 (Dried Thyme). Part of the reason for this decision was that it was considered CCSCH input should be involved in making the alternative approach. Full discussion for the reason is provided in item 34 below.

(37) It is recommended to remove note 51 ("For use in herbs only") from a number of draft provisions in food category 12.2.1. It may also be appropriate as a recommendation that CCSCH consider whether note 51 is needed for the various provisions in the GSFA. More detailed information is provided within item 37 in Part B. Specific questions to raise with the CCSCH could be:

> Does the GSFA note 51 ("For use in herbs only") need to be removed when it is listed with the draft provisions of a range of different food additives for food category 12.2.1 (Herbs and spices) due to apparent inconsistency with the annex to Table 3 which appear to allow Table 3 additives for spices? Does CCSCH agree with this Alignment EWG proposal? For standardized products developed by CCSCH, alignment of the commodity standards and the GSFA will be conducted individually; therefore, the question mainly relates to non-standardized products.

(38) A slight amendment was made to note A-CXS328 relating to alignment of CXS 328-2017 (Dried thyme) aimed to remove potential misinterpretation and lack of clarity.

(39) It is proposed to not add the functional class of stabilizer as an additional qualification for tamarind seed polysaccharide (INS 437) within Table 3 entries for CXS 273-1968 to be consistent with CXS 275-1973, and with the earlier policy of keeping Table 3 as clean as possible.

(40) The alignment work on tamarind seed polysaccharide (INS 437) will be completed when the full alignment of CXS 288-1976 is undertaken (which has already been undertaken as part of alignment for CCFA53).

Part B: SUMMARY OF THE DISCUSSIONS IN THE EWG

Introduction

This document provides issues and questions that arose during the alignment work conducted to date by the EWG. It also provides the proposed approach as outlined by the chair for consideration by the PWG. Responses and comments from the EWG received to these issues and questions from the 1st and 2nd circulars have been summarised. To shorten the size of the document some of the earlier discussions from the 1st circular have been removed if the issues were not contentious.

Please note that not all comments or suggestions contained in submissions have been recorded in this document. If simple errors and editorial amendments have been checked and agreed they were often made without noting or attribution.

Alignment of Milk and Milk Products (CCMMP) standards (Appendix 2)

Functional Class Table

1. The alignment work proposed adding a Functional Class Table, when one was not already provided, in the CCMMP commodity standards, in a similar way to alignment work completed at CCFA51 for earlier CCMMP cheese standards. The reason was to make all the standards consistent. This was the case even for CXS208 which has a small number of food additive provisions. Plus a column for surface/rind treatment was included in the Tables even if one was not originally provided; again for consistency.

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, Brazil, IDF, New Zealand, Chile, US

Chair's proposal: Make the changes as proposed by adding Functional Class Tables to those CCMMP Codex commodity standards that do not currently have one. As well, an additional column for surface/rind treatment is added as appropriate if such a column does not already exist.

Group food additives, additional provisions

2. There are a number of cases where commodity standards contain provisions for a general reference to a group of food additives, or not all the members of a group of food additives. For these cases, as has been agreed for earlier alignment work, all members of the food additive group should also be aligned into the GSFA when appropriate. This requires that there has been a joint group ADI determined by JECFA, a JECFA assessment has been conducted, each food additive has its own INS name and number, and a JECFA specification (or captured by a joint JECFA specification) exists and each additive has the appropriate functional class. There have been examples when the food additives are not currently listed in the GSFA. The proposed suggestion has been to add such food additives into the GSFA as part of the alignment work.

Initial specific proposed amendments are provided in the Table below.

Food additive (INS No)	**Food additive group**	**Current GSFA provisions**	**Proposed amendments to GSFA**
Monocalcium citrate (333(i)) Dicalcium citrate (333(ii))	Calcium citrate or calcium citrates (333)	Tricalcium citrate (333(iii)) in Table 3	Add 333(i) and 333(ii) to Table 3
Disodium monohydrogen citrate (331(ii))	Sodium citrates (331)	Sodium dihydrogen citrate (331(i)) and trisodium citrate (331(iii)) in Table 3	Add 331(ii) to Table 3
Lecithin, partially hydrolysed (322(ii))	Lecithin (322)	Lecithin (322(i)) in Table 3	Add 322(ii) to Table 3
Potassium diacetate (261(ii))	Potassium acetate (261)	Potassium acetate (261(i)) in Table 3	Add 261(ii) to Table 3
Calcium hydrogen carbonate (170(ii))	Calcium carbonates (170)	Calcium carbonate (170(i)) in Table 3	Add 170(ii) to Table 3

Comments received from the EWG on 1st circular

There was disagreement from some EWG members (US, Singapore, Japan and New Zealand) to include these food additives in Table 3 of the GSFA as these substances did not have their own JECFA specification, or it was not clear if they were captured by a group food additive JECFA specification. The US suggested confirming with the JECFA secretariat whether JECFA specifications exist for these substances (under a possible group specification?).

The US also suggested holding off discussion on lecithin, partially hydrolysed (322(ii)) until the GSFA EWG decision is made on this substance.

Outcome: Due to the concern that these substances did not have their own JECFA specifications, or were not captured by a JECFA group food additive specification it is not proposed to add these substances to Table 3 at this stage. It seems appropriate to request advice on the specification status of these substances from the JECFA secretariat before any decisions are made.

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore (pending confirmation from the JECFA secretariat on the specification status of these additives), Brazil, IDF, New Zealand, Chile, US, Canada

Canada suggests it may be prudent to seek early input from the FAO JECFA secretariat in advance of preparing the CRD document on alignment, to be able to make a recommendation to the PWG, rather than needing to discuss the issue at the meeting. This suggestion was undertaken. A response was received from the FAO JECFA secretariat which confirmed that these substances do not have their own JECFA specification and are not captured by specifications for similar substances. As a general rule, the specifications apply only to the substances specifically identified in the specifications (CAS number, chemical name, etc). It noted that difference in chemical composition will very often trigger differences in the specifications. For example the amount of cations in a salt (e.g., monosodium vs trisodium) and the nature of the cations often influence other physico-chemical parameters, such as pH, melting point, hygroscopicity and solubility.

Chair's proposal: NOT to make the changes listed in the right hand column of the above table; that is these food additives have not been added to Table 3. The reason was due to concerns about their JECFA specification status. Advice received from the JECFA secretariat confirmed that these substances are not covered by a current JECFA specification.

Appropriate food category

3. There is some confusion in identifying the appropriate GSFA food category relevant to CXS283-1978 (General Standard for Cheese). This is especially the situation for people inexperienced with CCMMP standards.

The GSFA Annex B, Part II (page 20) and the various entries in Annex C confuse matters as they reference CXS 283-1978 for food category 01.6.1 (Unripened cheese). What is more confusing is that Annex C (sorted by Codex Standard Number) has two food category entries for CXS 283-1978, being 01.6.2.1 (Ripened cheese, including rind) and 01.6.1 (Unripened cheese) (see page 50 of the GSFA). A similar situation exists for Annex C sorted by GSFA Food Category Number (page 60).

However, the important point, which is initially confusing, is how the Codex Standard Title is listed in these Tables (see below as extracted from page 50, with important sections underlined). The additional Title name is to provide additional relevant information which is very important for the alignment work.

Standard No	Codex Standard Title	Food Cat. No.
283-1978	Cheese (ripened, including mould ripened)	01.6.2.1
283-1978	Cheese (unripened, including fresh cheese) – See also CODEX STAN 221-2001	01.6.1

Also of importance is the explanation information provided in section 4 (Food Additives) of CXS 283-1978, which is also copied below and the important information highlighted by underlining.

4. FOOD ADDITIVES

Only those food additives listed below may be used and only within the limits specified.

Unripened cheeses

As listed in the Group Standard for Unripened Cheese Including Fresh Cheese (CXS 221-2001).

Cheeses in brine

As listed in the *Standard for Cheeses in Brine* (CXS 208-1999).

Ripened cheeses, including mould ripened cheeses

Additives not listed below but provided for in Codex individual standards for varieties of ripened cheeses may also be used for similar types of cheese within the limits specified within those standards.

Unripened cheeses have the food additive permissions as detailed in CXS 221-2001, which are relevant to food category 01.6.1 (unripened cheese). But ripened cheeses have different food additive permissions as detailed in the list within CXS 283-1978, but captured by food category 01.6.2.1 (Ripened cheese, including rind). These cheeses include a number of individual cheeses which were aligned at CCFA51, such as brie, gouda and Havarti.

For the alignment work, the food additives in CXS 283-1978 are being aligned with food category 01.6.2.1, not 01.6.1.

Questions: Are there appropriate amendments that can and should be made to the Annex C tables of the GSFA to remove the confusion and clarify which is the appropriate food category linked to CXS 283-1978? Is this something that the alignment EWG should consider? One suggested approach is to remove the second entry linking to food category 01.6.1.

Comments received from the EWG on 1st circular

The US and New Zealand support the option to remove the second entry linking CXS 283-1978 to food category 01.6.1. Canada does not object to making such a change but it notes that the current entries are correct and so does not see a need to change them. Singapore suggested a different amendment where the change would be made to CXS 221-2001 and not CXS 283-1978, as copied below.

221-2001	Cheese (unripened, including fresh cheese)	01.6.1

The US also suggested that the full section 4 in CXS 283-1978 be made in Appendix 2, so that all proposed changes are provided. The response is that no additional changes to section 4 are proposed to those provided within Appendix 2.

Outcome: It was proposed to make the minor change to the tables in Annex C of the GSFA as proposed in the question above due to the support for the suggestion. The justification for proposing the changes was to limit the confusion inherent in the current entries, especially for people less familiar with the individual commodity standards (CXS 221-2001 and CXS 283-1978).

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, Brazil (does not object to making the change, noting it supports Canada's initial comments that the current entries are correct), IDF, New Zealand, Chile, US, Canada

Chair's proposal: To request the Codex secretariat remove the second entry for CXS 283-1978 in the tables in Annex C of the GSFA. The proposed changes are (using strikethrough):

Standard No	Codex Standard Title	Food Cat. No.
283-1978	Cheese (ripened, including mould ripened)	01.6.2.1
~~283-1978~~	~~Cheese (unripened, including fresh cheese) – See also CODEX STAN 221-2001~~	~~01.6.1~~

Additional comments due to submissions to the 1st circular

Changes reflecting 2019 updates to GSFA

4. A number of submitters (including Canada and the IDF) noted that relevant provisions to the GSFA have been made post the initial work on the first circular and these need to be reflected in the various alignment documents, especially those in Appendix 2. This is because a number of amendments to the GSFA due to the CCMMP commodity standards (ripened cheeses) and food categories amended by the CCFA51 alignment work are relevant to the CCFA52 work and need to be reflected in the documents. In some cases these changes have required additional amendments to those suggested in the 1st circular.

It was noted that a number of food additives, specifically calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), potassium silicate (INS 560), calcium propionate (INS 282), propionic acid (INS 280), riboflavins (INS 101(i), (ii), (iii)), silicon dioxide, amorphous (INS 551), sodium propionate (INS 281) and talc (INS 553(iii)) were determined to have an ML of GMP for the various ripened cheeses when they were aligned at CCFA51. This same situation applies for the alignment of cheese products aligned for CCFA52. This has required a number of amendments in the proposed changes to Tables 1 and 2 for food categories 01.6.1 and 01.6.2.1.

5. It was separately noted that the 2019 update to the GSFA included provisions from the alignment work for annatto extracts – norbixin-based (INS 160b(ii)) for food category 01.6.2.1. This amendment had the ML of 25 mg/kg, which is different to that in CXS 283-1978. Therefore a new note was required to be written which is note I283.

6. Chile made a number of comments to Appendices 2 and 3 that need to be explained. These comments noted differences of the GSFA provisions in specific food categories to those listed in the relevant commodity standards, where food additives with additional functional classes were noted in the GSFA. It therefore suggested that these additional GSFA functional classes needed to be added to the alignment statement added to the commodity standards (e.g. “Acidity regulators, anticaking agents, etc). However, this request is incorrect as only those functional classes listed in the commodity standard apply to food complying with the commodity standard. Other food classes listed in the relevant food category in the GSFA do not necessarily mean they apply to food conforming to the specific commodity standard. This is part of the alignment exercise and often requires the use of exclusion notes (XSxxx) where the provision does not apply to foods complying with that commodity standard. In the first example provided in Chile’s comments to Appendix 2 aspartame (INS 951) is mentioned. However there are no provisions for aspartame in CXS 221-2001, CXS 273-1968 or CXS 275-1973, so exclusions notes XS221, XS273 and XS275 have been written into food category 01.6.1.

7. A number of submissions (IDF, Canada and Japan) suggested that note F221275 relevant for food category 01.6.1 needed to be split into separate notes, F221 and F275 since the provisions for carotenoids are different for the two different commodity standards (CXS 221-2001 and CXS 275-1973). This was accepted as being correct and two new notes were written and the document amended.

8. Malaysia made some suggested additions to the new statements for CXS 278-1978 in its comments. They included adding the standard statement for the use of flavourings, but this is not accepted since there is no provision for the addition of flavours in the standard. However, there is mention of harmless flavour producing bacteria and harmless enzymes to assist in flavour development in section 3.2.2 (optional additions), but they are not the same as flavourings.

Comments received from EWG on 2nd circular

Malaysia agrees and notes this misunderstanding.

However it also suggests adding the standard statement for processing aids, presumably since such bacteria and enzymes would be considered processing aids. This same statement is suggested for CXS 283-1978 since the standard refers to the use of starter cultures of harmless lactic acid and/or flavour producing bacteria and cultures of other harmless microorganisms, and safe and suitable enzymes, which again can be considered as processing aids.

Questions: Is it appropriate to add the standard processing aid statement as an additional statement under the new section 4 Food additives for both CXS 278-1978 and CXS 283-1978? The justification for adding the processing aid statement is because the optional additions listed in section 3.2.2, of flavour producing bacteria and enzymes to assist in flavour development in CXS 278-1978 and starter cultures and enzymes in CXS 283-178 could be considered as processing aids.

The proposed entry and statement is:

4.1 Processing aids

“Processing aids used in products conforming to this standard should be consistent with the *Guidelines on Substances used as Processing Aids* (CAC/GL 75-2010).”

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, Brazil (since processing aids are listed in the standard but no requirements about the quality of those substances, or criteria they should comply with are currently provided), Malaysia (the proposed statement is appropriate if the substances can be considered processing aids for the proposed purposes in the standards), Chile (suggests the issue can be evaluated at a later stage after the current alignment work is completed), US (would not oppose the inclusion of the standard processing aid statement).

Alternative comments and suggestions: IDF and New Zealand

IDF has previously discussed the issue of how starter cultures and coagulating enzymes are characterised when used in cheese production and it concluded that they should not be defined as processing aids since they are intended to be present and active in the final product. As a consequence they have been listed as ingredients in the cheese standards.

IDF further notes that there are a number of processing aids used in the production of cheese and therefore the inclusion of the processing aid statement in section 4.1 is justified. However, it believes that if it is justified in one cheese standard (or the two raised by Malaysia) then for consistency it should be added for all cheese standards, and probably all dairy standards.

New Zealand had similar comments to the IDF, where it noted that a number of starter cultures and renneting enzymes used for ripened cheese manufacture do not meet the processing aid definition as they have a technological function in the final cheese. In this case they are considered as ingredients as noted in the two standards. It notes that there will be some scenarios where such substances will perform as processing aids so it is appropriate to add the standard processing aid statement into the food additive section of the cheese standards.

Like IDF, New Zealand also proposes that the standard processing aid section should be added to all cheese standards, not just CXS 278-1978 and CXS 283-1978 since it is likely that processing aids are used in the manufacture of all cheeses.

Chair's proposal: To make the suggested entries (standard processing aid statement in section 4.1) for CXS 278-1978 and CXS 283-1978 as agreed by EWG. It is noted that the IDF and New Zealand do not consider starter cultures and coagulating enzymes used in the manufacture of cheese to (always) meet the definition of processing aids. However other processing aids are used in the production of such cheeses, so this is the justification for making such a suggestion.

It is felt that the further suggestion by the IDF to add this statement for all cheese (and even all dairy) standards is a broader question to be considered at the PWG on alignment as it has larger implications.

Question: Should the standard processing aid sentence:

"Processing aids used in products conforming to this standard should be consistent with the *Guidelines on Substances used as Processing Aids* (CAC/GL 75-2010)."

be added to all cheese standards (or even all dairy standards) since it is argued that various processing aids are used in the manufacture of products conforming to all these standards and to be consistent with the proposed entries for CXS 278-1978 and CXS 283-1978?

Provisions for phosphates

9. New Zealand questioned whether the very long and specific notes relating to phosphate provisions, being C250, C252, C251, C221, K273, L275 can be shortened. It wondered whether it might be appropriate to provide provision for all phosphates excluding phosphoric acid (INS 338), magnesium dihydrogen phosphate (INS 343(i)), trisodium diphosphate (INS 450(ii)), magnesium dihydrogen diphosphate (INS 450(ix)), calcium dihydrogen diphosphate (INS 450(vii)), sodium calcium polyphosphate (INS 452(iii)) and bone phosphate (INS 542).

Such an approach would shorten the notes but a concern may be in future if any new phosphate food additives are given provisions then such notes could inadvertently provide provisions without them being assessed. Because of this concern there would be a reluctance to use this approach, to have a general provision with exclusions, rather than having a list of specific provisions.

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, IDF, New Zealand, Chile, US, Canada

Chair's proposal: Not to change the current approach for listing phosphate provisions, noting that the lists are very long and detailed. The reason is as detailed above.

Separate columns in functional class table for cheese mass, and brine

10. Canada asked the question whether the functional class table added into the front of Group Standard for Cheeses in Brine (CXS 208-1999) can be improved by adding separate columns for food additive provisions for cheese mass, and separately for brine.

This would normally be a question for the CCMMP commodity committee since it is a technical question relating to the use and technological justification for how the food additives are used in dairy products, and not something that the CCFA, or the alignment EWG can address directly at this time.

However, upon consideration it was concluded inappropriate to add a second column for brine as CXS208-1999 does not make specific distinctions of food additive provisions between the cheese mass and the brine. This is different to the case for cheese mass and surface/rind treatment for specific cheese standards where distinctions are made and it is appropriate to add the second column for surface/rind treatment.

Comments received from EWG on 2nd circular

Supports chair's proposal: IDF, New Zealand

Chair's proposal: Not to make changes to functional class table for CXS 208-1999 for the reason detailed above.

Draft provision for aspartame-acesulfame salt (INS 962)

11. Quite detailed questions and suggested amendments to proposed notes for the draft provisions related to the sweetener aspartame-acesulfame salt (INS 962) for alignment of food category 1.3.2 in Table 1 (and subsequently Table 2) of the GSFA are provided in Canada's comments to the 1st circular. As these relate to draft provisions at step 3 the alignment work will not propose to make any amendments to the GSFA. Therefore it is not proposed to spend detailed time discussing the merits of the proposed amendments raised. This is possibly something for the GSFA EWG to consider at the appropriate time. However, the comments and suggested amendments made by Canada appear to have merit and should be considered when appropriate.

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, New Zealand, Chile, US, Canada

Chair's proposal: It is not proposed to make the changes since they relate to draft provisions, so changes to the GSFA will not be made due to the current alignment work. It is likely that these issues will be better addressed by the GSFA EWG as the draft provisions move through the step process.

Appropriate name for INS 554

12. Canada requested the alignment work make a decision about what the appropriate name is for the food additive with the INS number of 554. It is listed as "sodium aluminium silicate" in CXG 36-1989 and the online version of the GSFA. However, the printed version of the GSFA (which is usually the version used for the alignment work) uses the term "sodium alumino silicate" in Tables 1 and 2 as the main additive name, but with the name of "sodium aluminium silicate" listed next to INS 554 within the entry. Canada suggests that the name "sodium aluminium silicate" be used for all Codex documents.

Comments received from EWG on 2nd circular

The US: It can support Canada's proposal that the name "Sodium aluminium silicate" as listed in CXG 36-1989 is the most appropriate name for INS 554 in Codex documents. It suggests that the use of the old name "sodium alumino silicate" in the printed version of the GSFA is likely just a typographical error. It suggests that the Alignment EWG make a recommendation that the Codex Secretariat be asked to investigate the matter and make changes to the names in the paper copy of the GSFA as appropriate.

Chair's proposal: Support was received to Canada's suggestion. Therefore changes have been made to the name of the food additive for INS 554 to be consistent with CXG 36-1989. A recommendation could be made requesting the Codex secretariat investigate the differences within the two versions of the GSFA and amend to use the more appropriate name being "Sodium aluminium silicate".

Provisions for ascorbic acid, L- (INS 300) and sodium ascorbate (INS 301)

13. Canada suggested that both ascorbic acid, L- (INS 300) and sodium ascorbate (INS 331) provisions in the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006) at a maximum level of 500 mg/kg should be aligned as Table 3 food additives. The relevant GSFA food category is 01.5.2 which is not in the annex to Table 3. Both food additives are currently listed in Table 3.

It is noted that the decision tree (and box I) used for the alignment work is relevant for this suggestion. Therefore the suggestion made by Canada is supported and changes have been made.

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, Brazil, IDF, New Zealand, Chile, US

Chair's proposal: Canada's suggestion is supported and changes have been made by removing provisions for the two food additives (ascorbic acid, L- (INS 300) and sodium ascorbate (INS 301)) in Table 1 and 2 of the GSFA related to food category 01.5.2, and additions have been made for the two food additives entries in Table 3, with CS 251-2006 added to column 5.

Replacement of note 209 with note XS251

14. Canada suggested removing the current note 209 ("Excluding products conforming to the Standard for Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CODEX STAN 251-2006)") and replacing it with the exclusion note XS251 (which says exactly the same thing). This suggestion was for the alignment of the food additives provisions for carotenoids (INS 160a(i), a(iii), e, f) and grape skin extract (INS 163(ii)) in CXS 251-2006 to be aligned with food category 01.5.2 in Tables 1 and 2 of the GSFA.

Chair's initial proposal was not to make the changes since the notes say the same thing and note 209 is already in the GSFA.

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, New Zealand (while it can support the Chair's proposal it wondered if there will be a future opportunity once alignment has been completed to standardize the format of notes for consistency), Chile

Not support chair's proposal, but Canada's suggestion:

Brazil, notes that though it is just a matter of cleaning up the GSFA, it is welcome.

The USA, it prefers the use of XS notes and believes it is advantageous to users of the GSFA.

Chair's proposal: Make the suggested change as suggested by Canada due to EWG support to clean up the GSFA. That is to replace note 209 with the exclusion note XS251. The Chair further notes that the GSFA EWG has proposed similar changes; to replace current notes with new exclusion notes that say the same thing. Therefore it is appropriate for consistency that the same approach is taken between the EWGs for alignment and the GSFA.

Additional functional class qualification notes for Table 3

15. Canada suggested a number of other amendments to Table 3, which in general can be summarised as adding qualification notes about the functional class use for the provision related to the commodity standard. Examples are adding the term "as an acidity regulator only" for a number of different food additives linked to a number of commodity standards. There have also been some cases where new entries for the food additive have been proposed to be made directly to Table 3 (e.g. lysozyme (INS 1105) and paprika oleoresin (INS 160c(i)).

Questions of whether there is a need to add qualification notes for Table 3 food additive entries has been a regular issue for alignment. The policy and approach has generally been not to add many qualification notes unless there is a good justifiable reason to do so. The reason and justification for this view is to not make Table 3 too long and complicated by continually adding notes to column 5. If there is a qualification statement or requirement in the commodity standard then this is usually carried over into the relevant Table 3 entries.

It was also not clear why new entries for lysozyme and paprika oleoresin should be made to Table 3 as part of the alignment work. The decision tree for alignment does not deal with these situations, but it is noted that the alignment EWG or the CCFA have sometimes made decisions to add new entries for food additives to Table 3.

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, Brazil (support the proposal not to spend resources on adding additional qualification notes to Table 3 at the moment), New Zealand, Chile, US

Additional comments: Brazil

Brazil noted that the two food additives (lysozyme and paprika oleoresin) are being aligned in standards relating to the food categories 01.6.2.1 and 01.6.1 which are not listed in the annex to Table 3 of the GSFA. Therefore Table 3 does apply to these food categories. Considering there are no Table 3 entries for these food additives it might be necessary (and appropriate) to move the provisions from Tables 1 and 2 to Table 3 with the appropriate notes. This response is taken to support Canada's suggestion to add new entries for lysozyme and paprika oleoresin to Table 3 as part of the alignment work.

Chair's proposal: It is not proposed to make the additional qualification notes, especially those related to functional class, to entries to Table 3 as part of the alignment work for the reason of not making Table 3 too long or complicated.

Support has been provided to add new entries for lysozyme and paprika oleoresin to Table 3 as part of the alignment work relating to CXS 283-1978, noting the original Canadian comments to the 1st circular and these changes have been made.

Additional comments due to submissions to the 2nd circular

Turmeric (INS 10(ii))

16. IDF questioned whether a separate entry for turmeric (INS 100(ii)) needs to be added in the GSFA due to alignment of the colour curcumins (INS 100, [plural]) in CXS 221-2001. CXG 36-1989 lists curcumins as a food additive group with INS 100 containing both curcumin (INS 100(i)) and turmeric (INS 100(ii)). However there are no provisions for turmeric in the GSFA.

Response: It is noted that currently there is not a JECFA specification for turmeric so at this stage it is not proposed to add turmeric into the GSFA as part of the alignment work.

Chair's proposal: Since there is no JECFA specification for turmeric or a group specification for curcumins that includes turmeric it is not proposed to add turmeric to the GSFA as part of the alignment work. This response is consistent and similar to item 2.

Surface/rind treatment

17. Japan questioned why the word 'rind' was needed in the heading of 'Surface/rind treatment' for the functional class table currently in CXS 275-1975 (Standard for Cream Cheese) (and the same question can be asked or CXS 273-1968 (Standard for Cottage Cheese)) since such products do not have a rind. This question and even the use of this column itself in the table was questioned during the early stages of the alignment work for these standards. The response from the industry (as a surrogate for CCMMP) was that it wanted the same structure of these functional class tables to be used for the milk and milk product standards that are the responsibility of CCMMP. Therefore no changes are proposed as part of the alignment work.

Chair's proposal: To ensure consistency in the Tables of Functional Class for CCMMP no changes will be made for those listed in CXS 273-1968 and CXS 275-1975.

Note L275

18. Canada noted that note L275 contains the term "expressed as phosphorus" in the provisions for phosphates in food category 01.6.1 which also includes reference to note 33 "As phosphorus" so it wonders if that phrase is needed in the new note.

Outcome: It is noted that this same term is used in a number of new notes related to phosphate provisions written for Appendices 2 and 3 which also contain note 33. As well current notes relating to phosphate provisions in the GSFA (such as notes 343, 393, 394, 436) due to earlier alignment work also include this phrase even though note 33 also applies.

Chair's proposal: The duplication is noted but to be consistent and ensure clarity the phrase will be left in.

Alignment of CCFO (Fats and Oils) standards (Appendix 3)

Additive provisions in non-standardized products

19. The EWG was asked to comment on whether there are expected to be any non-standardized products captured by the relevant food categories in the GSFA. This has implications about whether some of the current provisions for food additives need to be investigated and potentially removed or not. Is this something that the alignment EWG can propose or does it need to refer these questions to the EWG for the GSFA?

It is clear from checking Annexes B and C of the GSFA that certain relevant Codex commodity standards are specifically captured by food categories in Tables 1 and 2 of the GSFA. But what is not clear is whether there may be other non-standardized foods also captured by these food categories. Examples are provided below, as listed in the table at the front of Appendix 3 which has been rearranged.

GSFA food category	CXS Number	Codex Standard Name
02.1 (02.1.2)	19-1981	Edible fats and oils not covered by individual standards
02.1.2 (Vegetable oils and fats)	33-1981	Olive oils and olive pomace oils
02.1.2	210-1999	Named vegetable oils
02.1 (02.1.3)	19-1981	Edible fats and oils not covered by individual standards
02.1.3 (Lard, tallow, fish oil, and other animal fats)	211-1999	Named animal fats
02.1.3	329-2017	Fish oils

The specific questions then is if a food additive has no provisions in CXS 19-1981, CXS 33-1981 and CXS 210-1999 is there a need to maintain a provision for this food additive in Tables 1 and 2 relating to food category 02.1.2 (Vegetable fats and oils) due to possible non-standardized products?

The same issues apply for food category 02.1.3 (Lard, tallow, fish oil, and other animal fats) relating to CXS 19-1981, CXS 211-1999 and CXS 329-2017.

Comments received from the EWG on 1st circular

The US did not support seeking advice from the GSFA EWG, as it indicated it would not be the best use of the EWG's resources. The comment is taken to support the alignment EWG to deal with the issues.

Canada suggested that it will be difficult for the alignment EWG to determine the situation for the food categories. Therefore, it suggests that the alignment exercise is performed assuming non-standardized foods are available. If future information confirms this is not the case then a clean-up exercise can be undertaken at a later stage.

New Zealand noted that non-standardized products may potentially require broader provisions. It suggests a category review could be conducted at a future date, following completion of alignment. This is taken to mean it is comfortable to complete the alignment without reference to non-standardized products.

The ICBA commented that the issue of standardized and non-standardized foods is important for all food categories and for the GSFA and commodity standards, not just for CCFO. It provided some general and useful comments and additional questions for future consideration but did not directly address the question.

Outcome: At this stage it is proposed to conduct the alignment process assuming there may be non-standardized products, by using the appropriate XS notes, which potentially addresses non-standardized products.

Comments received from EWG on 2nd circular

Supports chair's proposal: Brazil (it further notes it fully supports Canada's point of view), New Zealand, Malaysia, US

Chair's proposal: Amendments to the GSFA have been made on the understanding that there may be non-standardized foods related to the food additives and food categories as noted above. Therefore the provisions have been left in, with the appropriate XS notes due to alignment with the specific commodity standard. A future review could be undertaken once the alignment work has been completed to address the issue of standardized and non-standardized products which seems to be a vexed issue for CCFA and the commodity committees to deal with. CCFA is not in a position to provide an educated view on the CCFO standards and food categories.

Provisions for carotenes, beta-, vegetable (INS 160a(ii))

20. If the answer to the above question is that there are no non-standardized products captured by food category 02.1.3 then a separate question arises. Should the max level of the food additive, carotenes, beta-, vegetable (INS 160a(ii)), under food category 02.1.3 of 1000 mg/kg be reconsidered by forwarding to the GSFA EWG? This is because the provisions in the relevant commodity standards of CXS 19-1981 and CXS 211-1999 are for a ML of 25 mg/kg, and there is no provision for the other commodity standard, CXS 329-2017.

Comments received from the EWG on 1st circular

The US suggested that this question should not be circulated to the GSFA EWG, as it indicated it would not be the best use of the EWG's resources. It also suggested that the use of notes should be applied in this situation, as usual for alignment work.

New Zealand suggested that due to the disparity of the ML currently in the GSFA and in the two commodity standards that the ML of 1000 mg/kg should be forwarded to the GSFA EWG.

Outcome: Disparate views were received. The alignment situation does seem unusual but the simple solution seems to be to use notes.

Comments received from EWG on 2nd circular

Brazil: It notes this disparity is relevant and is an important issue to resolve. It notes that unless some member provides data to defend a higher limit (i.e. 1,000 mg/kg), the committee should consider the lowest limit for all, i.e. 25 mg/kg. However, if this proposal of reviewing the ML and to establish the lower limit of 25 mg/kg is not accepted then it can support the Chair's proposal.

Supports chair's proposal: New Zealand, Malaysia, US

Outcome:

The comments of Brazil (and earlier New Zealand to the 1st circular) are noted but at this stage it is not proposed to alter what was suggested in the 2nd circular, which is to use notes to differentiate between the MLs. These suggestions are outside the direct scope of alignment.

Chair's proposal: Use notes relating to the ML provisions for CXS 19-1981 and CXS 211-1999 and the exclusion note XS329 to align provisions in the GSFA for carotenes, beta-, vegetable (INS 160a(ii)), under food category 02.1.3, as currently listed in Appendix 3.

21. It was noted that specific technical assistance had been provided by CCFO in relation to alignment of these commodity standards in recent documents. These were para 56 of REP18/FA and CX/FA 19/51/2 Add. 2 (Matters referred by the 26th session of the Codex Committee on Fats and Oils). The information in these documents assisted the alignment work, especially since some of this information was not available in the current Codex commodity standards, which had not been updated at this time. Reference to when this information was used has not been explicitly made in Appendix 3.

22. It is important to understand that standard CXS 19-1981 does not apply to any oil or fat covered by the individual standards; being CXS 33-1981, CXS 210-1999, CXS 211-1999 and CXS 329-2017, as detailed in section 1 (Scope) of CXS 19-1981.

Virgin and cold pressed oils

23. Both CXS 19-1981 and CXS 210-1999 have requirements that "No food additives are permitted in virgin or cold pressed oils". Also CXS 33-1981 requires that no additives are permitted in virgin olive oils. It was therefore proposed to add the current note 356 (Excluding virgin or cold pressed oils) to all food additive provisions linked to these three commodity standards for food category 02.1.2, but not for 02.1.1 and 02.1.3. However, the note was not added for provisions linked to the other commodity standards, CXS 211-1999 or CXS 329-2017, since no explicit requirement was listed in these standards.

Comments received from the EWG on 1st circular

Support: US, Singapore,

Canada suggests that if the assumption is that non-standardized foods are available then note 356 would be inappropriate as it may inadvertently remove provisions. It therefore suggests that an alternative CXS style note be used; e.g. "Excluding virgin and cold pressed oils in products conforming to the Standards for Edible Fats and Oils not Covered by Individual Standards (CODEX STAN 19-1981) and for Named Vegetable Oils (CODEX STAN 210-1999)."

Initial outcome: Stay with what was proposed in the 1st circular, which has assumed there are no non-standardized products and so note 356 was added to various provisions as noted above. Additional comments were received on the 2nd circular.

Comments received from EWG on 2nd circular

Support Chair's proposal: New Zealand, Chile

Support Canada's suggestion: Brazil, US (its preference is Canada's proposal as it is more specific)

Outcome:

Further consideration of this issue occurred after receiving the submissions and comments. Canada's concern about dealing with possible non-standardized products was considered and as noted in the earlier Chair's proposal for item 19 the alignment work has been progressed assuming there may be non-standardized products. Therefore for consistency it is appropriate to also consider non-standardized products and Canada's suggested alternative note to the current note 356 is supported.

Chair's proposal: Support was received for Canada's suggestion and further consideration for dealing with non-standardized products led to the proposal to not add note 356 to food additives from CXS 19-1981, CXS 33-1981 and CXS 210-1999 that are aligned with food category 02.1.2 but not 02.1.1 and 02.1.3 but to use an alternative new note. This is the new note A-CXS19210: "Excluding virgin and cold pressed oils in products conforming to the Standard for Edible Fats and Oils not Covered by Individual Standards (CODEX STAN 19-1981) and the Standard for Named Vegetable Oils (CODEX STAN 210-1999)."

Draft provisions versus aligned provisions in the GSFA

24. There are occasions when the draft provisions in the step process are identical to the proposed aligned provisions. In this situation it was considered appropriate to remove the draft provisions since they are not needed. These cases have been left in the tables of proposed amendments but with a strikethrough with a note in the recommendation column of 'not needed' for information only. If the aligned amendments are agreed then these draft provisions can be removed.

Comments received from the EWG on 1st circular

Support: US, Singapore

Comments received from EWG on 2nd circular

Support: Brazil, New Zealand

Additional comments:

The US wondered if it may be more efficient to revise and adopt if appropriate the existing draft provisions in the step process rather than discontinue these and adopt a new provision into the GSFA. It notes the end result will be the same but revising and adopting the existing draft provisions may be a more efficient way to achieve the end result.

Response: A check of the appendices (Appendix 2) has noted that some of the alignment amendments differed to those as draft provisions. So the preferred approach is to use the alignment process so it is clear that the proposed amendments are consistent with the commodity standard.

Chair's proposal: Remove draft provisions in Tables 1 and 2 of the GSFA when they are consistent with provisions added due to alignment, but kept in the current document for information.

25. Other examples where no changes are required are tocopherols (INS 307a,b,c) for food category 02.1.2, and lecithin (INS 322(i)) for food category 02.1.3 where no changes are proposed as they seem to have been already aligned. But the entries have been kept for information only.

Additional comments due to submissions to the 1st circular

26. Like for Appendix 2 and updates to food additive provisions in CCMMP commodity standards, amendments to relevant CCFO commodity standards also occurred after the alignment work for the 1st circular had occurred. Therefore, amendments relating mainly to CXS 19-1981 as well as CXS 210-1999 and CXS 211-1999 have been required and have been made in the 2nd circular. These edits were noted by the Canadian submission.

No additive provision in virgin oil entry in CXS 33-1981

27. Canada suggested that the current 4.1 entry in CXS 33-1981 stating that no additives are permitted in virgin olive oils may not be necessary as it is covered by the exclusion note XS33 in the GSFA entries due to alignment.

Comments received from EWG on 2nd circular

Supports chair's proposal to not make the change: Singapore, Brazil (it may facilitate consultation by being in the commodity standard and avoid consultation and interpretation of GSFA provisions), New Zealand, Chile, US

Chair's proposal: To keep the current entry in the commodity standard CXS 33-1981 to ensure clarity and certainty, rather than rely solely on the GSFA.

Revised food additive section in CXS 256-2007

28. Canada suggested making editorial changes to the new paragraph proposed to be added to section 4 (Food Additives) in CXS 256-2007 as part of alignment. This is because the current text in the commodity standard refers specifically to Table 3 food additives which are not mentioned in the proposed new entry. The proposed amended paragraph (with amendments highlighted) is:

Acidity regulators, antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, ~~packaging gases,~~ preservatives, stabilizers and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 02.2.2 (Fat spreads, dairy fat spreads and blended spreads) are acceptable for use in foods conforming to this standard. **Additionally, packaging gases used in accordance with Table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in foods conforming to this standard.**

For the 2nd circular it was considered that the proposed additional sentence was not required. Adding Table 3 to the sentence should suffice. So the proposed sentence was:

Acidity regulators, antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, packaging gases, preservatives, stabilizers and thickeners used in accordance with Tables 1**,** ~~and~~ 2**, and 3** of the General Standard for Food Additives (CXS 192-1995) in food category 02.2.2 (Fat spreads, dairy fat spreads and blended spreads) are acceptable for use in foods conforming to this standard.

Comments received from EWG on 2nd circular

Supports chair's proposal: Singapore, New Zealand, Chile

Supports Canada's proposal: Brazil (as a matter of clarity),

US: It notes that if it is not appropriate to permit the use of all the functional classes listed in the sentence in Table 3 then the proposed initial suggestion is not appropriate and Canada's suggested new text should be used. It further notes that it is important to make sure that the general reference to the GSFA that will be added to the standard (CXS 256-2007) is consistent with the text pertaining to the use of Table 3 additives added to section 2 of the Annex to Table 3.

Discussion:

Further checking was performed (by the Japanese delegation responsible for the alignment of CCFO standards), searching back to the original reports that developed the food additives section in CXS 256-2007[3,4], which identified where the original references to Table 3 food additives came from. These documents, specifically ALINORM 07/30/17, clarified that the intention of the CCFO was that relevant functional classes as listed for Table 3 are technologically justified for use in this standard are appropriate. This list of the functional classes in the report and amended standard is unchanged in the current standard. Therefore the standard paragraph that references the GSFA needs to reflect these functional classes, so changes are required to what was proposed in the 2nd circular and even in the comments received. The proposed additional sections have been written to follow the format listed in the Procedural Manual, but with appropriate amendments reflecting the specific requirements.

Chair's proposal: Changes to what was originally proposed are required to correctly address the original intention of CCFO when it incorporated the food additives section into Standard CXS 256-2007. Its intention was specifically to provide provisions for food additives with the listed functional classes in Table 3.

The proposed amended paragraph is now:

Acidity regulators, antifoaming agents, antioxidants, colours, emulsifiers, preservatives, stabilizers and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 02.2.2 (Fat spreads, dairy fat spreads and blended spreads) **or listed in Table 3 of the General Standard for Food Additives** are acceptable for use in foods conforming to this standard.

[3] ALINORM 03/17,para. 41-51 and Appendix IV, Report of the Eighteenth Session of the Codex Committee on Fats and Oils, 2003, http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-709-18%252Fal03_17e.pdf

[4] ALINORM 07/30/17, para. 32-57 and Appendix II, Report of the Twentieth Session of the Codex Committee on Fats and Oils, 2007, http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-709-20%252Fal30_17e.pdf

Additionally, flavour enhancers and packaging gases listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.

Combination of proposed notes

29. Canada made suggestions to combine a number of proposed standalone notes relating to four antioxidants, being butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), propyl gallate (INS 310), and tertiary butylhydroquinone (INS 319). These antioxidants have consistent provisions in CXS 19-1981 and CXS 210-1999 relating to food category 02.1.2, and for CXS 19-1981 and CXS 211-1999 relating to food category 02.1.3. Canada suggested combining four proposed notes in the 1st circular into one new combined note, picking up the similarity of the provisions, for both food categories 02.1.2 and 02.1.3. These suggestions were very good ones and have been made for the 2nd circular. Examples of former notes in the 1st circular and the new proposed combined notes are listed below.

Food category	Original notes in 1st circular	Proposed new combined notes for 2nd circular
02.1.2	C-CXS19210	C2-CXS19210
	D-CXS19210	
	F-CXS19210	
	J-CXS19210	
02.1.3	C-CXS19211	C2-CXS19211
	D-CXS19211	
	F-CXS19211	
	J-CXS19211	

Other similar combined notes have also been made as changes to the 1st circular. They have been differentiated from the 1st circular notes by adding the letter 2, e.g. A-CXS19 combined with K-CXS19 has become A2-CXS19.

Chair's proposal: A number of combined notes as suggested by Canada has been made in the alignment documents.

30. Canada also suggested combining a number of other proposed notes. These were especially when one note stated that the food additive was for use in products conforming to a specific commodity standard, while the 2nd note mentioned specific conditions linked to its use in products conforming to this standard. An example was combining the two proposed notes in the 1st circular of H-CXS19 and K-CXS19, for the provisions of colour food additives to products conforming to CXS 19-1981. These suggestions are supported as it reduces the number of notes against provisions. They have not all been listed here but changes have been made as proposed by Canada to the 2nd circular. Checks have needed to be made if there are any unintended consequences, or if some of the proposed notes are still required for other provisions before finalisation.

Comments received from EWG on 2nd circular

Supports chair's proposal: Chile, US

Chair's proposal: To combine proposed notes in the 1st circular into one note where it is supported, from the Canadian comments. Checks have been made to ensure no notes are removed that are required for other provisions. A reasonable number of notes have been combined as well as slight edits made to other notes reflecting the Canadian comments.

Replacement of note 215 with note XS256

31. Canada questioned whether the current note 215 ("Excluding products conforming to the Standard for Fat Spreads and Blended Spreads (CODEX STAN 256-2007.") that have been added to a number of aligned provisions in Table 1 and 2 of the GSFA due to alignment with CXS 256-2007, should be replaced by the exclusion note XS256.

This is the same issue as item 14 where there were some disparate views but the proposal is now to make the change as Canada suggested. This approach is also consistent with that of the GSFA EWG.

Chair's proposal: To be consistent with the Chair's proposal for item 14 and the GSFA EWG proposals it is suggested to replace the current note 215 with the exclusion note XS256.

Checking food additive sections in CCFO standards

32. A number of submissions made note that the new entry statements under section 4 (Food Additives) for aligned commodity standards included functional classes that are not listed in the standard.

The response to this was that alignment had to also check the recent document from the CCFO to the CCFA51 meeting that dealt with alignment and technological justification for various food additives not listed in the standards. The relevant document was CX/FA 19/51/2 Add. 2 and the appendices. A number of these additional food additives had additional functional classes to those in the standard and so this needed to be included in the statement. An example of this situation is the alignment of INS 475, INS 491-495, INS 481(i), 482(i) and INS 473 for food category 02.1.2 for uses in cooking oils (linked to CXS 210-1999) noted on page 12 of the CX/FA 19/51/2 Add. 2 document.

Comments received from EWG on 2nd circular

Supports chair's proposal: Chile, US

Chair's proposal: The functional classes of alignment of food additives from CX/FA 19/51/2 Add. 2 have been rechecked to confirm the entries for the commodity standards are correct.

Additional comments due to submissions to the 2nd circular

Provisions for citric acid (INS 330)

33. The GOED and Malaysian submissions noted that citric acid (INS 330) was missing from the entries relating to food category 02.1.3 (Lard, tallow, fish oil, and other animal fats) due to alignment with CXS 211-1999 and CXS 329-2017. The provisions were added to the GSFA in 2014.

These provisions were noted as part of the alignment work but since no changes were required the entries were not added into Appendix 3. It is agreed that there are some entries within Appendix 3 (and Appendix 4) that note entries for which no changes are required and were added for information only, but this has not been done consistently. However, new entries will not be done for citric acid to produce the final document. Ultimately the entries that require no changes will be removed from the documents as they do not require amendments to the GSFA but are an historical record only. However, it became clear when checking the documents due to the comments raised that such entries should be made in green font to be consistent with other entries that will not be part of the final reports (CRD after the PWG) detailing changes to the GSFA.

Alignment of CCSCH (Spices and Culinary Herbs) standards (Appendix 4)

Reference in Annex to Table 3 to food category 12.2.1 Herbs and spices (EXCLUDING SPICES)

34. The Standard for Dried Thyme (CXS 328-2017) permits the use of anticaking agents in dried thyme only. The Standard for Dried Thyme falls within the GSFA food category 12.2.1 (Herbs and Spices). Food category 12.2.1 is listed in the Annex to Table 3 as "12.2.1 Herbs and Spices (EXCLUDING SPICES)." It is understood that dried thyme is considered to be an herb. Products in food category 12.2.1 that are spices are not included in the Annex to Table 3, and therefore permit the use of Table 3 additives in general (unless there are specific directions in a standard restricting the use of Table 3 additives). Products in food category 12.2.1 that are herbs (such as dried thyme), however, do fall under the Annex to Table 3. Thus, for herbs, any use of a Table 3 additive must be specifically listed in Tables 1 and 2 of the GSFA.

There was discussion at the 51st CCFA meeting during the in-session working group on alignment (FA/51 CRD3) relating to a possible amendment to the listing for food category 12.2.1 (Herbs and spices (EXCLUDING SPICES)) in the Annex to Table 3. This was to remove anticaking agents for herbs from the food category, such that the new title would be 12.2.1 (Herbs and spices (EXCLUDING SPICES AND ANTICAKING AGENTS FOR HERBS)). But this suggestion was not taken up to make changes in the GSFA as part of the REP19/FA.

There are two options to be considered, which the EWG was asked to comment on and provide its preferred option, and justification for the choice. These are given as option A and B summarised below.

Option A: The current listing of food category 12.2.1 in the Annex to Table 3 is maintained as "12.2.1 Herbs and Spices (EXCLUDING SPICES)." This means that entries in Tables 1 and 2 of the GSFA must be made for all Table 3 anticaking agents in food category 12.2.1 to permit the use of these additives in foods conforming to the Standard for Dried Thyme (CXS 328-2017).

Option B: The listing for food category 12.2.1 in the Annex to Table 3 is revised to exclude anticaking agents for use in herbs as follows: 12.2.1 Herbs and Spices (EXCLUDING SPICES AND ANTICAKING AGENTS FOR HERBS). Based on this revision, it would not be necessary to add provisions for Table 3 anticaking agents in Tables 1 and 2 of the GSFA. Rather, the alignment with CXS 328-2017 could be taken care of directly by adding a note to the last column of Table 3 for each anticaking agent indicating use in dried thyme.

Option A had been proposed since changes to the title of 12.2.1 was not made in REP19/FA and it was thought to be a decision that needs CCSCH input. But if the EWG believed that the alignment chair can make a recommendation to go with option B and supports this option then that can be the recommendation in the 2nd circular.

Comments received from the EWG on 1st circular

Support Option A: New Zealand, Singapore and Chile (noting that changes are required for both Tables 1 and 2)

Support Option B: US. Its justification was that the changes to the GSFA would be simpler; e.g. changes would be made to Table 3 and not to Tables 1 and 2.

Canada: It did not object to either option and did not provide a preferred option explicitly. However it did note that Option A would require duplicate entries (taken to be in both Table 1 and Table 2). It also suggested that an additional qualifying note, e.g. "Only for use as an anticaking agent in powdered thyme conforming to the Standard for Dried Thyme (CODEX STAN 328-2017). In spices, this food additive may be used in accordance with Table 3 of the GSFA." It suggests this additional explanatory note to be useful because the online edition of the GSFA does not show Table 3 food additives in food category 12.2.1, thus is would prompt the reader to check the full version of the GSFA.

Initial outcome: Option A has been used for Appendix 4 of the 1st circular. However, it is noted that Option B is simpler to do as less changes to the GSFA are required; that is only changes to Table 3, and not changes to both Tables 1 and 2. It is noted that only the US supported going with Option B, while support for Option A was received from other submissions, including a suggested additional note. Unless more support for Option B is received in submissions to the 2nd circular it is proposed to stay with Option A.

Comments received from the EWG on 2nd circular

Support Chair's proposal (option A): Brazil, Chile

Support's option B: US

Chair's proposal: It is proposed to use option A as noted above. This is reflected in the entries in Tables 1 and 2 of the GSFA that have been made for all Table 3 anticaking agents in food category 12.2.1 to permit the use of these food additives in foods conforming to the Standard for Dried Thyme (CXS 328-2017).

Additional comments due to submissions to the 1st circular

Aspartame-acesulfame salt (INS 962)

35. Canada questioned whether note 188 ("If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as acesulfame potassium, should not exceed this level") listed against the acesulfame potassium provision for food category 12.2 in the GSFA is required. This is because there are no provisions for the aspartame-acesulfame salt in this food category. Canada questioned whether this was really an issue better addressed by the GSFA EWG rather than alignment.

The EWG was asked to comment on whether the alignment EWG can make this suggestion (to remove note 188 from the acesulfame potassium provision for food category 12.2 in the GSFA) or whether the GSFA EWG is best placed to consider it.

Comments received from EWG on 2nd circular

Refer to the GSFA EWG to consider: Singapore, New Zealand, US, Canada

Additional US comments: It believes that the GSFA EWG may be the best place to handle issues pertaining to the notes for aspartame, acesulfame potassium and the aspartame-acesulfame salt. It further notes that there is a provision in the step process in FC 12.2.2 for aspartame-acesulfame potassium, and an adopted provision for aspartame. Thus, it would argue that Note 188 should be retained for the provision for acesulfame potassium in FC 12.2.

Canada provided additional information in its comments with its final suggestion supporting the issue being best addressed by the GSFA EWG.

Chair's proposal: It is proposed to recommend that this issue (dealing with notes for aspartame, acesulfame potassium and the aspartame-acesulfame salt) be passed to the GSFA EWG for its consideration as a number of comments have recommended. Further, as also recommended by the US note 188 will not be removed from the acesulfame potassium provision for food category 12.2.

Note 51 ("For use in herbs only")

36. Canada similarly noted the use of note 51 ("For use in herbs only") used for the caramel I – Plain caramel (INS 150a) draft provision at step 4, in food category 12.2.1 (Herbs and spices) seems in conflict with the explicit provisions of using Table 3 additives in spices. That is because spices are not excluded from the entry in the annex to Table 3, so Table 3 additives are able to be used for spices, but not for herbs. Canada suggests that a reworded note 51 which states "Acceptable for use in herbs and spices" would alleviate what seems to be a contradiction.

Again Canada wonders if this is a matter that may be better addressed by the GSFA EWG rather than alignment. Note that this is a draft provision in the step process, so decisions on alignment are not needed yet at this stage.

The alignment chair wondered if this is a matter that is better addressed by the commodity experts, being CCSCH rather than the EWGs of the GSFA or alignment.

Comments received from EWG on 2nd circular

Refer the matter to CCSCH: Singapore

Additional comments:

The US noted that this matter may be best addressed outside of alignment. However, it does agree with Canada's comment that for this provision, note 51 is not necessary and is confusing.

New Zealand also agrees that there is validity in Canada's comments and concern related to original items 32,33 and 34 of the 2nd circular (now items 36, 37 and 38).

Chair's proposal: If accepted a recommendation will be made that the issue is best addressed by the CCSCH. It notes that note 51 is in the draft provisions for a number of other food additives not just caramel I – plain caramel so the same issue applies to them. The recommendation will also be to remove note 51 from each of these draft provisions in food category 12.2.1 as part of the alignment work as recommended by the US which has been done in Appendix 4.

37. Canada also noted the use of note 51 ("For use in herbs only") used for the silicon dioxide, amorphous (INS 551) draft provision at step 4, in food category 12.2.1 (Herbs and spices) seems to contradict the proposed new note A-CXS327 ("For products conforming to the Standard for Cumin (CXS 327-2017), only for use in ground cumin") with the explicit provisions of using Table 3 additives in spices. That is because spices are not excluded from the entry in the annex to Table 3, so Table 3 additives are able to be used for spices, but not

for herbs. Canada suggests, like for issue 36 above, that a reworded note 51 which states “Acceptable for use in herbs and spices” might ameliorate what seems to be a contradiction.

Alternatively Canada suggested that note A-CXS327 might not be needed at all, but an alternative would be for the Table 3 entry of the food additive to include CS 327 in column 5 of the Table, to indicate its use is permissible. However, it is noted that food category 12.2.1 is listed in the annex to Table 3 so provisions for food additives need to be made to Tables 1 and 2, not Table 3.

Again Canada wonders if this is a matter that may be better addressed by the GSFA EWG rather than alignment.

The EWG was asked whether note 51 (“For use in herbs only”) needs to be amended when it is listed with the draft provisions of a range of different food additives for food category 12.2.1 (Herbs and spices) in the GSFA due to apparent inconsistency with the annex to Table 3 which appear to allow Table 3 additives for spices. Is this a question better addressed by CCSCH rather than the EWGs for alignment or GSFA? It is noted these are draft provisions in the step process.

Comments received from EWG on 2nd circular

Refer the matter to CCSCH: Singapore, Brazil (since the proposed note modification has broader impact since its uses will be extended also to spices. The issue should therefore be addressed to CCSCH regarding the technological purpose and applicability of this proposed extension), New Zealand

Refer to the GSFA EWG to consider: Brazil also suggested that this issue is not just a matter of alignment so maybe it could also be addressed to the GSFA EWG.

Additional comments:

New Zealand expressed the view that it is not appropriate to make amendments to note 51 as this could have broader ramifications outside the straight alignment work, so is outside the scope of alignment. This is because additional work would need to be conducted to ensure there are no unintended consequences for other uses of note 51 in the GSFA.

The US believes that it would be appropriate to remove Note 51. For non-standardized foods, the use in herbs (at GMP) would be covered by the provision in Tables 1 and 2, and the use in spices (again at GMP) would be covered by the listing of the additive in Table 3. It believes that Notes A-CXS327 and any XS notes are necessary to clarify use in the standardized products.

The US further notes that the choice of Option B (its preference) for item 34 would eliminate this confusion for anticaking agents.

Response:

A check was made where else note 51 is used in the GSFA and none were located, except those noted in Appendix 4 where a number are listed with draft provisions under food category 12.2.1.

Chair’s proposal: The EWG recommend that the CCFA refer the issue to the CCSCH as it is the commodity committee with technical expertise to deal with the suggestions. The suggested specific questions referred to CCSCH are:

Does the GSFA note 51 (“For use in herbs only”) need to be removed when it is listed with the draft provisions of a range of different food additives for food category 12.2.1 (Herbs and spices) due to apparent inconsistency with the annex to Table 3 which appear to allow Table 3 additives for spices? Does the CCSCH agree with this Alignment EWG proposal?

Note A-CXS328

38. Like for issue number 37 above, Canada questioned whether note A-CXS328 (“For use in powdered thyme only in products conforming to the Standard for Dried Thyme (CXS 328-2017)”) which is proposed to be added for a number of anticaking agents listed in Table 3 for food category 12.2.1 in Tables 1 and 2 of the GSFA needs amending. The justification for the proposed amendments is to avoid the interpretation that the Table 3 food additives cannot be used in spices. The proposed changes to note A-CXS328 are:

For herbs, ~~F~~for use in powdered thyme only in products conforming to the Standard for Dried Thyme (CXS 328-2017). **Refer to Table 3 for use in spices.**

It is not clear if this amendment was required for this note, as it is only aimed at aligning with CXS328. EWG comments were sought on this point.

Does the EWG believe amendments as proposed for the proposed new note A-CXS328 are appropriate?

A-CXS328	**For herbs, ~~F~~f**or use in powdered thyme only in products conforming to the Standard for Dried Thyme (CXS 328-2017). **Refer to Table 3 for use in spices.**

Comments received from EWG on 2nd circular

Supports chair's proposals not to make changes until responses provided to above questions: Singapore (comments provided to questions 35, 36 and 37), Brazil, New Zealand, Chile

Additional comments:

The US recommend using similar language for the note convention used earlier in Appendix 4 to alleviate confusion:

A-CXS328: For products conforming to the Standard for Dried Thyme (CXS 328-2017), only for use in powdered thyme.

Chair's proposal: Amendments to new note A-CXS328 as proposed by the US have been made building on the concern of possibly misinterpretation and lack of clarity expressed by Canada.

Alignment relating to tamarind seed polysaccharide (INS 437) and provisions in CXS 249-2006, CXS 273-1968, CXS 275-1973 and CXS 288-1976 (Appendix 5)

Additional questions relating to submissions to the 1st circular have been added into Appendix 5 and are copied here for completeness.

39. A question relating to CXS 273-1968 due to the EWG consideration of the 1st circular for CXS 275-1973.

Is it important that the functional class of stabilizer be added to the qualification note in the right hand column for CS 273-1968, or is it just enough to say "in cheese mass only" like the EWG has agreed for the 2nd circular for CS 275-1973 (for the same reasons, to keep the notes as less complicated as possible)?

Comments received from EWG on 2nd circular

Support not adding functional class: Brazil, New Zealand, US

Additional comments:

Brazil: Its comments are similar to the earlier related comments in Appendix 2 where it reiterated its comments that qualification notes in Table 3 should be avoided to keep the Table as clean as possible for better understanding. It suggests this kind of qualification is not relevant in Table 3 notes but is addressed in the standard post alignment section in the commodity standard.

New Zealand: It also suggests that adding the functional class of stabilizer to the qualification note is not appropriate for the same reasons as for CXS 275

Chair's proposal: Not add the function class of stabilizer to the qualification note but stay with "in cheese mass only" in the right hand column in Table 3 as part of the alignment of CXS 273-1968 to be consistent with the current alignment of CXS 275-1973. This is also consistent with the proposed approach for item 15 (relevant to Appendix 2).

Process for alignment of tamarind seed polysaccharide (INS 437)

40. A question was raised in the 1st circular relating to possible options for alignment work relating to CXS 288-1976. Two options were posed: being option 1, leave the work on tamarind seed polysaccharide until the full alignment relating to CXS 288-1976 is undertaken; option 2, complete the alignment for tamarind seed polysaccharide related to CXS 288-1976 now and complete the rest of the alignment for CXS 288-1976 later.

The submissions were split on the issue but the chair proposed to proceed with option 1 being not to perform the alignment for tamarind seed polysaccharide yet but wait until the full alignment is performed.

The EWG was asked if they agreed with this suggestion (option 1) or if they have any additional thoughts for what should be done in the finalised document.

Comments received from EWG on 2nd circular

Supports the Chair's proposal (option 1): Brazil, New Zealand reiterates its opinion provided in its comments to the 1st circular, Chile

Supports option 2 (complete the alignment work now): US reiterates its position to the 1st circular that the changes should be made now since the work has already been done.

Chair's proposal: leave the work on tamarind seed polysaccharide until the full alignment relating to CXS 288-1976 is undertaken (which has already been undertaken as part of alignment for CCFA53).

Appendix 2

PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE CODEX COMMODITY STANDARDS FOR MILK AND MILK PRODUCTS (CCMMP) AND TABLES 1, 2 AND 3 OF THE GSFA RELATING TO CCMMP

The relevant Codex Standards for milk and milk products that are being aligned with the GSFA are included in the following food categories in the GSFA:

CXS Number	Codex Standard Name	GSFA food category
208-1999	Cheeses in Brine	01.6.2.1
221-2001	Unripened Cheese including Fresh Cheese	01.6.1
250-2006	Blend of Evaporated Skimmed Milk and Vegetable Fat	01.3.2
251-2006	Blend of Skimmed Milk and Vegetable Fat in Powdered Form	01.5.2
252-2006	Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat	01.3.2
273-1968	Cottage Cheese	01.6.1
275-1973	Cream Cheese	01.6.1
278-1978	Extra Hard Grating Cheese	01.6.2.1
283-1978	General Standard for Cheese	01.6.2.1

1. Proposed amendments to the Codex commodity Standards for milk and milk products

The following amendments to the food additive provisions in Codex commodity Standards are proposed.

New text is indicated in **bold/underline.** Text to be removed is indicated in ~~strikethrough.~~

A. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *GROUP STANDARD FOR CHEESES IN BRINE* (CXS 208-1999)

The following amendments to Section 4 of the *Group Standard for Cheeses in Brine* (CXS 208-1999) are proposed.

4. FOOD ADDITIVES

Only those additive classes indicated as justified in the table below may be used for the product categories specified.

Only certain acidity regulators in Table 3 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use
Colours	-
Bleaching agents	-
Acidity regulators	X
Stabilizers	-
Thickeners	-
Emulsifiers	-
Antioxidants	-
Preservatives	-
Foaming agents	-
Anticaking agents	-
Packaging gases	-

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

~~Only those food additives listed may be used and only within the limits specified.~~

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~Acidity regulators~~		
~~270~~	~~Lactic acid, L-, D- and DL-~~	~~Limited by GMP~~
~~575~~	~~Glucono delta-lactone~~	~~Limited by GMP~~

B. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *GROUP STANDARD FOR UNRIPENED CHEESE INCLUDING FRESH CHEESE* (CXS 221-2001)

The following amendments to Section 4 of the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) are proposed.

4. FOOD ADDITIVES

Only those additive classes indicated as justified in the table below may be used for the product categories specified.

Acidity regulators, anticaking agents, colours, preservatives, stabilizers and thickeners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.6.1 (Unripened cheese including fresh cheese) and only certain acidity regulators, anticaking agents, colours, foaming agents, preservatives, stabilizers and thickeners in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use	
	Cheese mass	Surface/rind treatment
Colours:	X	X[(d)]
Bleaching agents:	–	–
Acidity regulators:	X	–
Stabilizers:	X[(c)]	–
Thickeners:	X[(c)]	–
Emulsifiers:	–	–
Antioxidants:	–	–
Preservatives:	X	X[(a)]
Foaming agents:	X[(b)]	–
Anticaking agents:	–	X[(a)]
Packaging gas	–	–

(a) For the surface treatment of sliced, cut, shredded or grated cheese only

(b) For whipped products only

(c) Stabilizers and thickeners including modified starches may be used in compliance with the definition for milk products and only to the extent they are functionally necessary taking into account any use of gelatine and starch as provided for in Section 3.2.

(d) For edible cheese rind

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

~~Only those food additives listed below may be used and only within the limits specified. Additives not listed below but provided for in individual Codex standards for varieties of Unripened Cheeses may also be used in similar types of cheese within the limits specified within those standards.~~

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~Acidity regulators~~		
~~170~~	~~Calcium carbonates~~	~~Limited by GMP~~
~~260~~	~~Acetic acid, glacial~~	~~Limited by GMP~~
~~270~~	~~Lactic acid, L-, D- and DL-~~	~~Limited by GMP~~

INS no.	Name of additive	Maximum level
296	Malic acid, DL-	Limited by GMP
330	Citric acid	Limited by GMP
338	Phosphoric acid	880 mg/kg expressed as phosphorous
500	Sodium carbonates	Limited by GMP
501	Potassium carbonates	Limited by GMP
507	Hydrochloric acid	Limited by GMP
575	Glucono delta-lactone (GDL)	Limited by GMP
Stabilizers/thickeners		
Stabilizers and thickeners including modified starches may be used in compliance with the definition for milk products and only to the extent they are functionally necessary taking into account any use of gelatine and starch as provided for in Section 3.2.		
331	Sodium citrates	Limited by GMP
332	Potassium citrates	
333	Calcium citrates	
339	Sodium phosphates	1 540 mg/kg, singly or in combination, expressed as phosphorous
340	Potassium phosphates	
341	Calcium phosphates	
450(i)	Disodium diphosphate	
450(ii)	Trisodium diphosphate	
400	Alginic acid	Limited by GMP
401	Sodium alginate	
402	Potassium alginate	
403	Ammonium alginate	
404	Calcium alginate	
405	Propylene glycol alginate	5 g/kg
406	Agar	Limited by GMP
407	Carrageenan	
410	Carob bean gum	
412	Guar gum	
413	Tragacanth gum	
415	Xanthan gum	
416	Karaya gum	
417	Tara gum	Limited by GMP
440	Pectins	
460	Cellulose	
466	Sodium carboxymethyl cellulose (Cellulose gum)	
576	Sodium gluconate	
Modified starches as follows:		
1400	Dextrins, roasted starch white and yellow	Limited by GMP
1401	Acid-treated starch	
1402	Alkaline treated starch	
1403	Bleached starched	
1404	Oxidized starch	
1405	Starches, enzyme-treated	
1410	Monostarch phosphate	
1412	Distarch phosphate esterified with sodium trimetasphosphate; esterified with phosphorus oxychloride	
1413	Phosphated distarch phosphate	
1414	Acetylated distarch phosphate	
1420	Starch acetate	
1422	Acetylated distarch adipate	
1440	Hydroxypropyl starch	
1442	Hydroxypropyl distarch phosphate	
Colours		
100	Curcumins (*for edible cheese rind*)	Limited by GMP
101	Riboflavins	Limited by GMP
140	Chlorophyll	Limited by GMP

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~141~~	~~Copper chlorophylls~~	~~15 mg/kg, singly or combined~~
~~160a(i)~~	~~Carotene, *beta*-, synthetic~~	~~25 mg/kg~~
~~160a(ii)~~	~~Carotenes, *beta*-, vegetable~~	~~600 mg/kg~~
~~160b(ii)~~	~~Annatto extracts – norbixin based~~	~~25 mg/kg~~
~~160c~~	~~Paprika oleoresins~~	~~Limited by GMP~~
~~160e~~	~~Carotenal, *beta*-apo-8'-~~	~~35 mg/kg~~
~~160f~~	~~Carotenoic acid, ethyl ester, *beta*-apo-8'-~~	~~35 mg/kg~~
~~162~~	~~Beet red~~	~~Limited by GMP~~
~~171~~	~~Titanium dioxide~~	~~Limited by GMP~~
~~**Preservatives**~~		
~~200~~	~~Sorbic acid~~	~~1000mg/kg of cheese, singly or in combination, expressed as sorbic acid~~
~~202~~	~~Potassium sorbate~~	
~~203~~	~~Calcium sorbate~~	
~~234~~	~~Nisin~~	~~12.5 mg/kg~~
~~280~~	~~Propionic acid~~	~~Limited by GMP~~
~~281~~	~~Sodium propionate~~	
~~282~~	~~Calcium propionate~~	
~~283~~	~~Potassium propionate~~	
~~*For surface/rind treatment only:*~~		
~~235~~	~~Natamycin (pimaricin)~~	~~2 mg/dm^2 of surface. Not present in a depth of 5 mm.~~
~~**Foaming agents (for whipped products only)**~~		
~~290~~	~~Carbon dioxide~~	~~Limited by GMP~~
~~941~~	~~Nitrogen~~	~~Limited by GMP~~
~~**Anticaking agents (Sliced, cut, shredded and grated products only (surface treatment)**~~		
~~460~~	~~Cellulose~~	~~Limited by GMP~~
~~551~~	~~Silicon dioxide, amorphous~~	~~10 000 mg/kg singly or in combination. Silicates calculated as silicon dioxide~~
~~552~~	~~Calcium silicate~~	
~~553~~	~~Magnesium silicates~~	
~~560~~	~~Potassium silicate~~	
~~**Preservatives (Sliced, cut, shredded and grated products only (surface treatment)**~~		
~~200~~	~~Sorbic acid~~	~~1000mg/kg of cheese, singly or in combination, expressed as sorbic acid~~
~~202~~	~~Potassium sorbate~~	
~~203~~	~~Calcium sorbate~~	
~~280~~	~~Propionic acid~~	~~Limited by GMP~~
~~281~~	~~Sodium propionate~~	
~~282~~	~~Calcium propionate~~	
~~283~~	~~Potassium propionate~~	
~~235~~	~~Natamycin (pimaricin)~~	~~20 mg/kg applied to the surface added during kneading and stretching process.~~

C. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR A BLEND OF EVAPORATED SKIMMED MILK AND VEGETABLE FAT* (CXS 250-2006)

The following amendments to Section 4 of the *Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat* (CXS 250-2006) are proposed.

4. FOOD ADDITIVES

Only those additive classes indicated as justified in the table below may be used for the product categories specified.

Acidity regulators used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.3.2 (Beverage whiteners), and only certain acidity regulators, emulsifiers, stabilizers and thickeners in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use
Colours	**-**
Bleaching agents	**-**
Acidity regulators	**X**

Stabilizers	**X**
Thickeners	**X**
Emulsifiers	**X**
Antioxidants	**-**
Preservatives	**-**
Foaming agents	**-**
Anticaking agents	**-**
Packaging gas	**-**

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

~~Only food additives listed below may be used and only within the limits specified.~~

~~**INS no.**~~	~~**Name of additive**~~	~~**Maximum level**~~
~~**Emulsifiers**~~		
~~322~~	~~Lecithins~~	~~Limited by GMP~~
~~**Stabilizers**~~		
~~331(i)~~	~~Sodium dihydrogen citrate~~	~~Limited by GMP~~
~~331(iii)~~	~~Trisodium citrate~~	~~Limited by GMP~~
~~332(i)~~	~~Potassium dihydrogen citrate~~	~~Limited by GMP~~
~~332(ii)~~	~~Tripotassium citrate~~	~~Limited by GMP~~
~~333~~	~~Calcium citrate~~	~~Limited by GMP~~
~~508~~	~~Potassium chloride~~	~~Limited by GMP~~
~~509~~	~~Calcium chloride~~	~~Limited by GMP~~
~~**Acidity regulators**~~		
~~170(i)~~	~~Calcium carbonate~~	~~Limited by GMP~~
~~339(i)~~	~~Sodium dihydrogen phosphate~~	~~4 400 mg/kg, singly or in combination as phosphorous~~
~~339(ii)~~	~~Disodium hydrogen phosphate~~	
~~339(iii)~~	~~Trisodium phosphate~~	
~~340(i)~~	~~Potassium dihydrogen phosphate~~	
~~340(ii)~~	~~Dipotassium hydrogen phosphate~~	
~~340(iii)~~	~~Tripotassium phosphate~~	
~~341(i)~~	~~Calcium dihydrogen phosphate~~	
~~341(ii)~~	~~Dicalcium hydrogen phosphate~~	
~~341(iii)~~	~~Tricalcium phosphate~~	
~~450(i)~~	~~Disodium diphosphate~~	
~~450(ii)~~	~~Trisodium diphosphate~~	
~~450(iii)~~	~~Tetrasodium diphosphate~~	
~~450(v)~~	~~Tetrapotassium diphosphate~~	
~~450(vi)~~	~~Dicalcium diphosphate~~	
~~450(vii)~~	~~Calcium dihydrogen diphosphate~~	
~~451(i)~~	~~Pentasodium triphosphate~~	
~~451(ii)~~	~~Pentapotassium triphosphate~~	
~~452(i)~~	~~Sodium polyphosphate~~	
~~452(ii)~~	~~Potassium polyphosphate~~	
~~452(iii)~~	~~Sodium calcium polyphosphate~~	
~~452(iv)~~	~~Calcium polyphosphates~~	
~~452(v)~~	~~Ammonium polyphosphates~~	
~~500(i)~~	~~Sodium carbonate~~	~~Limited by GMP~~
~~500(ii)~~	~~Sodium hydrogen carbonate~~	~~Limited by GMP~~
~~500(iii)~~	~~Sodium sesquicarbonate~~	~~Limited by GMP~~
~~501(i)~~	~~Potassium carbonates~~	~~Limited by GMP~~
~~501(ii)~~	~~Potassium hydrogen carbonate~~	~~Limited by GMP~~
~~**Thickeners**~~		
~~407~~	~~Carrageenan~~	~~Limited by GMP~~
~~407a~~	~~Processed euchema seaweed (PES)~~	~~Limited by GMP~~

D. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR A BLEND OF SKIMMED MILK AND VEGETABLE FAT IN POWDERED FORM* (CXS 251-2006)

The following amendments to Section 4 of the Standard for the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006) are proposed.

4. FOOD ADDITIVES

Only those additive classes indicated as justified in the table below may be used for the product categories specified.

Acidity regulators, anticaking agents and antioxidants used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.5.2 (Milk and cream powder analogues), and only certain acidity regulators, anticaking agents, emulsifiers and stabilizers in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use
Colours	-
Bleaching agents	-
Acidity regulators	X
Stabilizers	X
Thickeners	-
Emulsifiers	X
Antioxidants	X
Preservatives	-
Foaming agents	-
Anticaking agents	X
Packaging gas	-

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

~~Only food additives listed below may be used and only within the limits specified.~~

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~**Stabilizers**~~		
~~331(i)~~	~~Sodium dihydrogen citrate~~	~~Limited by GMP~~
~~331(iii)~~	~~Trisodium citrate~~	~~Limited by GMP~~
~~332(i)~~	~~Potassium dihydrogen citrate~~	~~Limited by GMP~~
~~332(ii)~~	~~Tripotassium citrate~~	~~Limited by GMP~~
~~508~~	~~Potassium chloride~~	~~Limited by GMP~~
~~509~~	~~Calcium chloride~~	~~Limited by GMP~~
~~**Acidity regulators**~~		
~~170(i)~~	~~Calcium carbonate~~	~~Limited by GMP~~
~~339(i)~~	~~Sodium dihydrogen phosphate~~	~~4 400 mg/kg, singly or in combination as phosphorous~~
~~339(ii)~~	~~Disodium hydrogen phosphate~~	
~~339(iii)~~	~~Trisodium phosphate~~	
~~340(i)~~	~~Potassium dihydrogen phosphate~~	
~~340(ii)~~	~~Dipotassium hydrogen phosphate~~	
~~340(iii)~~	~~Tripotassium phosphate~~	
~~341(i)~~	~~Calcium dihydrogen phosphate~~	
~~341(ii)~~	~~Dicalcium hydrogen phosphate~~	
~~341(iii)~~	~~Tricalcium phosphate~~	
~~450(i)~~	~~Disodium diphosphate~~	
~~450(ii)~~	~~Trisodium diphosphate~~	
~~450(iii)~~	~~Tetrasodium diphosphate~~	
~~450(v)~~	~~Tetrapotassium diphosphate~~	
~~450(vi)~~	~~Dicalcium diphosphate~~	
~~450(vii)~~	~~Calcium dihydrogen diphosphate~~	

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~451(i)~~	~~Pentasodium triphosphate~~	
~~451(ii)~~	~~Pentapotassium triphosphate~~	
~~452(i)~~	~~Sodium polyphosphate~~	
~~452(ii)~~	~~Potassium polyphosphate~~	
~~452(iii)~~	~~Sodium calcium polyphosphate~~	
~~452(iv)~~	~~Calcium polyphosphates~~	
~~452(v)~~	~~Ammonium polyphosphates~~	
~~500(i)~~	~~Sodium carbonate~~	~~Limited by GMP~~
~~500(ii)~~	~~Sodium hydrogen carbonate~~	~~Limited by GMP~~
~~500(iii)~~	~~Sodium sesquicarbonate~~	~~Limited by GMP~~
~~501(i)~~	~~Potassium carbonates~~	~~Limited by GMP~~
~~501(ii)~~	~~Potassium hydrogen carbonate~~	~~Limited by GMP~~
~~**Emulsifiers**~~		
~~322~~	~~Lecithins~~	~~Limited by GMP~~
~~471~~	~~Mono- and diglycerides of fatty acids~~	~~Limited by GMP~~
~~**Anticaking agents**~~		
~~170(i)~~	~~Calcium carbonate~~	~~Limited by GMP~~
~~504(i)~~	~~Magnesium carbonate~~	~~Limited by GMP~~
~~530~~	~~Magnesium oxide~~	~~Limited by GMP~~
~~551~~	~~Silicon dioxide, amorphous~~	~~Limited by GMP~~
~~552~~	~~Calcium silicate~~	~~Limited by GMP~~
~~553(i)~~	~~Magnesium silicate, synthetic~~	~~Limited by GMP~~
~~553(iii)~~	~~Talc~~	~~Limited by GMP~~
~~554~~	~~Sodium aluminium silicate~~	~~570 mg/kg, expressed as aluminium~~
~~341(iii)~~	~~Tricalcium phosphate~~	~~4 400 mg/kg, singly or in combination as phosphorous~~
~~343(iii)~~	~~Trimagnesium phosphate~~	
~~**Antioxidants**~~		
~~300~~	~~Ascorbic acid, L-~~	~~500 mg/kg as ascorbic acid~~
~~301~~	~~Sodium ascorbate~~	
~~304~~	~~Ascorbyl palmitate~~	~~80 mg/kg, singly or in combination as ascorbyl stearate~~
~~305~~	~~Ascorbyl stearate~~	
~~319~~	~~Tertiary butylhydroquinone~~	~~100 mg/kg singly or in combination. Expressed on fat or oil basis~~
~~320~~	~~Butylated hydroxyanisole~~	
~~321~~	~~Butylated hydroxytoluene~~	

E. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR A BLEND OF SWEETENED CONDENSED SKIMMED MILK AND VEGETABLE FAT* (CXS 252-2006)

The following amendments to Section 4 of the Standard for the *Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat* (CXS 252-2006) are proposed.

4. FOOD ADDITIVES

Only those additive classes indicated as justified in the table below may be used for the product categories specified.

Acidity regulators used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.3.2 (Beverage whiteners), and only certain acidity regulators, emulsifiers, stabilizers and thickeners in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use
Colours	-
Bleaching agents	-
Acidity regulators	X
Stabilizers	X
Thickeners	X
Emulsifiers	X

Antioxidants	**-**
Preservatives	**-**
Foaming agents	**-**
Anticaking agents	**-**
Packaging gas	**-**

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

~~Only food additives listed below may be used and only within the limits specified.~~

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~**Emulsifiers**~~		
~~322~~	~~Lecithins~~	~~Limited by GMP~~
~~**Stabilizers**~~		
~~331(i)~~	~~Sodium dihydrogen citrate~~	~~Limited by GMP~~
~~331(iii)~~	~~Trisodium citrate~~	~~Limited by GMP~~
~~332(i)~~	~~Potassium dihydrogen citrate~~	~~Limited by GMP~~
~~332(ii)~~	~~Tripotassium citrate~~	~~Limited by GMP~~
~~333~~	~~Calcium citrate~~	~~Limited by GMP~~
~~508~~	~~Potassium chloride~~	~~Limited by GMP~~
~~509~~	~~Calcium chloride~~	~~Limited by GMP~~
~~**Acidity regulators**~~		
~~170(i)~~	~~Calcium carbonate~~	~~Limited by GMP~~
~~339(i)~~	~~Sodium dihydrogen phosphate~~	~~4 400 mg/kg, singly or in combination as phosphorous~~
~~339(ii)~~	~~Disodium hydrogen phosphate~~	
~~339(iii)~~	~~Trisodium phosphate~~	
~~340(i)~~	~~Potassium dihydrogen phosphate~~	
~~340(ii)~~	~~Dipotassium hydrogen phosphate~~	
~~340(iii)~~	~~Tripotassium phosphate~~	
~~341(i)~~	~~Calcium dihydrogen phosphate~~	
~~341(ii)~~	~~Dicalcium hydrogen phosphate~~	
~~341(iii)~~	~~Tricalcium phosphate~~	
~~450(i)~~	~~Disodium diphosphate~~	
~~450(ii)~~	~~Trisodium diphosphate~~	
~~450(iii)~~	~~Tetrasodium diphosphate~~	
~~450(v)~~	~~Tetrapotassium diphosphate~~	
~~450(vi)~~	~~Dicalcium diphosphate~~	
~~450(vii)~~	~~Calcium dihydrogen diphosphate~~	
~~451(i)~~	~~Pentasodium triphosphate~~	
~~451(ii)~~	~~Pentapotassium triphosphate~~	
~~452(i)~~	~~Sodium polyphosphate~~	
~~452(ii)~~	~~Potassium polyphosphate~~	
~~452(iii)~~	~~Sodium calcium polyphosphate~~	
~~452(iv)~~	~~Calcium polyphosphates~~	
~~452(v)~~	~~Ammonium polyphosphates~~	
~~500(i)~~	~~Sodium carbonate~~	~~Limited by GMP~~
~~500(ii)~~	~~Sodium hydrogen carbonate~~	~~Limited by GMP~~
~~500(iii)~~	~~Sodium sesquicarbonate~~	~~Limited by GMP~~
~~501(i)~~	~~Potassium carbonates~~	~~Limited by GMP~~
~~501(ii)~~	~~Potassium hydrogen carbonate~~	~~Limited by GMP~~
~~**Thickeners**~~		
~~407~~	~~Carrageenan~~	~~Limited by GMP~~
~~407a~~	~~Processed euchema seaweed (PES)~~	~~Limited by GMP~~

F. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR COTTAGE CHEESE* (CXS 273-1968)

The following amendments to Section 4 of the *Standard for the Standard for Cottage cheese* (CXS 273-1968) are proposed.

4. FOOD ADDITIVES

Only those additives classes indicated as justified in the table below may be used for the product categories specified. ~~Within each additive class, and where permitted according to the table, only those food additives listed below may be used and only within the functions and limits specified.~~

Acidity regulators, preservatives and stabilizers used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.6.1 (Unripened cheese), and only certain acidity regulators, preservatives and stabilizers in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use	
	Cheese mass(b)	Surface/rind treatment
Colours:	–	–
Bleaching agents:	–	–
Acidity regulators:	X	–
Stabilizers:	X(a)	–
Thickeners:	–	–
Emulsifiers:	–	–
Antioxidants:	–	–
Preservatives:	X	–
Foaming agents:	–	–
Anti–caking agents:	–	–

(a) Stabilizers including modified starches may be used in compliance with the definition of milk products and only to the extent they are functionally necessary, taking into account any use of gelatine and starches as provided for in section 3.2.

(b) Cheese mass includes creaming mixture.

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~**Preservatives**~~		
~~200~~	~~Sorbic acid~~	~~1000mg/kg singly or in combinations sorbic acid~~
~~202~~	~~Potassium sorbate~~	
~~203~~	~~Calcium sorbate~~	
~~234~~	~~Nisin~~	~~12.5 mg/kg~~
~~280~~	~~Propionic acid~~	~~Limited by GMP~~
~~281~~	~~Sodium propionate~~	
~~282~~	~~Calcium propionate~~	
~~283~~	~~Potassium propionate~~	
~~**Acidity regulators**~~		
~~170(i)~~	~~Calcium carbonate~~	~~Limited by GMP~~
~~260~~	~~Acetic acid, glacial~~	~~Limited by GMP~~
~~261(i)~~	~~Potassium acetate~~	~~Limited by GMP~~
~~261(ii)~~	~~Potassium diacetate~~	~~Limited by GMP~~
~~262(i)~~	~~Sodium acetate~~	~~Limited by GMP~~
~~263~~	~~Calcium acetate~~	~~Limited by GMP~~
~~270~~	~~Lactic acid, L-, D- and DL-~~	~~Limited by GMP~~
~~296~~	~~Malic acid, DL-~~	~~Limited by GMP~~
~~325~~	~~Sodium lactate~~	~~Limited by GMP~~
~~326~~	~~Potassium lactate~~	~~Limited by GMP~~
~~327~~	~~Calcium lactate~~	~~Limited by GMP~~
~~330~~	~~Citric acid~~	~~Limited by GMP~~
~~338~~	~~Phosphoric acid~~	~~880 mg/kg expressed as phosphorous~~
~~350(i)~~	~~Sodium hydrogen DL-malate~~	~~Limited by GMP~~

INS no.	Name of additive	Maximum level
350(ii)	Sodium DL-malate	Limited by GMP
352(ii)	Calcium malate, D,L-	Limited by GMP
500(i)	Sodium carbonate	Limited by GMP
500(ii)	Sodium hydrogen carbonate	Limited by GMP
500(iii)	Sodium sesquicarbonate	Limited by GMP
501(i)	Potassium carbonate	Limited by GMP
501(ii)	Potassium hydrogen carbonate	Limited by GMP
504(i)	Magnesium carbonate	Limited by GMP
504)ii)	Magnesium hydrogen carbonate	Limited by GMP
507	Hydrochloric acid	Limited by GMP
575	Glucono delta-lactone (GDL)	Limited by GMP
577	Potassium gluconate	Limited by GMP
578	Calcium gluconate	Limited by GMP
Stabilizers		
331(i)	Sodium dihydrogen citrate	Limited by GMP
332(i)	Potassium dihydrogen citrate	Limited by GMP
333	Calcium citrates	Limited by GMP
339(i)	Sodium phosphate	1 300 mg/kg, singly or in combination, expressed as phosphorous
339(ii)	Disodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
340(i)	Potassium dihydrogen phosphate	
340(ii)	Dipotassium hydrogen phosphate	
340(iii)	Tripotassium phosphate	
341(i)	Calcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium phosphate	
342(i)	Ammonium dihydrogen phosphate	
342(ii)	Ammonium hydrogen phosphate	
343(ii)	Magnesium hydrogen phosphate	
343(iii)	Trimagnesium phosphate	
450(i)	Disodium diphosphate	1 300 mg/kg, singly or in combination, expressed as phosphorous
450(iii)	Tetrasodium diphosphate	
450(v)	Tetrapotassium phosphate	
450(vi)	Dicalcium phosphate	
451(i)	Pentasodium triphosphate	
451(ii)	Pentapotassium triphosphate	
452(i)	Sodium polyphosphate	
452(ii)	Potassium polyphosphate	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
400	Alginic acid	Limited by GMP
401	Sodium alginate	Limited by GMP
402	Potassium alginate	Limited by GMP
403	Ammonium alginate	Limited by GMP
404	Calcium alginate	Limited by GMP
405	Propylene glycol alginate	5000 mg/kg
406	Agar	Limited by GMP
407	Carrageenan	Limited by GMP
407a	Processed euchema seaweed (PES)	Limited by GMP
410	Carob bean gum	Limited by GMP
412	Guar gum	Limited by GMP
413	Tragacanth gum	Limited by GMP
415	Xanthan gum	Limited by GMP
416	Karaya gum	Limited by GMP
417	Tara gum	Limited by GMP
440	Pectins	Limited by GMP
466	Sodium carboxymethyl cellulose (Cellulose gum)	Limited by GMP
1400	Dextrins, roasted starch	Limited by GMP

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~1401~~	~~Acid-treated starch~~	~~Limited by GMP~~
~~1402~~	~~Alkaline treated starch~~	~~Limited by GMP~~
~~1403~~	~~Bleached starched~~	~~Limited by GMP~~
~~1404~~	~~Oxidized starch~~	~~Limited by GMP~~
~~1405~~	~~Starches, enzyme-treated~~	~~Limited by GMP~~
~~1410~~	~~Monostarch phosphate~~	~~Limited by GMP~~
~~1412~~	~~Distarch phosphate~~	~~Limited by GMP~~
~~1413~~	~~Phosphated distarch phosphate~~	~~Limited by GMP~~
~~1414~~	~~Acetylated distarch phosphate~~	~~Limited by GMP~~
~~1420~~	~~Starch acetate~~	~~Limited by GMP~~
~~1422~~	~~Acetylated distarch adipate~~	~~Limited by GMP~~
~~1440~~	~~Hydroxypropyl starch~~	~~Limited by GMP~~
~~1442~~	~~Hydroxypropyl distarch phosphate~~	~~Limited by GMP~~

G. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR CREAM CHEESE* (CXS 275-1973)

The following amendments to Section 4 of the *Standard for the Standard for Cream cheese* (CXS 275-1973) are proposed.

4. FOOD ADDITIVES

Only those additive classes indicated as justified in the table below may be used for the product categories specified. ~~Within each additive class, and where permitted according to the table, only those food additives listed below may be used and only within the functions and limits specified.~~

Acidity regulators, antioxidants, colours, emulsifiers, preservatives, stabilizers and thickeners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.6.1 (Unripened cheese) and only certain acidity regulators, antioxidants, colours, emulsifiers, foaming agents, preservatives, stabilizers and thickeners in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use	
	Cheese mass	Surface/rind treatment
Colours:	X(a)	–
Bleaching agents:	–	–
Acidity regulators:	X	–
Stabilizers:	X(b)	–
Thickeners:	X(b)	–
Emulsifiers:	X	–
Antioxidants:	X	–
Preservatives:	X~~(b)~~	–
Foaming agents:	X(c)	–
Anticaking agents:	–	–

(a) Only to obtain the colour characteristics, as described in Section 2.

(b) Stabilizers and thickeners including modified starches may be used in compliance with the definition of milk products and only to heat treated products to the extent they are functionally necessary, taking into account any use of gelatine and starches as provided for in section 3.2.

(c) For whipped products, only.

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~**Preservatives**~~		
~~200~~	~~Sorbic acid~~	~~1000mg/kg~~

INS no.	Name of additive	Maximum level
202	Potassium sorbate	singly or in combinations sorbic acid
203	Calcium sorbate	
234	Nisin	12.5 mg/kg
280	Propionic acid	Limited by GMP
281	Sodium propionate	
282	Calcium propionate	
283	Potassium propionate	
Acidity regulators		
170(i)	Calcium carbonate	Limited by GMP
260	Acetic acid, glacial	Limited by GMP
261(i)	Potassium acetate	Limited by GMP
261(ii)	Potassium diacetate	Limited by GMP
262(i)	Sodium acetate	Limited by GMP
263	Calcium acetate	Limited by GMP
270	Lactic acid, L-, D- and DL-	Limited by GMP
296	Malic acid, DL-	Limited by GMP
325	Sodium lactate	Limited by GMP
326	Potassium lactate	Limited by GMP
327	Calcium lactate	Limited by GMP
330	Citric acid	Limited by GMP
331(i)	Sodium dihydrogen citrate	Limited by GMP
332(i)	Potassium dihydrogen citrate	Limited by GMP
333	Calcium citrates	Limited by GMP
334	Tartaric acid, L(+)-	1500 mg/kg singly or in combination as tartaric acid
335(ii)	Sodium L(+)-tartrate	
337	Potassium sodium L(+)-tartrate	
338	Phosphoric acid	880 mg/kg as phosphorous
350(i)	Sodium hydrogen DL-malate	Limited by GMP
350(ii)	Sodium DL-malate	Limited by GMP
352(ii)	Calcium malate, D,L-	Limited by GMP
500(i)	Sodium carbonate	Limited by GMP
500(ii)	Sodium hydrogen carbonate	Limited by GMP
500(iii)	Sodium sesquicarbonate	Limited by GMP
501(i)	Potassium carbonate	Limited by GMP
501(ii)	Potassium hydrogen carbonate	Limited by GMP
504(i)	Magnesium carbonate	Limited by GMP
504(ii)	Magnesium hydrogen carbonate	Limited by GMP
507	Hydrochloric acid	Limited by GMP
575	Glucono delta-lactone (GDL)	Limited by GMP
577	Potassium gluconate	Limited by GMP
578	Calcium gluconate	Limited by GMP
Stabilizers		
339(i)	Sodium phosphate	4 400 mg/kg, singly or in combination, expressed as phosphorous
339(ii)	Disodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
340(i)	Potassium dihydrogen phosphate	
340(ii)	Dipotassium hydrogen phosphate	
340(iii)	Tripotassium phosphate	
341(i)	Calcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium phosphate	
342(i)	Ammonium dihydrogen phosphate	
342(ii)	Ammonium hydrogen phosphate	
343(ii)	Magnesium hydrogen phosphate	
343(iii)	Trimagnesium phosphate	
450(i)	Disodium diphosphate	
450(iii)	Tetrasodium diphosphate	
450(v)	Tetrapotassium phosphate	
450(vi)	Dicalcium phosphate	

INS no.	Name of additive	Maximum level
451(i)	Pentasodium triphosphate	
451(ii)	Pentapotassium triphosphate	
452(i)	Sodium polyphosphate	
452(ii)	Potassium polyphosphate	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
400	Alginic acid	Limited by GMP
401	Sodium alginate	Limited by GMP
402	Potassium alginate	Limited by GMP
403	Ammonium alginate	Limited by GMP
404	Calcium alginate	Limited by GMP
405	Propylene glycol alginate	5000 mg/kg
406	Agar	Limited by GMP
407	Carrageenan	Limited by GMP
407a	Processed euchema seaweed (PES)	Limited by GMP
410	Carob bean gum	Limited by GMP
412	Guar gum	Limited by GMP
413	Tragacanth gum	Limited by GMP
415	Xanthan gum	Limited by GMP
416	Karaya gum	Limited by GMP
417	Tara gum	Limited by GMP
418	Gellan gum	Limited by GMP
466	Sodium carboxymethyl cellulose (Cellulose gum)	Limited by GMP
1400	Dextrins, roasted starch	Limited by GMP
1401	Acid-treated starch	Limited by GMP
1402	Alkaline treated starch	Limited by GMP
1403	Bleached starched	Limited by GMP
1404	Oxidized starch	Limited by GMP
1405	Starches, enzyme-treated	Limited by GMP
1410	Monostarch phosphate	Limited by GMP
1412	Distarch phosphate	Limited by GMP
1413	Phosphated distarch phosphate	Limited by GMP
1414	Acetylated distarch phosphate	Limited by GMP
1420	Starch acetate	Limited by GMP
1422	Acetylated distarch adipate	Limited by GMP
1440	Hydroxypropyl starch	Limited by GMP
1442	Hydroxypropyl distarch phosphate	Limited by GMP
Emulsifiers		
322	Lecithins	Limited by GMP
470(i)	Salt of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium	Limited by GMP
470(ii)	Salt of oleic acid with calcium, potassium and sodium	Limited by GMP
471	Mono- and di-glycerides of fatty acids	Limited by GMP
472a	Acetic and fatty acid esters of glycerol	Limited by GMP
472b	Lactic and fatty acid esters of glycerol	Limited by GMP
472c	Citric and fatty acid esters of glycerol	Limited by GMP
472e	Diacetyltartaric and fatty acid esters of glycerol	10 000 mg/kg
Antioxidants		
300	Ascorbic acid, L-	Limited by GMP
301	Sodium ascorbate	Limited by GMP
302	Calcium ascorbate	Limited by GMP
304	Ascorbyl palmitate	500 mg/kg singly or in combination as ascorbyl stearate
305	Ascorbyl stearate	
307b	Tocopherol concentrate, mixed	200 mg/kg singly or in combination
307c	Tocopherol, *dl-alpha-*	

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~Colours~~		
~~160a(i)~~	~~Carotene, *beta*-, synthetic~~	~~35 mg/kg singly or in combination~~
~~160a(iii)~~	~~Carotene, *beta*-, *Blakeslea trispora*~~	
~~160e~~	~~Carotenal, *beta*-apo-8'-~~	
~~160f~~	~~Carotenoic acid, ethyl ester, *beta*-apo-8'-~~	
~~160a(ii)~~	~~Carotenes, beta-, vegetable~~	~~600 mg/kg~~
~~160b(ii)~~	~~Annatto extracts – norbixin based~~	~~25 mg/kg~~
~~171~~	~~Titanium dioxide~~	~~Limited by GMP~~
~~Foaming agent~~		
~~290~~	~~Carbon dioxide~~	~~Limited by GMP~~
~~941~~	~~Nitrogen~~	~~Limited by GMP~~

H. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR EXTRA HARD GRATING CHEESE* (CXS 278-1978)

The following amendments to section 3.2.2 (Optional additions) for the *Standard for Extra Hard Grating Cheese* (CXS 278-1978) that relate to food additive provisions are proposed.

3.2.2 *Optional additions*:

~~- calcium chloride, max. 200 mg anhydrous/kg of the milk used~~

- harmless flavour producing bacteria

- harmless enzymes to assist in flavour development (solids of preparation not to exceed 0.1% of weight of milk used)

~~- chlorophyll, including copper chlorophyll complex, max. 15 mg/kg cheese~~

~~- sorbic acid or its sodium or potassium salts, maximum 1 g/kg calculated as sorbic acid in the final product.~~

The insertion of a new Section 4 of the *Group Standard for Extra Hard Grating Cheese* (CXS 278-1978) is proposed as detailed below. This will require a renumbering of subsequent sections.

4. FOOD ADDITIVES

Only those additive classes indicated as justified in the table below may be used for the product categories specified.

Colours and preservatives used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.6.2.1 (Ripened cheese, includes rind) are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use
Colours	**X**
Bleaching agents	**-**
Acidity regulators	**-**
Stabilizers	**-**
Thickeners	**-**
Emulsifiers	**-**
Antioxidants	**-**
Preservatives	**X**
Foaming agents	**-**
Anticaking agents	**-**
Packaging gas	**-**

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

4.1 Processing aids

Processing aids used in products conforming to this standard should be consistent with the *Guidelines on Substances used as Processing Aids* (CXG 75-2010).

I. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *GENERAL STANDARD FOR CHEESE* (CXS 283-1978)

An amendment to section 3.2 (Permitted ingredients) of the *General Standard for Cheese* (CXS 283-1978) is proposed.

3.2 Permitted ingredients

– Starter cultures of harmless lactic acid and/or flavour producing bacteria and cultures of other harmless microorganisms

– Safe and suitable enzymes

– Sodium chloride **and potassium chloride as a salt substitute**

– Potable water

The following amendments and additions to Section 4 of the *General Standard for Cheese* (CXS 283-1978) are proposed.

4. FOOD ADDITIVES

~~Only those food additive listed below may be used and only within the limits specified.~~

Unripened cheeses

As listed in the *Group Standard for Unripened Cheese Including Fresh Cheese* (CXS 221-2001).

Cheeses in brine

As listed in the *Standard for Cheeses in Brine* (CXS 208-1999)

Ripened cheeses, including mould ripened cheeses

Additives not listed below but provided for in Codex individual standards for varieties of ripened cheeses may also be used for similar types of cheese within the limits specified within those standards.

Only those additive classes indicated as justified in the table below may be used for the product categories specified.

Acidity regulators, colours and preservatives used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.6.2.1 (Ripened cheese, includes rind) and only certain acidity regulators, anticaking agents, colours and preservatives in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use	
	Cheese mass	Surface/rind treatment
Colours:	X	X [(b)]
Bleaching agents:	–	–
Acidity regulators:	X	–
Stabilizers:	–	–
Thickeners:	–	–
Emulsifiers:	–	–
Antioxidants:	–	–
Preservatives:	X	x
Foaming agents:	–	–
Anticaking agents:	–	X [(a)]
Packaging gas	–	–

(a) For the surface of sliced, cut, shredded or grated cheese only

(b) For edible cheese rind

X The use of additives belonging to the class is technologically justified.

– The use of additives belonging to the class is not technologically justified.

4.1 Processing aids

Processing aids used in products conforming to this standard should be consistent with the *Guidelines on Substances used as Processing Aids* (CXG 75-2010).

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~**Colours**~~		
~~100~~	~~Curcumins (*for edible cheese rind*)~~	~~Limited by GMP~~
~~101~~	~~Ribiflavins~~	~~Limited by GMP~~
~~120~~	~~Carmines (*for red marbled cheeses only*)~~	~~Limited by GMP~~
~~140~~	~~Chlorophylls (*for green marbled cheeses only*)~~	~~Limited by GMP~~
~~141~~	~~Chlorophylls, copper complexes~~	~~15 mg/kg~~
~~160a(i)~~	~~Carotene, *beta* , synthetic~~	~~25 mg/kg~~
~~160a(ii)~~	~~Carotene, *beta , Blakeslea trispora*~~	~~600 mg/kg~~
~~160b(ii)~~	~~Annatto extracts – norbixin based~~	~~50 mg/kg~~
~~160c~~	~~Paprika oleoresin~~	~~Limited by GMP~~
~~160e~~	~~Carotenal, *beta*-apo-8'-~~	~~35 mg/kg~~
~~160f~~	~~Carotenoic acid, ethyl ester, *beta*-apo-8'-~~	~~35 mg/kg~~
~~160a(ii)~~	~~Carotenes, beta-, vegetable~~	~~600 mg/kg~~
~~162~~	~~Bet red~~	~~Limited by GMP~~
~~171~~	~~Titanium dioxide~~	~~Limited by GMP~~
~~**Acidity regulators**~~		
~~170~~	~~Calcium carbonates~~	~~Limited by GMP~~
~~504~~	~~Magnesium carbonates~~	
~~575~~	~~Glucono delta-lactone~~	
~~**Preservatives**~~		
~~200~~	~~Sorbic acid~~	~~3000 mg/kg calculated as sorbic acid~~
~~202~~	~~Potassium sorbate~~	
~~203~~	~~Calcium sorbate~~	
~~234~~	~~Nisin~~	~~12.5 mg/kg~~
~~239~~	~~Hexamethylene tetramine (*Provolone only*)~~	~~25 mg/kg, expressed as formaldehyde~~
~~251~~	~~Sodium nitrate~~	~~50 mg/kg. expressed as $NaNO_3$~~
~~252~~	~~Potassium nitrate~~	
~~280~~	~~Propionic acid~~	~~3 000 mg/kg, calculated as propionic acid~~
~~281~~	~~Sodium propionate~~	
~~282~~	~~Calcium propionate~~	
~~1105~~	~~Lysoyme~~	~~Limited by GMP~~
~~*For surface/rind treatment only:*~~		
~~200~~	~~Sorbic acid~~	~~1 000 mg/kg singly or in combination, calculated as sorbic acid~~
~~202~~	~~Potassium sorbate~~	
~~203~~	~~Calcium sorbate~~	
~~235~~	~~Natamycin (pimaricin)~~	~~2 mg/dm^2 of surface. Not present in a depth of 5 mm~~
~~**Miscellaneous additive**~~		
~~508~~	~~Potassium chloride~~	~~Limited by GMP~~
~~**Anti-caking agents (Sliced, cut, shredded or grated cheese)**~~		
~~460~~	~~Celluloses~~	~~Limited by GMP~~
~~551~~	~~Silicon dioxide, amorphous~~	~~10 000 mg/kg singly or in combination. Silicates calculated as silicone dioxide~~
~~552~~	~~Calcium silicate~~	
~~553~~	~~Magnesium silicates~~	
~~560~~	~~Potassium silicate~~	
~~**Preservatives**~~		
~~200~~	~~Sorbic acid~~	~~1 000 mg/kg singly or in combination,~~

~~**INS no.**~~	~~**Name of additive**~~	~~**Maximum level**~~
~~202~~	~~Potassium sorbate~~	~~calculated as sorbic acid~~
~~203~~	~~Calcium sorbate~~	

2. Proposed amendments to Table 1, 2 and 3 of the GSFA for milk and milk products

The following amendments to the food additive provisions in the GSFA are proposed.

New text is indicated in **bold/underline.** Text to be removed is indicated in ~~strikethrough.~~

Entries in green are for draft provisions and are provided for information only. They will be maintained at their current step and so will not be added to the final alignment document. Additionally, there are some other entries that are provided for information only that do not require any changes to the GSFA.

A PROPOSED AMENDMENTS TO TABLE 1

FOOD CATEGORY 1.3.2

Acesulfame potassium **INS 950: Functional class: Sweetener, Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	2000 mg/kg	161**,** ~~&~~ 188**, XS250 & XS252**	Adopt

Advantame **INS 969: Functional class: Sweetener, Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	60 mg/kg	**XS250 & XS252**	Maintain at Step 2

Annatto extracts, bixin-based **INS 160b(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	50 mg/kg	8, **XS250 & XS252**	Maintain at Step 4

Ascorbyl esters **INS 304, 305: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	80 mg/kg	10**, XS250 & XS252**	Adopt

Aspartame **INS 951: Functional class: Sweetener, Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	6000 mg/kg	161**,** ~~&~~ 191, **XS250 & XS252**	Adopt

Aspartame-Acesulfame salt **INS 962: Functional class: Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	4540 mg/kg	**113, XS250 & XS252**	Maintain at Step 3

Butylated Hydroxyanisole **INS 320: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	100 mg/kg	15**,** ~~&~~ 195**, XS250 & XS252**	Adopt

Butylated Hydroxytoluene **INS 321: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	100 mg/kg	15**, XS250 & XS252** ~~&~~ 195	Adopt

Caramel III, ammonia caramel **INS 150c: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	1000 mg/kg	**XS250 & XS252**	Adopt

Caramel IV, sulfite ammonia caramel **INS 150d: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	1000 mg/kg	**XS250 & XS252**	Adopt

Carotenes, beta-, vegetable **INS 160a(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	1000 mg/kg	**XS250 & XS252**	Adopt

Carotenoids **INS 160a(i),a(iii),e,f: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	100 mg/kg	**XS250 & XS252**	Adopt

Diacetyltartaric and fatty acid esters of glycerol **INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	5000 mg/kg	**XS250 & XS252**	Adopt

Lycopene, tomato **INS 161d(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	5000 mg/kg	**XS250 & XS252**	Maintain at Step 3

Neotame **INS 961: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	65 mg/kg	161**, XS250 & XS252**	Adopt

Paprika extract **INS 160c(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	5 mg/kg	39**, XS250 & XS252**	Maintain at Step 2

Phosphates **INS 338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii) 450(i)-(iii),(v)-(vii),(ix), 451(i),(ii), 452(i)-(v), 542: Functional class: Acidity regulator, Anticaking agent, Antioxidant, Emulsifier, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Preservative, Raising agent, Sequestrant, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	13000 mg/kg	33, **C250252**	Adopt

Polysorbates **INS 432-436: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	4000 mg/kg	**XS250 & XS252**	Adopt

Propylene glycol esters of fatty acids **INS 477: Functional class: Emulsifier, Flour treatment agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	1000 mg/kg	**XS250 & XS252**	Adopt

Riboflavins **INS 101(i),(ii),(iii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	300 mg/kg	**XS250 & XS252**	Adopt

Sodium ~~aluminio~~ aluminium silicate **INS 554: Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	570 mg/kg	6**,** ~~&~~ 260**, XS250 & XS252**	Adopt

Sorbates **INS 200, 202,203: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	200 mg/kg	42**, XS250 & XS252**	Adopt

Sucralose (Trichlorogalactosucrose) **INS 955: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	580 mg/kg	161**, XS250 & XS252**	Adopt

Tartrazine INS 102: Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	300 mg/kg	**XS250 & XS252**	Maintain at Step 7

Tertiary Butylhydroquinone **INS 319: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.3.2	Beverage whiteners	100 mg/kg	15 ~~&~~ 195**, XS250 & XS252**	Adopt

NOTES

XS250: Excluding products conforming to the *Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat* (CXS 250-2006).

XS252: Excluding products conforming to the *Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat* (CXS 252-2006).

C250252: Except for use in products conforming to the *Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat* (CXS 250-2006) and *the Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat* (CXS 252-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as acidity regulators only, at 4,400 mg/kg as phosphorus, singly or in combination.

FOOD CATEGORY 1.5.2

Acesulfame potassium **INS 950: Functional class: Sweetener, Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	1000 mg/kg	161**,** ~~&~~ 188, **XS251**	Adopt

Advantame INS 969: Functional class: Sweetener, Flavour enhancer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	20 mg/kg	**XS251**	Maintain at Step 2

Annatto extracts, bixin-based INS 160b(i): Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	100 mg/kg	**8, XS251**	Maintain at Step 4

Annatto extracts, norbixin-based INS 160b(ii): Functional class: Colour

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.5.2	Milk and cream powder analogues	55 mg/kg	**185, XS251**	Maintain at Step 4

Aspartame **INS 951: Functional class: Sweetener, Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	2000 mg/kg	161, ~~&~~ 191, **XS251**	Adopt

Aspartame-Acesulfame salt **INS 962: Functional class: Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	3100 mg/kg	**119, XS251**	Maintain at Step 3

Butylated Hydroxyanisole **INS 320: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	**Milk and cream powder analogues**	**100 mg/kg**	**15, A251**	Adopt

Butylated Hydroxytoluene **INS 321: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	**Milk and cream powder analogues**	**100 mg/kg**	**15, A251**	Adopt

Caramel III, ammonia caramel **INS 150c: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	5000 mg/kg	**XS251**	Adopt

Caramel IV, sulfite ammonia caramel **INS 150d: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	5000 mg/kg	**XS251**	Adopt

Carotenes, beta-, vegetable **INS 160a(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	1000 mg/kg	**XS251**	Adopt

Carotenoids **INS 160a(i),a(iii),e,f: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**

01.5.2	Milk and cream powder analogues	100 mg/kg	~~209~~, **XS251**	Adopt

Diacetyltartaric and fatty acid esters of glycerol INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	10000 mg/kg	**XS251**	Adopt

Grape skin extract INS 163(ii): Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	150 mg/kg	181, 201, ~~& 209,~~ **XS251**	Adopt

Neotame INS 961: Functional class: Flavour enhancer, Sweetener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	65 mg/kg	161, **XS251**	Adopt

Paprika extract INS 160c(ii): Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	5 mg/kg	**39, XS251**	Maintain at Step 2

Phosphates INS 338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii), 450(i)-(iii),(v)-(vii),(ix), 451(i),(ii), 452(i)-(v), 542: Functional class: Acidity regulator, Anticaking agent, Antioxidant, Emulsifier, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Preservative, Raising agent, Sequestrant, Stabilizer, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	4400 mg/kg	33, 88, **B251, C251**	Adopt

Polysorbates INS 432-436: Functional class: Emulsifier, Stabilizer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	4000 mg/kg	**XS251**	Adopt

Propylene glycol esters of fatty acids INS 477: Functional class: Emulsifier				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	100000 mg/kg	**XS251**	Adopt

Riboflavins INS 101(i),(ii),(iii): Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	300 mg/kg	**XS251**	Adopt

Sodium ~~alumino~~ aluminium silicate INS 554: Functional class: Anticaking agent				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	570 mg/kg	6 ~~& 259~~	Adopt

Steviol glycosides INS 960a, 960b(i): Functional class: Sweetener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	330 mg/kg	26, ~~&~~ 201, **XS251**	Adopt

Sucralose (Trichlorogalactosucrose) INS 955: Functional class: Flavour enhancer, Sweetener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	400 mg/kg	**XS251**	Maintain at Step 3

Sucrose esters of fatty acids INS 473: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	Milk and cream powder analogues	5000 mg/kg	350, **XS251**	Adopt

Tertiary butylhydroquinone INS 319: Functional class: Antioxidant				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.2	**Milk and cream powder analogues**	**100 mg/kg**	**15, A251**	Adopt

NOTES

XS251: **Excluding products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006).**

A251 **For use in products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006), singly or in combination: butylated hydroxyanisole (BHA, INS 320), butylated hydroxytoluene (BHT, INS 321) and tertiary butylhydroxyquinone (TBHQ, INS 319).**

B251 **Except for use in products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006): tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)) for use as anticaking agents only, singly or in combination.**

C251 **Except in products conforming to the Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium**

polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), and ammonium polyphosphate (INS 452(v)), as acidity regulators only, singly or in combination.

FOOD CATEGORY 1.6.1

Advantame **INS 969: Functional class: Sweetener, Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	10 mg/kg	**XS221, XS273, XS275**	Maintain at Step 2

Annatto extracts, norbixin-based **INS 160b(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**25 mg/kg**	**185, AA221275, XS273**	Adopt
~~01.6.1~~	~~Unripened Cheese~~	~~25 mg/kg~~	~~185~~	~~Maintain at Step 4~~ (not needed)

Ascorbyl esters **INS 304, 305: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**500 mg/kg**	**10, XS221, XS273**	Adopt

Aspartame **INS 951: Functional class: Sweetener, Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	1000 mg/kg	161**,** ~~& 191,~~ **XS221, XS273, XS275**	Adopt

Azorubine (Carmoisine) **INS 122: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	GMP	3**, XS221, XS273, XS275**	Maintain at Step 7

Brilliant black (Black PN) **INS 151: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	GMP	3**, XS221, XS273, XS275**	Maintain at Step 7

Brown HT **INS 155: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	GMP	3**, XS221, XS273, XS275**	Maintain at Step 7

Calcium silicate **INS 552: Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**

01.6.1	**Unripened Cheese**	**GMP**	**E221, XS273, XS275**	Adopt

Canthaxanthin **INS 161g: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	15 mg/kg	201, **XS221, XS273, XS275**	Adopt

Caramel II, sulfite caramel **INS 150b: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	50 000 mg/kg	**XS221, XS273, XS275**	Maintain at Step 4

Caramel III, ammonia caramel **INS 150c: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	15 000 mg/kg	201, **XS221, XS273, XS275**	Adopt

Caramel IV, sulfite ammonia caramel **INS 150d: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	50 000 mg/kg	201, **XS221, XS273, XS275**	Adopt

Carotenoids **INS 160a(i),a(iii), e, f: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	100 mg/kg	**F221, F275, XS273**	Adopt

Chlorophylls and chlorophyllins, copper complexes **INS 141(i), 141(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	50 mg/kg	161, **A221, XS273, XS275**	Adopt

Curcumin **100(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**GMP**	**I221, XS273, XS275**	Adopt
01.6.1	Unripened Cheese	500 mg/kg	**I221, XS273, XS275**	Maintain at Step 4

Diacetyltartaric and fatty acid esters of glycerol **INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Cream cheese**	**10000 mg/kg**	**M275, XS221, XS273**	Adopt

Indigotine (Indigo Carmine) **INS 132: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	200 mg/kg	3, **XS221, XS273, XS275**	Adopt

Lauric arginate ethyl ester **INS 243: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	200 mg/kg	**XS221, XS273, XS275**	Adopt

Lutein from *Tagetes erecta* **INS 161b(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	GMP	**XS221, XS273, XS275**	Maintain at Step 4

Magnesium silicate, synthetic **INS 553(i): Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**GMP**	**E221, XS273, XS275**	Adopt

~~**Magnesium trisilicate**~~ ~~**INS 553(ii): Functional class: Anticaking agent**~~				
~~**Food Category No.**~~	~~**Food Category**~~	~~**Max Level**~~	~~**Notes**~~	~~**Recommendations**~~
~~**01.6.1**~~	~~**Unripened Cheese**~~	~~**GMP**~~	~~**3, E221, XS273, XS275**~~	Hold until JECFA establishes an ADI

Natamycin (Pimaricin) **INS 235: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	40 mg/kg	3, ~~&~~80, **B221, XS273, XS275**	Adopt

Nitrates (Sodium nitrate, Potassium nitrate) **INS 251, 252: Functional class: Preservative, Colour retention agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	40 mg/kg	**30, XS221, XS273, XS275**	Maintain at Step 7 CCFA EWG investigating nitrates and nitrites, on hold

Paprika extract **INS 160c(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	15 mg/kg	39**, XS221, XS273, XS275**	Maintain at Step 2

Paprika oleoresin **INS 160c(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**GMP**	**39, XS273, XS275**	Adopt

Phosphates **INS 338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii) 450(i)-(iii),(v)-(vii),(ix), 451(i),(ii), 452(i)-(v), 542: Functional class: Acidity regulator, Anticaking agent, Antioxidant, Emulsifier, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Preservative, Raising agent, Sequestrant, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	4400 mg/kg	33, **C221, , K273, L275**	Adopt

Polysorbates **INS 432-436: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	80 mg/kg	38, **XS221, XS273, XS275**	Adopt

Ponceau 4R (Cochineal red A) **INS 124: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	100 mg/kg	3, ~~&~~161, **XS221, XS273, XS275**	Adopt

Potassium silicate **INS 560: Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**GMP**	**E221, XS273, XS275**	Adopt

Quinoline yellow **INS 104: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	GMP	3**, XS221, XS273, XS275**	Maintain at Step 7

Riboflavins **INS 101(i),(ii),(iii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	300 mg/kg	**G221, XS273, XS275**	Adopt

Silicon dioxide, amorphous **INS 551: Functional class: Anticaking agent, Antifoaming agent, Carrier**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**GMP**	**3, E221, XS273, XS275**	Adopt

Sorbates **INS 200, 202, 203: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	1000 mg/kg	42**,** ~~&~~ 223, **H273275, J221**	Adopt

Sunset yellow FCF **INS 110: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	300 mg/kg	3, **XS221, XS273, XS275**	Adopt

Talc **INS 553(iii): Functional class: Anticaking agent, Glazing agent, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**GMP**	**3, E221, XS273, XS275**	Adopt

Tartrazine **INS 102: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	300 mg/kg	**3, XS221, XS273, XS275**	Maintain at Step 4

Tocopherols **INS 307a, b, c: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	200 mg/kg	168, ~~&~~ 351, **XS221, XS273**	Adopt

Zeaxanthin, synthetic **INS 161h(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened Cheese	100 mg/kg	**XS221, XS273, XS275**	Maintain at Step 4

NOTES

XS221: **Excluding products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001).**

XS273: **Excluding products conforming to the *Standard for Cottage Cheese* (CXS 273-1968).**

XS275: **Excluding products conforming to the *Standard for Cream Cheese* (CXS 275-1973).**

A221: **Except for use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) at 15 mg/kg**.

AA221275 **Only for use in products conforming to the *Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) and the cheese mass of products conforming to the *Standard for Cream Cheese* (CXS 275-1973).**

B221: **Except for use in the surface treatment of sliced, cut, shredded, and grated cheese products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001): at 20 mg/kg applied to the surface, added during kneading and stretching process.**

C221: **Except for use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)) and trisodium diphosphate (INS 450(ii)), as stabilizers/thickeners at 1540 mg/kg as phosphorus, singly or in combination, in cheese mass only.**

E221: **Except for use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001): silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), talc (INS 553(iii)) and potassium silicate (INS 560), singly or in combination, as anticaking agents for the surface treatment of sliced, cut, shredded or grated cheese only, at 10,000 mg/kg as silicon dioxide.**

F221: **Except for use in products conforming to the *General Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) at 25 mg/kg for carotenes, *beta*-, synthetic (INS 160a(i)) and 35 mg/kg for both carotenal, *beta*-apo-8' (INS 160e) and carotenoic acid, ethyl ester, *beta*-apo-08'- (INS 160f) only, i.e. no provision for carotenes, *beta*-, *Blakeslea trispora* (INS 160a(iii)).**

F275: **Except for use in products conforming to the *Standard for Cream Cheese* (CXS 275-1973), for carotenes, *beta*-, synthetic (INS 160a(i)), *beta*-, *Blakeslea trispora* (INS 160a(iii)), carotenal, *beta*-apo-8' (INS 160e) and carotenoic acid, ethyl ester, *beta*-apo-08'- (INS 160f), singly or in combination, at 35 mg/kg.**

G221: **Except for use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) at GMP.**

H273275: **For use in cheese mass only of products conforming to the *Standard for Cottage Cheese* (CXS 273-1968) and the *Standard for Cream Cheese* (CXS 275-1973): sorbic acid (INS 200), potassium sorbate (INS 202), calcium sorbate (INS 203), singly or in combination.**

I221: **For use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001), for treatment of edible cheese rind only.**

J221: **For use in cheese mass and the surface treatment of sliced, cut, shredded and grated cheese products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001): sorbic acid (INS 200), potassium sorbate (INS 202), calcium sorbate (INS 203), singly or in combination.**

K273: **Except for use in products conforming to the *Standard for Cottage cheese* (CXS 273-1968): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as stabilizers at 1,300 mg/kg as phosphorus, singly or in combination, in cheese mass only.**

L275: **Except for use in products conforming to the *Standard for Cream cheese* (CXS 275-1973): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)),**

ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as stabilizers at 4400 mg/kg as phosphorus, singly or in combination, in cheese mass only.

M275: **Except for use in products conforming to the *Standard for Cream cheese* (CXS 275-1973) as an emulsifier in cheese mass only.**

FOOD CATEGORY 01.6.2

Canthaxanthin **INS 161g: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	Ripened Cheese	15 mg/kg	201, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, XS283**	Adopt

Caramel II, sulfite caramel **INS 150b: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	Ripened Cheese	50 000 mg/kg	**XS208, XS278, XS283**	Maintain at Step 4

Curcumin **INS 100(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	**Ripened Cheese**	**GMP**	**A283, XS208, XS278**	Adopt
01.6.2	Ripened Cheese	500 mg/kg	**XS208, XS278**	Maintain at Step 4

Lutein from *Tagetes erecta* **INS 161b(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	Ripened Cheese	GMP	**XS208, XS278, XS283**	Maintain at Step 4

Lysozyme **INS 1105: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	Ripened Cheese	GMP	XS274, XS276, XS277, **XS208, XS278**	Adopt

Natamycin (Pimaricin) **INS 235: Functional class: Preservative**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.6.2	Ripened Cheese	40 mg/kg	3, 80, XS274, XS276, XS277, **XS208, XS278**	Adopt

Nisin **INS 234: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	Ripened Cheese	12.5 mg/kg	233, XS274, XS276, XS277, **XS208, XS278**	Adopt

Nitrates (Sodium nitrate, Potassium nitrate) **INS 251, 252: Functional class: Preservative, Colour retention agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	Ripened Cheese	35 mg/kg	30, 464, XS274, XS276, XS277, **XS208, XS278**	Adopt (due to alignment with CXS283)
01.6.2	Ripened Cheese	40 mg/kg	30**, XS208, XS278**	Maintain at Step 7 (CCFA EWG investigating nitrates and nitrites, on hold)

Sorbates **INS 200, 202, 203: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	Ripened Cheese	3000 mg/kg	42, 457, XS274, XS276, XS277, **XS208, B278, C283**	Adopt

Zeaxanthin, synthetic **INS 161h(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2	Ripened Cheese	100 mg/kg	**XS208, XS278, XS283**	Maintain at Step 4

NOTES

XS208: **Excluding products conforming to the *Group Standard for Cheeses in Brine* (CXS 208-2001).**

XS278: **Excluding products conforming to the *Standard for Extra Hard Grating cheese* (CXS 278-1978).**

XS283: **Excluding products conforming to the *General Standard for Cheese* (CXS 283-1978).**

A283: **Only for use in the edible cheese rind in products conforming to the *General Standard for Cheese* (CXS 283-1978).**

B278: **Except for use in products conforming to the *Standard for Extra Hard Grating Cheese* (CXS 278-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203), at 1000 mg/kg in the final product, singly or in combination.**

C283: **Except for surface or rind treatment of sliced, cut, shredded or grated cheese only for products conforming to the *General Standard for Cheese* (CXS 283-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203), at 1000 mg/kg, singly or in combination.**

FOOD CATEGORY 01.6.2.1

Annatto extracts – norbixin-based **INS 160b(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	25 mg/kg	185, 463, **I283, XS208, XS278**	Adopt
~~01.6.2.1~~	~~Ripened Cheese, includes rind~~	~~25 mg/kg~~	~~**185**~~	~~Maintain at Step 4~~ (not needed)

Ascorbyl esters, ascorbyl palmitate, ascorbyl stearate **INS 304, 305: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	500 mg/kg	10, 112, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, XS283**	Adopt

Calcium propionate **INS 282: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese includes rind	GMP	3, 460, XS269, XS274, XS276, XS277, **XS208, XS278, E283**	Adopt

Calcium silicate **INS 552: Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese includes rind	GMP	459, 461, XS274, XS276, XS277, **D283, XS208, XS278**	Adopt

Caramel IV – sulfite ammonia caramel **INS 150d: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	50000 mg/kg	201, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, XS283**	Adopt

Carmines **INS 120: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	125 mg/kg	178, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, H283**	Adopt

Carotenes, Beta-, vegetable **INS 160a(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	600 mg/kg	463, **XS208, XS278**	Adopt

Carotenoids **INS 160a(i),a(iii),e,f: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	100 mg/kg	458, **XS208, XS278, B283**	Adopt

Chlorophylls and chlorophyllins, copper complexes **INS 141(i),(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	15 mg/kg	62, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208**	Adopt

Diacetyltartaric and fatty acid esters of glycerol **INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	10000 mg/kg	XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, XS283**	Adopt

Hexamethylene tetramine **INS 239: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	25 mg/kg	66, 298, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278**	Adopt

Lauric arginate ethyl ester **INS 243: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	200 mg/kg	XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, XS283**	Adopt

Magnesium silicate, synthetic **INS 553(i): Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese includes rind	GMP	459, 461, XS274, XS276, XS277, **XS208, XS278, D283**	Adopt

~~**Magnesium trisilicate**~~ ~~**INS 553(ii): Functional class: Anticaking agent**~~				
~~**Food Category No.**~~	~~**Food Category**~~	~~**Max Level**~~	~~**Notes**~~	~~**Recommendations**~~
~~**01.6.2.1**~~	~~**Ripened Cheese includes rind**~~	~~**GMP**~~	~~**XS208, XS278, D283**~~	Hold until JECFA establishes an ADI

Paprika extract **INS 160c(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese, includes rind	30 mg/kg	**39, XS208, XS278, XS283**	Maintain at Step 2

Paprika oleoresin **INS 160c(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	**Ripened Cheese, includes rind**	**GMP**	**39, XS208, XS278**	Adopt

Potassium silicate **INS 560: Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	**Ripened Cheese includes rind**	**GMP**	**3, XS208, XS278, D283**	Adopt

Propionic acid **INS 280: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese includes rind	GMP	3, 460, XS269, XS274, XS276, XS277, **XS208, XS278, E283**	Adopt

Riboflavins **INS 101(i), (ii), (iii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese includes rind	300 mg/kg	462, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, G283**	Adopt

Silicon dioxide, amorphous **INS 551: Functional class: Anticaking agent, Antifoaming agent, Carrier**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese includes rind	GMP	459, 461, XS274, XS276, XS277, **XS208, XS278, D283**	Adopt

Sodium propionate **INS 281: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese includes rind	GMP	3, 460, XS269, XS274, XS276, XS277, **XS208, XS278, E283**	Adopt

Talc **INS 553(iii): Functional class: Anticaking agent, Glazing agent, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.2.1	Ripened Cheese includes rind	GMP	459, 461, XS274, XS276, XS277, **XS208, XS278, D283**	Adopt

NOTES

XS208: Excluding products conforming to the *Group Standard for Cheeses in Brine* (CXS 208-1999).

XS278: Excluding products conforming to the *Standard for Extra Hard Grating cheese* (CXS 278-1978).

XS283: Excluding products conforming to the *Group Standard for Cheese* (CXS 283-1978).

B283: **Except for use in products conforming to the *General Standard for Cheese* (CXS 283-1978) at 25 mg/kg for carotenes, *beta*-, synthetic (INS 160a(i)) and 35 mg/kg for both carotenal, *beta*-apo-8' (INS 160e) and carotenoic acid, ethyl ester, *beta*-apo-08'- (INS 160f) only, i.e. no provision for carotenes, *beta*-, *Blakeslea trispora* (INS 160a(iii)).**

D283: **Except for use in surface treatment of sliced, cut, shredded or grated cheese only for products conforming to the *General Standard for Cheese* (CXS 283-1978): silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), talc (INS 553(iii)) and potassium silicate (INS 560) as anticaking agents at 10,000 mg/kg, as silicon dioxide, singly or in combination.**

E283: **Except for products conforming to the *General Standard for Cheese* (CXS 283-1978): propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) at 3000 mg/kg as propionic acid.**

G283: **Except for use in products conforming to the *General Standard for Cheese* (CXS 283-1978) at GMP.**

H283: **Except for use in products conforming to the *General Standard for Cheese* (CXS 283-1978) at GMP for red marbled cheeses only.**

I283: **Except for use in products conforming to the *General Standard for Cheese* (CXS 283-1978) at 50 mg/kg.**

B PROPOSED AMENDMENTS TO TABLE 2

Food category 01.3.2 Beverage whiteners				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Acesulfame potassium	950	2000 mg/kg	161**,** ~~&~~188**,** **XS250, XS252**	
Advantame	969	60 mg/kg	**XS250, XS252**	Maintain at Step 2
Annatto extracts – bixin-based	160b(i)	50 mg/kg	8**, XS250, XS252**	Maintain at Step 4
Ascorbyl esters	304, 305	80 mg/kg	10, **XS250, XS252**	Adopt
Aspartame	951	6000 mg/kg	161**,** ~~&~~191, **XS250, XS252**	Adopt
Aspartame-Acesulfame salt	962	4540 mg/kg	**113, XS250, XS252**	Maintain at Step 3
Butylated Hydroxyanisole	320	100 mg/kg	15**,** ~~&~~195**,** **XS250, XS252**	Adopt
Butylated Hydroxytoluene	321	100 mg/kg	15**,** ~~&~~195**,** **XS250, XS252**	Adopt
Caramel III, ammonia caramel	150c	1000 mg/kg	**XS250, XS252**	Adopt
Caramel IV, sulfite ammonia caramel	150d	1000 mg/kg	**XS250, XS252**	Adopt
Carotenes, beta-, vegetable	160a(ii)	1000 mg/kg	**XS250, XS252**	Adopt
Carotenoids	160a(i),a(iii),e,f	100 mg/kg	**XS250, XS252**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	5000 mg/kg	**XS250, XS252**	Adopt
Lycopene (tomato)	160d(i)	5000 mg/kg	**XS250, XS252**	Maintain at Step 3
Neotame	961	65 mg/kg	161, **XS250, XS252**	Adopt
Paprika extract	160c(ii)	15 mg/kg	39**, XS250, XS252**	Maintain at Step 2

Phosphates	338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii), 450(i)-(iii),(v)-(vii),(ix), 451(i),(ii), 452(i)-(v), 542	13000 mg/kg	33, **C250252**	Adopt
Polysorbates	432-436	4000 mg/kg	**XS250, XS252**	Adopt
Propylene glycol esters of fatty acids	477	1000 mg/kg	**XS250, XS252**	Adopt
Riboflavins	101(i), (ii), (iii)	300 mg/kg	**XS250, XS252**	Adopt
Sodium ~~alumino~~ **aluminium** silicate	554	570 mg/kg	6**,** ~~&~~260**,** **XS250, XS252**	Adopt
Sorbates	200, 202, 203	200 mg/kg	42, **XS250, XS252**	Adopt
Sucralose (Trichlorogalactosucrose)	955	580 mg/kg	161, **XS250, XS252**	Adopt
Tartrazine	102	300 mg/kg	**XS250, XS252**	Maintain at Step 7
Tertiary Butylhydroquinone	319	100 mg/kg	15**,** ~~&~~195**,** **XS250, XS252**	Adopt

NOTES

XS250: **Excluding products conforming to the Standard for a *Blend of Evaporated Skimmed Milk and Vegetable Fat* (CXS 250-2006).**

XS252: **Excluding products conforming to the *Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat* (CXS 252-2006).**

C250252: **Except for use in products conforming to the *Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat* (CXS 250-2006) and *the Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat* (CXS 252-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as acidity regulators only, at 4,400 mg/kg as phosphorus, singly or in combination.**

Food category 01.5.2: Milk and cream powder analogues				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Acesulfame potassium	950	1000 mg/kg	161**,** ~~&~~188, **XS251**	Adopt
Advantame	969	20 mg/kg	**XS251**	Maintain at Step 2
Annatto extracts – bixin-based	160b(i)	100 mg/kg	**8, XS251**	Maintain at Step 4
Annatto extracts – norbixin-based	160b(ii)	55 mg/kg	**185, XS251**	Maintain at Step 4

Aspartame	951	2000 mg/kg	161, ~~&~~ 191, **XS251**	Adopt
Aspartame-Acesulfame salt	962	3100 mg/kg	**119, XS251**	Maintain at Step 3
Butylated Hydroxyanisole	**320**	**100 mg/kg**	**15, A251**	Adopt
Butylated Hydroxytoluene	**321**	**100 mg/kg**	**15, A251**	Adopt
Caramel III, ammonia caramel	150c	5000 mg/kg	**XS251**	Adopt
Caramel IV, sulfite ammonia caramel	150d	5000 mg/kg	**XS251**	Adopt
Carotenes, beta-, vegetable	160a(ii)	1000 mg/kg	**XS251**	Adopt
Carotenoids	160a(i),a(iii),e,f	100 mg/kg	~~209,~~ **XS251**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	10000 mg/kg	**XS251**	Adopt
Grape skin extract	163(ii)	150 mg/kg	181, 201, ~~&~~ ~~209,~~ **XS251**	Adopt
Neotame	961	65 mg/kg	161, **XS251**	Adopt
Paprika extract	160c(ii)	5 mg/kg	**39, XS251**	Maintain at Step 2
Phosphates	338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii) 450(i)-(iii),(v)-(vii),(ix) 451(i),(ii), 452(i)-(v), 542	4440 mg/kg	33, 88, **B251, C251**	Adopt
Polysorbates	432-436	4000 mg/kg	**XS251**	Adopt
Propylene glycol esters of fatty acids	477	100000 mg/kg	**XS251**	Adopt
Riboflavins	101(i), (ii), (iii)	300 mg/kg	**XS251**	Adopt
Sodium ~~alumino~~ **aluminium** silicate	554	570 mg/kg	6 **~~& 259~~**	Adopt
Steviol glycosides	960a, 960b(i)	330 mg/kg	26, ~~&~~ 201, **XS251**	Adopt
Sucralose (Trichlorogalactosucrose)	955	400 mg/kg	**XS251**	Maintain at Step 3
Sucrose esters of fatty acids	473	5000 mg/kg	350, **XS251**	Adopt
Tertiary butylhydroxyquinone	**319**	**100 mg/kg**	**15, A251**	Adopt

NOTES

XS251 **Excluding products conforming to the *Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form* (CXS 251-2006).**

A251 **For use in products conforming to the *Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form* (CXS 251-2006), singly or in combination: butylated hydroxyanisole (BHA, INS 320), butylated hydroxytoluene (BHT, INS 321) and tertiary butylhydroxyquinone (TBHQ, INS 319).**

B251 **Except for use in products conforming to the *Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form* (CXS 251-2006): tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)) for use as anticaking agents only, singly or in combination.**

C251 **Except in products conforming to the *Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form* (CXS 251-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium**

diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450 (ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), and ammonium polyphosphate (INS 452(v)), as acidity regulators only, singly or in combination.

Food category 01.6.1 Unripened cheese				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Advantame	969	10 mg/kg	**XS221, XS273, XS275**	Maintain at Step 2
~~Annatto extracts – norbixin-based~~	~~160b(ii)~~	~~25 mg/kg~~	~~**185**~~	~~Maintain at Step 4~~ (not needed)
Annatto extracts – norbixin-based	**160b(ii)**	**25 mg/kg**	**185, AA221275, XS273**	Adopt
Ascorbyl esters	**304, 305**	**500 mg/kg**	**10, XS221, XS273**	Adopt
Aspartame	951	1000 mg/kg	161**,** ~~& 191,~~ **XS221, XS273, XS275**	Adopt
Azorubine (Carmoisine)	122	GMP	3**, XS221, XS273, XS275**	Maintain at Step 7
Brilliant Black (Black PN)	151	GMP	3**, XS221, XS273, XS275**	Maintain at Step 7
Brown HT	155	GMP	3**, XS221, XS273, XS275**	Maintain at Step 7
Calcium silicate	**552**	**GMP**	**E221, XS273, XS275**	Adopt
Canthaxanthin	161g	15 mg/kg	201, **XS221, XS273, XS275**	Adopt
Caramel II, sulfite caramel	150b	50000 mg/kg	**XS221, XS273, XS275**	Maintain at Step 4
Caramel III, ammonia caramel	150c	15000 mg/kg	201, **XS221, XS273, XS275**	Adopt
Caramel IV, sulfite ammonia caramel	150d	50000 mg/kg	201, **XS221, XS273, XS275**	Adopt
Carotenoids	160a(i),a(iii), e, f	100 mg/kg	**F221, F275, XS273**	Adopt
Chlorophylls and chlorophyllins, copper complexes	141(i), 141(ii)	50 mg/kg	161, **A221, XS273, XS275**	Adopt
Curcumin	100(i)	500 mg/kg	**I221, XS273, XS275**	Maintain at Step 4
Curcumin	**100(ii)**	**GMP**	**I221, XS273, XS275**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	**472e**	**10000 mg/kg**	**M275, XS221, XS273**	Adopt
Indigotine (Indigo Carmine)	132	200 mg/kg	3, **XS221, XS273, XS275**	Adopt
Lauric arginate ethyl ester	243	200 mg/kg	**XS221, XS273, XS275**	Adopt
Lutein from *Tagetes erecta*	161b(i)	GMP	**XS221, XS273, XS275**	Maintain at Step 4

Magnesium silicate, synthetic	**553(i)**	**GMP**	**E221, XS273, XS275**	Adopt
~~**Magnesium trisilicate**~~	~~**553(ii)**~~	~~**10000 mg/kg**~~	~~**3, E221, XS273, XS275**~~	Hold until JECFA establishes an ADI
Natamycin (Pimaricin)	235	40 mg/kg	3, ~~&~~ 80, **B221, XS273, XS275**	Adopt
Nitrates	251, 252	40 mg/kg	**30, XS221, XS273, XS275**	Maintain at Step 7 CCFA EWG investigating nitrates and nitrites, on hold
Paprika extract	160c(ii)	15 mg/kg	39**, XS221, XS273, XS275**	Maintain at Step 2
Paprika oleoresin	**160c(i)**	**GMP**	**39, XS273, XS275**	Adopt
Phosphates	338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i)-(ii), 343(i)-(iii), 450(i)-(iii),(v)-(vii),(ix), 451(i),(ii), 452(i)-(v), 542	4400 mg/kg	33, **C221, , K273, L275**	Adopt
Polysorbates	432-436	80 mg/kg	38, **XS221, XS273, XS275**	Adopt
Ponceau 4R (Cochineal red A)	124	100 mg/kg	3, ~~&~~ 161, **XS221, XS273, XS275**	Adopt
Potassium silicate	**560**	**GMP**	**E221, XS273, XS275**	Adopt
Quinoline yellow	104	GMP	3**, XS221, XS273, XS275**	Maintain at Step 7
Riboflavins	101(i), (ii), (iii)	300 mg/kg	**G221, XS273, XS275**	Adopt
Silicon dioxide, amorphous	**551**	**GMP**	**3, E221, XS273, XS275**	Adopt
Sorbates	200, 202, 203	1000 mg/kg	42**,** ~~&~~ 223, **H273275, J221**	Adopt
Sunset yellow	110	300 mg/kg	3, **XS221, XS273, XS275**	Adopt
Talc	**553(iii)**	**GMP**	**3, E221, XS273, XS275**	Adopt
Tartrazine	102	300 mg/kg	**3, XS221, XS273, XS275**	Maintain at Step 4
Tocopherols	307a, b, c	200 mg/kg	168, ~~&~~ 351, **XS221, XS273**	Adopt
Zeaxanthin, synthetic	161h(i)	100 mg/kg	**XS221, XS273, XS275**	Maintain at Step 4

NOTES

XS221: **Excluding products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001).**

XS273: **Excluding products conforming to the *Standard for Cottage Cheese* (CXS 273-1968).**

XS275: **Excluding products conforming to the *Standard for Cream Cheese* (CXS 275-1973).**

A221: **Except for use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) at 15 mg/kg**.

AA221275: **Only for use in products conforming to the *Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) and the *cheese mass of products conforming to the Standard for Cream Cheese* (CXS 275-1973).**

B221: **Except for use in the surface treatment of sliced, cut, shredded, and grated cheese products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001): at 20 mg/kg applied to the surface, added during kneading and stretching process.**

C221: **Except for use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001): phosphoric acid (INS 338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)) and trisodium diphosphate (INS 450(ii)), as stabilizers/thickeners at 1540 mg/kg as phosphorus, singly or in combination, in cheese mass only.**

E221: **Except for use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001): silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), talc (INS 553(iii)) and potassium silicate (INS 560), singly or in combination, as anticaking agents for the surface treatment of sliced, cut, shredded or grated cheese only, at 10,000 mg/kg as silicon dioxide.**

F221: **Except for use in products conforming to the *General Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) at 25 mg/kg for carotenes, *beta*-, synthetic (INS 160a(i)) and 35 mg/kg for both carotenal, *beta*-apo-8' (INS 160e) and carotenoic acid, ethyl ester, *beta*-apo-08'- (INS 160f) only, i.e. no provision for carotenes, *beta*-, *Blakeslea trispora* (INS 160a(iii)).**

F275: **Except for use in products conforming to the *Standard for Cream Cheese* (CXS 275-1973), for carotenes, *beta*-, synthetic (INS 160a(i)), *beta*-, *Blakeslea trispora* (INS 160a(iii)), carotenal, *beta*-apo-8' (INS 160e) and carotenoic acid, ethyl ester, *beta*-apo-08'- (INS 160f), singly or in combination, at 35 mg/kg.**

G221: **Except for use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) at GMP.**

H273275: **For use in cheese mass only of products conforming to the *Standard for Cottage Cheese* (CXS 273-1968) and the *Standard for Cream Cheese* (CXS 275-1973): sorbic acid (INS 200), potassium sorbate (INS 202), calcium sorbate (INS 203), singly or in combination.**

I221: **For use in products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001), for treatment of edible cheese rind only.**

J221: **For use in cheese mass and the surface treatment of sliced, cut, shredded and grated cheese products conforming to the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001): sorbic acid (INS 200), potassium sorbate (INS 202), calcium sorbate (INS 203), singly or in combination.**

K273: **Except for use in products conforming to the *Standard for Cottage cheese* (CXS 273-1968): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), magnesium dihydrogen phosphate (INS 343(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450(ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as stabilizers at 1,300 mg/kg as phosphorus, singly or in combination, in cheese mass only.**

L275: **Except for use in products conforming to the *Standard for Cream cheese* (CXS 275-1973): phosphoric acid (INS338) as acidity regulators at 880 mg/kg as phosphorus, and sodium**

dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450(ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)), as stabilizers at 4400 mg/kg as phosphorus, singly or in combination, in cheese mass only.

M275: **Except for use in products conforming to the *Standard for Cream cheese* (CXS 275-1973) as an emulsifier in cheese mass only.**

Food category 01.6.2 Ripened cheese				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Canthaxanthin	161g	15 mg/kg	201, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS279, XS271, XS272, XS274, XS276, XS277, **XS208, XS221, XS283**	Adopt
Caramel II, sulfite caramel	150b	50000 mg/kg	**XS208, XS278, XS283**	Maintain at Step 4
Curcumin	100(i)	500 mg/kg	**XS208, XS278**	Maintain at Step 4
Curcumin	**100(i)**	**GMP**	**A283, XS208, XS278**	Adopt
Lutein from *Tagetes erecta*	161b(i)	GMP	**XS208, XS278, XS283**	Maintain at Step 4
Lysozyme	1105	GMP	XS274, XS276, XS277, **XS208, XS278**	Adopt
Natamycin (Pimaricin)	235	40 mg/kg	3, 80, XS274, XS276, XS277, **XS208, XS278**	Adopt
Nisin	234	12.5 mg/kg	233, XS274, XS276, XS277, **XS208, XS278**	Adopt
Nitrates	251, 252	40 mg/kg	30**, XS208, XS278**	Maintain at Step 7 CCFA (EWG investigating nitrates and nitrites, on hold)
Nitrates	251, 252	35 mg/kg	30, 464, XS274, XS276, XS277, **XS208, XS278**	Adopt (due to alignment with CXS283)
Sorbates	200, 202, 203	3000 mg/kg	42, 457, XS274, XS276, XS277, **XS208, B278, C283**	Adopt
Zeaxanthin, synthetic	161h(i)	100 mg/kg	**XS208, XS278, XS283**	Maintain at Step 4

NOTES

XS208: **Excluding products conforming to the *Group Standard for Cheeses in Brine* (CXS 208-2001).**

XS278: **Excluding products conforming to the *Standard for Extra Hard Grating cheese* (CXS 278-1978).**

XS283: **Excluding products conforming to the *General Standard for Cheese* (CXS 283-1978).**

A283: **Only for use in the edible cheese rind in products conforming to the *General Standard for Cheese* (CXS 283-1978).**

B278: **Except for use in products conforming to the *Standard for Extra Hard Grating Cheese* (CXS 278-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203), at 1000 mg/kg in the final product, singly or in combination.**

C283: **Except for surface or rind treatment of sliced, cut, shredded or grated cheese only for products conforming to the *General Standard for Cheese* (CXS 283-1978): sorbic acid (INS 200), potassium sorbate (INS 202) and calcium sorbate (INS 203), at 1000 mg/kg, singly or in combination.**

Food category 01.6.2.1 Ripened cheese, includes rind				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
~~Annatto extracts – norbixin-based~~	~~160b(ii)~~	~~25 mg/kg~~	~~**185**~~	~~Maintain at Step 4~~ (not needed)
Annatto extracts – norbixin-based	160b(ii)	25 mg/kg	185, 463, **I283, XS208, XS278**	Adopt
Ascorbyl esters	304, 305	500 mg/kg	10**,** 112**,** XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, XS283**	Adopt
Calcium propionate	282	GMP	3, 460, XS269, XS274, XS276, XS277, **XS208, XS278, E283**	Adopt
Calcium silicate	552	GMP	459, 461, XS274, XS276, XS277, **D283, XS208, XS278**	Adopt
Caramel IV – sulfite ammonia caramel	150d	50000 mg/kg	201, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278**	Adopt
Carmines	120	125 mg/kg	178, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, H283**	Adopt
Carotenes, Beta-, vegetable	160a(ii)	600 mg/kg	463, **XS208, XS278**	Adopt
Carotenoids	160a(i),a(iii),e,f	100 mg/kg	458, **XS208, XS278, B283**	Adopt
Chlorophylls and chlorophyllins, copper complexes	141(i),(ii)	15 mg/kg	62, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	10000 mg/kg	XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, XS283**	Adopt
Hexamethylene tetramine	239	25 mg/kg	66, 298, XS263, XS264, XS265, XS266, XS267,	Adopt

			XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278**	
Lauric arginate ethyl ester	243	200 mg/kg	XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, XS283**	Adopt
Magnesium silicate, synthetic	553(i)	GMP	459, 461, XS274, XS276, XS277, **XS208, XS278, D283**	Adopt
~~**Magnesium trisilicate**~~	~~553(ii)~~	~~**GMP**~~	~~**XS208, XS278, D283**~~	Hold until JECFA establishes an ADI
Paprika extract	160c(ii)	30 mg/kg	**39, XS208, XS278, XS283**	Maintain at Step 2
Paprika oleoresin	**160c(i)**	**GMP**	**39, XS208, XS278**	Adopt
Potassium silicate	**560**	**GMP**	**3, XS208, XS278, D283**	Adopt
Propionic acid	280	GMP	3, 460, XS269, XS274, XS276, XS277, **XS208, XS278, E283**	Adopt
Riboflavins	101(i), (ii), (iii)	300 mg/kg	462, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, **XS208, XS278, G283**	Adopt
Silicon dioxide, amorphous	551	GMP	459, 461, XS274, XS276, XS277, **XS208, XS278, D283**	Adopt
Sodium propionate	281	GMP	3, 460, XS269, XS274, XS276, XS277, **XS208, XS278, E283**	Adopt
Talc	553(iii)	GMP	459, 461, XS274, XS276, XS277, **XS208, XS278, D283**	Adopt

NOTES

XS208: **Excluding products conforming to the *Group Standard for Cheeses in Brine* (CXS 208-1999).**

XS278: **Excluding products conforming to the *Standard for Extra Hard Grating cheese* (CXS 278-1978).**

XS283: **Excluding products conforming to the *Group Standard for Cheese* (CXS 283-1978).**

B283: **Except for use in products conforming to the *General Standard for Cheese* (CXS 283-1978) at 25 mg/kg for carotenes, *beta*-, synthetic (INS 160a(i)) and 35 mg/kg for both carotenal, *beta*-apo-8' (INS 160e) and carotenoic acid, ethyl ester, *beta*-apo-08'- (INS 160f) only, i.e. no provision for carotenes, *beta*-, *Blakeslea trispora* (INS 160a(iii)).**

D283: **Except for use in surface treatment of sliced, cut, shredded or grated cheese only for products conforming to the *General Standard for Cheese* (CXS 283-1978): silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), talc (INS 553(iii)) and potassium silicate (INS 560) as anticaking agents at 10,000 mg/kg, as silicon dioxide, singly or in combination.**

E283: **Except for products conforming to the *General Standard for Cheese* (CXS 283-1978): propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) at 3000 mg/kg as propionic acid.**

G283: **Except for use in products conforming to the *General Standard for Cheese* (CXS 283-1978) at GMP.**

H283: **Except for use in products conforming to the *General Standard for Cheese* (CXS 283-1978) at GMP for red marbled cheeses only.**

I283: **Except for use in products conforming to the *General Standard for Cheese* (CXS 283-1978) at 50 mg/kg.**

C PROPOSED AMENDMENTS TO TABLE 3

AMENDMENTS TO TABLE 3

This table identifies certain Table 3 food additive provisions for the *Group Standard for Cheeses in Brine* (CXS 208-1999) and the *General Standard for Cheese* (CXS 283-1978).

INS No.	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards
162	Beet Red	Colour	1999	**CS 283-1978**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	**CS 283-1978**
140	Chlorophylls	Colour	1999	**CS 283-1978 (for green marbled cheeses only)**
575	Glucono delta-lactone	Acidity regulator, Raising agent, Sequestrant	1999	**CS 208-1999, CS 283-1978**
270	Lactic acid, L-, D- and DL-	Acidity regulator	1999	**CS 208-1999**
1105	**Lysozyme**	**Preservative**		**CS 283-1978**
504(i)	Magnesium carbonate	Acidity regulator, Anticaking agent, Carrier, Colour retention agent	1999	**CS 283-1978**
504(ii)	Magnesium hydroxide carbonate	Acidity regulator, Anticaking agent, Colour retention agent	1999	**CS 283-1978**
460(i)	Microcrystalline cellulose (Cellulose gel)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	**CS 283-1978 (for use in sliced, cut, shredded or grated cheese only)**
160c(i)	**Paprika oleoresin**	**Colour**		**CS 283-1978**
460(ii)	Powdered cellulose	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 283-1978 (for use in sliced, cut, shredded or grated cheese only)**
171	Titanium dioxide	Colour	1999	**CS 283-1978**

This table identifies certain Table 3 food additive provisions for the *Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat* (CXS 250-2006), the *Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form* (CXS 251-2006) and the *Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat* (CXS 252-2006).

INS No.	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards
300	Ascorbic acid, L-	Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant	1999	**CS 251-2006**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
509	Calcium chloride	Firming agent, Stabilizer, Thickener	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
552	Calcium silicate	Anticaking agent	1999	**CS 251-2006**
407	Carrageenan	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 250-2006, CS 252-2006**
322(i)	Lecithin	Antioxidant, emulsifier	1999	**CS 250-2006, CS 251-2006, CS 252-2006**

504(i)	Magnesium carbonate	Acidity regulator, Anticaking agent, Colour retention agent	1999	**CS 251-2006**
530	Magnesium oxide	Acidity regulator, Anticaking agent	1999	**CS 251-2006**
553(i)	Magnesium silicate, synthetic	Anticaking agent	1999	**CS 251-2006**
471	Mono- and diglycerides of fatty acids	Antifoaming agent, Emulsifier, Glazing agent, Stabilizer	1999	**CS 251-2006**
501(i)	Potassium carbonate	Acidity regulator, Stabilizer	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
508	Potassium chloride	Firming agent, Flavour enhancer, Stabilizer, Thickener	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
332(i)	Potassium dihydrogen citrate	Acidity regulator, Raising agent, Stabilizer	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
501(ii)	Potassium hydrogen carbonate	Acidity regulator, Raising agent, Stabilizer	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
407a	Processed eucheuna seaweed (PES)	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	2001	**CS 250-2006, CS 252-2006**
551	Silicon dioxide, amorphous	Anticaking agent, Antifoaming agent, Carrier	1999	**CS 251-2006**
301	Sodium ascorbate	Antioxidant	1999	**CS 251-2006**
500(i)	Sodium carbonate	Acidity regulator, Anticaking agent, Emulsifying salt, Raising Agent, Stabilizer, Thickener	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
331(i)	Sodium dihydrogen citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
500(ii)	Sodium hydrogen carbonate	Acidity regulator, Anticaking agent, Raising Agent, Stabilizer, Thickener	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
500(iii)	Sodium sesquicarbonate	Acidity regulator, Anticaking agent, Raising Agent,	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
553(iii)	Talc	Anticaking agent, Glazing agent, Thickener	1999	**CS 251-2006**
333(iii)	Tricalcium citrate	Acidity regulator, Emulsifying salt, Firming agent, Sequestrant, Stabilizer	1999	**CS 250-2006, CS 252-2006**
332(ii)	Tripotassium citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 250-2006, CS 251-2006, CS 252-2006**
331(iii)	Trisodium citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 250-2006, CS 251-2006, CS 252-2006**

This table identifies certain Table 3 food additive provisions for the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001), the *Standard for Cottage Cheese* (CXS 273-1968), and the *Standard for Cream Cheese* (CXS 275-1973).

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Acceptable in foods conforming to the following commodity standards**
260	Acetic acid	Acidity regulator, Preservative	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
472a	Acetic and fatty acid esters of glycerol	Emulsifier, Sequestrant, Stabilizer	1999	**CS 275-1973**
1422	Acetylated distarch adipate	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**

1414	Acetylated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
1401	Acid-treated starch	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
406	Agar	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
400	Alginic acid	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
1402	Alkaline treated starch	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
403	Ammonium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
300	Ascorbic acid, L-	Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant	1999	**CS 275-1973**
162	Beet Red	Colour	1999	**CS 221-2001**
1403	Bleached starch	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
263	Calcium acetate	Acidity regulator, Preservative, Stabilizer	1999	**CS 273-1968, CS 275-1973**
404	Calcium alginate	Antifoaming agent, Bulking agent, Carrier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
302	Calcium ascorbate	Antioxidant	1999	**CS 275-1973**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
578	Calcium gluconate	Acidity regulator, Firming agent, Sequestrant	1999	**CS 273-1968, CS 275-1973**
327	Calcium lactate	Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener	1999	**CS 273-1968, CS 275-1973**
352(ii)	Calcium malate, D,L	Acidity regulator	1999	**CS 273-1968, CS 275-1973**
282	Calcium propionate	Preservative	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
290	Carbon dioxide	Carbonating agent, Foaming agent, Packaging gas, Preservative, Propellant	1999	**CS 221-2001 (for whipped products only), CS 275-1973**
410	Carob bean gum	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
407	Carrageenan	Bulking agent, Carrier, Emulsifier, Gelling agent,	1999	**CS 221-2001, CS 273-1968, CS 275-1973**

		Glazing agent, Humectant, Stabilizer, Thickener		
140	Chlorophylls	Colour	1999	**CS 221-2001**
330	Citric acid	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
472c	Citric and fatty acid esters of glycerol	Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer	1999	**CS 275-1973**
1400	Dextrins, roasted starch	Carrier, Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
1412	Distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
418	Gellan gum	Gelling agent, Stabilizer, Thickener	1999	**CS 275-1973**
575	Glucono delta-lactone	Acidity regulator, Raising agent, Sequestrant	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
412	Guar gum	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
507	Hydrochloric acid	Acidity regulator	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
1442	Hydroxypropyl distarch phosphate	Anticaking agent, Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
1440	Hydroxypropyl starch	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
416	Karaya gum	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
270	Lactic acid, L-, D- and DL-	Acidity regulator	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
472b	Lactic and fatty acid esters of glycerol	Emulsifier, Stabilizer, Thickener	1999	**CS 275-1973**
322(i)	Lecithin	Antioxidant, emulsifier	1999	**CS 275-1973**
504(i)	Magnesium carbonate	Acidity regulator, Anticaking agent, Carrier, Colour retention agent	1999	**CS 273-1968, CS 275-1973**
504(ii)	Magnesium hydroxide carbonate	Acidity regulator, Anticaking agent, Colour retention agent	1999	**CS 273-1968, CS 275-1973**
296	Malic acid	Acidity regulator, Sequestrant	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
460(i)	Microcrystalline cellulose (Cellulose gel)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	**CS 221-2001**
471	Mono- and di-glycerides of fatty acids	Antifoaming agent, Emulsifier, Glazing agent, Stabilizer	1999	**CS 275-1973**
1410	Monostarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
941	Nitrogen	Foaming agent, Packaging gas, Propellant	1999	**CS 221-2001 (for whipped products only), CS 275-1973**

1404	Oxidized starch	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
440	Pectins	Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968**
1413	Phosphated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
261(i)	Potassium acetate	Acidity regulator, Preservative	1999	**CS 273-1968, CS 275-1973**
402	Potassium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
501(i)	Potassium carbonate	Acidity regulator, Stabilizer	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
332(i)	Potassium dihydrogen citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
577	Potassium gluconate	Acidity regulator, Sequestrant	1999	**CS273-1968, CS 275-1973**
501(ii)	Potassium hydrogen carbonate	Acidity regulator, Raising agent, Stabilizer	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
326	Potassium lactate	Acidity regulator, Antioxidant, Emulsifier, Humectant	1999	**CS 273-1968, CS 275-1973**
283	Potassium propionate	Preservative	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
460(ii)	Powdered cellulose	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 221-2001**
407a	Processed eucheuma seaweed (PES)	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	2001	**CS 273-1968, CS 275 -1973**
280	Propionic acid	Preservative	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
470(i)	Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium	Anticaking agent, Emulsifier, Stabilizer	1999	**CS275-1973**
470(ii)	Salts of oleic acid with calcium, potassium and sodium	Anticaking agent, Emulsifier, Stabilizer	1999	**CS275-1973**
262(i)	Sodium acetate	Acidity regulator, Preservative, Sequestrant	1999	**CS 273-1968, CS 275-1973**
401	Sodium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
301	Sodium ascorbate	Antioxidant	1999	**CS 275-1973**
500(i)	Sodium carbonate	Acidity regulator, Anticaking agent, Emulsifying salt, Raising Agent, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**

466	Sodium carboxymethyl cellulose (Cellulose gum)	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
331(i)	Sodium dihydrogen citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
576	Sodium gluconate	Sequestrant, Stabilizer, Thickener	1999	**CS 221-2001**
500(ii)	Sodium hydrogen carbonate	Acidity regulator, Anticaking agent, Raising Agent, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
350(i)	Sodium hydrogen DL-malate	Acidity regulator, Humectant	1999	**CS 273-1968, CS 275-1973**
325	Sodium lactate	Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying salt, Humectant, Thickener	1999	**CS 273-1968, CS 275-1973**
350(ii)	Sodium DL-malate	Acidity regulator, Humectant	1999	**CS 273-1968, CS 275-1973**
281	Sodium propionate	Preservative	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
500(iii)	Sodium sesquicarbonate	Acidity regulator, Anticaking agent, Raising Agent	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
1420	Starch acetate	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
1405	Starches, enzyme treated	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
417	Tara gum	Gelling agent, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
171	Titanium dioxide	Colour	1999	**CS 221-2001, CS 275-1973**
413	Tragacanth gum	Emulsifier, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
333(iii)	Tricalcium citrate	Acidity regulator, Emulsifying salt, Firming agent, Sequestrant, Stabilizer	1999	**CS 221-2001, CS 273-1968, CS 275-1973**
332(ii)	Tripotassium citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 221-2001**
331(iii)	Trisodium citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 221-2001**
415	Xanthan gum	Emulsifier, Foaming agent, Stabilizer, Thickener	1999	**CS 221-2001, CS 273-1968, CS 275-1973**

Section 2 of the Annex to Table 3

In the case of the *Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat* (CXS 250-2006) and the *Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat* (CXS 252-2006) the intention of the commodity committee has been to allow only certain Table 3 additives.

Therefore it is proposed to add the following to Section 2 of the Annex to Table 3 of the GSFA.

01.3.2	Beverage whiteners
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards
Codex standards	Blend of Evaporated Skimmed Milk and Vegetable Fat (CXS 250-2006), Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat (CXS 252-2006)

In the case of the *Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form* (CXS 251-2006) the intention of the commodity committee has been to allow only certain Table 3 additives.

Therefore it is proposed to add the following to Section 2 of the Annex to Table 3 of the GSFA.

01.5. 2	Milk and cream powder analogues
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to this standard
Codex standards	Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006)

In the case of the *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001), the *Standard for Cottage Cheese* (CXS 273-1968) and the *Standard for Cream Cheese* (CXS 275-1973) the intention of the commodity committee has been to allow only certain Table 3 additives.

Therefore it is proposed to add the following to Section 2 of the Annex to Table 3 of the GSFA.

01.6.1	Unripened Cheese
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to this standard
Codex standards	Unripened Cheese including Fresh Cheese (CXS 221-2001), Cottage Cheese (CXS 273-1968), Cream Cheese (CXS 275-1973)

In the case of the *Group Standard for Cheeses in Brine* (CXS 208-1999) and the *General Standard for Cheese* (CXS 283-1978) the intention of the commodity committee has been to allow only certain Table 3 additives.

Therefore it is proposed to add the following to Section 2 of the Annex to Table 3 of the GSFA.

01.6.2.1	Ripened Cheese, includes rind
	Only certain acidity regulators, anticaking agents, colours and preservatives in Table 3 (as indicated in Table 3) are acceptable for use in foods conforming to CXS 283-1978, and only certain acidity regulators in Table 3 (as indicated in Table 3) are acceptable for use in foods conforming to CXS 208-1999.
Codex standards	Cheeses in Brine (CXS 208-1999) General Standard for Cheese (CXS 283-1978)

Appendix 3

PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE CODEX COMMODITY STANDARDS FOR FATS AND OILS (CCFO) AND TABLES 1, 2 AND 3 OF THE GSFA RELATING TO CCFO

It is proposed to forward CCFO the proposed amendments to food additive provision in CCFO standards for its consideration.

The relevant Codex Standards for fats and oils that are being aligned with the GSFA are included in the following food categories in the GSFA:

CXS Number	Codex Standard Name	GSFA food category
19-1981	Edible fats and oils not covered by individual standards	02.1
33-1981	Olive oils and olive pomace oils	02.1.2
210-1999	Named vegetable oils	02.1.2
211-1999	Named animal fats	02.1.3
256-2007	Fat spreads and blended spreads	02.2.2
329-2017	Fish oils	02.1.3

The following amendments to the food additive provisions in Codex commodity Standards are proposed.

New text is indicated in **bold/underline.** Text to be removed is indicated in ~~strikethrough.~~

1. Proposed amendments to the Codex commodity standards for fats and oils

A. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR EDIBLE FATS AND OILS NOT COVERED BY INDIVIDUAL STANDARDS* (CXS 19-1981)

3. FOOD ADDITIVES

Antifoaming agents, antioxidants and colours used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 02.1 (Fats and oils essentially free from water) and its sub-categories are acceptable for use in foods conforming to this standard.

No additives are permitted in virgin or cold pressed oils covered by this Standard.

~~**3.1 Colours**~~

~~No colours are permitted in vegetable oils covered by this Standard.~~

~~The following colours are permitted for the purpose of restoring natural colour lost in processing or for the purpose of standardizing colour, as long as the added colour does not deceive or mislead the consumer by concealing damage or inferiority or by making the product appear to be of greater than actual value:~~

~~INS No.~~	~~Additive~~	~~Maximum Use Level~~
~~100(i)~~	~~Curcumin~~	~~5 mg/kg~~
~~160a(ii)~~	~~*beta*-Carotenes (vegetable)~~	~~25 mg/kg~~
~~160a(i)~~	~~*beta*-Carotenes (synthetic)~~	~~25 mg/kg (Singly or in combination)~~
~~160a(iii)~~	~~*beta*-Carotenes (*Blakeslea trispora*)~~	
~~160e~~	~~*beta-apo-8'-Carotenal*~~	
~~160f~~	~~*beta*-apo-8'-Carotenoic acid, methyl or ethyl ester~~	
~~160b(i)~~	~~Annatto extracts, bixin-based~~	~~10 mg/kg (as bixin)~~

~~**3.2 Flavourings**~~

The flavourings used in products covered by this standard **should** ~~shall~~ comply with the *Guidelines for the Use of Flavourings* (CXG 66-2008).

~~**3.3 Antioxidants**~~

~~INS N.o.~~	~~Additive~~	~~Maximum Use Level~~
~~304~~	~~Ascorbyl Palmitate~~	~~500 mg/kg (Singly or in combination)~~
~~305~~	~~Ascorbyl Stearate~~	
~~307a~~	~~Tocopherol, d-*alpha*~~	~~300 mg/kg (Singly or in combination)~~
~~307b~~	~~Tocopherol concentrate, mixed~~	
~~307c~~	~~Tocopherol, dl-*alpha*~~	
~~310~~	~~Propyl gallate~~	~~100 mg/kg~~

~~319~~	~~Tertiary butyl hydroquinone (TBHQ)~~	~~120 mg/kg~~
~~320~~	~~Butylated hydroxyanisole (BHA)~~	~~175 mg/kg~~
~~321~~	~~Butylated hydroxytoluene (BHT)~~	~~75 mg/kg~~
~~Any combination of gallates, BHA, BHT, and/or TBHQ~~		~~200 mg/kg but limits above not to be exceeded~~
~~322(i)~~	~~Lecithin~~	~~GMP~~
~~389~~	~~Dilauryl thiodipropionate~~	~~200 mg/kg~~

~~**3.4 Antioxidant synergists**~~

~~**INS No.**~~	~~**Additive**~~	~~**Maximum Use Level**~~
~~330~~	~~Citric acid~~	~~GMP~~
~~331(i)~~	~~Sodium dihydrogen citrate~~	~~GMP~~
~~331(iii)~~	~~Trisodium citrate~~	~~GMP~~
~~332(ii)~~	~~Tripotassium citrate~~	~~GMP~~
~~333(iii)~~	~~Tricalcium citrate~~	~~GMP~~
~~384~~	~~Isopropyl citrates~~	~~100 mg/kg~~ (~~Singly or in combination~~)
~~472c~~	~~Citric and fatty acid esters of glycerol~~	

~~**3.5 Anti-foaming agents (for oils and fats for deepfrying)**~~

~~**INS No.**~~	~~**Additive**~~	~~**Maximum Use Level**~~
~~471~~	~~Mono- and di-glycerides of fatty acids~~	~~GMP~~
~~900a~~	~~Polydimethylsiloxane~~	~~10 mg/kg~~

B. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR OLIVE OILS AND OLIVE POMACE OILS* (CXS 33-1981)

4. FOOD ADDITIVES

Antioxidants used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 02.1.2 (Vegetable oils and fats) are acceptable for use in foods conforming to this standard.

~~**4.1 Virgin olive oils**~~

No additives are permitted in **virgin olive oils covered by this Standard** ~~these products~~.

~~**4.2 Refined olive oil, olive oil, refined olive-pomace oil and olive-pomace oil**~~

~~The addition of alpha-tocopherols (d-*alpha* tocopherol (INS 307a); mixed tocopherol concentrate (INS 307b); dl-*alpha*-tocopherol (INS 307c)) to the above products is permitted to restore natural tocopherol lost in the refining process. The concentration of alpha-tocopherol in the final product shall not exceed 200 mg/kg.~~

C. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR NAMED VEGETABLE OILS* (CXS 210-1999)

4. FOOD ADDITIVES

Antifoaming agents, antioxidants and emulsifiers used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 02.1.2 (Vegetable oils and fats) are acceptable for use in foods conforming to this standard

No food additives are permitted in virgin or cold pressed oils.

~~**4.1 Flavouring**~~

The flavourings used in products covered by this standard **should** ~~shall~~ comply with the *Guidelines for the Use of Flavourings* (CXG 66-2008).

~~**4.2 Antioxidants**~~

~~**INS No.**~~	~~**Additive**~~	~~**Maximum Use Level**~~
~~304~~	~~Ascorbyl palmitate~~	~~500 mg/kg (Singly or in combination)~~
~~305~~	~~Ascorbyl stearate~~	
~~307a~~	~~Tocopherol, d-*alpha*-~~	~~300 mg/kg (Singly or in combination)~~
~~307b~~	~~Tocopherol concentrate, mixed~~	
~~307c~~	~~Tocopherol, dl-*alpha*~~	
~~310~~	~~Propyl gallate~~	~~100 mg/kg~~
~~319~~	~~Tertiary butyl hydroquinone (TBHQ)~~	~~120 mg/kg~~
~~320~~	~~Butylated hydroxyanisole (BHA)~~	~~175 mg/kg~~

~~321~~	~~Butylated hydroxytoluene (BHT)~~	~~75 mg/kg~~
~~Any combination of gallates, BHA, BHT, or TBHQ not to exceed 200 mg/kg within individual limits~~		
~~322(i)~~	~~Lecithin~~	~~GMP~~
~~389~~	~~Dilauryl thiodiproprionate~~	~~200 mg/kg~~

~~4.3 Antioxidant synergists~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~330~~	~~Citric acid~~	~~GMP~~
~~331(i)~~	~~Sodium dihydrogen citrate~~	~~GMP~~
~~331(iii)~~	~~Trisodium citrate~~	~~GMP~~
~~332(ii)~~	~~Tripotassium citrate~~	~~GMP~~
~~333(iii)~~	~~Tricalcium citrate~~	~~GMP~~
~~384~~	~~Isopropyl citrates~~	~~100 mg/kg (Singly or in combination)~~
~~472c~~	~~Citric and fatty acid esters of glycerol~~	

~~4.4 Anti-foaming agents (oils for deepfrying)~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~900a~~	~~Polydimethylsiloxane~~	~~10 mg/kg~~

D. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR NAMED ANIMAL FATS* (CXS 211-1999)

4. FOOD ADDITIVES

Antifoaming agents, antioxidants and colours used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 02.1.3 (Lard, tallow, fish oil, and other animal fats) are acceptable for use in foods conforming to this standard.

~~4.1 Colours~~

~~The following colours are permitted for the purpose of restoring natural colour lost in processing or for the purpose of standardizing colour, as long as the added colour does not deceive or mislead the consumer by concealing damage or inferiority or by making the product appear to be of greater than actual value:~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~100(i)~~	~~Curcumin~~	~~5 mg/kg~~
~~160a(ii)~~	~~*beta*-Carotenes (vegetable)~~	~~25 mg/kg~~
~~160a(i)~~	~~*beta*-Carotenes (synthetic)~~	~~25 mg/kg (Singly or in combination)~~
~~160a(iii)~~	~~*beta*-Carotenes (*Blakeslea trispora*)~~	
~~160e~~	~~*beta-apo-8'-Carotenal*~~	
~~160f~~	~~*beta*-apo-8'-Carotenoic acid, methyl or ethyl ester~~	
~~160b(i)~~	~~Annatto extracts, bixin-based~~	~~10 mg/kg (as bixin)~~

~~4.2 Antioxidants~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~304~~	~~Ascorbyl palmitate~~	~~500 mg/kg (Singly or in combination)~~
~~305~~	~~Ascorbyl stearate~~	
~~307a~~	~~Tocopherol, d-*alpha*-~~	~~300 mg/kg (Singly or in combination)~~
~~307b~~	~~Tocopherol concentrate, mixed~~	
~~307c~~	~~Tocopherol, dl-*alpha*~~	
~~310~~	~~Propyl gallate~~	~~100 mg/kg~~
~~319~~	~~Tertiary butyl hydroquinone (TBHQ)~~	~~120 mg/kg~~
~~320~~	~~Butylated hydroxyanisole (BHA)~~	~~175 mg/kg~~
~~321~~	~~Butylated hydroxytoluene (BHT)~~	~~75 mg/kg~~
~~Any combination of gallates, BHA, BHT, or TBHQ~~		~~200 mg/kg but limits above not to be exceeded~~
~~322(i)~~	~~Lecithin~~	~~GMP~~

~~4.3 Antioxidant synergists~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~330~~	~~Citric acid~~	~~GMP~~
~~331(i)~~	~~Sodium dihydrogen citrate~~	~~GMP~~

~~331(iii)~~	~~Trisodium citrate~~	~~GMP~~
~~384~~	~~Isopropyl citrates~~	~~100 mg/kg~~
~~472c~~	~~Citric and fatty acid esters of glycerol~~	~~(Singly or in combination)~~

~~4.4 Antifoaming agents~~ ~~(for oils and fats for deep frying)~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~471~~	~~Mono- and di-glycerides of fatty acids~~	~~GMP~~

E. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR FAT SPREADS AND BLENDED SPREADS* (CXS 256-2007)

4. FOOD ADDITIVES

Acidity regulators, antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, preservatives, stabilizers and thickeners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 02.2.2 (Fat spreads, dairy fat spreads and blended spreads) are acceptable for use in foods conforming to this standard. Additionally, packaging gases used in accordance with Table 3 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in foods conforming to this standard.

~~Only those food additive classes listed below are technologically justified and may be used in products covered by this Standard. Within each additive class only those food additives listed below, or referred to, may be used and only for the functions, and within the limits, specified.~~

~~Additive Functional Classes~~

~~a. Acidity regulators~~

~~b. Antifoaming agents~~

~~c. Antioxidants~~

~~d. Colours~~

~~e. Emulsifiers~~

~~f. Flavour enhancers~~

~~g. Packing gases~~

~~h. Preservatives~~

~~i. Stabilizers~~

~~j. Thickeners~~

~~Acidity regulators, antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, packing gases, preservatives, stabilizers and thickeners used in accordance with Table 3 of the Codex General Standard for Food Additives are acceptable for use in foods conforming to this Standard.~~

~~4.1 Acidity Regulators~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~262(ii)~~	~~Sodium diacetate~~	~~1,000 mg/kg~~
~~334; 335 (ii); 337~~	~~Tartrates~~	~~100 mg/kg (as tartaric acid)~~
~~338; 339(i), (ii), (iii); 340(i), (ii), (iii); 341(i), (ii), (iii); 342(i), (ii); 343(i), (ii), (iii); 450(i), (ii), (iii), (v), (vi); (vii), 451(i), (ii); 452(i), (ii), (iii), (iv), (v); 542~~	~~Phosphates~~	~~1,000 mg/kg (as Phosphorus)~~

~~4.2 Antifoaming Agents~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~900a~~	~~Polydimethylsiloxane~~	~~10 mg/kg (frying purposes, only)~~

~~4.3 Antioxidants~~

~~INS No.~~	**~~Additive~~**	**~~Maximum Use Level~~**
~~304, 305~~	~~Ascorbyl esters~~	~~500 mg/kg (as ascorbyl stearate)~~
~~307a~~	~~Tocopherol, d-*alpha*-~~	~~500 mg/kg (Singly or in combination)~~
~~307b~~	~~Tocopherol concentrate, mixed~~	
~~307c~~	~~Tocopherol, dl-*alpha*~~	

310	Propyl gallate	200 mg/kg (fat or oil basis) singly or in combination.
319	Tertiary butylhydroquinone	
320	Butylated hydroxyanisole	
321	Butylated hydroxytoluene	
384	Isopropyl citrates	100 mg/kg
385, 386	EDTAs	100 mg/kg (as anhydrous calcium disodium EDTA)
388, 389	Thiodipropionates	200 mg/kg (as thiodipropionic acid)

4.4 Colours

INS No.	Additive	Maximum Use Level
100(i)	Curcumin	10 mg/kg
101(i), (ii)	Riboflavins	300 mg/kg
120	Carmines	500 mg/kg
150b	Caramel II - caustic sulfite process	500 mg/kg
150c	Caramel III - ammonia process	500 mg/kg
150d	Caramel IV - sulfite ammonia process	500 mg/kg
160a(ii)	beta-Carotenes, (vegetable)	1000 mg/kg
160a(i)	beta-Carotenes (synthetic)	35 mg/kg singly or in combination
160a(iii)	*beta*-Carotenes (*Blakeslea trispora*)	
160e	*beta*-apo-8'-Carotenal	
160f	*beta*-apo-8'-Carotenoic acid, methyl or ethyl ester	
160b(i)	Annatto extracts, bixin-based	100 mg/kg (as bixin)

4.5 Emulsifiers

INS No.	Additive	Maximum Use Level
432, 433, 434, 435, 436	Polysorbates	10,000 mg/kg (singly or in combination)
472e	Diacetyltartaric and fatty acid esters of glycerol	10,000 mg/kg
473	Sucrose esters of fatty acids	10,000 mg/kg
474	Sucroglycerides	10,000 mg/kg
475	Polyglycerol esters of fatty acids	5,000 mg/kg
476	Polyglycerol esters of interesterified ricinoleic acid	4,000 mg/kg
477	Propylene glycol esters of fatty acids	20,000 mg/kg
479	Thermally oxidized soya bean oil interacted with mono- and diglycerides of fatty acids)	5,000 mg/kg (in fat emulsions for frying or baking purpose, only).
481(i), 482(i)	Stearoyl-2-lactylates	10,000 mg/kg (singly or in combination)
484	Stearyl citrate	100 mg/kg (fat or oil basis)
491, 492, 493, 494, 495	Sorbitan esters of fatty acids	10,000 mg/kg (singly or in combination)

4.6 Flavouring

The flavourings used in products covered by this standard **should** ~~shall~~ comply with the *Guidelines for the Use of Flavourings* (CXG 66-2008).

4.7 Preservatives

INS No.	Additive	Maximum Use Level
200, 202, 203	Sorbates	2,000 mg/kg (singly or in combination (as sorbic acid))
210, 211, 212, 213	Benzoates	1,000 mg/kg (singly or in combination (as benzoic acid))
If used in combination, the combined use shall not exceed 2000 mg/kg of which the benzoic acid portion shall not exceed 1000 mg/kg.		

4.8 Stabilizers and Thickeners

INS No.	Additive	Maximum Use Level
405	Propylene glycol alginate	3,000 mg/kg

F. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR FISH OILS* (CXS 329-2017)

4. FOOD ADDITIVES

Antifoaming agents, antioxidants, emulsifiers and sequestrants, used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995), in food category *02.1.3* (Lard, tallow, fish oil, and other animal fats) are acceptable for use in foods conforming to this standard.

~~The following additives may be used in addition:~~

~~**INS**~~	~~**Additive name**~~	~~**Maximum level**~~
~~**Antioxidant**~~		
~~300~~	~~Ascorbic acid, L-~~	~~GMP~~
~~304, 305~~	~~Ascorbyl esters~~	~~2500 mg/kg, as ascorbyl stearate~~
~~307a, b, c~~	~~Tocopherols~~	~~6000 mg/kg, singly or in combination~~
~~**Emulsifier**~~		
~~322 (i)~~	~~Lecithin~~	~~GMP~~
~~471~~	~~Mono- and di-glycerides of fatty acids~~	~~GMP~~

The flavourings used in products covered by this standard should comply with the *Guidelines for the Use of Flavourings* (CXG 66-2008).

2. Proposed amendments to Tables 1, 2 and 3 of the GSFA for fats and oils

The following amendments to the food additive provisions in the GSFA are proposed.

New text is indicated in **bold/underline.** Text to be removed is indicated in ~~strikethrough.~~

Entries in green are for draft provisions and are provided for information only. They will be maintained at their current step and so will not be added to the final alignment document. Additionally there are some other entries that are provided for information only that do not require any changes to the GSFA.

A. PROPOSED AMENDMENTS TO TABLE 1

Food category 02.1 Fats and oils essentially free from water

Lycopene, Blakeslea trispora INS: 160d(iii) Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1	Fats and oils essentially free from water	25 mg/kg	**XS19, XS33, XS210, XS211, XS329**	Step 4	Maintain at step 4

Lycopene, synthetic INS: 160d(i) Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1	Fats and oils essentially free from water	25 mg/kg	**XS19, XS33, XS210, XS211, XS329**	Step 4	Maintain at step 4

Lycopene, tomato INS: 160d(ii) Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1	Fats and oils essentially free from water	25 mg/kg	**XS19, XS33, XS210, XS211, XS329**	Step 4	Maintain at step 4

Food category 02.1.1 Butter oil, anhydrous milkfat, ghee

Annatto extracts, bixin based: **INS: 160b(i) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	100 mg/kg	8	Step 4	Maintain at step 4
02.1.1	**Butter oil, anhydrous milkfat, ghee**	**10 mg/kg**	**8, A2-CXS19**		Adopt

Ascorbyl esters: **INS: 304, 305 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	500 mg/kg	10, 171	2006	(no change)

Butylated hydroxyanisole: **INS: 320 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	175 mg/kg	15, 133, 171, **C-CXS19**	2006	Adopt

Butylated hydroxytoluene: **INS: 321 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	75 mg/kg	15, 133, 171, **C-CXS19**	2006	Adopt

Citric acid: **INS: 330 Functional class: Acidity regulator, Antioxidant, Colour retention agent, Sequestrant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	GMP	171	2006	(no change)

Lecithin: **INS: 322(i) Functional class: Antioxidant, Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	**Butter oil, anhydrous milkfat, ghee**	**GMP**	**A-CXS19**		**Adopt**

Mono- and di-glycerides of fatty acids: **INS: 471 Functional class: Antifoaming agent, Emulsifier, Glazing agent, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	**Butter oil, anhydrous milkfat, ghee**	**GMP**	**A-CXS19**		**Adopt**

Propyl gallate: **INS: 310 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	100 mg/kg	15, 133, 171, **C-CXS19**	2006	Adopt

Sodium dihydrogen citrate: **INS: 331(i) Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	GMP	171	2006	(no change)

Tertiary butylhydroquinone: **INS 319 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	**Butter oil, anhydrous milkfat, ghee**	**120 mg/kg**	**15, 171, C-CXS19**		**Adopt**

Tocopherols: **INS 307a, b, c Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	500 mg/kg	171, **B-CXS19**	2006	Adopt

Tricalcium citrate: **INS 333(iii) Functional class: Acidity regulator, Emulsifying salt, Firming agent, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	**Butter oil, anhydrous milkfat, ghee**	**GMP**	**A-CXS19**		**Adopt**

Tripotassium citrate: **INS 332(ii) Functional class: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	**Butter oil, anhydrous milkfat, ghee**	**GMP**	**A-CXS19**		**Adopt**

Trisodium citrate: INS 331(iii) Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer					
AdoptFood Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.1	Butter oil, anhydrous milkfat, ghee	GMP	171	2006	(no change)

Food category 02.1.2 Vegetable oils and fats

Annatto extracts, bixin based: **INS: 160b(i) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	**Vegetable oils and fats**	**10 mg/kg**	**8, A-CXS19210, A2-CXS19, XS33, XS210**		**Adopt**

Ascorbyl esters: **INS: 304, 305 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	500 mg/kg	10**, A-CXS19210, XS33**	2006	Adopt

Beet red: INS: 162 Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	GMP	**XS19, XS33, XS210**	Step 7	Maintain at Step 7

Butylated hydroxyanisole: **INS: 320 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	200 mg/kg	15, 130, **A-CXS19210, C2-CXS19210, XS33**	2006	Adopt

Butylated hydroxytoluene: **INS: 321: Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	200 mg/kg	15, 130, **A-CXS19210, C2-CXS19210, XS33**	2006	Adopt

Caramel II - sulfite caramel: INS: 150b Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	20000 mg/kg	**XS19, XS33, XS210**	4	Maintain at step 4

Carotenes, *beta*-, vegetable: **INS: 160a(ii) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	1000 mg/kg	**A-CXS19210, E2-CXS19, XS33, XS210**	2006	Adopt

Carotenoids: **INS:160a(i), a(iii),e,f Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	25 mg/kg	~~232,~~ **A-CXS19210, A2-CXS19, XS33, XS210**	2012	Adopt

Chlorophylls: Functional class: Colour INS: 140					
Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
02.1.2	Vegetable oils and fats	GMP	**XS19, XS33, XS210**	Step 7	Maintain at step 7

Citric acid: **INS: 330 Functional class: Acidity regulator, Antioxidant, Colour retention agent, Sequestrant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	GMP	15, ~~& 277,~~ **A-CXS19210, XS33**	2014	Adopt

Citric and fatty acid esters of glycerol: **INS: 472c Functional class: Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	100 mg/kg	~~277,~~ **A-CXS19210, G-CXS19210, XS33**	2015	Adopt

Curcumin: **INS: 101(i) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	**Vegetable oils and fats**	**5 mg/kg**	**A-CXS19210, A2-CXS19, XS33, XS210**		**Adopt**
~~02.1.2~~	~~Vegetable oils and fats~~	~~5 mg/kg~~		~~Step 7~~	~~Maintain at Step 7~~ (not needed)

Diacetyltartaric and fatty acid esters of glycerol: **INS: 472e Functional class: Emulsifier, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	10000 mg/kg	**XS19, XS33, XS210**	2006	Adopt

Guaiac resin: **INS: 314 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	1000 mg/kg	**XS19, XS33, XS210**	2006	Adopt

Isopropyl citrates: **INS: 384 Functional class: Antioxidant, Preservative, Sequestrant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	200 mg/kg	**A-CXS19210, G-CXS19210, XS33**	2005	Adopt

Lecithin: **INS: 322(i) Functional class: Antioxidant, Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	GMP	~~277,~~ **A-CXS19210, XS33, F-CXS19210**	2018	Adopt

Lycopene, tomato: **INS: 160d(ii) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	50000 mg/kg	**XS19, XS33, XS210**	Step 3	Maintain at step 3

Mono- and di-glycerides of fatty acids: **INS: 471 Functional class: Antifoaming agent, Emulsifier, Glazing agent, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	**Vegetable oils and fats**	**GMP**	**A-CXS19210, I-CXS19, XS33, XS210**		~~Adopt~~ **Hold pending discussion in GSFA pWG**

Polydimethylsiloxane: **INS: 900a Functional class: Anticaking agent, Antifoaming agent, Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	10 mg/kg	**A-CXS19210, I-CXS19210, XS33**	2006	Adopt

Polyglycerol esters of fatty acids: **INS: 475 Functional class: Emulsifier, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	**Vegetable oils and fats**	**10000 mg/kg**	**A-CXS19210, XS33, ~~G-CXS210,~~ A**		~~Adopt~~ **Hold pending discussion in GSFA pWG**

~~02.1.2~~	~~Vegetable oils and fats~~	~~20000 mg/kg~~	~~A-CXS19210, XS33, G-CXS210~~	~~Step 7~~	~~Maintain at step 7~~

Polyglycerol esters of interesterified ricinoleic acid: INS: 476 Functional class: Emulsifier					
Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
02.1.2	Vegetable oils and fats	10000 mg/kg	**XS19, XS33, XS210**	Step 7	Maintain at step 7

Polysorbates: **INS 432-436 Functional class: Emulsifier, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	5000 mg/kg	102, **XS19, XS33, XS210**	2007	Adopt

Propyl gallate: **INS: 310 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	200 mg/kg	15, 130, **A-CXS19210, C2-CXS19210, X33**	2006	Adopt

Propylene glycol alginate: **INS: 405 Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	11000 mg/kg	**XS19, XS33, XS210**	Step 7	Maintain at step 7

Propylene glycol esters of fatty acids: **INS: 477 Functional class: Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	10000 mg/kg	**XS19, XS33, XS210**	2006	Adopt

Sodium dihydrogen citrate: **INS: 331(i) Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
02.1.2	Vegetable oils and fats	GMP	~~277~~, **A-CXS19210, XS33**	2015	Adopt

Sorbitan esters of fatty acids: **INS 491-495 Functional class: Emulsifier, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	**Vegetable oils and fats**	**750 mg/kg**	**A-CXS19210, XS33, ~~G-CXS210~~, A**		~~Adopt~~ **Hold pending discussion in GSFA pWG**
~~02.1.2~~	~~Vegetable oils and fats~~	~~10000 mg/kg~~	~~XS19, XS33, G-CXS210~~	~~Step 7~~	~~Maintain at step 7~~

Stearoyl lactylates: **INS 481(i), 482(i) Functional class: Emulsifier, Flour treatment agent, Foaming agent, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	**Vegetable oils and fats**	**300 mg/kg**	**A-CXS19210, XS33, ~~G-CXS210,~~ A**		~~Adopt~~ **Hold pending discussion in GSFA pWG**
~~02.1.2~~	~~Vegetable oils and fats~~	~~3000 mg/kg~~	~~**A-CXS19210, XS33, G-CXS210**~~	~~Step 7~~	~~Maintain at step 7~~

Stearyl citrate: **INS 484 Functional class: Emulsifier, Sequestrant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	GMP	**XS19, XS33, XS210**	2006	Adopt

Tertiary butylhydroquinone: **INS 319 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	200 mg/kg	15, 130, **A-CXS19210, C2-CXS19210, XS33**	2006	Adopt

Thiodipropionates: **INS 388, 389 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	200 mg/kg	46**, A-CXS19210, XS33**	2006	Adopt

Tocopherols: **INS 307a, b, c Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	300 mg/kg	~~356,~~ 357, **A-CXS19210**,	2016	Adopt

Tricalcium citrate: **INS 333(iii) Functional class: Acidity regulator, Firming agent, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	GMP	~~277,~~ **A-CXS19210,** XS33	2018	Adopt

Tripotassium citrate: **INS 332(ii) Functional class: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	GMP	~~277,~~ **A-CXS19210,** XS33	2018	Adopt

Trisodium citrate: **INS 331(iii) Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	GMP	~~277,~~ **A-CXS19210, XS33**	2015	Adopt

Food category 02.1.3 Lard, tallow, fish oil, and other animal fats

Annatto extracts, bixin based: **INS: 160b(i) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	**Lard, tallow, fish oil, and other animal fats**	**10 mg/kg**	**8, A2-CXS19211, XS329**		**Adopt**

Ascorbic acid, L-: **INS: 300 Functional class: Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	**Lard, tallow, fish oil, and other animal fats**	**GMP**	**XS19, XS211**		**Adopt**

Ascorbyl esters: **INS: 304, 305 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	500 mg/kg	10, **A-CXS329**	2006	Adopt

Beet red: **INS: 162 Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	GMP	**XS19, XS211, XS329**	Step 7	Maintain at Step 7

Butylated hydroxyanisole **INS: 320 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	200 mg/kg	15, 130, **C2-CXS19211**	2006	Adopt

Butylated hydroxytoluene **INS: 321: Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	200 mg/kg	15, 130, **C2-CXS19211**	2006	Adopt

Caramel II - sulfite caramel **INS: 150b Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	20000 mg/kg	**XS19, XS211, XS329**	4	Maintain at step 4

Carotenes, *beta*-, vegetable: **INS: 160a(ii) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	1000 mg/kg	**E2-CXS19211, XS329**	2006	Adopt

Carotenoids: **INS:160a(i), a(iii),e,f Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	25 mg/kg	**A2-CXS19211, XS329**	2011	Adopt

Chlorophylls: Functional class: Colour INS: 140					
Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
02.1.3	Lard, tallow, fish oil, and other animal fats	GMP	**XS19, XS211, XS329**	Step 7	Maintain at step 7

Citric and fatty acid esters of glycerol: **INS: 472c Functional class: Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	100 mg/kg	~~322~~**, G-CXS19211**	2015	Adopt

Curcumin: **INS: 101(i) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	**Lard, tallow, fish oil, and other animal fats**	**5 mg/kg**	**A2-CXS19211, XS329**		**Adopt**
~~02.1.3~~	~~Lard, tallow, fish oil, and other animal fats~~	~~5 mg/kg~~		~~Step 7~~	~~Maintain Step 7~~ (not needed)

Diacetyltartaric and fatty acid esters of glycerol: INS: 472e Functional class: Emulsifier, Sequestrant, Stabilizer					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	10000 mg/kg	**XS19, XS211**	2006	Adopt

Fast green FCF: INS: 143 Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	GMP	**XS19, XS211, XS329**	1999	Adopt

Guaiac resin: INS: 314 Functional class: Antioxidant					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	1000 mg/kg	**XS19, XS211**	2006	Adopt

Indigotine (Indigo carmine): INS: 132 Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	300 mg/kg	161, **XS19, XS211, XS329**	2009	Adopt

Isopropyl citrates: INS: 384 Functional class: Antioxidant, Preservative, Sequestrant					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	200 mg/kg	**G-CXS19211**	2005	Adopt

Lecithin: INS: 322(i) Functional class: Antioxidant, Emulsifier					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	GMP		2018	(no change)

Lycopene, tomato: INS: 160d(ii) Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	50000 mg/kg	**XS19, XS211, XS329**	Step 3	Maintain at step 3

Mono- and di-glycerides of fatty acids: **INS: 471 Functional class: Antifoaming agent, Emulsifier, Glazing agent, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	GMP	~~408,~~ ~~XS211,~~ **I-CXS19211**	2018	Adopt

Polydimethylsiloxane: **INS: 900a Functional class: Anticaking agent, Antifoaming agent, Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	10 mg/kg	**I-CXS19, XS211**	2006	Adopt

Polysorbates: **INS 432-436 Functional class: Emulsifier, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	5000 mg/kg	102, **XS19, XS211**	2007	Adopt

Propyl gallate: **INS: 310 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	200 mg/kg	15, 130, **C2-CXS19211**	2006	Adopt

Propylene glycol esters of fatty acids: **INS: 477 Functional class: Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	10000 mg/kg	**XS19, XS211**	2006	Adopt

Sodium dihydrogen citrate: **INS 331(i) Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	**Lard, tallow, fish oil, and other animal fats**	**GMP**	**H-CXS19211, XS329**		**Adopt**

Stearyl citrate: **INS 484 Functional class: Antioxidant, Emulsifier, Sequestrant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	GMP	**XS19, XS211**	2006	Adopt

Sunset yellow FCF: **INS: 110 Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	300 mg/kg	161, **XS19, XS211, XS329**	2008	Adopt

Tartrazine: **INS: 102 Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	300 mg/kg	**XS19, XS211, XS329**	Step 4	Maintain at step 4

Tertiary butylhydroquinone: **INS 319 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	200 mg/kg	15, 130, **C2-CXS19211**	2006	Adopt

Thiodipropionates: **INS 388, 389 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	200 mg/kg	46**, XS211**	2006	Adopt

Tocopherols: **INS 307a, b, c Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.3	Lard, tallow, fish oil, and other animal fats	300 mg/kg	~~358~~**, B-CXS329**	2016	Adopt

Trisodium citrate: **INS 331(iii) Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
~~02.1.3~~	~~Lard, tallow, fish oil, and other animal fats~~	~~GMP~~		~~Step 7~~	~~Maintain at step 7~~ (not needed)
02.1.3	**Lard, tallow, fish oil, and other animal fats**	**GMP**	**H-CXS19211, XS329**		**Adopt**

Notes

(for information only)

Note 8 As bixin

Note 10 As ascorbyl stearate

Note 15 On the fat or oil basis

Note 46 As thiodipropionic acid.

Note 102 For use in fat emulsions for baking purposes only.

Note 130 Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylated hydroquinone (INS 319), and propyl gallate (INS 310).

Note 133 Any combination of butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), and propyl gallate (INS 310) at 200 mg/kg, provided that single use limits are not exceeded.

Note 171 Excluding anhydrous milkfat

Note 232 For use in vegetable fats conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981) only.

Note 277 Excluding virgin and cold pressed oils and products conforming to the standard for Olive Oils and Olive Pomace Oils (CODEX STAN 33-1981)

Note 322 For use in products conforming to the Standard for Edible Fats and Oils not Covered by Individual Standards (CODEX STAN 19-1981) and the Standard for Named Animal Fats (CODEX STAN 211-1999)

Note 356 Excluding virgin or cold pressed oils

Note 357 Except for use in refined olive oil, olive oil, refined olive-pomace oil and olive pomace oil at 200 mg/kg to restore natural tocopherol lost in production.

Note 358 Except for use in fish oils at 6,000 mg/kg, singly or in combination.

Note 408 Only for use as an emulsifier in products conforming to the Standard for Fish Oils (CODEX STAN 329-2017), or as an antifoaming agent in oils and fats for deep frying conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981).

Note XS33 Excluding products conforming to the Standard for Olive Oils and Olive Pomace Oils (CXS 33-1981).

Proposed new notes

XS19: Excluding products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981).

XS210: Excluding products conforming to the *Standard for Named Vegetable Oils* (CXS 210-1999).

XS211: Excluding products conforming to the *Standard for Named Animal Fats* (CXS 211-1999).

XS256: Excluding products conforming to the *Standard for Fat Spreads and Blended Spreads* (CXS 256-2007).

XS329: Excluding products conforming to the *Standard for Fish Oils* (CXS 329-2017).

A For use as an emulsifier in cooking oils conforming to the Standard for Edible Fats and Oils not Covered by Individual Standards (CXS 19-1981) and the Standard for Named Vegetable Oils (CXS 210-1999).

A-CXS19 For use in products conforming to the S*tandard for Edible fats and Oils Not Covered by Individual Standards* (CXS 19-1981).

A2-CXS19 For use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) for the purposes of restoring natural colour lost in processing, or standardizing colour only.

A-CXS19210 Excluding virgin and cold pressed oils in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and the *Standard for Named Vegetable Oils* (CXS 210-1999).

A2-CXS19211 For use in products conforming to the *Standard for Edible fats and oils not Covered by Individual Standards* (CXS 19-1981) and the *Standard for Named Animal Fats* (CXS 211-1999) for the purposes of restoring natural colour lost in processing, or standardizing colour only.

B-CXS19 Except for use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) at 300 mg/kg.

C-CXS19 Except for use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981): butylated hydroxyanisole (INS 320) at 175 mg/kg, butylated hydroxytoluene (INS 321) at 75 mg/kg, propyl gallate (INS 310) at 100 mg/kg, and tertiary butylhydroquinone (INS 319) at 120 mg/kg; as well,

	any combination of INS 320, INS 321, INS 310 and INS 319 at up to 200 mg/kg, provided the single use limits are not exceeded.
C2-CXS19210	**Except for use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and the *Standard for Named Vegetable Oils* (CXS 210-1999): butylated hydroxyanisole (INS 320) at 175 mg/kg, butylated hydroxytoluene (INS 321) at 75 mg/kg, propyl gallate (INS 310) at 100 mg/kg, and tertiary butylhydroquinone (INS 319) at 120 mg/kg; as well, any combination of INS 320, INS 321, INS 310 and INS 319 at up to 200 mg/kg, provided the single use limits are not exceeded.**
C2-CXS19211	**Except for use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and the *Standard for Named Animal Fats* (CXS 211-1999)): butylated hydroxyanisole (INS 320) at 175 mg/kg, butylated hydroxytoluene (INS 321) at 75 mg/kg, propyl gallate (INS 310) at 100 mg/kg, and tertiary butylhydroquinone (INS 319) at 120 mg/kg; as well, any combination of INS 320, INS 321, INS 310 and INS 319 at up to 200 mg/kg, provided the single use limits are not exceeded.**
E2-CXS19	**Except for use in products conforming to the *Standard for Edible fats and oils not covered by individual standards* (CXS 19-1981) at 25 mg/kg for the purposes of restoring natural colour lost in processing, or standardizing colour only.**
E2-CXS19211	**Except for use in products conforming to the *Standard for Edible fats and oils not covered by individual standards* (CXS 19-1981) and the *Standard for Named Animal Fats* (CXS 211-1999) at 25 mg/kg for the purposes of restoring natural colour lost in processing, or standardizing colour only.**
F-CXS19210	**For use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and to the *Standard for Named Vegetable Oils* (CXS 210-1999) as an antioxidant only.**
G-CXS19210	**Except for use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981), the *Standard for Named Vegetable Oils* (CXS 210-1999), singly or in combination: isopropyl citrates (INS 384) and citric and fatty acid esters of glycerol (INS 472c) at 100 mg/kg.**
G-CXS19211	**For use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and the *Standard for Named Animal Fats* (CXS 211-1999), singly or in combination: isopropyl citrates (INS 384) and citric and fatty acid esters of glycerol (INS 472c) at 100 mg/kg.**
H-CXS19211	**For use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and the *Standard for Named Animal Fats* (CXS 211-1999).**
I-CXS19	**For use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981), as an antifoaming agent in oils for deep frying only.**
I-CXS19210	**For use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and the *Standard for Named Vegetable Oils* (CXS 210-1999), as an antifoaming agent in oils for deep frying only.**
I-CXS19211	**For use in products conforming to the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and the *Standard for Named Animal Fats* (CXS 211-1999), as an antifoaming agent in oils for deep frying only.**
A-CXS329	**Except for use in products conforming to the *Standards for Fish Oils* (CXS 329-2017) at 2500 mg/kg.**
B-CXS329	**Except for use in products conforming to the *Standards for Fish Oils* (CXS 329-2017), singly or in combination at 6000 mg/kg.**

Food category 02.2.2 Fat spreads, dairy fat spreads and blended spreads

Annatto extracts, bixin-based: **INS: 160b(i) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
~~02.2.2~~	~~Fat spreads, dairy fat spreads and blended spreads~~	~~100 mg/kg~~	~~8~~	~~Step 4~~	~~Maintain at step 4~~ (not needed)
02.2.2	**Fat spreads, dairy fat spreads and blended spreads**	**100 mg/kg**	**8, A-CXS256**		**Adopt**

Benzoates: **INS: 210-213 Functional class: Preservative**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	1000 mg/kg	13, **B-CXS256**	2001	Adopt

Caramel II - sulfite caramel: **INS: 150b Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	20000 mg/kg	**A-CXS256**	Step 4	Maintain at step 4
02.2.2	**Fat spreads, dairy fat spreads and blended spreads**	**500 mg/kg**	**A-CXS256**		**Adopt**

Curcumin: **INS: 101(i) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	**Fat spreads, dairy fat spreads and blended spreads**	**10 mg/kg**	**A-CXS256**		**Adopt**
~~02.2.2~~	~~Fat spreads, dairy fat spreads and blended spreads~~	~~10 mg/kg~~		~~Step 4~~	~~Maintain Step 4~~ (not needed)

Hydroxybenzoates, para-: **INS:214, 218 Functional class: Preservative**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	300 mg/kg	27, **215**	2012	Adopt

Lycopene, tomato: **INS: 160d(ii) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10000 mg/kg	**215**	Step 3	Maintain at step 3

Paprika extract: INS: 160c(ii) Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	40 mg/kg	39, **215**	Step 2	Maintain at step 2

Phosphates: **INS 338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i), (ii), 343(i)-(iii), 450(i)-(iii), (v)-(vii), (ix), 451(i), (ii), 452((i)-(v), 542 Functional class: Acidity regulator, Antioxidant, Emulsifier, Firming agent, Flour treatment agent, Humectant, Preservative, Raising agent, Sequestrant, Stabilizer, Thickener**					
Food Category No	Food Category	Max level	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	2200 mg/kg	33, **E-CXS256**	2009	Adopt

Sorbates: **INS; 200, 202, -203 Functional class: Preservative**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	2000 mg/kg	42, **B-CXS256**	2009	Adopt

Thermally oxidized soya bean oil interacted with mono- and diglycerides of fatty acids : **INS: 479 Functional class: Emulsifier**					
Food Category No	Food Category	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	5000 mg/kg	**F-CXS256**	1999	Adopt

Zeaxanthin, synthetic : INS: 161h(i) Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	100 mg/kg	**215**	Step 4	Maintain at Step 4

Notes

(for information only)

Note 8 As bixin

Note 27 As para-hydroxybenzoic acid.

Note 39 On a total carotenoid basis.

Note 215 Excluding products conforming to the Standard for Fat Spreads and Blended Spreads (CXS 256-2007).

(Proposed new notes)

A-CXS256 **For use in products conforming to the *Standard for Spreads and Blended Spreads* (CXS 256-2007).**

B-CXS256 **For use in products conforming to the *Standard for Fat Spreads and Blended Spreads* (CXS 256-2007); if benzoates and sorbates are used in combination, the combined use shall not exceed 2000 mg/kg of which the benzoic acid portion shall not exceed 1000 mg/kg.**

E-CXS256 **Except for use as acidity regulators only in products conforming to the *Standard for Spreads and Blended Spreads* (CXS 256-2007) at 1000 mg/kg as phosphorus: phosphoric**

acid (INS 338), sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii), ammonium dihydrogen phosphate (INS 342(i)), diammonium hydrogen phosphate (INS 342(ii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium diphosphate (INS 450(vi)), calcium dihydrogen diphosphate (INS 450(vii)), magnesium dihydrogen diphosphate (INS 450(ix)), pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate (INS 451(ii)), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), ammonium polyphosphate (INS 452(v)).

F-CXS256 **For use in products conforming to the *Standard for Spreads and Blended Spreads* (CXS 256-2007); for use in fat emulsions for frying or baking purpose only.**

B. PROPOSED AMENDMENTS TO TABLE 2

Food category 02.1 Fats and oils essentially free from water				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Lycopene, Blakeslea trispora	**160d(iii)**	25 mg/kg	**XS19, XS33, XS210, XS211, XS329**	Maintain at step 4
Lycopene, synthetic	**160d(i)**	25 mg/kg	**XS19, XS33, XS210, XS211, XS329**	Maintain at step 4
Lycopene, tomato	**160d(ii)**	25 mg/kg	**XS19, XS33, XS210, XS211, XS329**	Maintain at step 4

Food category 02.1.1 Butter oil, anhydrous milkfat, ghee				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Annatto extracts, bixin based	**160b(i)**	**100 mg/kg**	8	**Maintain at step 4**
Annatto extracts, bixin based	**160b(i)**	**10 mg/kg**	**8, A2-CXS19**	**Adopt**
Ascorbyl esters	304, 305	500 mg/kg	10, 171	(no change)
Butylated hydroxyanisole	320	175 mg/kg	15, 133, 171, **C-CXS19**	Adopt
Butylated hydroxytoluene	321	75 mg/kg	15, 133, 171, **C-CXS19**	Adopt
Citric acid	330	GMP	171	(no change)
Lecithin	**322(i)**	**GMP**	**A-CXS19**	**Adopt**
Mono- and di-glycerides of fatty acids	**471**	**GMP**	**A-CXS19**	**Adopt**
Propyl gallate	310	100 mg/kg	15, 133, 171, **C-CXS19**	Adopt
Sodium dihydrogen citrate	331(i)	GMP	171	(no change)
Tertiary butylhydroquinone	**319**	**120**	**15, 171, C-CXS19**	**Adopt**
Tocopherols	307a, b, c	500 mg/kg	171, **B-CXS19**	Adopt
Tricalcium citrate	**333(iii)**	**GMP**	**A-CXS19**	**Adopt**
Tripotassium citrate	**332(ii)**	**GMP**	**A-CXS19**	**Adopt**
Trisodium citrate	331(iii)	GMP	171	(no change)

Food category 02.1.2 Vegetable oils and fats				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**

Annatto extracts, bixin based	**160b(i)**	**10 mg/kg**	**8, A-CXS19210, A2-CXS19, XS33, XS210**	Adopt
Ascorbyl esters	304, 305	500 mg/kg	10**, A-CXS19210, XS33**	Adopt
Beet red	162	GMP	**XS19, XS33, XS210**	Maintain at step 7
Butylated hydroxyanisole	320	200 mg/kg	15, 130, **A-CXS19210, C2-CXS19210, XS33**	Adopt
Butylated hydroxytoluene	321	200 mg/kg	15, 130, **A-CXS19210, C2-CXS19210, XS33**	Adopt
Caramel II - sulfite caramel	150b	20000 mg/kg	**XS19, XS33, XS210**	Maintain at step 4
Carotenes, beta-, vegetable	160a(ii)	1000 mg/kg	**A-CXS19210, E2-CXS19, XS33, XS210**	Adopt
Carotenoids	160a(i), a(iii), e, f	25 mg/kg	~~232,~~ **A-CXS19210, A2-CXS19, XS33, XS210**	Adopt
Chlorophylls	140	GMP	**XS19, XS33, XS210**	Maintain at step 7
Citric acid	330	GMP	15, ~~277,~~ **A-CXS19210, XS33**	Adopt
Citric and fatty acid esters of glycerol	472c	100 mg/kg	~~277,~~ **A-CXS19210, G-CXS19210, XS33**	Adopt
~~Curcumin~~	~~100(i)~~	~~5 mg/kg~~		~~Maintain at step 7~~ (not needed)
Curcumin	**100(i)**	**5 mg/kg**	**A-CXS19210, A2-CXS19, XS33, XS210**	**Adopt**
Diacetyltartaric and fatty acid esters of glycerol	472e	10000 mg/kg	**XS19, XS33, XS210**	Adopt
Guaiac resin	314	1000 mg/kg	**XS19, XS33, XS210**	Adopt
Isopropyl citrates	384	200 mg/kg	**A-CXS19210, G-CXS19210, XS33**	Adopt
Lecithin	322(i)	GMP	~~277,~~ **A-CXS19210, XS33, F-CXS19210**	Adopt
Lycopene, tomato	**160d(ii)**	5000 mg/kg	**XS19, XS33, XS210**	Maintain at step 3
Mono- and di-glycerides of fatty acids	**471**	**GMP**	**A-CXS19210, I-CXS19, XS33, XS210**	**Hold pending discussion in GSFA pWG**
Polydimethylsiloxane	900a	10 mg/kg	**A-CXS19210, I-CXS19210, XS33**	Adopt

Polyglycerol esters of fatty acids	**475**	**10000 mg/kg**	**A-CXS19210, ~~XS19,~~ XS33, ~~G-CXS210,~~ A**	~~Adopt~~ **Hold pending discussion in GSFA pWG**
~~Polyglycerol esters of fatty acids~~	~~475~~	~~20000 mg/kg~~	**~~A-CS19210, XS19, XS33, G-CXS210~~**	~~Maintain at step 7~~
Polyglycerol esters of interesterified ricinoleic acid	476	10000 mg/kg	**XS19, XS33, XS210**	Maintain at step 7
Polysorbates	432-436	5000 mg/kg	102, **XS19, XS33, XS210**	Adopt
Propyl gallate	310	200 mg/kg	15, 130, **A-CXS19210, C2-CXS19210, XS33**	Adopt
Propylene glycol alginate	405	11000 mg/kg	**XS19, XS33, XS210**	Maintain at step 7
Propylene glycol esters of fatty acids	477	10000 mg/kg	**XS19, XS33, XS210**	Adopt
Sodium dihydrogen citrate	331(i)	GMP	~~277,~~**A-CXS19210, XS33**	Adopt
Sorbitan esters of fatty acids	**491-495**	**750 mg/kg**	**A-CXS19210, ~~XS19,~~ XS33, ~~G-CXS210,~~ A**	~~Adopt~~ **Hold pending discussion in GSFA pWG**
~~Sorbitan esters of fatty acids~~	~~491-495~~	~~10000 mg/kg~~	**~~XS19, XS33, G-CXS210~~**	~~Maintain at Step 7~~
Stearoyl lactylates	**481(i), 482(i)**	**300 mg/kg**	**A-CXS19210, ~~XS19,~~ XS33, ~~G-CXS210,~~ A**	~~Adopt~~ **Hold pending discussion in GSFA pWG**
~~Stearoyl lactylates~~	~~481(i), 482(i)~~	~~3000 mg/kg~~	**~~A-CXS19210, XS19, XS33, G-CXS210~~**	~~Maintain at Step 7~~
Stearyl citrate	484	GMP	**XS19, XS33, XS210**	Adopt
~~Sucrose esters of fatty acids~~	**~~473~~**	**~~2000 mg/kg~~**	**~~A-CXS19210, XS19, XS33, H-CXS210~~**	~~Adopt~~
Tertiary butylhydroquinone	319	200 mg/kg	15, 130, **A-CXS19210, C2-CXS19210, XS33**	Adopt
Thiodipropionates	388, 389	200 mg/kg	46, **A-CXS19210, XS33**	Adopt
Tocopherols	307a, b, c	300 mg/kg	~~356 &~~ 357**, A-CXS19210**	Adopt
Tricalcium citrate	333(iii)	GMP	~~277,~~ **A-CXS19210,** XS33	Adopt
Tripotassium citrate	332(ii)	GMP	~~277,~~ **A-CXS19210,** XS33	Adopt
Trisodium citrate	331(iii)	GMP	~~277,~~ **A-CXS19210, XS33**	Adopt

Food category 02.1.3 Lard, tallow, fish oil, and other animal fats

Additive	INS	Max Level	Notes	Recommendations
Annatto extracts, bixin based	**160b(i)**	**10 mg/kg**	**8, A2-CXS19211, XS329**	Adopt
Ascorbic acid, L-	**300**	**GMP**	**XS19, XS211**	Adopt
Ascorbyl esters	304, 305	500 mg/kg	10, **A-CXS329**	Adopt
Beet red	162	GMP	**XS19, XS211, XS329**	Maintain at step 7
Butylated hydroxyanisole	320	200 mg/kg	15, 130, **C2-CXS19211**	Adopt
Butylated hydroxytoluene	321	200 mg/kg	15, 130, **C2-CXS19211**	Adopt
Caramel II - sulfite caramel	150b	20000 mg/kg	**XS19, XS211, XS329**	Maintain at step 4
Carotenes, beta-, vegetable	160a(ii)	1000 mg/kg	**E2-CXS19211, XS329**	Adopt
Carotenoids	160a(i), a(iii), e, f	25 mg/kg	**A2-CXS19211, XS329**	Adopt
Chlorophylls	140	GMP	**XS19, XS211, XS329**	Maintain at step 7
Citric and fatty acid esters of glycerol	472c	100 mg/kg	~~322~~**, G-CXS19211**	Adopt
~~Curcumin~~	~~100(i)~~	~~5 mg/kg~~		~~Maintain at step 7~~ (Not needed)
Curcumin	**100(i)**	**5 mg/kg**	**A2-CXS19211, XS329**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	10000 mg/kg	**XS19, XS211**	Adopt
Fast green FCF	143	GMP	**XS19, XS211, XS329**	Adopt
Guaiac resin	314	1000 mg/kg	**XS19, XS211**	Adopt
Indigotine (Indigo carmine)	132	300 mg/kg	161, **XS19, XS211, XS329**	Adopt
Isopropyl citrates	384	200 mg/kg	**G-CXS19211**	Adopt
Lecithin	322(i)	GMP		(no change)
Lycopene, tomato	**160d(ii)**	5000 mg/kg	**XS19, XS211, XS329**	Maintain at step 3
Mono- and di-glycerides of fatty acids	471	GMP	~~408, XS211~~ **I-CXS19211**	Adopt
Polydimethylsiloxane	900a	10 mg/kg	**I-CXS19, XS211**	Adopt
Polysorbates	432-436	5000 mg/kg	102, **XS19, XS211**	Adopt
Propyl gallate	310	200 mg/kg	15, ~~&~~ 130**, C2-CXS19211**	Adopt
Propylene glycol esters of fatty acids	477	10000 mg/kg	**XS19, XS211**	Adopt
Sodium dihydrogen citrate	**331(i)**	**GMP**	**H-CXS19211, XS329**	Adopt
Stearyl citrate	484	GMP	**XS19, XS211**	Adopt
Sunset yellow FCF	110	300 mg/kg	161, **XS19, XS211, XS329**	Adopt
Tartazine	102	300 mg/kg	**XS19, XS211, XS329**	Maintain at step 4
Tertiary butylhydroquinone	319	200 mg/kg	15, 130**, C2-CXS19211**	Adopt
Thiodipropionates	388, 389	200 mg/kg	46**, XS211**	Adopt
Tocopherols	307a, b, c	300 mg/kg	~~358~~**, B-CXS329**	Adopt

Trisodium citrate	**331(iii)**	**GMP**	**H-CXS19211, XS329**	**Adopt**
~~Trisodium citrate~~	~~331(iii)~~	~~GMP~~		~~Maintain at step 7~~ (Not needed)

Food category 02.2.2 Fat spreads, dairy fat spreads and blended spreads				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
~~Annatto extracts, bixin based~~	~~160b(i)~~	~~100 mg/kg~~	~~8~~	~~Maintain at step 4~~ (not needed)
Annatto extracts, bixin based	**160b(i)**	**100 mg/kg**	**8, A-CXS256**	Adopt
Benzoates	210-213	1000 mg/kg	13, **B-CXS256**	Adopt
Caramel II - sulfite caramel	150b	20000 mg/kg	**A-CXS256**	Maintain at step 4
Caramel II - sulfite caramel	**150b**	**500 mg/kg**	**A-CXS256**	Adopt
~~Curcumin~~	~~100(i)~~	~~10 mg/kg~~		~~Maintain at step 4~~ (not needed)
Curcumin	**100(i)**	**10 mg/kg**	**A-CXS256**	Adopt
Hydroxybenzoates, para-	214, 218	300 mg/kg	27, **215**	Adopt
Lycopene, tomato	**160d(ii)**	10000 mg/kg	**215**	Maintain at step 3
Paprika extract	**160c(ii)**	40 mg/kg	39, **215**	Maintain at step 2
Phosphates	338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii), 342(i), (ii), 343(i)-(iii), 450(i)-(iii), (v)-(vii), (ix), 451(i), (ii), 452((i)-(v), 542	2200 mg/kg	33**, E-CXS256**	Adopt
Sorbates	200**, 202,** 203	2000 mg/kg	42, **B-CXS256**	Adopt
Thermally oxidized soya bean oil interacted with mono- and diglycerides of fatty acids	479	5000 mg/kg	**F-CXS256**	Adopt
Zeaxanthin, synthetic	161h(i)	100 mg/kg	**215**	Maintain at step 4

C. PROPOSED AMENDMENTS TO TABLE 3

Section 2 of the Annex to Table 3

In the case of the *Standard for Fat Spreads and Blended Spreads* (CXS 256-2007) the intention of the commodity committee has been to allow only specific Table 3 additives.

Therefore it is proposed to add the following to section 2 of the Annex to Table 3 of the GSFA.

02.2.2	**Fat spreads, dairy fat spreads and blended spreads**
	Acidity regulators, antifoaming agents, antioxidants, colours, emulsifiers, flavour enhancers, packaging gases, preservatives, stabilizers and thickeners listed in Table 3 are acceptable for use in foods conforming to the standard.
Codex standards	Fat Spreads and Blended Spreads (CXS 256-2007)

Appendix 4

PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE CODEX COMMODITY STANDARDS FOR SPICES AND CULINARY HERBS (CCSCH) AND TABLES 1, 2 AND 3 OF THE GSFA RELATING TO CCSCH

It is proposed to forward CCSCH the proposed amendments to food additive provision in CCSCH standards for its consideration.

1. Proposed amendments to the Codex commodity standards; Black, White and Green Peppers (CXS 326-2017), Cumin (CXS 327-2017) and Dried Thyme (CXS 328-2017)

The relevant Codex Standards for spices and culinary herbs that are being aligned with the GSFA are included in the following food categories in the GSFA:

CXS Number	Codex Standard Name	GSFA food category
326-2017	Black, White and Green (BWG) Peppers	12.2.1
327-2017	Cumin	12.2.1
328-2017	Dried Thyme	12.2.1

The following amendments to the food additive provisions in Codex commodity Standards are proposed.

New text is indicated in **bold/underline.** Text to be removed is indicated in ~~strikethrough.~~

A. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR BLACK, WHITE AND GREEN PEPPERS* (CXS 326-2017)

4. FOOD ADDITIVES

Preservatives used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 12.2.1 (Herbs and spices) are acceptable for use in green peppers only conforming to this standard.

~~**The following additive is permitted for use in Green Peppers only.**~~

~~**Table 6 – Food Additive**~~

~~**INS Number**~~	~~**Additive Name**~~	~~**Type of peppers**~~		
		~~**Black Peppers**~~	~~**White Peppers**~~	~~**Green Peppers**~~
~~**Preservatives**~~				
~~INS 220~~	~~Sulphur dioxide~~	~~None permitted~~	~~None permitted~~	~~150 (mg/kg), max.~~

B. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR CUMIN* (CXS 327-2017)

4. FOOD ADDITIVES

Anticaking agents ~~as~~ listed in Table ~~III~~ **3** of the General Standard for Food Additives (CXS 192-1995) are permitted for use in ground cumin only.

C. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR DRIED THYME* (CXS 328-2017)

4. FOOD ADDITIVES

Anticaking agents listed in Tables 1 and 2 of food category 12.2.1 (Herbs and Spices) of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in powdered thyme.

~~Only the anticaking agents listed in Table 3 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in powdered thyme, at GMP.~~

2. Proposed amendments to Table 1, 2 and 3 of the GSFA due to Codex commodity standards for Black, White and Green Peppers (CXS 326-2017), Cumin (CXS 327-2017) and Dried Thyme (CXS 328-2017)

The following amendments to the food additive provisions in the GSFA are proposed.

New text is indicated in **bold/underline.** Text to be removed is indicated in ~~strikethrough.~~

Entries in green are for draft provisions and are provided for information only. They will be maintained at their current step and so will not be added to the final alignment document. Additionally there are some other entries that are provided for information only that do not require any changes to the GSFA.

STANDARD FOR BLACK, WHITE AND GREEN PEPPERS (CXS 326-2017) and STANDARD FOR CUMIN (CXS 327-2017)

A PROPOSED AMENDMENTS TO TABLE 1

Food category 12.2 Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)

Acesulfame Potassium: Functional Class: Flavour enhancer, Sweetener INS 950					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	2000	2008	161, 188, **XS326, XS327**	Adopt

Annatto Extracts, Bixin-Based: Functional Class: Colour INS 160b(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	50	4	8, **XS326, XS327**	Maintain at Step 4

Annatto Extracts, Norbixon-Based: Functional Class: Colour INS 160b(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	50	4	185, **XS326, XS327**	Maintain at Step 4

Ascorbyl Esters: Functional class: Antioxidant INS 304, 305					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	500	2001	10, **XS326, XS327**	Adopt

Butylated Hydroxyanisole: Functional class: Antioxidant INS 320					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	200	2005	15, 130, **XS326, XS327**	Adopt

Butylated Hydroxytoluene: Functional class: Antioxidant INS 321					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	200	2006	15, 130, **XS326, XS327**	Adopt

Caramel II – Sulfite Ammonia Caramel: Functional class: Colour INS 150b					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	100000	4	**XS326, XS327**	Maintain at Step 4

Caramel IV – Sulfite Ammonia Caramel: Functional class: Colour INS 150d					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	10000	2010	**XS326, XS327**	Adopt

Ethylene Diamine Tetraacetates: Functional class: Antioxidant, Colour retention agent, Preservative, Sequestrant, Stabilizer INS 385, 386					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	70	2001	21, **XS326, XS327**	Adopt

Neotame: Functional class: Flavour enhancer, Sweetener INS 961					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	32	2008	161, **XS326, XS327**	Adopt

Propyl Gallate: Functional class: Antioxidant INS 310					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	200	2001	15, 130, **XS326, XS327**	Adopt

Sorbates: Functional class: Preservative INS 200, 202, 203					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	1000	2009	42, **XS326, XS327**	Adopt

Tertiary Butylhydroquinone: Functional class: Antioxidant INS 319					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	200	2005	15, 130, **XS326, XS327**	Adopt

Tocopherols: Functional class: Antioxidant INS 307a, b, c					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	2000	2018	421, XS326, XS327, XS328	already in alignment (for information only)

Food category 12.2.1 Herbs and spices

Caramel I – Plain Caramel: Functional class: Colour INS 150a					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	4	~~51,~~ **XS326, XS327**	Maintain at Step 4

Erythritol: Functional class: Sweetener INS 968					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	200000	4	~~51,~~ **XS326, XS327**	Maintain at Step 4

Isomalt (Hydrogenated Isomaltulose): Functional class: Anticaking agent, Bulking agent, Glazing agent, Stabilizer, Sweetener, Thickener INS 953					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	7	~~51,~~ **XS326, XS327**	Maintain at Step 7

Lactitol: Functional class: Emulsifier, Sweetener, Thickener INS 966					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	4	~~51,~~ **XS326, XS327**	Maintain at Step 4

Lycopene, Tomato: Functional class: Colour INS 160d(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	3	**XS326, XS327**	Maintain at Step 3

Magnesium Stearate: Functional class: Anticaking agent, Emulsifier, Thickener INS 470(iii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	10000	2	**XS326 , XS327**	Maintain at Step 2

Maltitol: Functional class: Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener INS 965(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	50000	4	~~51,~~ **XS326, XS327**	Maintain at Step 4

Maltitol Syrup: Functional class: Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener INS 965(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	50000	4	~~51,~~ **XS326, XS327**	Maintain at Step 4

Paprika Extract: Functional class: Colour INS 160c(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	300	2	39, **XS326, XS327**	Maintain at Step 2

Polysorbates: Functional class: Emulsifier, Stabilizer INS 432-436					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	2008	**XS326, XS327**	Adopt

Silicon Dioxide, Amorphous: Functional class: Anticaking agent, Antifoaming agent, Carrier INS 551					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	4	~~51,~~**XS326, A-CXS327**	Maintain at Step 4

Sorbitol: Functional class: Bulking agent, Humectant, Sequestrant, Stabilizer, Sweetener, Thickener INS 420(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	7	~~51,~~ **XS326, XS327**	Maintain at Step 7

Sorbitol Syrup: Functional class: Bulking agent, Humectant, Sequestrant, Stabilizer, Sweetener, Thickener INS 420(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	7	~~51,~~ **XS326, XS327**	Maintain at Step 7

Sucralose (Trichlorogalactosucrose): Functional class: Flavour enhancer, Sweetener INS 955					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	400	2008	161, **XS326, XS327**	Adopt

Sucroglycerides: Functional class: Emulsifier INS 474					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	2018	348, 422, **XS326, XS327**	Under discussion in GSFA EWG

Sucrose Esters of Fatty Acids: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer INS 473					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	2018	348, 422, **XS326, XS327**	Under discussion in GSFA EWG

Sucrose Oligoesters, Type I and Type II: Functional class: Emulsifier, Glazing agent, Stabilizer INS 473a					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	2018	348, 422, **XS326, XS327**	Under discussion in GSFA EWG

Sulfites: Functional class: Antioxidant, Bleaching agent, Flour treatment agent, Preservative INS 220-225, 539					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	150	2006	44, **A-CXS326, XS327**	Adopt

Tartrazine: Functional class: Colour INS 102					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	300	7	**XS326, XS327**	Maintain at Step 7

Xylitol: Functional class: Emulsifier, Humectant, Stabilizer, Sweetener, Thickener INS 967					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	7	~~51,~~ **XS326, XS327**	Maintain at Step 7

NOTES

XS326: **Excluding products conforming to the *Standard for Black, White and Green Peppers* (CXS 326-2017).**

XS327: **Excluding products conforming to the *Standard for Cumin* (CXS 327-2017).**

A-CXS326: **For products conforming to the *Standard for Black, White and Green Peppers* (CXS 326-2017), only sulfur dioxide (INS 220) may be used and only in green peppers.**

A-CXS327: **For products conforming to the *Standard for Cumin* (CXS 327-2017), only for use in ground cumin.**

B PROPOSED AMENDMENTS TO TABLE 2

Food category 12.2 Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)					
Food additive	**INS**	**Maximum Level**	**Step/Year Adopted**	**Notes**	**Recommendation**
ACESULFAME POTASSIUM	950	2000	2008	161, 188, **XS326, XS327**	Adopt
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	50	4	8, **XS326, XS327**	Maintain at Step 4
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	50	4	185, **XS326, XS327**	Maintain at Step 4
ASCORBYL ESTERS	304, 305	500	2001	10, **XS326, XS327**	Adopt
BUTYLATED HYDROXYANISOLE	320	200	2005	15, 130, **XS326, XS327**	Adopt
BUTYLATED HYDROXYTOLUENE	321	200	2006	15, 130, **XS326, XS327**	Adopt
CARAMEL II - SULFITE CARAMEL	150b	100000	4	**XS326, XS327**	Maintain at Step 4
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	10000	2010	**XS326, XS327**	Adopt
ETHYLENE DIAMINE TETRA ACETATES	385, 386	70	2001	21, **XS326, XS327**	Adopt
NEOTAME	961	32	2008	161, **XS326, XS327**	Adopt
PROPYL GALLATE	310	200	2001	15, 130, **XS326, XS327**	Adopt
SORBATES	200, **202,** 203	1000	2009	42, **XS326, XS327**	Adopt
TERTIARY BUTYLHYDROQUINONE	319	200	2005	15, 130, **XS326, XS327**	Adopt
TOCOPHEROLS	307a, b, c	2000	2018	421, XS326, XS327, XS328	already in alignment (for information only)

Food category 12.2.1 Herbs and spices					
Food additive	**INS**	**Maximum Level**	**Step/Year Adopted**	**Notes**	**Recommendation**
CARAMEL I - PLAIN CARAMEL	150a	GMP	4	~~51,~~ **XS326, XS327**	Maintain at Step 4
ERYTHRITOL	968	200000	4	~~51,~~ **XS326, XS327**	Maintain at Step 4
ISOMALT (HYDROGENATED ISOMALTULOSE)	953	GMP	7	~~51,~~ **XS326, XS327**	Maintain at Step 7
LACTITOL	966	GMP	4	~~51,~~ **XS326, XS327**	Maintain at Step 7
LYCOPENE, TOMATO	160d(i)	2000	3	**XS326, XS327**	Maintain at Step 3

MAGNESIUM STEARATE	470(iii)	10000	2	**XS326, XS327**	Maintain at Step 2
MALTITOL	965(i)	50000	4	~~51,~~ **XS326, XS327**	Maintain at Step 4
MALTITOL SYRUP	965(ii)	50000	4	~~51,~~ **XS326, XS327**	Maintain at Step 4
PAPRIKA EXTRACT	160c(ii)	300	2	39, **XS326, XS327**	Maintain at Step 2
POLYSORBATES	432-436	2000	2008	**XS326, XS327**	Adopt
SILICON DIOXIDE, AMORPHOUS	551	GMP	4	~~51,~~ **XS326, A-CXS327**	Maintain at Step 4
SORBITOL	420(i)	GMP	7	~~51,~~ **XS326, XS327**	Maintain at Step 7
SORBITOL SYRUP	420(ii)	GMP	7	~~51,~~ **XS326, XS327**	Maintain at Step 7
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	2008	161, **XS326, XS327**	Adopt
SUCROGLYCERIDES	474	2000	2018	348, 422, **XS326, XS327**	Under discussion in GSFA EWG
SUCROSE ESTERS OF FATTY ACIDS	473	2000	2018	348, 422, **XS326, XS327**	Under discussion in GSFA EWG
SUCROSE OLIGOESTERS, TYPE I AND TYPE II	473a	2000	2018	348, 422, **XS326, XS327**	Under discussion in GSFA EWG
SULFITES	220-225, 539	150	2006	44, **A-CXS326, XS327**	Adopt
TARTRAZINE	102	300	7	**XS326, XS327**	Maintain at Step 7
XYLITOL	967	GMP	7	~~51,~~ **XS326, XS327**	Maintain at Step 7

NOTES

XS326: **Excluding products conforming to the *Standard for Black, White and Green Peppers* (CXS 326-2017).**

XS327: **Excluding products conforming to the *Standard for Cumin* (CXS 327-2017).**

A-CXS326: **For products conforming to the *Standard for Black, White and Green Peppers* (CXS 326-2017), only sulfur dioxide (INS 220) may be used and only in green peppers.**

A-CXS327: **For products conforming to the *Standard for Cumin* (CXS 327-2017), only for use in ground cumin.**

***STANDARD FOR DRIED THYME* (CXS 328-2017)**

A PROPOSED AMENDMENTS TO TABLE 1 OF THE GSFA

Food category 12.2 Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)

Acesulfame Potassium: Functional Class: Flavour enhancer, Sweetener INS 950					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	2000	2008	161, 188, **XS328**	Adopt

Annatto Extracts, Bixin-Based: Functional Class: Colour INS 160b(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	50	4	8, **XS328**	Maintain at Step 4

Annatto Extracts, Norbixin-Based: Functional Class: Colour INS 160b(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	50	4	185, **XS328**	Maintain at Step 4

Ascorbyl Esters: Functional class: Antioxidant INS 304, 305					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	500	2001	10, **XS328**	Adopt

Butylated Hydroxyanisole: Functional class: Antioxidant INS 320					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	200	2005	15, 130, **XS328**	Adopt

Butylated Hydroxytoluene: Functional class: Antioxidant **INS 321**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	200	2006	15, 130, **XS328**	Adopt

Caramel II – Sulfite Ammonia Caramel: Functional class: Colour **INS 150b**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	100000	4	**XS328**	Maintain at Step 4

Caramel IV – Sulfite Ammonia Caramel: Functional class: Colour **INS 150d**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	10000	2010	**XS328**	Adopt

Ethylene Diamine Tetraacetates: Functional class: Antioxidant, Colour retention agent, Preservative, **Sequestrant, Stabilizer** **INS 385, 386**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	70	2001	21**, XS328**	Adopt

Neotame: Functional class: Flavour enhancer, Sweetener **INS 961**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	32	2008	161**, XS328**	Adopt

Propyl Gallate: Functional class: Antioxidant INS 310					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	200	2001	15, 130, **XS328**	Adopt

Sorbates: Functional class: Preservative INS 200, 202, 203					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	1000	2009	42, **XS328**	Adopt

Tertiary Butylhydroquinone: Functional class: Antioxidant INS 319					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	200	2005	15, 130, **XS328**	Adopt

Tocopherols: Functional class: Antioxidant INS 307a, b, c					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2	Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)	2000	2018	421, XS326, XS327, XS328	Already in alignment (for information only)

Food category 12.2.1 Herbs and spices

Calcium carbonate: Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer INS 170(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Calcium silicate: Functional class: Anticaking agent **INS 552**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Caramel I – Plain Caramel: Functional class: Colour **INS 150a**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	4	~~51 &~~ **XS328**	Maintain at Step 4

Erythritol: Functional class: Sweetener **INS 968**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	200000	4	~~51 &~~ **XS328**	Maintain at Step 4

Hydroxypropyl distarch phosphate: Functional class: Anticaking agent, Emulsifier, Stabilizer, Thickener **INS 1442**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Isomalt (Hydrogenated Isomaltulose): Functional class: Anticaking agent, Bulking agent, Glazing agent, Stabilizer, Sweetener, Thickener **INS 953**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
~~12.2.1~~	~~Herbs and spices~~	~~GMP~~	~~7~~	~~51~~	(not needed)
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Lactitol: Functional class: Emulsifier, Sweetener, Thickener **INS 966**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	4	~~51 &~~ **XS328**	Maintain at Step 4

Lycopene, Tomato: Functional class: Colour **INS 160d(ii)**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	3	**XS328**	Maintain at Step 3

Magnesium carbonate: Functional class: Acidity regulator, Anticaking agent, Colour retention agent INS 504(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Magnesium hydroxide carbonate: Functional class: Acidity regulator, Anticaking agent, Carrier, Colour retention agent INS 504(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Magnesium oxide: Functional class: Acidity regulator, Anticaking agent INS 530					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Magnesium silicate, synthetic: Functional class: Anticaking agent INS 553(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Magnesium Stearate: Functional class: Anticaking agent, Emulsifier, Thickener INS 470(iii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
~~12.2.1~~	~~Herbs and spices~~	~~10000~~	~~2~~		(not needed)
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	~~Adopt~~ **Hold pending discussion in GSFA pWG**

Maltitol: Functional class: Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener INS 965(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	50000	4	~~51 &~~ **XS328**	Maintain at Step 4

Maltitol Syrup: Functional class: Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener INS 965(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	50000	4	~~51 &~~ **XS328**	Maintain at Step 4

Mannitol: Functional class: Anticaking agent, Bulking agent, Humectant, Stabilizer, Sweetener, Thickener **INS 421**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Microcrystalline cellulose (Cellulose gel): Functional class: Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener **INS 460(i)**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Paprika Extract: Functional class: Colour **INS 160c(ii)**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	300	2	39**, XS328**	Maintain at Step 2

Polysorbates: Functional class: Emulsifier, Stabilizer **INS 432-436**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	2008	**XS328**	Adopt

Powdered cellulose: Functional class: Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener **INS 460(ii)**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium: Functional class: Anticaking agent, Emulsifier, Stabilizer **INS 470(i)**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Salts of oleic acid with calcium, potassium and sodium: Functional class: Anticaking agent, Emulsifier, Stabilizer **INS 470(ii)**					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Silicon Dioxide, Amorphous: Functional class: Anticaking agent, Antifoaming agent, Carrier INS 551					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
~~12.2.1~~	~~Herbs and spices~~		~~4~~	~~51~~	(not needed)
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	~~Adopt~~ **Hold pending discussion in GSFA pWG**

Sodium carbonate: Functional class: Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener INS 500(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Sodium hydrogen carbonate: Functional class: Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener INS 500(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Sodium sesquicarbonate: Functional class: Acidity regulator, Anticaking agent, Raising agent INS 500(iii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Sorbitol: Functional class: Bulking agent, Humectant, Sequestrant, Stabilizer, Sweetener, Thickener INS 420(i)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	7	~~51 &~~ **XS328**	Maintain at Step 7

Sorbitol Syrup: Functional class: Bulking agent, Humectant, Sequestrant, Stabilizer, Sweetener, Thickener INS 420(ii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	7	~~51 &~~ **XS328**	Maintain at Step 7

Sucralose (Trichlorogalactosucrose): Functional class: Flavour enhancer, Sweetener INS 955					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	400	2008	161 & **XS328**	Adopt

Sucroglycerides: Functional class: Emulsifier INS 474					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	2018	348, 422 & **XS328**	Under discussion in GSFA EWG

Sucrose Esters of Fatty Acids: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer INS 473					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	2018	348, 422 & **XS328**	Under discussion in GSFA EWG

Sucrose Oligoesters, Type I and Type II: Functional class: Emulsifier, Glazing agent, Stabilizer INS 473a					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	2000	2018	348, 422 & **XS328**	Under discussion in GSFA EWG

Sulfites: Functional class: Antioxidant, Bleaching agent, Flour treatment agent, Preservative INS 200-225, 539					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	150	2006	44**, XS328**	Adopt

Talc: Functional class: Anticaking agent, Glazing agent, Thickener INS 500(iii)					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	**Herbs and spices**	**GMP**	**1999**	**A-CXS328**	Adopt

Tartrazine: Functional class: Colour INS 102					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	150	7	44 & **XS328**	Maintain at Step 7

Xylitol: Functional class: Emulsifier, Humectant, Stabilizer, Sweetener, Thickener INS 967					
Food category No	**Food category**	**Max level**	**Step/Year Adopted**	**Notes**	**Recommendation**
12.2.1	Herbs and spices	GMP	7	~~51,~~ **XS328**	Maintain at Step 7

Notes

XS328: **Excluding products conforming to the *Standard for Dried Thyme* (CXS 328-2017).**

A-CXS328: **For products conforming to the *Standard for Dried Thyme* (CXS 328-2017), only for use in powdered thyme.**

B PROPOSED AMENDMENTS TO TABLE 2 OF THE GSFA

Food category 12.2 Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles)					
Food additive	**INS**	**Maximum Level**	**Step/Year Adopted**	**Notes**	**Recommendation**
ACESULFAME POTASSIUM	950	2000	2008	161, 188**, XS328**	Adopt
5ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	50	4	8**, XS328**	Maintain at Step 4
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	50	4	185**, XS328**	Maintain at Step 4
ASCORBYL ESTERS	304, 305	500	2001	10**, XS328**	Adopt
BUTYLATED HYDROXYANISOLE	320	200	2005	15, 130**, XS328**	Adopt
BUTYLATED HYDROXYTOLUENE	321	200	2006	15, 130**, XS328**	Adopt
CARAMEL II - SULFITE CARAMEL	150b	100000	4	**XS328**	Maintain at Step 4
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	10000	2010	**XS328**	Adopt
ETHYLENE DIAMINE TETRA ACETATES	385, 386	70	2001	21**, XS328**	Adopt
NEOTAME	961	32	2008	161**, XS328**	Adopt
PROPYL GALLATE	310	200	2001	15, 130**, XS328**	Adopt
SORBATES	200**, 202,** 203	1000	2009	42**, XS328**	Adopt
TERTIARY BUTYLHYDROQUINONE	319	200	2005	15, 130**, XS328**	Adopt
TOCOPHEROLS	307a, b, c	2000	2018	421, XS326, XS327, XS328	Already in alignment (for information only)

Food category 12.2.1 Herbs and spices					
Food additive	**INS**	**Maximum Level**	**Step/Year Adopted**	**Notes**	**Recommendation**
CALCIUM CARBONATE	**170(i)**	**GMP**	**1999**	**A-CXS328**	Adopt
CALCIUM SILICATE	**552**	**GMP**	**1999**	**A-CXS328**	Adopt
CARAMEL I - PLAIN CARAMEL	150a	GMP	4	~~51 &~~ **XS328**	Maintain at Step 4
ERYTHRITOL	968	200000	4	~~51 &~~ **XS328**	Maintain at Step 4
HYDROXYPROPYL DISTARCH PHOSPHATE	**1442**	**GMP**	**1999**	**A-CXS328**	Adopt
~~ISOMALT (HYDROGENATED ISOMALTULOSE)~~	~~953~~	~~GMP~~	~~7~~	~~51~~	(Not needed)
ISOMALT (HYDROGENATED ISOMALTULOSE)	**953**	**GMP**	**1999**	**A-CXS328**	Adopt
LACTITOL	966	GMP	4	~~51 &~~ **XS328**	Maintain at Step 4
LYCOPENE, TOMATO	160d(ii)	2000	3	**XS328**	Maintain at Step 3
MAGNESIUM CARBONATE	**504(i)**	**GMP**	**1999**	**A-CXS328**	Adopt
MAGNESIUM HYDROXIDE CARBONATE	**504(ii)**	**GMP**	**1999**	**A-CXS328**	Adopt

MAGNESIUM OXIDE	**530**	**GMP**	**1999**	**A-CXS328**	Adopt
MAGNESIUM SILICATE, SYNTHETIC	**553(i)**	**GMP**	**1999**	**A-CXS328**	Adopt
MAGNESIUM STEARATE	**470(iii)**	**GMP**	**2016**	**A-CXS328**	~~Adopt~~ **Hold pending discussion in GSFA pWG**
~~MAGNESIUM STEARATE~~	~~470(iii)~~	~~10000~~	~~2~~		(not needed)
MALTITOL	965(i)	50000	4	~~51 &~~ **XS328**	Maintain at Step 4
MALTITOL SYRUP	965(ii)	50000	4	~~51 &~~ **XS328**	Maintain at Step 4
MANNITOL	**421**	**GMP**	**1999**	**A-CXS328**	Adopt
MICROCRYSTALLINE CELLULOSE (CELLULOSE GEL)	**460(i)**	**GMP**	**1999**	**A-CXS328**	Adopt
PAPRIKA EXTRACT	160c(ii)	300	2	39 & **XS328**	Maintain at Step 2
POLYSORBATES	432-436	2000	2008	**XS328**	Adopt
POWDERED CELLULOSE	**460(ii)**	**GMP**	**1999**	**A-CXS328**	Adopt
SALTS OF MYRISTIC, PALMITIC AND STEARIC ACIDS WITH AMMONIA, CALCIUM, POTASSIUM AND SODIUM	**470(i)**	**GMP**	**1999**	**A-CXS328**	Adopt
SALTS OF OLEIC ACID WITH CALCIUM, POTASSIUM AND SODIUM	**470(ii)**	**GMP**	**1999**	**A-CXS328**	Adopt
~~SILICON DIOXIDE, AMORPHOUS~~	~~551~~	~~GMP~~	4	~~51~~	(not needed)
SILICON DIOXIDE, AMORPHOUS	**551**	**GMP**	**1999**	**A-CXS328**	~~Adopt~~ **Hold pending discussion in GSFA pWG**
SODIUM CARBONATE	**500(i)**	**GMP**	**1999**	**A-CXS328**	Adopt
SODIUM HYDROGEN CARBONATE	**500(ii)**	**GMP**	**1999**	**A-CXS328**	Adopt
SODIUM SESQUICARBONATE	**500(iii)**	**GMP**	**1999**	**A-CXS328**	Adopt
SORBITOL	420(i)	GMP	7	~~51 &~~ **XS328**	Maintain at Step 7
SORBITOL SYRUP	420(ii)	GMP	7	~~51 &~~ **XS328**	Maintain at Step 7
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	2008	161 & **XS328**	Adopt
SUCROGLYCERIDES	474	2000	2018	348, 422 & **XS328**	Under discussion in GSFA EWG
SUCROSE ESTERS OF FATTY ACIDS	473	2000	2018	348, 422 & **XS328**	Under discussion in GSFA EWG
SUCROSE OLIGOESTERS, TYPE I AND TYPE II	473a	2000	2018	348, 422 & **XS328**	Under discussion in GSFA EWG
SULFITES	220-225, 539	150	2006	44**, XS328**	Adopt
TALC	**553(iii)**	**GMP**	**1999**	**A-CXS328**	Adopt
TARTRAZINE	102	300	7	44**, XS328**	Maintain at Step 7
XYLITOL	967	GMP	7	~~51~~ **XS328**	Maintain at Step 7

Notes

XS328: Excluding products conforming to the *Standard for Dried Thyme* (CXS 328-2017).

A-CXS328: For products conforming to the *Standard for Dried Thyme* (CXS 328-2017), only for use in powdered thyme.

C PROPOSED AMENDMENTS TO TABLE 3 OF THE GSFA

At CCFA50 (see paras. 41-42 of REP18/FA), a revised procedure for the listing of commodity standards in the last column of Table 3 was put forward and agreed to. It was decided that commodity standards that permit all Table 3 additives or all Table 3 additives with a particular functional class would not be listed in the final column of Table 3. Rather, only commodity standards that only permitted particular additives would be listed with the additive in the last column of Table 3. However, it was also determined that the revised procedure would not be implemented until the Codex Secretariat had overcome certain technological issues with the online GSFA. Until these issues have been taken care of, the old procedure for listing commodity standards in the last column of Table 3 will still be used.

New text is indicated in **bold/underline.** Text to be removed is indicated in ~~strikethrough.~~

This table identifies amendments to Table 3 food additive provisions due to the *Standard for Cumin* (CXS 327-2017).

INS No	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 87-1981, CS 141-1983, CS 309R-2011, CS 291-2010, CS 319-2015, CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 269-1967, CS 270-1968, CS 271-1968, CS 272- 1968 (for use in cheese mass only for these standards), CS 249-2006, **CS 327-2017 (anticaking agents in ground cumin only)**
552	Calcium silicate	Anticaking agent	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, **CS 327-2017 (anticaking agents in ground cumin only)**
1442	Hydroxypropyl distarch phosphate	Anticaking agent, Emulsifier, Stabilizer, Thickener	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 309R-2011, CS 70-1981, CS 94-1981, CS 119-1981, CS 249-2006, **CS 327-2017 (anticaking agents in ground cumin only)**
953	Isomalt (Hydrogenated isomaltulose)	Anticaking agent, Bulking agent, Glazing agent, Stabilizer,	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 87-1981, **CS**

INS No	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards
		Sweetener, Thickener		**327-2017 (anticaking agents in ground cumin only)**
504(i)	Magnesium carbonate	Acidity regulator, Anticaking agent, Colour retention agent	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 87-1981, CS 141-1983, CS 309R-2011, CS 291-2010, CS 319-2015, CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 269-1967, CS 270-1968, CS 271-1968, CS 272-1968 (for use in cheese mass only for these standards), **CS 327-2017 (anticaking agents in ground cumin only)**
504(ii)	Magnesium hydroxide carbonate	Acidity regulator, Anticaking agent, Carrier, Colour retention agent	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 309R-2011, CS 291-2010, CS 319-2015, **CS 327-2017 (anticaking agents in ground cumin only)**
530	Magnesium oxide	Acidity regulator, Anticaking agent	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 87-1981, CS 141-1983, CS 309R-2011, CS 291-2010, CS 319-2015, **CS 327-2017 (anticaking agents in ground cumin only)**
553(i)	Magnesium silicate, synthetic	Anticaking agent	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, **CS 327-2017 (anticaking agents in ground cumin only)**
470(iii)	Magnesium stearate	Anticaking agent, Emulsifier, Thickener	2016	CS 117-1981 (anticaking agents in dehydrated products only), CS 309R-2011, **CS 327-2017 (anticaking agents in ground cumin only)**
421	Mannitol	Anticaking agent, Bulking agent, Humectant, Stabilizer, Sweetener, Thickener	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 87-1981, **CS 327-2017 (anticaking agents in ground cumin only)**

INS No	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards
460(i)	Microcrystalline cellulose (Cellulose gel)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 309R-2011, CS 263-1966, CS 264- 1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 269- 1967, CS 270-1968, CS 271-1968, CS 272- 1968 (for surface treatment only, of sliced, cut, shredded or grated cheese for these cheese standards), **CS 327-2017 (anticaking agents in ground cumin only)**
460(ii)	Powdered cellulose	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 309R-2011, CS 263-1966, CS 264- 1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 269- 1967, CS 270-1968, CS 271-1968, CS 272- 1968 (for surface treatment only, of sliced, cut, shredded or grated cheese for these cheese standards), **CS 327-2017 (anticaking agents in ground cumin only)**
470(i)	Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium	Anticaking agent, Emulsifier, Stabilizer	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 309R-2011, **CS 327-2017 (anticaking agents in ground cumin only)**
470(ii)	Salts of oleic acid with calcium, potassium and sodium	Anticaking agent, Emulsifier, Stabilizer	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 309R-2011, **CS 327-2017 (anticaking agents in ground cumin only)**
551	Silicon dioxide, amorphous	Anticaking agent, Antifoaming agent, Carrier	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, **CS 327-2017 (anticaking agents in ground cumin only)**
500(i)	Sodium carbonate	Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent,	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 87-1981, CS

INS No	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards
		Stabilizer, Thickener		141-1983, CS 309R-2011, CS 291-2010, CS 319-2015, CS 249-2006, **CS 327-2017 (anticaking agents in ground cumin only)**
500(ii)	Sodium hydrogen carbonate	Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, CS 87-1981, CS 141-1983, CS 309R-2011, CS 291-2010, CS 319-2015, CS 249-2006, **CS 327-2017 (anticaking agents in ground cumin only)**
500(iii)	Sodium sesquicarbonate	Acidity regulator, Anticaking agent, Raising agent	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 309R-2011, CS 291-2010, CS 319-2015, **CS 327-2017 (anticaking agents in ground cumin only)**
553(iii)	Talc	Anticaking agent, Glazing agent, Thickener	1999	CS 117-1981 (anticaking agents in dehydrated products only), CS 105-1981, **CS 327-2017 (anticaking agents in ground cumin only)**

References to Commodity Standards for GSFA Table 3 Additives

In the case of the Standard for Cumin (CXS 327-2017) the intention of the commodity committee has been to allow only certain Table 3 additives.

Therefore it is proposed to add the following to Section 2 of the Annex to Table 3 of the GSFA.

12.2.1	**Herbs and spices (EXCLUDING SPICES)**
	Table 3 additives are not permitted for use in products conforming to this standard.
Codex standards	Black, White and Green Peppers (CXS 326-2017)
	Anticaking agents listed in Table 3 are acceptable for use in ground cumin only, conforming to this standard.
Codex standards	Cumin (CXS 327-2017)

Appendix 5

Proposed amendments to the food additive provisions of the Codex commodity standards CXS 249-2006, CXS 273-1968, CXS 275-1973 and CXS 288-1976 for tamarind seed polysaccharide

CCFA51 agreed to request that the alignment EWG consider:

- revision to the food additive section of the commodity standards as indicated CCFA51/CRD2 Annex 1 Part A to include tamarind seed polysaccharide (INS 437) under the appropriate functional class header with a maximum use level (ML) of Good Manufacturing Practice (GMP) (See CCFA51/CRD2 – Recommendation 2)[5].

The relevant commodity standards highlighted in the table within Annex 1 Part A and the relevant information for alignment is provided in the table below.

Standard No.	Standard title	GSFA status		Alignment status
		Food category No.	Annex to Table 3[a]	
249-2006	Instant noodles	06.4.3	No	Aligned, CCFA51, 2019
273-1968	Cottage cheese	01.6.1	No	CCFA52, 2020, App 2
275-1973	Cream cheese	01.6.1	No	CCFA52, 2020, App 2
288-1976	Cream and prepared creams	01.4.1 01.4.2 01.4.3	Yes Yes No	Not aligned, proposed to be aligned at CCFA53, 2021

Notes:

a. If no, then provisions can be listed in Table 3. If yes, then use of food additives in Table 3 need to be added as provisions in Tables 1 and 2.

The 2019 updated entry for tamarind seed polysaccharide (INS 437) in Table 3 of the GSFA (originally from Annex 1 Part A) is copied below:

INS	Additive	Functional Class	Step	Year	Acceptable, including foods conforming to the following commodity standards
437	Tamarind seed polysaccharide	Emulsifier, Gelling agent, Stabilizer, Thickener	Adopted	2019	CS 66-1981 (as a thickener in table olives with stuffing) only), CS 94-1981, CS 117-1981, CS 119-1981, CS 243-2003, CS 249-2006, CS 256-2007, CS 273-1968 (as a stabilizer in cheese mass only), CS 275-1973 (as an emulsifier, stabilizer and thickener in cheese mass only), CS 288-1976, CS 296-2009, CS 309R-2011

The alignment for tamarind seed polysaccharide (INS 437) for the Codex standards CXS 249-2006, CXS 273-1968 and CXS 275-1973 seems relatively straight forward as the amendments can be made to Table 3 of the GSFA (as noted in the above table). However, the situation is more complicated for CXS 288-1976 since this standard is linked to three food commodities in the GSFA, two of which are listed in the annex to Table 3 (food categories 01.4.1 and 01.4.2), which means that the use of food additives listed in Table 3 need to be governed by provisions written into Tables 1 and 2.

CXS 249-2006 – *Standard for Instant Noodles*

The alignment WG at CCFA51 (2019) proposed changes to the food additives section of CXS 249-2006, as detailed in REP 19/FA Appendix V. This is copied below (relevant sections underlined for emphasis).

> Acidity regulators, anticaking agents, antioxidants, colours, emulsifiers, flour treatment agents, humectants, preservatives, stabilizers used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 06.4.3 (Pre-cooked pastas and noodles and like products) and only certain Table 3 acidity regulators, antioxidants, colours, emulsifiers, flavour

[5] REP 19/FA, para. 58 (i)c

> enhancers, humectants, stabilizers, and thickeners as indicated in table 3 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in foods conforming to this Standard.

The important point is that the new section allowed certain emulsifiers, stabilizers and thickeners in Table 3 of the GSFA for use in foods conforming to this Standard. It would seem appropriate that tamarind seed polysaccharide (INS 437) with the accepted functional classes of emulsifier, gelling agent, stabilizer and thickener to have provisions under this commodity standard, provided there is agreement there is a technological justification for its use in these products. Japan submitted comments providing technological justification supporting the use of the food additive as a thickener over other thickeners within Appendix 5 of CX/FA 19/51/7.

It is proposed to add CS 249-2006 to Table 3 of the GSFA against tamarind seed polysaccharide as listed in Annex 1 Part A, as already listed in the 2019 update of the GSFA. No change is therefore proposed to this entry.

INS	Additive	Functional Class	Step	Year	Acceptable, including foods conforming to the following commodity standards
437	Tamarind seed polysaccharide	Emulsifier, Gelling agent, Stabilizer, Thickener			CS 249-2006 (no change proposed)

Comments received from the EWG on 1st circular

Support: Singapore

CXS 273-1968 – *Standard for Cottage Cheese*

Appendix 2 (CCMMP alignment document) contains the proposed amendments for the alignment of CXS 273-1968. This is provided in section F of Part 1 (Proposed amendments to the Codex commodity Standards for milk and milk products) of Appendix 2, and is copied below (relevant sections underlined for emphasis).

> Acidity regulators, preservatives and stabilizers used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.6.1 (Unripened cheese) and only certain acidity regulators, preservatives and stabilizers in Table 3 are acceptable for use in foods conforming to this standard.

As noted in the functional class table in the standard, stabilizers are justified for their use in the cheese mass only. It would seem appropriate that tamarind seed polysaccharide (INS 437) with the accepted functional classes of emulsifier, gelling agent, stabilizer and thickener to have provisions under this commodity standard, provided there is agreement there is a technological justification for its use in these products. The qualification listed in Annex 1, Part A seems appropriate. Therefore, it is proposed to add CS 273-1968 with a qualification statement to Table 3 of the GSFA against tamarind seed polysaccharide. It is however proposed to make slight amendments to the statement as noted below.

INS	Additive	Functional Class	Step	Year	Acceptable, including foods conforming to the following commodity standards
437	Tamarind seed polysaccharide	Emulsifier, Gelling agent, Stabilizer, Thickener			CS 273-1968 (~~as a stabilizer~~ in cheese mass only)

Comments received from the EWG on 1st circular (no changes were proposed to the statement)

Support: Singapore

A question for the EWG (2nd circular):

Is it important that the function class of stabilizer be added to the qualification note in the right hand column for CS 273-1968, or is it enough to say “in cheese mass only” like the EWG has agreed for the 2nd circular for CS 275-1973 (for the same reasons, to keep the notes as short and least complicated as possible)?

Comments received from the EWG on 2nd circular

Japan: It supports use of the term “in cheese mass only” for the same reasons as agreed for CXS 275-1973.

Chair’s proposal: To use the shorter qualification note of “in cheese mass only” for the entry related to CS 273-1968 like the EWG has proposed for CS 275-1973 in the right hand column for the entry of Table 3.

CXS 275-1973 – *Standard for Cream Cheese*

As for CXS 273-1968 above, Appendix 2 (CCMMP alignment document) contains the proposed amendments for the alignment of CXS 275-1973. This is provided in section G of Part 1 (Proposed amendments to the Codex commodity Standards for milk and milk products) of Appendix 2 and is copied below (relevant sections underlined for emphasis).

> Acidity regulators, antioxidants, colours, emulsifiers, preservatives, stabilizers and thickeners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.6.1 (Unripened cheese) and only certain acidity regulators, antioxidants, colours, emulsifiers, foaming agents, preservatives, stabilizers and thickeners in Table 3 are acceptable for use in foods conforming to this standard.

As noted in the functional class table in the standard, emulsifiers, stabilizers and thickeners are justified for their use in the cheese mass only. It would seem appropriate that tamarind seed polysaccharide (INS 437) with the accepted functional classes of emulsifier, gelling agent, stabilizer and thickener to have provisions under this commodity standard, provided there is agreement there is a technological justification for its use in these products.

A question for the EWG (1st circular):

Is it important that the function classes of emulsifier, stabilizer and thickener be added to the qualification note in the right hand column, or is it just enough to say "in cheese mass only"?

Comments received from the EWG on 1st circular

Support for full note "as an emulsifier, stabilizer and thickener in cheese mass only": Singapore

Support for limited note, "in cheese mass only": Malaysia, US, Japan and New Zealand

Japan suggested that the full qualification note is not necessary. This is because the function class of a gelling agent is not technologically justified for foods conforming to CXS 275-1973.

New Zealand stated that to date the alignment work has avoided including notes relating to functional class use in Table 3. This is primarily a matter of practicality to ensure column 5 entries are not unduly complicated. Functional class restrictions are retained in the functional class column and Table 3 additives are permitted at GMP so there is less safety concern compared to Table 1 and 2 additives.

Outcome: Change to the shorter qualification note, being "in cheese mass only" due to support for this option, in particular to keep column 5 entries in Table 3 as short and least complicated as possible and to be consistent with current approaches.

INS	Additive	Functional Class	Step	Year	Acceptable, including foods conforming to the following commodity standards
437	Tamarind seed polysaccharide	Emulsifier, Gelling agent, Stabilizer, Thickener			CS 275-1973 (~~as a stabilizer, thickener and emulsifier~~ in cheese mass only)

CXS 288-1976 – Cream and Prepared Creams

This commodity standard has not yet been aligned. The forward workplan for alignment has alignment to occur at CCFA53, 2021 meeting, with the remainder of the milk and milk product standards.

Annex C of the GSFA lists three food categories linked to CXS 288-1976; being 01.4.1, 01.4.2 and 01.4.3. As noted earlier, two of these food categories (01.4.1 and 01.4.2) are listed in the annex to Table 3 which means that the use of food additives listed in Table 3 need to be governed by provisions written into Tables 1 and 2. This complicates the alignment for tamarind seed polysaccharide for CXS 288-1976. It is inappropriate to add CX 288-1976 into the right hand side column of Table 3, for tamarind seed polysaccharide.

There are two options for the EWG to consider:

1) to leave the alignment of tamarind seed polysaccharide provisions for CXS 288-1976 until the full alignment is performed which is due to occur for CCFA53 (2021), or

2) to complete the individual alignment for amendments to food categories 01.4.1 and 01.4.2 in Tables 1 and 2, and food categories 01.4.3 in Table 3, with appropriate notes.

If option 1: No work is required for CCFA52.

If option 2: The alignment could be completed provided there is agreement there is a technological justification for its use in these products. The proposed amendments to Tables 1, 2 and 3 of the GSFA are provided at the end of the document.

Comments received from the EWG on 1st circular

Support for option 1: Japan, as it considered it appropriate to horizontally consider all the provisions for Table 3 stabilizers and thickeners in CXS 288-1976 together. Otherwise CCFA would consider the provisions for INS 437 at CCFA52 and then the other Table 3 stabilizers and thickeners in CXS 283-1976 at CCFA53. New Zealand considered it appropriate to wait until the full alignment is performed, as there may be further changes in the meantime that need further alignment. The food additive is not currently used in creams in New Zealand.

Support for option 2: Malaysia, the US, since the chair has already undertaken the work required to make the change.

Outcome: The submissions were split between the two options.

Comments received from the EWG on 2nd circular

Japan: It reiterates it support for the Chair's proposal, being option 1

Chair's proposal: It is proposed to proceed with option 1 to not perform partial alignment for INS 437 related to CXS 288-1976 at this CCFA52 meeting, but wait until the full alignment is conducted, likely to be for CCFA53. This was because it was thought to be a more appropriate use of the Alignment EWG resources; to do the complete alignment once. Therefore the proposed amendments to Tables 1, 2 and 3 listed in the 1st circular have been removed by strikethrough (kept for future information so this work is not lost).

Summary recommendation

Chair's proposal: The proposed recommendation is to make the following changes to the entry for tamarind seed polysaccharide in Table 3 to reflect the chair's earlier proposals.

New text is indicated in **bold/underline.** Text to be removed is indicated in ~~strikethrough.~~

INS	Additive	Functional Class	Step	Year	Acceptable, including foods conforming to the following commodity standards
437	Tamarind seed polysaccharide	Emulsifier, Gelling agent, Stabilizer, Thickener	Adopted	2019	CS 66-1981 (as a thickener in table olives with stuffing) only), CS 94-1981, CS 117-1981, CS 119-1981, CS 243-2003, CS 249-2006, CS 256-2007, CS 273-1968 (~~as a stabilizer~~ in cheese mass only), CS 275-1973 (~~as an emulsifier, stabilizer and thickener~~ in cheese mass only), CS 288-1976, CS 296-2009, CS 309R-2011

~~**Proposed amendments to Table 1**~~

~~**Tamarind seed polysaccharide**~~ ~~**INS 437: Functional class: Emulsifier, Gelling agent, Stabilizer, Thickener**~~				
~~**Food Category No.**~~	~~**Food Category**~~	~~**Max Level**~~	~~**Notes**~~	~~**Recommendations**~~
~~**01.4.1**~~	~~**Pasteurized cream (plain)**~~	~~**GMP**~~	~~**A288**~~	~~**Adopt**~~

~~**Note:**~~

~~**A288: For use in reconstituted cream, recombined cream and prepackaged liquid cream products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only.**~~

~~**Tamarind see polysaccharide**~~ ~~**INS 437: Functional class: Emulsifier, Gelling agent, Stabilizer, Thickener**~~				
~~**Food Category No.**~~	~~**Food Category**~~	~~**Max Level**~~	~~**Notes**~~	~~**Recommendations**~~
~~**01.4.2**~~	~~**Sterilized and UHT creams, whipping and whipped**~~	~~**GMP**~~	~~**B288**~~	~~**Adopt**~~

	creams, and reduced fat creams (plain)			

Note:

B288: For use in whipping cream, cream packed under pressure and whipped cream products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only.

Proposed amendments to Table 2

Food category 01.4.1 Pasteurized cream (plain)				
Additive	INS	Max Level	Notes	Recommendations
Tamarind see polysaccharide	437	GMP	A288	Adopt

Food category 01.4.2 Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)				
Additive	INS	Max Level	Notes	Recommendations
Tamarind see polysaccharide	437	GMP	B288	Adopt

Notes:

A288: For use in reconstituted cream, recombined cream and prepackaged liquid cream products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only.

B288: For use in whipping cream, cream packed under pressure and whipped cream products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only.

Proposed amendments to Table 3

INS	Additive	Functional Class	Step	Year	Acceptable, including foods conforming to the following commodity standards
437	Tamarind seed polysaccharide	Emulsifier, Gelling agent, Stabilizer, Thickener			CS 288-1976 (for fermented cream and acidified cream only)

Appendix 6

ALIGNMENT OF FOOD ADDITIVE PROVISIONS IN THE GSFA – AVOIDING FUTURE DIVERGENCE BETWEEN THE GSFA AND COMMODITY STANDARDS

Background

At the 38th, 39th and 40th sessions, CCFA discussed extensively the relationship between the GSFA and the food additives provisions in the Codex commodity standards, and reached a consensus with respect to the procedure for developing the GSFA, involving in a clear and transparent manner the responsible Codex Commodity Committee for those food categories that are covered by a commodity standard.

The key objective that was agreed by CCFA was that of having the GSFA as the single source of Codex food additive provisions and bringing the work on alignment to completion.

CCFA has each year established an electronic working group (EWG) to consider the alignment of tranches of commodity standards with the GSFA. Through this work, the EWG developed a decision tree to facilitate the alignment work and as a way to progressively achieve the goal of the GSFA being the single Codex reference for food additives.

Alignment work has now been completed for scores of Commodity Standards, including for meat products, bouillons and consommés, chocolate and cocoa products, fish and fish products, and processed cheeses. The aligned commodity standards now include a general reference to the GSFA with respect to food additive provisions.

The physical WG (PWG) on Endorsement and Alignment (ref. CRD 3, CCFA51) which met just prior to CCFA51, discussed the issue of future divergence of the GSFA and the commodity standards as the Commodity Committees amend or develop new food additive provisions. The PWG Chair suggested that the process for such new food additive provisions be further considered so that the work on alignment can be completed and the GSFA can be maintained as the single reference point for food additives in the Codex Alimentarius. Subsequently, CCFA51 agreed to ask the EWG on Alignment to consider the issue of how future divergence of the GSFA and the commodity standards can be avoided.

EWG activity

First circular paper

The first circular to the EWG on Alignment sought the views of EWG members on four questions relating to how future divergence of the GSFA and the commodity standards can be avoided. In response to these four questions, submissions were received from ISDI, ICBA, New Zealand, Singapore and USA.

Second circular paper

A paper was distributed as part of the second circular to the EWG on alignment in October 2019. The questions, recommendations and key decision points that were put to the EWG on Alignment are at *Annex 1*. In response to the second circular paper, submissions were received from ISDI, ICBA. Brazil, New Zealand, Malaysia and Japan.

Discussion

Active committee committees

Several of the comments received from EWG participants highlighted that the process for ensuring that future divergence does not occur depends on whether there is an *active* Codex commodity committee (with physical meetings). For food categories without an active commodity committee, responsibility for new or changed food additive provisions rests with CCFA.

For food categories where there is an *active* Commodity Committee (with physical meetings), the *active* Commodity Committees (*with physical meetings)* should not make changes to the Food Additive section of the commodity standard without the agreement of CCFA. Rather, a general reference to the GSFA should be maintained and the commodity committee should make any request for the addition or change to a food additive provision directly to CCFA after considering the technological function(s) undertaken by each food additive(s).

In addition to *active* Commodity Committees (*with physical meetings*), there are also adjourned Commodity Committees and active Commodity Committees (working by correspondence only). The role of these other Commodity Committees can be classified as follows:

(i) Adjourned Committees: It is the responsibility of CCFA to make new or changed food additive provisions.

(ii) 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 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, it might consider the listing of a new/amended functional class in consultation with CCFA.

Three questions were posed to the EWG with respect to the functional class issue – *see Annex 1.* All of the submissions received in response to the second circular supported the retention of the listing of specific functional classes in the commodity standards. Submitters did *not* consider it appropriate to only include this information in the GSFA in the future.

Chair's proposal

It is proposed to keep the functional classes in the standard sentence referring to the GSFA in the commodity standard, as an outcome of CCFA's alignment work.

Decision Tree and decision points

Taking into account the comments provided during the work of the EWG, a proposed concise decision tree has been developed for the consideration of CCFA. The decision tree aims to avoid future divergence of food additive provisions in the GSFA with Commodity Standards.

Recommendations

1. It is recommended that the CCFA agree to the *Guideline on avoiding future divergence of food additive provisions in the GSFA with Commodity Standards* that is at Annex 2.

2. The Guideline, if agreed by the CCFA, should be communicated to the active Commodity Committees and published as an information document.

Annex 1 – Questions, recommendations and key decision points that were put to the EWG on Alignment, as part of the Second Circular.

The EWG on Alignment was asked to consider the following ***questions and recommendations*** as part of the 2nd circular that was distributed in October 2019.

Questions in 2nd circular

1. Is the practice of listing specific functional classes in the general reference to the GSFA within the commodity standards required?

2. How is this information used?

3. Could this information be included only in the GSFA in the future? For example, the commodity standard could state that "Food additives used in accordance with Table 1 and 2 (and 3 if relevant) of the General Standard for Food Additives (CXS 192-1995) in food category x.x.x (name) are acceptable for use in foods conforming to this standard". If a food additive provision is only for a certain type of functional class that will be addressed by a note in the GSFA?

Recommendations in 2nd circular

1. That once the alignment of the commodity standard is complete, no further changes be made to the food additive section of commodity standards, other than the consideration of the listing of a new/amended functional class in consultation with the CCFA. The commodity standard would maintain a general reference to the GSFA.

2. For food categories without an active Commodity Committee, responsibility for new or changed food additive provisions rests with the CCFA.

3. For food categories with an active Commodity Committee, the primary responsibility for new or changed food additive provisions rests with the CCFA. However, the Commodity Committee would confirm the need, and where necessary, clarify the technological function(s) undertaken by each food additive(s).

4. CCFA recommend a formal process that can be shared with the Codex Commodity Committees with the aim of avoiding future divergence for commodity standards for which alignment is complete. This process to be contained in a short Guidance document[6] with a schematic decision tree.

Key decision points in the 2nd circular.

The key **decision points** that are envisaged in the decision tree (referred to in recommendation 4 above) when considering a proposed new or amended food additive provision(s) are:

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

2. Is there an *active* commodity committee (with physical meetings)?

3. Where there is an *active* commodity committee (with physical meetings), does that committee consider that there is a technological justification for the proposed new or amended food additive uses?

[6] This Guidance document would outline the procedural steps that would be taken to request additions or changes to additive provisions and be compatible with the Codex Procedural Manual e.g. "Relations Between Commodity Committees and General Subject Committees".

Annex 2 – 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[7]. 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.

CCFA has a concern that after a commodity standard has been aligned with the GSFA, Commodity Committees may wish to vary the food additive provisions relevant to their commodity standards but not notify CCFA to update the GSFA. Such changes could include additional food additive provisions, amend functional classes, or alter conditions of use of the food additives. It is important 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)

Active Commodity Committees (*with physical meetings)* should not make changes to the Food Additive section of the commodity standard without the agreement of CCFA. Rather, a general reference to the GSFA should be maintained and the Commodity Committee should make any request for the addition or change to a food additive provision directly to CCFA after considering the technological function(s) undertaken by each food additive(s).

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

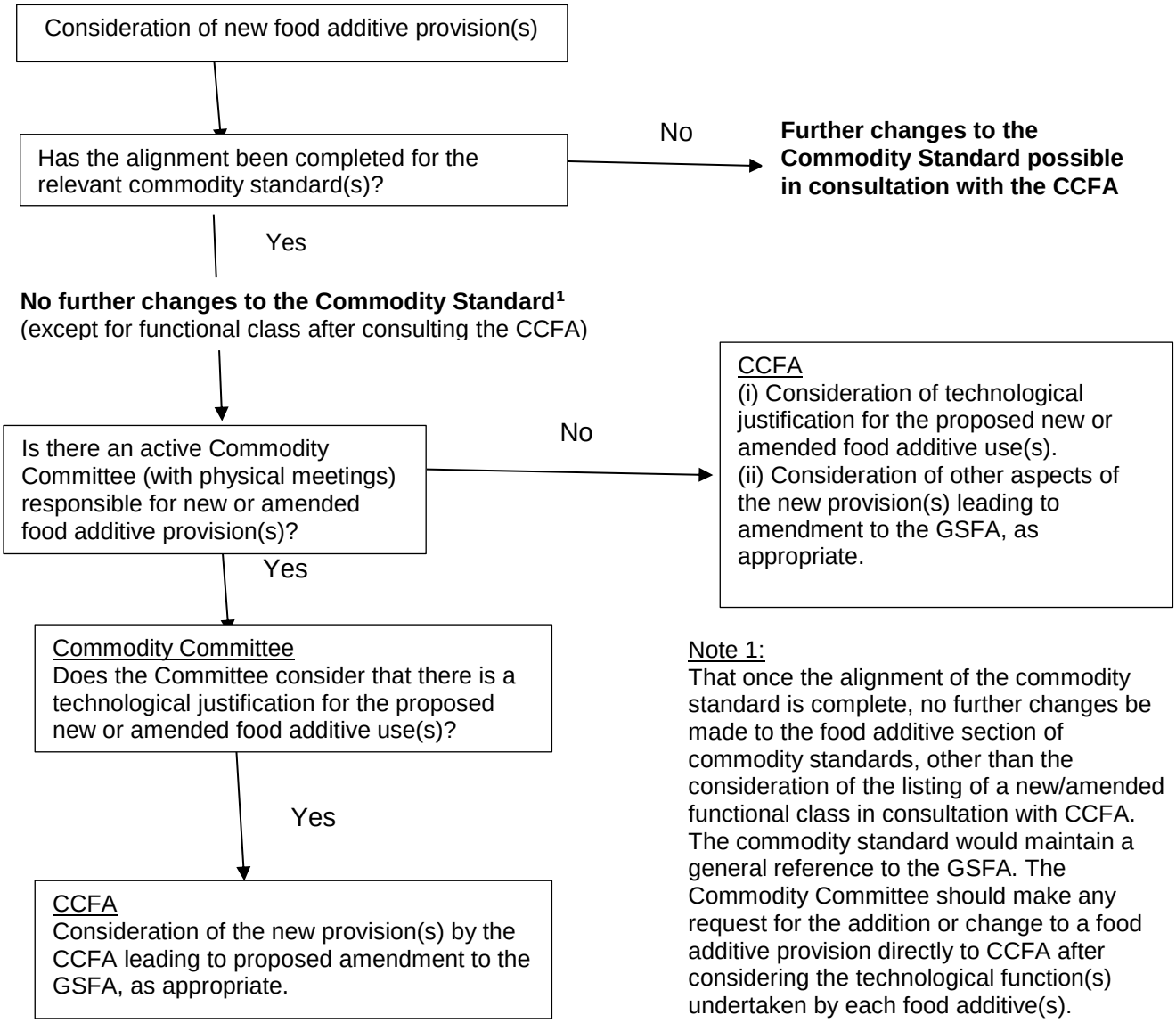
Where there is an *active* commodity committee relevant to the food additive provision under consideration, it is recognised that they are in the best position to decide on whether the use of a particular food additive is technologically justified in the commodities standards under their purview. Furthermore 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.

[7] Guidance to commodity committees on the alignment of food additive provisions, http://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CCFA_e_01.pdf



Note 1:
That once the alignment of the commodity standard is complete, no further changes be made to the food additive section of commodity standards, other than the consideration of the listing of a new/amended functional class in consultation with CCFA. The commodity standard would maintain a general reference to the GSFA. The Commodity Committee should make any request for the addition or change to a food additive provision directly to CCFA after considering the technological function(s) undertaken by each food additive(s).