CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 5(b) **CRD11**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-third Session

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE EWG ON THE GSFA

(Comments of Brazil, El Salvador, European Union, India, Indonesia, Japan, Kenya, Nigeria, Republic of Korea, Senegal and ICBA)

Brazil

Comments on the provisions for Xanthan gum (INS 415) in FCs 14.1.2 and 14.1.3 (Appendix 2, Annex B, Part 2)

BACKGROUND

1. The 52nd session of the Codex Committee on Food Additives (CCFA52) established an EWG, chaired by the USA, to consider several topics, including the reply from CCPFV on the use of emulsifiers, stabilizers, thickeners in general, and xanthan gum (INS 415) specifically, in FC 14.1.2 “Fruit and vegetable juices” and its subcategories and FC 14.1.3 “Fruit and vegetable nectar” and its subcategories.
2. CCPF29 informed that there was a significant market presence of formulated juices and nectars with “non-juice ingredients”, including stabilizers. However, CCPFV could not reach consensus on the proper classification of these products with “non-juice ingredients”, as in CCPFV`s opinion juices and nectars with “non-juice ingredients” do not fall within the scope of CXS 247-2005 and requested CCFA how to properly classify them.
3. During discussions of the EWG, members were invited to provide comments on 4 possible approaches:

   Proposal 1: draft a new note to differentiate that some members allow the use of the additive while others limit that use;

   Proposal 2: attach Note XS247 “Excluding products conforming to the Standard for Fruit Juices and Nectars” to these provisions;

   Proposal 3: Amend the Codex General Standard for the Labeling of Prepackaged Foods (CXS 1-1985) to include a requirement for juice labels to include the “with added” qualifier when non-juice ingredients are added to the product;

   Proposal 4: Amend the “Labelling” section of the Standard for Fruit Juices and Nectars (CXS 247-2005) to include a requirement for juice labels to include the “with added” qualifier when non-juice ingredients are added to the product.

COMMENTS ON TECHNOLOGICAL JUSTIFICATION

1. The General Standard for Food Additives includes provision of use of stabilizers, like pectin, in food categories 14.1.2.1 and 14.1.3.1, namely fruit juices and fruit nectars respectively. This already indicates the technological need of food additives with function class “stabilizer” in these food categories.
2. However, pectin is not the most appropriate stabilizer in many cases, considering a vast variety of fruit pulps available to produce a great variety of juices and nectars with those fruits, alone or in combination.
3. Stabilizers are used in clear as well as cloudy 100% juices including insoluble materials, like pulp. They provide optimal colloidal suspension of solids in juice products. They are particularly effective in maintaining homogeneity and distribution of pulp and fruit in juice products, avoiding issues related to separation during production, filling and transportation, and prior to purchase, storage and consumption by consumers.

4. Pulpy fruits (notably of tropical origin) are characterized by high pulp (insoluble solids) content. In the preparation of tropical juices and nectars, the insoluble solids (fruit pulp) tend to separate due to density difference depositing to the bottom of commercial juice/nectar packages thereby resulting in two phases: (i) the colorful pulp in the bottom phase and (ii) the whitish clear appearance pulp-free in the upper phase. Separation of pulp from the juice/nectar is not desirable for the following reasons:

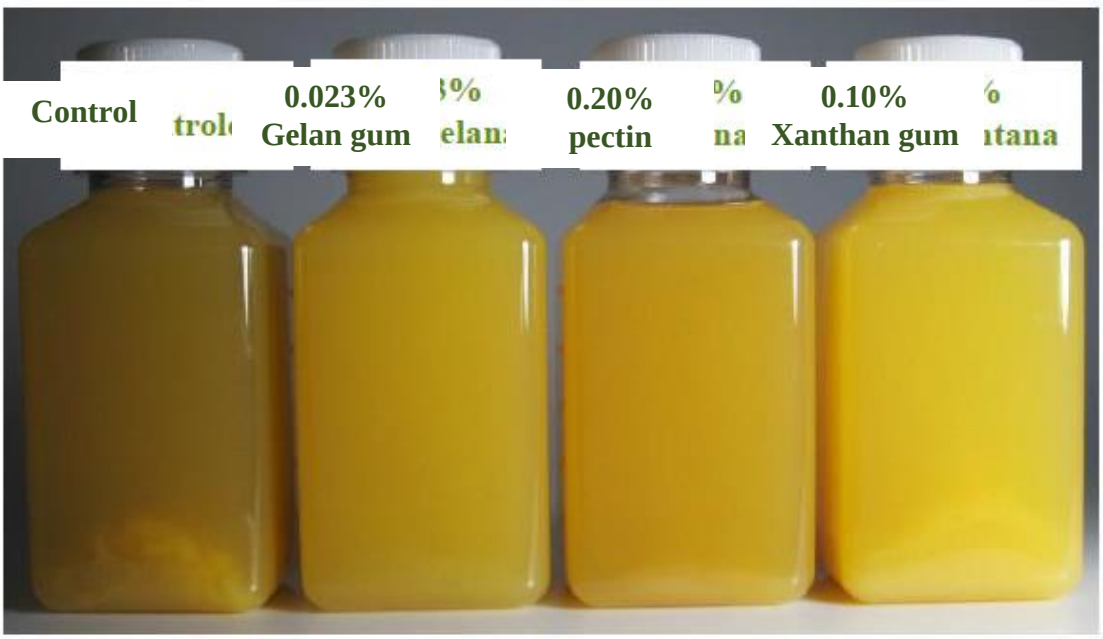
   a. Appearance of the product: Phase separation in transparent packages (i.e., glass, PET) may not meet consumer acceptance of 100% juice products misleading the consumer to believe that these products are inferior in some way, of lesser quality or have expired. They may perceive these products to be full of water instead of 100% juice due to the upper phase having a translucent and diluted appearance.
   b. Product Consumption: Consumption of these products requires that they are always shaken by the consumer to ensure homogeneity among soluble and insoluble solids when served. Without shaking the product well, the consumer's impression of differences between first and final content might lead to the wrong perception of a low-quality item. The initial content from a large container of 100% juice will have a thin appearance with little pulp, light coloration and low consistency whereas the final content served would have a thick appearance with high pulp and darker coloration. Both instances would have low consumer acceptance.
   c. Processing challenges: Separation of some fruit pulps occurs so quickly that even during the production of tropical juices/nectars it is necessary to constantly shake the product during its processing to ensure that all packages have uniform composition throughout production. However, temporary production stops occur from time-to-time in commonplace plant operations, which may result in inconsistent and not uniform final packaged products.

5. For example, in Brazil and other tropical countries, whole fruit pulp use in tropical juices and nectars continues to be a mainstay and are not commonly reduced or removed to generate clarified and concentrated juices and nectars. Phase separation in tropical juices and nectars is quite evident due to their high pulp content.

6. For all of the aforementioned reasons, pectins and gums as stabilizers are important tools to minimize the undesired attributes that adversely affect the appearance, homogeneity and consumer acceptance of such products. This separation naturally occurs due to density difference.

7. It is also worthwhile noting that stabilizers' effectiveness depends on the type of fruit pulp to be stabilized. Thus, it becomes fundamentally important to have viable and multiple stabilizer options to maximize the synergistic action between the specific stabilizer and the specific 100% juice or nectar product.

8. Specifically, xanthan gum (INS 415) serves to stabilize these juices as a possible alternative to pectin, and sometimes better, particularly in maintaining homogeneity and distribution of pulp and fruit in juice products, avoiding issues related to separation during production, filling and transportation, and prior to purchase, storage and consumption by consumers. In the exemplification below, it is noticeable the difference in efficacy of each hydrocolloid, being xanthan gum the best alternative in this case.



Picture: Accelerated shelf-life of an orange nectar using 3 distinct gums.

9. For certain juices and nectars of different flavors there are better stabilizing agents than pectin to keep not only insoluble solids suspended but also vitamins and minerals (e.g., calcium) added to fortified products. When precipitation is likely to occur (e.g., calcium) in certain juice/nectar matrices, it is necessary to place a more effective stabilizing agent than pectin.

10. Additionally, juices and nectars are primarily constituted by water, making it challenging to incorporate oily compounds, mainly present in citrus fruit. Use of gums, which also have emulsifier property, facilitate the incorporation of such substances in the product in a homogeneous way.

11. Finally, regarding the processing, unlike pectin that needs to be dissolved at 80°C, other gums are cold-soluble. The ability to use, for example, xanthan gum at lower processing temperatures (e.g., room temperature) supports sustainability and productivity, as manufacturers are able to reduce energy consumption while producing a comparable or superior product to pectin based juice.

CONCLUSION

12. There was no consensus on any of the four proposals discussed in the EWG. Brazil has serious concerns about Proposal 1, as it states that some members allow the use of these additives while others may limit it, which does not provide harmonization at Codex level.

13. As to excluding the products with “non-juice ingredients” from CXS 247-2005, (Proposal 2), some members expressed the opinion that the addition of Xantham gum to fruit juices and nectars compromises section 3.3 of CXS 247-2005 “Authenticity”. They also expressed the opinion that the addition of non-juice ingredients is considered an addition to the standardized product and becomes a modified product even when properly labeled and disclosed on the principal display panel while ensuring no diminution of either (i) fruit juice soluble solids OR (ii) volume for the expressed fruit juice. On the other hand, several comments noted that juice and nectar products including these additives were marketed as 100% juices or nectars with added ingredients and proposed that the labeling section of CODEX STAN 247-2005 be revised to include labeling requirements pertaining to the use of “non-juice food additive ingredients” in fruit juices and nectars conforming to the standard. These comments indicate that many eWG members see a benefit to applying the requirements in CODEX STAN 247-2005 to juice and nectar products with “non-juice food additive ingredients”. We agree that the addition of “non-juice ingredients” do not mischaracterize the product from a technological point of view.

14. Furthermore, several EWG members noted that if note XS247 were to be added to provisions for Xanthan gum, it could have implications for provisions for other additives in FCs that correspond to CX 247-2005 including FCs 14.1.2, 14.1.2.1, 14.1.2.3, 14.1.3, 14.1.3.1, and 14.1.3.3.

15. It was also commented that none of the adopted provisions with Note 122 attached to them have additional notes stating that their use is excluded from products conforming to CODEX STAN 247-2005, indicating that CCFA considered these additives acceptable in products conforming to CODEX STAN 247-2005 provided the use of the additive was acceptable in the importing country.

16. Proposal 3 for amending the Codex General Standard of Prepackaged Foods (CSX 1-1985) was not recommended by the EWG.

17. Taking into consideration that:

    a. stabilizers and xanthan gum (INS 415) have proper technological justification;
    b. many members allow the use of emulsifiers/stabilizers/thickeners in juices and nectars;
    c. it was reported that many products in the market use these additives; and
    d. proposals 1, 2 and 3 are not adequate to solve current issue and reach consensus;

18. Brazil supports proposal 4, amend the “Labelling” section of the Standard for Fruit Juices and Nectars (CXS 247-2005) to include a requirement for juice labels to include the “with added” qualifier when non-juice ingredients are added to the product, as it addresses all points discussed in the EWG, maintaining the provision for xanthan gum and other “non-juice ingredients” in products covered by this Standard, and correctly informing consumers about product`s true nature.

19. Additionally, Brazil supports adoption of the provisions for xanthan gum in FC 14.1.2 and FC 14.1.3.

Appendix 1 – Use of emulsifiers/stabilizers/thickeners in juices and nectars reported to the EWG

Australia

Emulsifiers/stabilizers/thickeners (e.g., pectin, xanthan gum) are permitted in 100% fruit and vegetable juices including fruit smoothies. In Australia, ready-to-drink (RTD) fruit smoothies in the supermarket are 100% fruit. They generally contain a lot of purée and categorized as such by their thick texture.

Pectin (440) used in tropical fruit juice blends at up to 800 ppm to help stabilize the fruit juice blend that contains fruit pulp, sediment and improve mouth feel. See product example here: http://www.goldencircle.com.au/en/products/juice-and-drinks/juice/tropical-juice.

Brazil

The use of stabilizers is allowed in fruit juices and nectars. Pectin is allowed as GMP. Other stabilizers are allowed with specific maximum level of use:

Food additive	**Maximum level (mg/kg)**
Guar gum (INS 412)	1000
Gelan gum (INS 414)	500
Xanthan gum (INS 415)	2000
Microcrystalline Cellulose (INS 460)	5000
Sodium Carboxymethyl Cellulose (INS 466)	3000

Canada

A variety of emulsifiers/stabilizers/thickeners (e.g., cellulose, gum acacia, pectin, xanthan gum, etc) are permitted in unstandardized foods, including fruit and vegetable juice beverages.

Sections B.11.120 through B.11.134 of Canada's Food and Drug Regulations include various instances where use of a stabilizing/thickening agent is permitted in the named standardized 100% fruit juice.

Costa Rica

The Costa Rican food standards allow for the following stabilizers/thickeners/emulsifiers in 100% juices and nectars:

Categoría de Alimentos No. 14.1.2.1		**Zumos (jugos) de frutas**	
Aditivo	**INS**	**Nivel Máximo Aceptado**	**Comentarios**
GOMA DE TRAGACANTO	413	2000 mg/kg	
PECTINAS (AMIDADA Y NO AMIDADA)	440	BPM	Nota 35

Categoría de Alimentos No. 14.1.3		**Néctares de frutas y hortalizas**	
Aditivo	**INS**	**Nivel Máximo Aceptado**	**Comentarios**
CARRAGENINA Y SUS SALES	407	BPM	
Categoría de Alimentos No. 14.1.3.1		**Néctares de frutas**	
Aditivo	**INS**	**Nivel Máximo Aceptado**	**Comentarios**
ALGINATO DE CALCIO	404	3000 mg/kg	FDA 184.1187
ALGINATO DE POTASIO	402	2500 mg/kg	FDA 184.1610
ALGINATO DE SODIO	401	20000 mg/kg	FDA 184.1724
CELULOSA MICROCRISTALINA	460i	BPM	
GOMA ARABIGA	414	10000 kg/mg	FDA 184.1330
GOMA DE KARAYA	416	20 mg/kg	FDA 184.1349
DE SEMILLAS DE ALGARROBO	410	BPM	
GOMA DE TRAGACANTO	413	2000 mg/kg	FDA 184.1351
GOMA GUAR	412	BPM	
GOMA XANTANA	415	BPM	FDA 172.695
HIDROXIPROPILCELULOSA, METILCELULOSA, METIL ETIL CELULOSA (ETIL METIL CELULOSA)	464, 463**, 461,** 465	BPM	
PECTINAS (AMIDADA Y NO AMIDADA)	440	BPM	

Japan

There is no inhibition of use of 'emulsifiers/thickeners/stabilizers' in 100% juice and their nectars and their corresponding concentrates in "Standard for Use of Food Additives" under Japanese Food Sanitation Act. (http://www.ffcr.or.jp/en/tenka/standards-for-use/standards-for-use-of-food-additives.html; http://www.ffcr.or.jp/en/upload/90a214f8b8b1b90ec5acff9db0a39c194d8df7ae.pdf)

United States of America

For any non-standardized 100% fruit juice (i.e., any 100% fruit juice that is not a standardized 100% fruit juice, i.e., not lemon juice, not orange juice, not grapefruit juice, not pineapple juice, not prune juice), stabilizers and thickeners may be added as long as it is a permitted ingredient or additive specifically for use

in fruit juices or generally in foods or beverages. (See specifically 21 C.F.R. Part 101.30 b(3) (pp. 107) where non-juice ingredients are mentioned related to 100% juices.)

Appendix 2 – Use of stabilizers in juices and nectars

Appendix 2: Examples of juices and nectars which stabilizers/emulsifiers are used.

Brazil:

Acacia gum, Xanthan gum

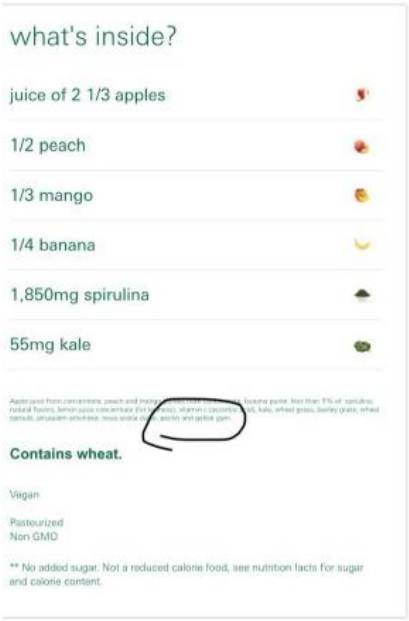
Sodium carboxymethyl cellulose (cellulose gum)

Xanthan gum, Guar gum

United States:

Carrageenan gum, Xanthan gum

Xanthan gum



Pectin, Gellan gum

Arabic gum, Xanthan gum

Xanthan gum

El Salvador

Comentarios Generales:

El Salvador agradece el documento remitido por la Secretaría del Codex Alimentarius, que ha sido preparado por Estados Unidos de América con la asistencia de los demás países participantes del GTe y agradece el seguimiento del CCFA al tema en cuestión.

El Comité Espejo Nacional sobre Aditivos Alimentarios ha analizado los siguientes puntos del Informe del GTe encargado de la NGAA y se presentan comentarios de carácter general, detallados a continuación:

1. Revisión de las notas de la NGAA que vinculan el aspartamo (SIN 951), el acesulfame potásico (SIN 950) y la sal de acesulfamo aspartame (SIN 962), para las categorías de alimentos 14.1.4 y 14.1.5", que figuran en el apéndice 4 del documento CX/FA 23/53/8.

El Salvador apoya las recomendaciones del GTe, en cuanto a:

- Para la categoría de alimento 14.1.4, que las notas son correctas para todas las disposiciones. No es necesariohacer cambios
- Para la categoría de alimento 14.1.5, agregar la Nota 191 a la disposición sobre el aspartamo (SIN 951), que expresamente dice *"Si se utiliza en combinación con la sal de aspartamo y acesulfamo (SIN 962), la dosis máxima de uso combinada, expresada como aspartamo, no será superior a esta dosis".* Se considera que esta enmienda da mayor seguridad en la ingesta diaria establecida por el JECFA para el uso del aspartamo (SIN 951) al combinarse con la Sal de acesulfamo aspartame (SIN 962).

2. Revisión de las notas de la NGAA para las sacarinas (SIN 954(i)-(iv)), para todas las disposiciones de uso en la Norma, incluyéndose las categorías de alimentos 14.1.4. y 14.1.5, que figuran en el apéndice 3 del documento CX/FA 23/53/8.

El Salvador apoya las recomendaciones del GTe, en cuanto a:

Que la nota para sacarinas propuesta por la Secretaría del JECFA en la reunión 52° del CCFA "Para la sacarina y sus sales de Ca, K, Na, expresado como sacarina de Na" se añada a todas las disposiciones sobre sacarinas en la NGAA. Se considera que esta enmienda brinda mayor claridad para su aplicación y uso. De igual manera al momento de analizar los productos en el laboratorio.

European Union

CX/FA 23/53/8 – review of caretenoids

Appendix 1: Review of Carotenoids and Related Additives

In general, the EU supports the review of the GSFA provisions for carotenoids. The EU observes and appreciates that the proposals in CX/FA 23/53/8 would lead to a substantial reduction of the GSFA uses and use levels following-up on the most recent JECFA assessment of carotenoids, which for beta-carotenes highlighted the elevated level of risk of developing lung cancer in heavy smokers and for Beta-apo-8'-Carotenal established a low ADI of 0.3 mg/kg bw/day.

In the EU's view, taking into account the recent JECFA assessment, the review of the GSFA provisions for carotenoids shall restrict the uses and use levels to the necessary minimum based on the technological justification and actual use and use levels.

In this regard, the EU notes a significant discrepancy between the uses and use levels reported to JECFA and used in the JECFA exposure assessments and the uses and use levels reported to the GSFA EWG.

For example, the use in only limited number of food categories for INS160e (i.e. the same data sets) was reported to both JECFA and EFSA (https://www.who.int/publications/i/item/9789240001312 and https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2014.3492).

Based on the reported uses and use levels and analytical data, EFSA carried out refined exposure estimates, which were below the ADI at the mean level, however, at high level of exposure, the ADI was exceeded for toddlers and children, and the exposure for adolescents was at about the ADI. According to EFSA this high level exposure estimate was still conservative and these exceedances are unlikely to occur and therefore EFSA concluded that the uses and use levels of β-apo-8"-carotenal (E 160e), as reported by the food industry, would not be of safety concern. As noted, the information reported to EFSA / JECFA does not correspond to the uses and use levels in CX/FA 23/53/8.

Appendix 2: Replies of Codex Committee on Processed Fruits and Vegetables (CCPFV)

As regards formulated juice/nectars products with 'non-juice food additive ingredients' (e.g. xanthan gum (INS 415), tamarind seed polysaccharide (INS 437)), the EU notes that no consensus was reached by the EWG. The EU looks forward to further exchanges and suggestions on this matter. The EU considers that a note, which would capture the differences in practices of different Codex Members, offers the best prospect to achieve consensus.

Further specific comments on different topics covered by items 5a and 5b will be made at the PWG meeting.

India

Appendix 1: Review of Carotenoids and Related Additives
Annex 1: Final EWG Proposals for Beta-Carotenes (beta-carotenes, synthetic (INS 160a(i)), beta-carotenes, Blakesleatrispora (INS 160a(iii)), beta-Carotene-Rich Extract from Dunaliellasalina (INS 160a(iv)), formerly called "Carotenoids".

Food Category	Comments
01.6.4 Processed cheese	India supports maintaining use level at 100 mg/kg with new reporting basis note (Expressed as beta-Carotene) and new note "singly or in combination" note.
02.1.2 Vegetable oils and fats	India supports maintaining use level at 25 mg/kg, with Notes 508, 509, XS33, XS210, XS325R, new reporting basis note (Expressed as beta-Carotene) and new "singly or in combination" note.
02.2.2 Fat spreads, dairy fat spreads and blended spreads	India supports maintaining use level at 35 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.
04.2.2.5 Vegetable (including mushrooms and fungi, roots and	India supports maintaining use level at 50 mg/kg with Note 161, new reporting basis note (Expressed as beta-Carotene) and "singly or in

tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g.,peanut butter)	combination" note.
04.2.2.6 Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g. vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	India supports maintaining use level at 50 mg/kg with Notes 92, 161, new reporting basis note (Expressed as beta-Carotene) and "singly or in combination" note.
05.1.4 Cocoa and chocolate products	India supports maintaining use level at 100 mg/kg with Note 183 with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.
05.1.5 Imitation chocolate, chocolate substitute products	India supports maintaining use level at 100 mg/kg, new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.
05.2 Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	India supports adoption at 150 mg/kg (for parity with beta-carotenes, vegetable) with XS309R, new reporting basis note(Expressed as beta-Carotene), and "singly or in combination" note.
06.3 Breakfast cereals, including rolled oats	India supports adoption at 50 mg/kg (for parity with beta-carotenes, vegetable) with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.
06.4.3 Pre-cooked pastas and noodles and like products	India supports adoption at 40 mg/kg with note 153, new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.
07.2 Fine bakery wares (sweet, salty, savoury) and mixes	India supports adoption at 42 mg/kg (for parity with beta-carotenes, vegetable provision), add new reporting basis note (Expressed as beta-Carotene), and "singly or in
14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinksand particulated drinks	India had supported 50 mg/kg in 3rd circular GSFA EWG proposal for carotenoids. Post discussion with industry, India supports adoption at 25 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.
15.1 Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	India supports adoption at 30 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note
15.2 Processed nuts, including coated nuts and nut mixtures (with e.g. dried fruit)	India supports adoption at 4 mg/kg (for parity with beta-carotenes, vegetable) with new reporting basis note (Expressed as beta-Carotene).

Annex 2: Final EWG Proposals for Beta-apo-8'-carotenal (INS 160e)

Food Category	Comments
01.6.4 Processed cheese	India supports adoption at 100 mg/kg

Annex 3: Final EWG Proposals for beta-Carotenes, Vegetable (INS 160a(ii))

Food Category	Comments
05.2 Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	India supports adoption at 150 mg/kg with XS309R, new reporting basis note(Expressed as beta-Carotene),and "singly or in combination" note
05.3 Chewing gum	India supports adoption at 180 mg/kg with new reporting basis note (Expressed as beta-Carotene),and "singly or in combination" note.
06.3 Breakfast cereals, including rolled oats	India supports adoption at 50 mg/kg, new reporting basis note (Expressed as beta-Carotene), and new "singly or in combination" note.
07.2 Fine bakery wares (sweet, salty, savoury) and mixes	India supports adoption at 42 mg/kg and add new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.

14.1.4 Water-based flavoured drinks, including "sport," "energy," or"electrolyte" drinks and particulated drinks	India had supported 50 mg/kg in 3rd circular GSFA EWG proposal for carotenoids. Post discussion with industry, India supports adoption at 25 mg/kg with new reporting basis note (Expressed as beta-Carotene), and “singly or in combination” note.

Appendix 2: Replies of Codex Committee on Processed Fruits and Vegetables (CCPFV)
Annex A - provisions in food categories not related to fruit and vegetable juices and nectars (Topics A, B, D, and G)
Topics A and B: Provisions for Tartrates in FCs 04.1.2.2 (Dried fruit) and 04.1.2.6 (Fruit based spreads)

1. **Food Category No. 04.1.2.2 (Dried fruit)**
   India supports the adoption of tartrates at 3000mg/kg level in Food Category No. 04.1.2.2 (Dried fruit) as India allows tartaric acid at GMP level in this FC.

2. **Food Category No. 04.1.2.6 (Fruit based spreads (e.g. chutney), excluding products in FC 04.1.2.5)**
   India supports final EWG proposal for adoption of tartrates (INS 334, INS 335(ii), 337) at 3000 mg/kg use level in this Food Category.

Annex B - provisions in food categories 14.1.2 and 14.1.3 and their subcategories (the use of additives in fruit and vegetable juices and nectars – Topics C, E, and F)
Part 1: Provisions in FCs 14.1.2 and 14.1.3 and their subcategories that the EWG was able to reach consensus on
Topic C: Provisions for Emulsifiers, Stabilizers, and Thickeners in Fruit and Vegetable Juices and Nectars (FCs 14.1.2, 14.1.3, and subcategories) with the exception of provisions for Xanthan gum (INS 415), Tamarind seed polysaccharide (INS 437), and Gellan gum (INS 418)
Food Category No. 14.1.2 (Fruit and vegetable juices)

Additive	Comments
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	India supports discontinuation.

Food Category No. 14.1.3 (Fruit and vegetable nectars)

Additive	Comments
Pectins	India supports discontinuation.

Topic F: Acidity Regulators in Vegetable Juices (FC 14.1.2.2, 14.1.2.4) and Vegetable Nectars (FC 14.1.3.2, 14.1.3.4)
Food Category No. 14.1.2.4 (Concentrates for vegetable juice)

Additive	Comments
PHOSPHATES	India supports discontinuation.
TARTRATES	India supports discontinuation.

Food Category No. 14.1.3.2 (Vegetable nectar)

Additive	Comments
PHOSPHATES	India supports discontinuation.

Appendix 3: Recommendations to the notes associated with provisions for the seven group food additives in the GSFA
Table 1. Recommendations for revisions to notes for GSFA group food additives

Additive	Comments
SACCHARINS INS 954(i) Saccharin INS 954(ii) Calcium saccharin INS 954(iii) Potassium saccharin INS 954(iv) Sodium saccharin	India supports final EWG proposal “For saccharin and its Ca, K, Na salts, expressed as Na Saccharin” be added to all provisions for Saccharins in the GSFA.

Topic D: Horizontal approach to replace Note 161 in FCs 05.1.1, and 07.1 and 12.2 and their subcategories
Category No. 12.2 (Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles))
India supports final EWG proposal to consider additive provisions for Acesulfame Potassium and Neotame in FC 12.2.2, replace Note 161 with note 478.

Category No. 12.2.1 (Herbs and spices)
India supports revoking provisions for SUCRALOSE (TRICHLOROGAL ACTOSUCROSE) as there is already and adopted provision for INC 955 in FC 12.2.2.

Category No. 12.2.2 (Seasonings and condiments)

Additive	Comments
ASPARTAME	India supports final EWG proposal to replace Note 161 with note 478.
ACESULFAME POTASSIUM	India supports final EWG proposal to move from FC 12.2, Adopt in FC 12.2.2 - Replace Note 161 with note 478
NEOTAME	India supports final EWG proposal to move from FC 12.2, Adopt in FC 12.2.2 - Replace Note 161 with note 478
SUCRALOSE (TRICHLOROGAL ACTOSUCROSE)	India supports final EWG proposal to revise Adopted, Replace Note 161 with note 478

Appendix 5: Proposed draft provision in the GSFA for propylene glycol alginate (INS 405) in FC 01.1.2; and provisions entered into the step process as a result of CX/FA 21/52/8
Category No. 01.1.2 (Other fluid milks (plain))

Additive	Comments
PROPYLENE GLYCOL ALGINATE	India does not support adoption of this food additive in this food category.

Indonesia

Indonesia would like to thank eWG chaired by United States of America for preparing working document on General Standard for Food Additives (GSFA): Report of The eWG on GSFA. Indonesia would like to provide the following comment:

Annex 1: Final EWG Proposals for Beta-Carotenes (beta-carotenes, synthetic (INS 160a(i)), beta-carotenes, Blakeslea trispora (INS 160a(iii)), beta-Carotene-Rich Extract from *Dunaliella salina* (INS 160a(iv)), formerly called "Carotenoids".

		CAROTENOIDS INS 160a(i), 160a(iii), 160a(iv) Functional effect: Colour			**beta-Carotene-Rich Extract from *Dunaliella salina* INS 160a(iv) Functional effect: Colour**				
Food Cat. No.	**Food Category Name**	**Max Level**	**Notes**	**Year Adopted**	**Max Level**	**Notes**	**Step**	**Final EWG Proposal for "BETA-CAROTENES"**	**Comment**
01.3.2	Beverage whiteners	100	XS250 & XS252	2021	100	XS250 & XS252	2	Adopt at 10 mg/kg with Notes XS250, XS252, new reporting basis note (Expressed as beta-Carotene) andnew "singly or in combination" note.	Indonesia supports final eWG proposal
01.6.2.1	Ripened cheese, includes rind	100	458, 500, XS208, XS278	2021	100	XS208, XS263, XS264, XS265, XS266, XS267, XS268, XS269, XS270, XS271, XS272, XS274, XS276, XS277, XS278, XS283	2	Adopt at 25 mg/kg with XS208, XS278, new reporting basis note (Expressed as beta-Carotene), new "singly or in combination" note, revised Note 458 (CAROT458) "Except for use in cheese mass only for products conforming to the Standards for Cheddar (CXS 263-1966), Danbo (CXS 264-1966), Edam (CXS 265-1966), Gouda (CXS 266-1966), Havarti (CXS 267-1966), Samsø (CXS 268-1966), Emmental (CXS 269-1967), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968), Provolone (CXS 272-1968), Coulommiers (CXS 274-1969), Camembert (CXS 276- 1973) and Brie (CXS 277-1973) at 35 mg/kg)", Chair's note: Revised note 500 is not necessary if the uselevel for beta-Carotenes in FC 01.6.2.1 is 25 mg/kg.	Indonesia does not support final ewg proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 100 mg/kg. The use of 100 mg/kg gives exposure of 0,55% ADI (adult) and 1,2%ADI (children).

		CAROTENOIDS INS 160a(i), 160a(iii), 160a(iv) Functional effect: Colour			**beta-Carotene-Rich Extract from *Dunaliella salina* INS 160a(iv) Functional effect: Colour**				
Food Cat. No.	**Food Category Name**	**Max Level**	**Notes**	**Year Adopted**	**Max Level**	**Notes**	**Step**	**Final EWG Proposal for "BETA-CAROTENES"**	**Comment**
01.6.4	Processed cheese	100		2009	100		2	Maintain use level at 100 mg/kg, add new reporting basis note (Expressed as beta-Carotene) and new "singly or in combination" note.	Indonesia supports final eWG proposal
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	100		2009	100	XS243	2	Adopt at 20 mg/kg with new reporting basis note (Expressed as beta-Carotene), and new "singly or incombination note".	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 100 mg/kg. The use of 100 mg/kg gives exposure of 2,3% ADI (adult) and 5,6% ADI (children).
02.1.2	Vegetable oils and fats	25	508, 509, XS33, XS210	2021	25	232, XS33, XS210, XS325R	2	Maintain use level at 25 mg/kg, with Notes 508, 509, XS33, XS210, XS325R, new reporting basis note (Expressed as beta-Carotene) and new "singly or in combination" note.	Indonesia supports final eWG proposal
02.2.1	Butter	25	146 & 291	2008	25	146, 291, XS279	2	Adopt at 12 mg/kg with new reporting basis note (Expressed as beta-Carotene) and "singly or in combination" note.	Indonesia supports final eWG proposal

		CAROTENOIDS INS 160a(i), 160a(iii), 160a(iv) Functional effect: Colour			beta-Carotene-Rich Extract from *Dunaliella salina* INS 160a(iv) Functional effect: Colour				
Food Cat. No.	**Food Category Name**	**Max Level**	**Notes**	**Year Adopted**	**Max Level**	**Notes**	**Step**	**Final EWG Proposal for "BETA-CAROTENES"**	**Comment**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	35		2010	35	XS253, XS256	2	Maintain use at 35 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 50 mg/kg. The use of 50 mg/kg gives exposure of 0,07 % ADI (adult) and 0,15%ADI (children)
02.3	Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	200		2009	200		2	Adopt at 10 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia supports final eWG proposal
04.1.2.9	Fruit-based desserts, including fruit-flavoured water-based desserts	150		2009	150		2	Adopt at 15 mg/kg with new reporting basis note (Expressed as beta-Carotene) and "singly or in combination" note.	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 100 mg/kg. The use of 100 mg/kg gives exposure of 1,5% ADI (adult) and 3,6%ADI (children)
05.1.4	Cocoa and chocolate products	100	183	2016	100	183, XS87	2	Maintain use at 100 mg/kg with Note 183 with new reporting basis note (Expressed as beta-Carotene), and "singly or in	Indonesia supports final eWG proposal

		CAROTENOIDS INS 160a(i), 160a(iii), 160a(iv) Functional effect: Colour			beta-Carotene-Rich Extract from *Dunaliella salina* INS 160a(iv) Functional effect: Colour				
Food Cat. No.	**Food Category Name**	**Max Level**	**Notes**	**Year Adopted**	**Max Level**	**Notes**	**Step**	**Final EWG Proposal for "BETA-CAROTENES"**	**Comment**
								combination" note.	
05.1.5	Imitation chocolate, chocolate substitute products	100		2009	100		2	Maintain use at 100 mg/kg, new reporting basis note (Expressed as beta-Carotene), and "singly or incombination" note.	Indonesia supports final eWG proposal
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	100	XS309 R	2017	100		2	Adopt at 150 mg/kg (for parity with beta-carotenes,vegetable) with XS309R, new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 500 mg/kg. The use of 500 mg/kg gives exposure of 1,5 % ADI (adult) and 3,6%ADI (children)

		CAROTENOIDS INS 160a(i), 160a(iii), 160a(iv) Functional effect: Colour			beta-Carotene-Rich Extract from *Dunaliella salina* INS 160a(iv) Functional effect: Colour				
Food Cat. No.	**Food Category Name**	**Max Level**	**Notes**	**Year Adopted**	**Max Level**	**Notes**	**Step**	**Final EWG Proposal for "BETA-CAROTENES"**	**Comment**
05.4	Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces	100		2009	100		2	Adopt at 200 mg/kg (for parity with beta-carotene, vegetable) with new reporting basis note (Expressed asbeta-Carotene), and "singly or in combination" note.	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 300 mg/kg. The use of 300 mg/kg gives exposure of 1%ADI (adult) and 2,4% ADI (children).
06.3	Breakfast cereals, including rolled oats	200		2009	200		2	Adopt at 50 mg/kg (for parity with beta-carotenes, vegetable) with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at160 mg/kg. The use of 160 mg/kg gives exposure of 2,4%ADI (adult) and 5,7% ADI (children).

		CAROTENOIDS INS 160a(i), 160a(iii), 160a(iv) Functional effect: Colour			**beta-Carotene-Rich Extract from *Dunaliella salina* INS 160a(iv) Functional effect: Colour**				
Food Cat. No.	**Food Category Name**	**Max Level**	**Notes**	**Year Adopted**	**Max Level**	**Notes**	**Step**	**Final EWG Proposal for "BETA-CAROTENES"**	**Comment**
06.4.3	Pre-cooked pastas and noodles and like products	1200	153, 474	2019	1200	153 & XS249	2	Adopt at 40 mg/kg with note 153, new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note. Chair's note: A comment was made regarding the use of carotenoids in the sauce used in frozen pasta meal products. It is our understanding that the sauce portion of a frozen meal would actually be covered under FC 04.2.2.6. We believe that FC 06.4.3 would only cover the starch portion of a frozen meal.	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 260 mg/kg. The use of 260 mg/kg gives exposure of 9% ADI (adult) and 23% ADI (children).
06.5	Cereal and starch based desserts (e.g. rice pudding, tapioca pudding)	150		2009	150		2	Adopt at 40 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia supports final eWG proposal
07.1.2	Crackers, excluding sweet crackers	1000		2009	1000		2	Adopt at 200 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia supports final eWG proposal
07.2	Fine bakery wares (sweet, salty, savoury) and mixes	100		2009	100		2	Adopt at 42 mg/kg (for parity with beta-carotenes, vegetable provision), add new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 200 mg/kg. The use of 200 mg/kg gives

		CAROTENOIDS INS 160a(i), 160a(iii), 160a(iv) Functional effect: Colour			beta-Carotene-Rich Extract from *Dunaliella salina* INS 160a(iv) Functional effect: Colour				
Food Cat. No.	**Food Category Name**	**Max Level**	**Notes**	**Year Adopted**	**Max Level**	**Notes**	**Step**	**Final EWG Proposal for "BETA-CAROTENES"**	**Comment**
									exposure of 3,7%ADI (adult) and 8,8% ADI (children).
12.2.2	Seasonings and condiments	500		2009	500		2	Adopt at 100 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia supports final eWG proposal
13.5	Dietetic foods (e.g. supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300		2009	300		2	Adopt use level at 100 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia supports final eWG proposal
15.1	Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	100		2010	100		2	Adopt use level of 30 mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Indonesia does not support final eWG proposal. The highest actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea trispora INS 160a(iii) in Indonesia is at 200 mg/kg. The use of 200 mg/kg gives exposure of 1,7%ADI (adult) and 4% ADI (children).
15.2	Processed nuts, including coated nuts and nut mixtures (with e.g. dried fruit)	100		2009	100		2	Adopt at 4 mg/kg (for parity with beta-carotenes, vegetable) with new reporting basis note (Expressed as beta-Carotene).	Indonesia does not support final eWG proposal. The actual use of beta-Carotenes, synthetic INS 160a(i) and beta-Carotenes, Blakeslea

		CAROTENOIDS INS 160a(i), 160a(iii), 160a(iv) Functional effect: Colour			beta-Carotene-Rich Extract from *Dunaliella salina* INS 160a(iv) Functional effect: Colour				
Food Cat. No.	**Food Category Name**	**Max Level**	**Notes**	**Year Adopted**	**Max Level**	**Notes**	**Step**	**Final EWG Proposal for "BETA-CAROTENES"**	**Comment**
									trispora INS 160a(iii) in Indonesia ia at 30 mg/kg. The use of 30 mg/kg gives exposure of 0,35% ADI (adult) and 0,8% ADI (children).

Annex 2: Final EWG Proposals for Beta-apo-8'-carotenal (INS 160e)

The 87th JECFA established a new ADI of 0-0.3 mg/kg bw for beta-apo-8'-Carotenal (INS 160e). As a result, CCFA52 requested that the GSFA EWG remove INS 160e from the group header for Carotenoids and duplicate as separate provisions those provisions that currently exist for "CAROTENOIDS" for Beta -apo-8'-Carotenal (INS 160e) in the GSFA and circulate those provisions for comment on actual use and use level. Final EWG proposals from the EWG discussions for INS 160e are presented, below.

Carotenal, beta-apo-8'- INS 160e beta-apo-8'-Carotenal Functional class: Colour						
Food Cat. No.	**Food Cat. Name**	**Max Level (mg/kg)**	**Notes**	**Step**	**Final EWG Proposal**	**Comment**
01.6.2.1	Ripened cheese, includes rind	100	458, 500, XS208, XS278		Adopt at 12 mg/kg with revised Note 458 (CAROT458) "Except for use in cheese mass only for products conforming to the Standards for Cheddar (CXS 263-1966), Danbo (CXS 264-1966), Edam (CXS265-1966), Gouda (CXS 266-1966), Havarti (CXS 267-1966), Samsø (CXS 268-1966), Emmental (CXS 269-1967), Tilsiter (CXS270-1968), Saint-Paulin (CXS 271-1968), Provolone (CXS 272-1968), Coulommiers (CXS 274-1969), Camembert (CXS 276-1973)and Brie (CXS 277-1973) at 35 mg/kg)", and revised Note 500 (APO500) "Except for use in products conforming to the General Standard for Cheese (CXS-283-1978) at 35 mg/kg", XS208 andXS278.	Indonesia supports final eWG proposal

Carotenal, beta-apo-8'- INS 160e beta-apo-8'-Carotenal Functional class: Colour						
Food Cat. No.	**Food Cat. Name**	**Max Level (mg/kg)**	**Notes**	**Step**	**Final EWG Proposal**	**Comment**
04.1.2.9	Fruit-based desserts, includingfruit-flavoured water-based desserts	150			Adopt provision at 48 mg/kg.	Indonesia does not support final eWG proposal. The actual use of beta-apo-8'-Carotenal INS 160e in Indonesia is at 80 mg/kg. The use of 80 mg/kg gives exposure of 1,2% ADI (adult) and 2,9% ADI (children).
05.1.3	Cocoa-based spreads, includingfillings	100	161 & XS86		Adopt at 10 mg/kg with Note 161 and XS86.	Indonesia supports final ewg proposal
05.2	Confectionery including hard andsoft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	100	XS309R		Adopt at 50 mg/kg with Note XS309R	Indonesia does not support final eWG proposal. The highest actual use of beta-apo-8'-Carotenal INS 160e in Indonesia is at 500 mg/kg. The use of 500 mg/kg gives exposure of 1,5% ADI (adult) and 3,6 %ADI (children)

Appendix 2: Replies of Codex Committee on Processed Fruits and Vegetables (CCPFV)

Annex A - provisions in food categories not related to fruit and vegetable juices and nectars (Topics A, B, D, and G)
Topics A and B: Provisions for Tartrates in FCs 04.1.2.2 (Dried fruit) and 04.1.2.6 (Fruit based spreads)

Food Category No. 04.1.2.6 (Fruit based spreads (e.g. chutney), excluding products in FC 04.1.2.5)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Comment
TARTRATES	334, 335(ii), 337	3000	45	7	Acidity regulator, Antioxidant, Emulsifying salt, Flavour enhancer (INS 334 only), Sequestrant, Stabilizer	Adopt. Forward to WG on Alignment to revise CODEX STAN 160-1987 to include a provision for tartrates with a note "To maintain the pH at alevel not above 4.6"	Indonesia supports final eWG proposal

Annex B - provisions in food categories 14.1.2 and 14.1.3 and their subcategories (the use of additives in fruit and vegetable juices and nectars – Topics C, E, and F)

Topic F: Acidity Regulators in Vegetable Juices (FC 14.1.2.2, 14.1.2.4) and Vegetable Nectars (FC 14.1.3.2, 14.1.3.4)

Food Category No. 14.1.3.4 (Concentrates for vegetable nectar)

Horizontal approach (FA/45 CRD2 Appendix IV, FA/46 CRD 2 Appendix II): The use of acidity regulators is justified in this FC on a general basis

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Comment
TARTRATES	334, 335(II), 337	1600	45	7	Acidity regulator, Antioxidant, Emulsifying salt, Flavour enhancer (INS334 only), Sequestrant, Stabilizer	Adopt with Notes 45, 127, and 128	Indonesia supports final eWG proposal

Appendix 4: Discussion on Adopted, Draft and Proposed Draft Provisions for Sweetener

Topics C and E: Provisions in the step process for sweeteners in FCs for which CCFA52 reached consensus on an approach to replace Note 161 and all other provisions in the step process for sweeteners not covered under other Topics

Category No. 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Comment
SORBITOL	420(i)	500		4	Bulking agent, Humectant, Sequestrant, Stabilizer, Sweetener, Thickener	Move to FC 09.2.4. Adopt as listed with Note 144, 322, 241, and New Note: “Except for use in octopus with wasabi at 50,000 mg/kg” and new note “For use incooked molluscs only”.	Indonesia supports final eWG proposal

Topic D: Horizontal approach to replace Note 161 in FCs 05.1.1, and 07.1 and 12.2 and their subcategories

Category No. 05.1.1 (Cocoa mixes (powders) and cocoa mass/cake)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final EWG Proposal	Comment
SACCHARINS	954(i) – (iv)	100	97, 161, XS141	2016	Sweetener	Revise Adopted, Replace Note 161 with Note 477	Indonesia supports final eWG proposal
STEVIOL GLYCOSIDES	960a, 960b(i)	350	26	3	Sweetener	Adopt with Notes 26, 97, 477, and XS141	Indonesia supports final eWG proposal

Japan

Japan would like to submit the following comments regarding CX/FA 23/53/8. Addition is in **bold and underlined font** and deletion is in ~~strikethrough font~~.

1. Appendix 1 of CX/FA 23/53/8, Annex 1: Beta-Carotenes (beta-carotenes, synthetic (INS 160a(i)), beta-carotenes, Blakeslea trispora (INS 160a(iii)), beta-Carotene-Rich Extract from Dunaliella salina (INS 160a(iv)), formerly called "Carotenoids".

Food Cat. No.	Food Category Name	Final EWG Proposal for "BETA-CAROTENES"	Japan 's comment
02.4	Fat-based desserts excluding dairybased dessert products of food category 01.7	Adopt at **15**~~10~~ mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Japan proposes to change the maximum use level to 15 mg/kg. Beta-carotenes are used at 15 mg/kg in fat-based fillings to impart appealing colour. The ML of "beta-carotenes, vegetable" should also be changed for parity because of the same technological justification.
04.1.2.8	Fruit preparations, including pulp, purees, fruit toppings and coconut milk	Adopt at **18**~~10~~ mg/kg with Note 161, XS240, new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note. Chair's note: XS240 replaces Note 182.	Japan proposes to change the maximum use level to 18 mg/kg. Beta-carotenes, vegetable is used at 18 mg/kg in fruit sauce for pastries to impart appealing colour. The ML of "beta-carotenes" should also be changed for parity because of the same technological justification.
06.3	Breakfast cereals, including rolled oats	Adopt at **200**~~50~~ mg/kg (for parity with beta-carotenes, vegetable) with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Japan proposes to change the maximum use level to 200 mg/kg. Although the ML of beta-carotenes was lowered to 50 mg/kg to be linked with beta-carotenes, vegetable (INS 160a(ii)), beta-carotenes are used at 200 mg/kg in breakfast cereals and they have the same technological justification with INS 160a(ii). Therefore, Japan proposes to change the MLs of "beta carotenes" and "beta-carotenes, vegetable" to 200 mg/kg for parity.
06.5	Cereal and starch based desserts (e.g. rice pudding, tapioca pudding)	Adopt at **50**~~40~~ mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Japan proposes to change the maximum use level to 50 mg/kg. Beta-carotenes are used at 50 mg/kg in starch based fillings to impart appealing colour. The ML of "beta-carotenes, vegetable" should also be changed for parity because of the same technological justification.
07.1.5	Steamed breads and buns	Adopt at **1**~~60~~ mg/kg with ~~Note 216 and~~ new reporting basis note (Expressed as beta-Carotene). **Replace note 216 with new note "Except for use in maize-based products at 60 mg/kg".**	According to Food Category Descriptors in GSFA, FC 07.1.5 mainly covers oriental-style leavened wheat or rice products. Maize-based products are not main products in this FC. Therefore, Japan proposes to change the maximum use level to 1 mg/kg and replace Note 216 with the new note stating ML of maize-based product.

2. Appendix 1 of CX/FA 23/53/8, Annex 3: beta-Carotenes, Vegetable (INS 160a(ii))

Food Cat. No.	Food Category Name	Final EWG Proposal for "BETA-CAROTENES"	Japan 's comment
02.4	Fat-based desserts excluding dairybased dessert products of food category 01.7	Adopt at **15**~~10~~ mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Please see the above comment.
04.1.2.8	Fruit preparations, including pulp, purees, fruit toppings and coconut milk	Adopt at **18**~~10~~ mg/kg with Note XS240, new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note. Chair's note: XS240 replaces Note 182.	Please see the above comment.
06.3	Breakfast cereals, including rolled oats	Adopt at **200**~~50~~ mg/kg with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Please see the above comment.
06.5	Cereal and starch based desserts (e.g. rice pudding, tapioca pudding)	Adopt at **50**~~40~~ mg/kg (for parity with beta-Carotenes) with new reporting basis note (Expressed as beta-Carotene), and "singly or in combination" note.	Please see the above comment.

3. Appendix 4 of CX/FA 23/53/8
Food Category 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms)

Additive	INS	Max Level (mg/kg)	Final EWG Proposal	Japan 's comment
Sorbitol	420(i)	500	Move to FC 09.2.4. Adopt **at GMP** ~~as listed~~ with Note 144, 322, 241, and ~~New Note: "Except for use in octopus with wasabi at 50,000 mg/kg" and~~ new note "For use in cooked molluscs only".	Japan proposes to change the maximum use level to GMP and remove new note stating ML of octopus with wasabi Sorbitol is used at GMP in cooked surimi products (FC09.2.4.1) to retain moisture and prevent protein denaturation, and in fried surimi products and molluscs (FC09.2.4.3) to add sweetness while prevent Maillard reaction and frying colour.

Food Category 09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)

Additive	INS	Max Level (mg/kg)	Notes	Final EWG Proposal	Japan 's comment
Steviol glycosides	960a, 960b(i)	165	26 &208	Adopt as listed **with new note "for use in smoked or salted molluscs only".**	Japan proposes to add new note "for use in smoked or salted molluscs only". Steviol glycosides are used in smoked molluscs and salted molluscs to add sweetness with small amount.

Kenya

Comment: Kenya seeks clarification on whether the alternative criteria taken by the committee is procedural based on preamble 1.1 of CXS 192-1995

Nigeria

A. Matters for information

CCFA52 agreed to establish an EWG to provide recommendations to CCFA53 on the following topics:

- The result of review of 87th JECFA on CAROTENOIDS as well as discussion at CCFA52
- Replies from CCPFV on:

a. tartrates (INS 334, 335(ii), 337) in FC 04.1.2.6 “Fruit based spreads (e.g., chutney), excluding products in FC 04.1.2.5)”;

b. acidity regulators in general, and tartrates (INS 334, 335(ii), 337) specifically in FC 04.1.2.2 “Dried fruit”;

c. emulsifiers, stabilizers, thickeners in general, and xanthan gum (INS 415) specifically, in FC 14.1.2 “Fruit and vegetable juices” and its subcategories and FC 14.1.3 “Fruit and vegetable nectar” and its subcategories. This would also include tamarind seed polysaccharide (INS 437) in FCs 14.1.3.1, 14.1.3.2, 14.1.3.3, and 14.1.3.4 as listed in Annex 3 Part D of CRD2;

d. colours in the Annex on French fried potatoes of the Standard for Quick Frozen Vegetables (CXS 320-2015);

e. acidity regulators in general, and calcium lactate (INS 327) specifically, in FC 14.1.2.1 “Fruit juice” generally, and in Chinese plum juice specifically;

f. acidity regulators in general, and 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) and tartrates (INS 334, 335(ii), 337) specifically in FC 14.1.2.2 “Vegetable juice”, FC 14.1.2.4 “Concentrates for vegetable juice”, FC 14.1.3.2 “Vegetable nectar”, and FC 14.1.3.4 “Concentrates for vegetable nectar” and the maximum use levels needed to achieve the intended technological effect;

g. tamarind seed polysaccharide (INS 437) in the Standard for Pickled Cucumbers (CXS 115- 1981);

The appropriateness of the proposals listed in Appendix 1 of CX/FA 21/52/2 pertaining to notes associated with food additives contained under group headers; 1 REP 21/FA, para. 183. CX/FA 23/53/8 2 (iv) Whether the notes in the GSFA linked to aspartame (INS 951), acesulfame potassium (INS 950) and the aspartame-acesulfame salt (INS 962) are aligned and revise related provisions in the GSFA accordingly;

The provision for propylene glycol alginate (INS 405) in FC 01.1.2 for comment on the specific use level and technological justifications for the use level (CRD2, Annex 3 Part B);

Draft and proposed draft provisions for sweeteners in FC 14.1.5 for comment on the actual use level as well as the reporting basis for any provided use level (CRD2, Annex 3 Part E);

The requests from agenda item 5c: draft and proposed draft sweetener provisions still in the Step Process in the Food Categories listed in Appendix 1 of CX/FA 21/52/9 (see para. 173(iii)a));

The requests from agenda item 5c: discuss provisions with Note 161 attached to them in FCs 05.1.1, 07.1 and 12.2 and its subcategories (see para. 173(iii)b));

Draft and proposed draft provisions for sweeteners in all FCs of the GSFA not covered by the topics (vi), (vii), and (viii); and (x)

Provisions entered at Step 2 of the GSFA contained in CRD2 Annex 5.

Appendix 1: Review of Carotenoids and Related Additive

Appendix 2: Replies of Codex Committee on Processed Fruits and Vegetables (CCPFV)

Topics C and E: Provisions in the step process for sweeteners in FCs for which CCFA52 reached consensus on an approach to replace Note 161 and all other provisions in the step process for sweeteners not covered under other Topics

First circular proposal for horizontal approach for sweeteners in FC 07.1 and subcategories:

Comment: Nigeria thanks the EWG on the job well done and agrees with the final EWG proposals on Beta-Carotenes and sweetener provisions as indicated on annex 1.

Republic of Korea

Appendix 4: Discussion on Adopted, Draft and Proposed Draft Provisions for Sweeteners

Topic D: Horizontal approach to replace Note 161 in FCs 05.1.1, 07.1 and 12.2 and their subcategories

Republic of Korea supports revising maximum level of erythritol(INS 968) from 200000 to GMP in FC 12.2.2(Seasonings and condiments).

Supports revising max level of maltitol(INS 965(i)) and maltitol syrup(INS 965(ii)) from 50000 to GMP in FC 12.2.2. However, for notes in provisions of maltitol and maltitol syrup, we suggest replacing note 478 with note 477 and adding it.

In Korea, erythritol, maltitol and maltitol syrup are authorized for use at GMP for foods in general.

Senegal

Contexte : La CCFA52 a convenu de créer un GTE chargé de formuler des recommandations à la CCFA53 sur les sujets suivants :

A. Les résultats de l'examen du 87ème session du JECFA sur les caroténoïdes ainsi que des débats au CCFA52 sur le point 3 a) de l'ordre du jour ;

B. Réponses du CCPFV sur tartrates, les régulateurs d'acidité, émulsifiants, stabilisants, épaississants en général et gomme xanthane, Colorants, les phosphates et les Polysaccharide de graines de tamarin.

- Question A : Examen des caroténoïdes et des additifs apparentés

Position : Le Sénégal ne soutient pas les propositions du GTE pour l'adoption des dispositions prévues dans CX/FA 22/53/8.

Justification : Le préambule 1.1 de la NGAA indique que l'inclusion des additifs alimentaires dans les NGAA doit être placée sous la direction du JECFA. Dans ce cas, il est demandé si les autres critères proposés par le GTE sont approuvés par le JECFA.

- ***Question B : Réponses du Comité du Codex sur les fruits et légumes transformés (CCPFV).***

a. Tartrates (INS 334, 335(ii), 337) dans FC 04.1.2.6 « Tartinades à base de fruits (par exemple, chutney), à l'exclusion des produits de la FC 04.1.2.5) » ;

b. Les régulateurs d'acidité en général, et les tartrates (INS 334, 335(ii), 337) en particulier dans la section FC 04.1.2.2 « Fruits séchés » ;

Contexte : Le Groupe de travail électronique (GTE) sur les NGAE à la CCFA48 a examiné les dispositions proposées pour les tartrates dans les catégories d'aliments (Fruits séchés) et les Tartinades à base de fruits (par exemple chutney) à l'exclusion des produits de la catégorie alimentaire. Il a été noté que les tartrates sont utilisés comme régulateur d'acidité dans les produits normalisés et non normalisés de ces catégories d'aliments.

Le groupe de travail sur la NGAE à la CCFA47 a examiné les projets de dispositions existants dans les tableaux 1 et 2 de la NGAA pour les additifs alimentaires ayant une fonction « émulsifiant, stabilisant, épaississant », y compris les dispositions relatives aux pectines (INS 440) et à la gomme xanthane (INS 416) dans les FC 14.1.2 et 14.1.3.5 CCFA47 a accepté de demander des éclaircissements au CCPFV sur l'utilisation de la justification technologique des « émulsifiants », stabilisants et épaississants » en général et gomme xanthane (INS 415) en particulier dans ces FC.

Position : Le Sénégal soutient les propositions du GTE telles que fournies aux des Annexes A et B (***CX/FA 22/53/8, appendice 2***).

Justification : La justification technologique a été fournie et l'alignement vise à assurer la cohérence avec les textes du codex.

c. Colorants de l'annexe sur les pommes de terre frites de la norme pour les légumes surgelés (CXS 320-2015)

Contexte : Dans le cadre de ses travaux d'établissement de normes sur les dispositions relatives aux additifs alimentaires pour la norme pour les légumes surgelés (CXS 320-2015), le CCPFV28 n'a pas pu parvenir à un consensus sur l'utilisation de colorants dans les pommes de terre frites (une annexe du (CXS 320-2015) et a demandé à la CCFA49 de clarifier cette utilisation dans le cadre de la réduction de l'acrylamide. La CCFA49 a répondu que la justification technique de l'utilisation de colorants dans les pommes de terre frites relevant de la compétence du CCPFV a renvoyé aux éclaircissements du Secrétariat du JECFA concernant l'acrylamide. Le CXS 320-2015 correspond à la FC 04.2.2.1 de la NGAA.

Position : Le Sénégal soutient les propositions du GTE visant à reporter la discussion jusqu'à ce que le GTE sur la NGAA reprenne les dispositions relatives à l'utilisation des couleurs dans la FC 04.2.2 et ses sous-catégories, comme prévu à l'Annexe A, ***(CX/FA 22/53/8, appendice 2)***.

Justification : L'utilisation de la couleur peut induire les consommateurs en erreur sur la véritable nature du produit, contrairement aux directives fournies dans le préambule de la NGAA. Bien qu'une justification technologique de l'utilisation de la couleur soit fournie et puisse réduire le temps de traitement pour éviter la formation d'acrylamide, d'autres stratégies que l'utilisation de colorants alimentaires pourraient être explorées.

d. Régulateurs d'acidité en général, et lactate de calcium (INS 327) en particulier, dans FC 14.1.2.1 « Jus de fruits » en général, et dans le jus de prune chinois en particulier ;

e. Régulateurs d'acidité en général, phosphates et tartrates (INS 334, 335(ii), 337) en particulier dans FC 14.1.2.2 « Jus de légumes », FC 14.1.2.4 « Concentrés pour jus de légumes », FC 14.1.3.2 « Nectar végétal » et FC 14.1.3.4 « Concentrés pour nectar végétal » et les limites maximales d'utilisation nécessaires pour obtenir l'effet technologique recherché

Contexte : Des projets de dispositions relatives à l'utilisation de la gomme gellane (INS 418) dans la FC 14.1.2.1 spécifique à l'utilisation dans le jus de prune chinois et en combinaison avec le lactate de calcium (INS 327) et le citrate trisodique (INS 331 iii) ont été proposés pour inclusion dans le GSFA par la Thaïlande en réponse à la CL 2014/15-FA13. Le GTE sur le GSFA au CCFA50 a examiné le projet de dispositions dans la catégorie d'aliments 14.1.2.1 (Jus de fruits) et a noté que la norme de produit correspondant à cette catégorie d'aliments (CODEX STAN 247-2005) avait été aligné pour inclure une référence générale à la GSFA. Le CCFA50 a par la suite demandé au CCPFV de fournir des éclaircissements sur la justification technologique du lactate de calcium utilisé comme régulateur d'acidité dans les jus de fruits en général et dans le jus de prune chinois en particulier, ainsi que sur le niveau d'utilisation aux BPF.

Le groupe de travail sur la GSFA à la CCFA50 a également examiné les dispositions du processus par étapes pour l'utilisation des phosphates dans les catégories d'aliments (Jus de légumes), (Concentrés pour jus de légumes), (Nectar végétal) et (Concentrés pour nectar végétal) et a recommandé que les dispositions soient maintenues en attendant les directives du CCPFV sur la justification technologique de l'utilisation des régulateurs d'acidité en général dans ces catégories d'aliments, et ces additifs comme régulateur d'acidité en particulier, ainsi que sur les niveaux d'utilisation maximaux nécessaires pour obtenir l'effet technique.

Position : Le Sénégal soutient les propositions du GTE telles que fournies à l'annexe B (***CX/FA 22/53/8, appendice 2***).

Justification : La justification technologique a été fournie et l'alignement vise à assurer la cohérence avec les textes du codex.

f. Polysaccharide de graines de tamarin (INS 437) dans la norme pour les concombres marinés (CXS 115-1981).

Contexte : Le CCPFV29 a accepté de transmettre à la CCFA les dispositions révisées relatives aux additifs alimentaires dans le CXS 115-1981 afin d'inclure une disposition pour le SIN 437 dans la liste des agents épaississants de cette norme de produit.

Position : Le Sénégal soutient les propositions du GTE telles que fournies à l'Annexe A (***CX/FA 22/53/8, appendice 2).***

Justification : La justification technologique a été fournie et l'alignement vise à assurer la cohérence avec les textes du Codex. De plus, l'inclusion de SIN 437 est conforme aux dispositions de la NGAA.

ICBA (International Council of Beverages Associations)

ICBA supports the below levels for β-carotene (INS 160a(i), 160a(iii), 160a(iv), and 160a(ii)) or β-apo-8'-Carotenal (INS 160e). ICBA is proposing to add an additional footnote – Note 127 'On the served to the consumer basis' – to account for levels that would be needed in reconstituted beverages from their concentrates (e.g., powder, syrups) captured under FC 14.1.4.3. 'Concentrates (liquid or solid) for water-based flavoured drinks'.

Carotenoids	ICBA Supported Use Levels in FC 14.1.4	Footnotes
β-carotenes INS 160a(i), 160a(iii), 160a(iv) (*see* p.18, Annex 1, Appx I, CX/FA 23/53/8)	25 mg kg−1	**New Note** – Expressed as β-carotene
		New Note – Singly or in combination: β-Carotenes (β-carotenes, synthetic (INS 160a(i)), β-carotenes, *Blakeslea trispora* (INS 160a(iii)), β-Carotene-Rich Extract from *Dunaliella salina* (INS 160a(iv)) and β-carotenes, vegetable (INS 160a(ii)).
		Note 127 – On the served to the consumer basis

β-carotenes, vegetables 160a(ii) (*see* p.38, Annex 3, Appx I, CX/FA 23/53/8)	25 mg kg−1	**New Note** – Expressed as β-carotene
		New Note – Singly or in combination: β-Carotenes (β-carotenes, synthetic (INS 160a(i)), β-carotenes, *Blakeslea trispora* (INS 160a(iii)), β-Carotene-Rich Extract from *Dunaliella salina* (INS 160a(iv)) and β-carotenes, vegetable (INS 160a(ii)).
		Note 127 – On the served to the consumer basis
β-apo-8'-Carotenal (INS 160e) (*see* p.26, Annex2, Appx I, CX/FA 23/53/8)	10 mg kg−1	**Note 127** – On the served to the consumer basis