

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 3a, 4a, 4b, 5a, 5b, 5c, 5d, 5e, 5f, 6, 7, 8, 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES

Fifty-third Session

Comments of Mauritius

SN	Agenda item	Position
3a	Matters of Interest arising from FAO/WHO and from the 92nd and 95th Meetings of the Joint FAO/WHO Expert Committee on Food Additives (JECFA) respectively	<p>92nd JECFA We note the withdrawal of the previous ADIs for Benzoic Acid, and additionally, the withdrawal of the specifications for synthetic Riboflavin.</p> <p>JECFA 95 SESSION We note that temporary ADIs have been established for processing aids and support the request for additional information to finalize the evaluations. We also note the delay in the evaluation of Phospholipase A2</p>
4a	AGENDA ITEM 4A: ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS (CX/FA 23/53/5)	<p>We take note of the information provided in the Table (Annex 1, CX/FA 23/53/5) and on the Proposed draft regional standard for soybean products fermented with Bacillus species. We support the endorsement of the food additives provisions in the Regional standard for dried meat, Standard for dried or dehydrated chilli pepper and paprika, Standard for dried small cardamom, Standard for spices derived from dried fruits and berries- allspice, juniper berry, and star anise, Proposed draft regional standard for cooked rice wrapped in plant leaves</p>
4b	Alignment of the food additive provisions of commodity standards: Report of the EWG on Alignment, CX/FA 23/53/6	<p>Issue 1: Proposal of Table 3 notes to also consider them to identify the specific function class consistent with aligning the provision in the commodity standard. We do not to support this approach. Rationale: This is introducing a new approach to the inclusion of function class to GSFA contrary to the current procedure (Section II, Codex Procedural Manual). A new work project targeting revision of the procedure needs to be initiated for consideration. In addition, this is beyond the mandate and ToR of Alignment EWG.</p> <p>Issue 2: Alignment EWG recommendations to amend the names and descriptors of FC 01.4, and subcategories 01.4.1, 01.4.2 and 01.4.3 as proposed be brought to the CCFA for broader consideration and possibly new work. We support the amendment and seek clarification on the procedure for undertaking this amendment.</p> <p>Issue 3: What MLs for INS 405 (propylene glycol alginate), INS 636 (maltol) and INS 637 (ethyl maltol) are appropriate to align CXS 243 with the GSFA and whether this is outside the EWG We note that the establishment of ML is beyond the alignment process. The Committee may only identify the anomalies and report to the plenary of the committee.</p> <p>Issue 4: Changing the name of adipates to adipic acid. We support the proposed change of name.</p> <p>Issue 5: Is it appropriate for EWG on Alignment to recommend the removal of provisions for food additives in the relevant food categories in the GSFA when there are only XS notes. We do not to support this approach. The EWG should identify such scenarios and inform the plenary to make a decision on whether or not to remove.</p> <p>Issue 7: the question of whether the food additive sodium sesquicarbonate (INS</p>

		<p>500(iii)) has the functional class of stabilizer and thickener, for which it is listed in CXS 253-2006 We request that this question be referred to the WG on INS to provide a technological justification.</p> <p>Issue 8: Codex secretariat proposal on amendment is that the Standard for Mozzarella is listed in the tables to Annex C in the GSFA as Codex Standard 262-2007 but it should be corrected to Codex Standard 262-2006. We support the proposal of the Secretariat in addressing the identified anomaly.</p> <p>APPENDIX 3 (proposed amendments to the food additive provisions of the codex commodity standards for milk and milk products (CCMMP) due to alignment with the GSFA), APPENDIX 4 (proposed amendments to tables 1, 2 and 3 of the GSFA relating to the alignment of the codex commodity standards for milk and milk products (CCMMP), APPENDIX 5 (full list of amendments to GSFA due to introduction of Table 3 notes arising from CCFA51, CCFA52 and proposed CCFA53 CCMMP alignment). We support the adoption of the proposed alignments contained in Appendices 3, 4, 5, 7, 9 and 10 of EWG report.</p>
5a	<p>GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): FOOD ADDITIVE PROVISIONS FOR COLOURS IN FOOD CATEGORIES 01.0 THROUGH 03.0 AND THEIR SUBCATEGORIES INCLUDING ADOPTED PROVISIONS FOR COLOURS WITH NOTE 161 AND DRAFT AND PROPOSED DRAFT PROVISIONS (OUTSTANDING FROM CCFA52) (CX/FA 23/53/7)</p>	<p>Appendix D: Provisions for colours in FCs 01.0 through 03.0 and their subcategories including adopted provisions for colours with Note 161 and draft and proposed draft provisions. We support the respective final EWG proposals as given in document CX/FA 23/53/7) although several uses and use levels proposed in CX/FA 23/ 53/7 and CX/FA 23/53/8 seem to be excessive, and not necessarily always technologically warranted. Safety considerations should be stressed. As a general principle, we do not support the use of colours in plain products.</p>
5b	<p>GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE EWG ON THE GSFA (CX/FA 23/53/8)</p>	<p>Issue 1: Appendix 1: Review of Carotenoids and Related Additives: The result of review of the 87th JECFA on CAROTENOIDS as well as discussion at CCFA52 on agenda item 3(a). We do NOT to support the EWG proposals for adoption of provisions as provided in CX/FA 22/53/8, Appendix 1.</p> <p>The preamble 1.1 of GSFA guides that inclusion of food additives in GSFA shall be under the guidance of JECFA. In this case clarification is sought whether the alternative criteria are as proposed by the EWG is approved by JECFA</p> <p>Issue 2: Appendix 2: Replies of Codex Committee on Processed Fruits and Vegetables (CCPFV) We support the EWG proposals as provided in Annex A, CX/FA 22/53/8, Appendix 2. 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 We support the EWG proposals as provided in Annex B, CX/FA 22/53/8, Appendix 2. D. colours in the Annex on French fried potatoes of the Standard for Quick Frozen Vegetables (CXS 320-2015)</p> <p>We support the EWG proposals to postpone the discussion until the EWG on the</p>

		<p>GSFA takes up provisions for the use of colors in FC 04.2.2 and its subcategories, as provided in Annex A, CX/FA 22/53/8, Appendix 2.</p> <p>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.</p> <p>We support the EWG proposals as provided in Annex B, CX/FA 22/53/8, Appendix 2.</p> <p>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</p> <p>We support the EWG proposals as provided in Annex B, CX/FA 22/53/8, Appendix 2.</p> <p>G. tamarind seed polysaccharide (INS 437) in the Standard for Pickled Cucumbers (CXS 115-1981).</p> <p>We support the EWG proposals as provided in Annex A, CX/FA 22/53/8, Appendix 2.</p>
5c	<p>GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS (REPLIES TO CL 2021/55-FA) (CX/FA 23/53/9)</p>	<p>We support the proposed list except for the proposal by: -</p> <ul style="list-style-type: none"> · IADSA for use of carmosine colour at a higher level in food supplements, · IFAC on use of Dimethyl decarbonate in fruits and vegetable juices subject to national legislation of importing country <p>It is recommended that the proposals received from Egypt for Allura Red, Annato extract, Chlorophylls and Carmines in food categories 14.1.3.1& 14.1.3.2 be revised because the proposed food additives have a numerical ADI and therefore will not be considered at the GMP level in the GSFA.</p>
5d	<p>STATUS PAPER ON ALL ADOPTED FOOD ADDITIVES PROVISIONS IN THE GSFA FOR ADDITIVES WITH SWEETENER FUNCTION BUT NOT ASSOCIATED WITH NOTE 161</p>	<p>We endorse the administrative review done by the CODEX Secretariat in assigning notes 477 and 478 or leaving as listed, provisions of additives in food categories and sub-categories 1-15.</p>
5e	<p>OCCURRENCE DATA AND / OR DIETARY EXPOSURE TO NITRATES AND NITRITES; AND SURVEYS OF NATURAL OCCURRENCE AND/OR CONTAMINATION LEVELS OF NITRATES AND NITRITES IN FOOD AND LEVELS OF NITRATES AND NITRITES OCCURRING FROM USE AS ADDITIVES</p>	<p>We note and appreciate the data provided by some member states so far. We further note that data submitted is limited in geographic coverage and to a limited number of food categories. In view of this we seek clarification from JECFA whether the information provided is adequate to enable scientific advice.</p>
5f	<p>GENERAL STANDARD FOR FOOD ADDITIVES (GSFA) INFORMATION</p>	<p>CCFA53 to make further decisions on whether to include them in the priority list for JECFA's re-evaluation or delete them from the General Standard for Food Additives</p>

	ON COMMERCIAL USE OF ORTHO-PHENYLPHENOL (INS 231) AND SODIUM ORTHOPHENYLPHENOL (INS 232) IN FOOD Replies to CL 2021/83	(GSFA, CXS 192-1995) based on the members' response to the circular letter. We support deletion of these additives from the GSFA and not to include them on the JECFA priority list.
6	PROPOSED DRAFT REVISION OF THE DOCUMENT CLASS NAMES AND INTERNATIONAL NUMBERING SYSTEM (INS) FOR FOOD ADDITIVES (CXG 36-1989)	<p>Issue 1: Review the proposed additions/changes/deletions to the INS list</p> <p>We support the recommendation of the Electronic Working Group to adopt the functional class and technological purpose of the listed food additives as indicated in the Annex of CX/FA 23/53/13. We support the deletion of INS 960b (i) as proposed by the EWG.</p> <p>Issue 2: Review other proposals that are not acceptable or are premature, as described in the following paragraphs:</p> <p>- Addition of Blue Microalgae Extract: Several EWG members considered the inclusion of this food additive premature as no authorization has been granted for this coloring agent as a food additive, nor are any risk assessments or standards publicly available. The EWG was of the opinion not to include this food additive in CXG36-1989 at this stage.</p> <p>We support the advice of the EWG.</p> <p>Rationale: It is premature to include this additive before the JECFA evaluation.</p> <p>Addition of functions in alignment with JECFA and Codex: Peru has submitted a list of requests</p> <p>We support the advice of the EWG.</p> <p>Assignment of an INS number to Aspergillus niger fungal amylase and inclusion of the functional class and technological function «flour treatment agent»</p> <p>We support the advice of the EWG.</p>
7	PROPOSALS FOR ADDITIONS AND CHANGES TO THE PRIORITY LIST OF SUBSTANCES PROPOSED FOR EVALUATION BY JECFA (REPLIES TO CL 2021/81-FA) (CX/FA 23/53/14)	We support the priority lists and ranking as circulated by the Codex Secretariat except for ortho-phenylphenol (INS 231) and sodium ortho-phenylphenol (INS 232) (Ref Agenda Item 5). We seek clarity on request for the proposed use Glycolipids on group for FC 14.1.2 and new request for Steviol Glycosides.
8	DISCUSSION PAPER ON MAPPING FOOD CATEGORIES OF THE GSFA TO THE FOODEx2 DATABASE	<p>a. Recommendation 1:</p> <p>The mapping of the FoodEx2 to the GSFA should use the Exposure hierarchy, given its focus on organizing foods specifically for exposure calculations, that food consumption data bases are already mapped to this hierarchy and that a reference is available that may serve as a verification tool.</p> <p>We support the mapping of FoodEx2 and GSFA up to the Exposure hierarchy and the mapping of the GSFA to level of Core terms in FoodEx2. We endorse the recommendations 3, 4, 5, 6, 7, 8.</p>

9	<p>DISCUSSION PAPER ON THE FOOD ADDITIVE PROVISION FOR THE USE OF TRISODIUM CITRATE IN FC 01.1.1 « LIQUID MILK (PLAIN) » (CX/FA 23/53/16)</p>	<p>We oppose the use of trisodium citrate in this food category 01.1.1 (Plain liquid milk).</p> <p>According to Section 3.2 of the Preamble of the GSFA, the use of food additives is justified only when it provides a benefit, does not pose an appreciable risk to the health of consumers, does not mislead the consumer, and fulfils one or more of the technological functions defined by Codex and meets the needs set out in (a) to (d), and only when these objectives cannot be achieved by other economically and technologically feasible means.</p> <p>UHT treatment of milk has been around for a long time as a means of inactivating micro-organisms and extending the shelf life of milk. UHT products have remained stable over this period without the need for additives. The sedimentation problem that is used as a basis for justifying the use of this additive has not been reported. Therefore, and based on the guidelines in the preamble of the GSFA on the use of additives only when they are extremely necessary to achieve a certain purpose, there is no justification for the use of trisodium citrate in FC 01.1.1. Furthermore, the proposal is inconsistent with the definition of milks in Codex STAN CXS 206-1999 (General Standard for the Use of Dairy Terms) which are included under FC 01.1.1</p> <p>We understand that the technological need for trisodium citrate is only recognized for UHT goat's milk, as goat's milk produces heavy sediment during UHT processing. Therefore, technological controls are needed to avoid protein coagulation. While high temperature processing of bovine milk causes less problems with protein coagulation. Therefore, the use of citrates is not indicated. The use of the additive in bovine milk can be misleading to the consumer by ensuring the stability of low quality milk and maintaining its organoleptic properties by buffering a low pH which is an indicator of spoilage.</p> <p>Furthermore, sedimentation has been observed in reconstituted milks and the use of trisodium citrate may lead to reconstituted milk being passed off as milk as defined by Codex, thereby misleading consumers to make informed choices about the true nature of the products, as required by Section 4.1.1 of CXS 1-1985.</p> <p>We express their concern and request information on the specific conditions under which this additive may be used (REP19/FA, Para 76). They also note that in the CCFA52 (REP21/FA, Para 11 (ii)), countries interested or with a justification to use the additive had the possibility to have a regional standard to meet their specific needs.</p>
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