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 23/53/6[1]**

January 2023

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-third 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 Brazil, Canada, Chile, Egypt, El Salvador, EU, France, India, Indonesia, Japan, New Zealand, Republic of Korea, Russian Federation, Saudi Arabia, Senegal, Thailand, UK, USA, Vietnam, EFEMA, EU Specialty Food Ingredients, FIA, IDF, IFAC, IFU, ICBA, NATCOL, IOFI and ISDI.

Alignment work undertaken in 2021 and 2022

1. The 52nd session of the CCFA (CCFA52) 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 (REP21/FA para 107):

a) re-circulating for a third time the alignment of the following milk and milk products commodity standards which were circulated twice for comments in 2020: 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;

b) investigating the development and implementation issues associated with establishing Table 3 notes in the GSFA, in consultation with the Codex Secretariat *(ref. CRD03 recommendation 6)*;

c) whether the information in the Procedural Manual is sufficient or if amendments are required to ensure future divergence does not occur, taking into account the Guideline Document on Avoiding Future Divergence of Food Additive Provisions in the GSFA with Commodity Standards, *(ref. CRD03 recommendation 10)*;

d) CCPFV food additives provisions to resolve the technical issues identified by the VWG in their consideration of endorsement, specifically for: *Standard for Mango Chutney; Standard for Gochujang; and Standard for Chilli Sauce (ref. CRD03 recommendation 4)*;

e) the alignment of the following CCNFSDU commodity standards: *CXS 72-1981; CXS73-1981; CXS 74-1981; CXS 156-1987; CXS 181-1991; CXS 203-1995;* and the Guideline for the Ready to Use Therapeutic Foods (RUTF) *(ref. Brought forward from Workplan and CRD3 recommendation 3)*; and

f) alignment for the regional standards: CCAFRICA (CXS 325R-2017); CCEURO (CXS 40R-1981) *(ref. Brought forward from Workplan).*

Progress since the 52nd Session of the CCFA

2. This report of the EWG has addressed all of the Terms of Reference (TOR) that were assigned to it at CCFA52.

3. A summary of the issues and questions arising from the work of the EWG is at Appendix 1. Appendix 7 includes discussion of issues for the alignment of CCPFV and Appendix 8 for discussion of issues for alignment of the CCFNFSDU standards. These Appendices also provide an explanation for the Chair's proposed approach for each of the key issues that were identified.

4. Appendices 2, 3, 4, 5, 6, 7, 9 and 10 address the requests that were made of the EWG for the consideration of the CCFA.

[1] The document will be partially translated into French and Spanish and some appendices will be in English only.

List of Appendices

1. Explanatory document – questions, comments and chair's proposals for the EWG for CCMMP, and the issues associated with the Alignment of CCPFV commodity standards (related to items a) and e) of the TOR).
2. Proposed amendments to the food additive provisions of the codex commodity standards for milk and milk products (CCMMP) due to alignment with the GSFA (related to item a) of the TOR).
3. 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) (related to item a) of the TOR).
4. Consideration of the development and implementation issues associated with establishing Table 3 notes in the GSFA (related to item b) of the TOR).
5. Full list of amendments to GSFA due to introduction of Table 3 notes arising from CCFA51, CCFA52 and proposed CCFA53 CCMMP alignment (related to item b) of the TOR).
6. Evaluation of whether the information in the Procedural Manual is sufficient or if amendments are required to ensure future divergence does not occur (related to item c) of the TOR).
7. Proposed amendments to the food additive provisions of the codex commodity standards for processed fruits and vegetables (CCPFV) and Tables 1, 2 and 3 of the GSFA relating to CCPFV (related to item d) of the TOR).
8. Explanatory document – issues and chair's proposals relating to the Alignment of CCNFSDU standards with the GSFA (related to item e) of the TOR).
9. The alignment of the seven CCNFSDU commodity standards, including the Guideline for the Ready to Use Therapeutic Foods (RUTF) (related to item e) of the TOR).
10. Proposed amendments to the GSFA due to: CXS 325R-2017 *Regional Standard for Unrefined Shea Butter* (FC 02.1.2) CCAFRICA; and CXS 40R-1981 *Regional Standard for Chanterelles* (FC 04.2.1.1) CCEURO (related to item f) of the TOR).

Appendix 1

EXPLANATORY DOCUMENT – QUESTIONS, COMMENTS AND CHAIR'S PROPOSALS FOR THE EWG FOR CCMMP, AND AN ISSUE ASSOCIATED WITH THE ALIGNMENT OF CCPFV COMMODITY STANDARDS

Introduction and background

This document provides issues and questions arising from the alignment work under the TOR of the convened alignment EWG. It also provides a proposed approach by the chair for consideration by the PWG.

Preliminary alignment technical work had been undertaken by the International Dairy Federation (IDF). This preliminary work had been checked and validated by Australia to ensure that the alignment proposals had been conducted appropriately in accordance with the Alignment procedures, including the CCFA Decision Tree and the working principles[2].

The issues in Appendix 1 specifically relate to the proposed amendments to the GSFA due to alignment of the final nine (9) CCMMP standards, as detailed in Appendix 3. Issues that were resolved by the alignment EWG in undertaking earlier CCMMP alignment work in 2018[3] and 2021[4] have *not* generally been repeated here. It should be noted though that the alignment work undertaken by the EWG in 2019 was due to be presented to the CCFA in March 2020 but this meeting was delayed due to the COVID-19 pandemic. The Alignment EWG documents were therefore discussed at the CCFA52 meeting in September 2021, following a virtual WG meeting in June 2021.

Additionally, it is noted that there is some overlap of the work conducted by the EWG on Alignment and the EWG of the GSFA. This has been noted for both CX/FA 21/52/6 and CX/FA 21/52/7. The chairs and their teams of the two EWGs have had communications when these overlaps became clear. Comments have been added to some of the recommendations for alignment where this has been identified though they may not capture all overlaps. Very good communications will be required when both sets of documents are finalised as amendments may be required to address similar amendments to the GSFA from both EWGs.

Many comments and suggestions provided in EWG submissions have been assessed and if correct and appropriate and viewed as non-controversial changes have been made without acknowledgement. However, these have been much appreciated. Comments and suggestions that raised more complex issues, or in some cases were not supported have been summarised and explained within this document. Some of the earlier comments and discussion to earlier circulars in this document have been removed when they didn't alter the chair's proposal, to reduce the length of the document.

This is the final document of the EWG for Alignment formed by the CCFA52, so the 4th document post CCFA52. It is noted that there were two rounds of consultation for these CCMMP commodity standards between CCFA51 (2019) and CCFA52 (2021). However, they were not considered during the CCFA52 meeting in September 2021, since it was agreed that it would have been too much to consider all the Alignment documents during the virtual meeting. Due to many additional comments and the complex issues in some of these standards they had not been finalised then but had been circulated to the EWG for further checking.

The following references to different WG circulars are used in this document (which differs slightly to earlier WG versions) for clarity:

Consideration during 2020 that did not go to CCFA52 (2021) meeting but now part of EWG for CCFA53 (2023): 1st circular (2020) and 2nd circular (2020).

Consideration during 2022: 1st circular (2022); 2nd circular (2022) and 3rd circular (2022).

Appendix 1 has been prepared to separate out issues that were discussed by the EWG and provides additional information and explanations. It also considers one additional issue associated with the alignment of a CCPFV commodity standard also discussed in Appendix 7.

Appendix 1 contains the following three annexes:

Annex 1 - Key issues and questions requiring consideration by the Committee

Annex 2 - Other issues arising from the work of the EWG for CCFA53 meeting

Annex 3 - Detailed consideration of identified issues, including Chair's proposals

Considerations

[2] http://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CCFA_e_01.pdf
[3] CX/FA 19/51/6
[4] CX/FA 21/52/6

Complexity of alignment for CXS 243-2003 and CXS 288-1976

In relation to the alignment of the following two Commodity Standards, some EWG members commented that the alignment work is very complicated and may require further Alignment EWG work and even CCFA consideration after CCFA53:

- CXS 243-2003 – *Standard for Fermented Milks* (relevant to FCs 01.1.4. 01.2. 01.2.1, 01.2.1.1, 01.2.1.2 and 01.7) (see discussion in items 12, 26, 28, 31, 35, 42, 44, 46, 47 and 52);

- CXS 288-1976 – *Standard for Cream and Prepared Creams* (relevant to FCs 01. 4.1, 01.4.2 and 01.4.3) (see discussion in items 10, 11, 23, 29 and 49).

Table 3 Notes

The issue of Table 3 notes was discussed at CCFA52 and it was agreed that the Alignment EWG would investigate the development and implementation issues associated with establishing Table 3 notes in the GSFA, in consultation with the Codex Secretariat.

Since no decision has yet been made by the CCFA with respect to Table 3 notes, the Alignment EWG continued to use the previous approach of continuing to make changes to Tables 1 and 2, rather than Table 3. This is consistent with the approach undertaken in the alignment work for CCFA52. If CCFA53 agrees to the approach of adding notes to Table 3, changes to reflect this decision will subsequently need to be made.

However, please see the discussion documents on exploring the use of Table 3 notes as a separate ToR item and documents that further proposes how Table 3 notes could operate (i.e. Appendices 4 and 5).

Annex 1

Key issues and questions requiring consideration by the Committee

Issue 1

To expand the general USA proposal of Table 3 notes to also consider them to identify the specific function class consistent with aligning the provision in the commodity standard. However, this would only be on a case-by-case basis if there are a variety of possible functional classes and if justified and supported. See fuller discussion in Annex 3, item 8.

Comments on the 3rd circular (2022)

Support: Brazil, only on case-by-case basis

Issue 2

The 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. Consideration and views of this suggestion are sought, and what the next steps may entail (see fuller discussion in Annex 3, items 10 and 11 below). If new work is proposed then the alignment of the relevant standard, CXS 288 may need to be deferred.

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? Is this outside the scope of Alignment, like the consideration of ML for curcumin (INS 100(i)), but needs to be considered by another process? See discussion in Annex 3, item 35 (and item 37 for curcumin). It is proposed that this issue be passed to the EWG on the GSFA.

Comments on the 3rd circular (2022)

Brazil: proposed a ML of 5000 mg/kg for INS 405 as a starting point for discussions as permitted for fermented milk in Brazil. INS 636 and 637 are not permitted in Brazil. The issue should be referred to the GSFA [EWG].

Issue 4

It has been suggested that the name of the food additive adipates (INS 355) should be changed to adipic acid since there is not a group of adipates. Due to the support from Brazil and IDF to Canada's original suggestion, it is proposed to make this change even noting it is outside the scope of the Alignment exercise. See Annex 3, item 41.

Comments on the 3rd circular (2022)

Brazil and IDF: Although this issue is not within the scope of the EWG on Alignment, Brazil and the IDF both do not object in making the highlighted correction once it is well justified and will avoid inconsistency in the GSFA. The IDF notes that CXS 243 refers specifically to INS 355 as adipic acid, as does CXG 36.

Issue 5

Is it appropriate for Alignment to recommend the removal of provisions for food additives in the relevant food categories in the GSFA when there are only XS notes. Removing provisions means no provisions for non-standardized products. This is an issue from Appendix 10 (alignment of CXS 325R) for FC 02.1.2. It was questioned whether to remove provisions for four food additives (472e, 314, 432-436 & 477) as they all have 4 exclusion notes (XS19, XS33, XS210 and XS325R) and no provisions. It was noted that FC 02.1.2 is linked only to these four standards. However, after EWG consideration, it was proposed not to make changes, that is not to remove provisions. Comments are sought if this is considered an issue or concern, or would removing such provisions be overreach by Alignment. See Annex 3, item 56.

Issue 6 - EWG on the GSFA

See issue 3 above, discussed in Annex 3, item 35.

Issues 7 - EWG on INS

It is suggested that EWG on Alignment pass the question of whether the food additive sodium sesquicarbonate (INS 500(iii)) has the functional class of stabiliser and thickener, for which it is listed in CXS 253-2006, but not in CXG 36-1989, to the EWG on INS. See Annex 3, item 51

Issue 8 - Codex secretariat

A minor suggested 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. The proposed changes are on pages 50, 57 and 60 of the current GSFA (2021 updated version). The suggestion is that Codex Secretariat replace CXS 262-2007 with CXS 262-2006 in the three tables within Annex C of the GSFA. See Annex 3, item 9.

Chile noted what appears to be Spanish translation issues, as it 'requests that notes 234 and 235 in CXS 192-1995 in Spanish be modified, since the same meaning appears'. It is requested that Codex secretariat investigate the issue and remedy if required. See Annex 3, item 39. It is noted that this problem has been fixed.

It has been noted that note 236 should be replaced by the exclusion note XS288, but since no new use of note 236 are proposed due to alignment it was not considered something that can be conducted during alignment. It is noted that there are many entries with note 236 that could be replaced by XS288 but that would need to be conducted via another process (i.e. by Codex secretariat replacing all note 236 with XS288) if agreed. See Annex 3, item 48

Annex 2

Other issues arising from the work of the EWG for CCFA53 meeting

a) The proposed outcome is to remove notes 130 for the provisions for BHA (INS 320), BHT (INS 321) and propyl gallate (INS 310) due to alignment of CXS 253 (and separately CXS 256) for FC 02.2.2. The alignment of CXS 256 already occurred in CX/FA 21/52/6 (at CCFA52), which needed to be amended to ensure alignment works for the two standards together. That is, note B253 has been amended to better reflect the condition notes in CXS 253. An additional new note (B256) linked specifically to CXS 256 is also proposed, to aim to ensure appropriate consolidated alignment occurs. B256 also applies for tertiary butylhydroquinone (INS 319) (additional information is provided in Annex 3 item 4).

b) Use the more recent ML and statement to ensure consistency for phosphate provisions as acidity regulators in the alignment of CXS 207, CXS 281 and CXS 282 of '4,400 mg/kg, singly or in combination'.

c) Entries for sodium citrates (INS 331(i) & 331(ii)), potassium citrates (332(i) & 332(ii)), sodium carbonates (INS 500(i) & 500(ii)) and potassium carbonates (INS 501(i) & 501(ii)) related to alignment of CXS 207, CXS 281 and CXS 282 are made to Table 3, and not to Tables 1 & 2.

d) It is to consider on a case-by-case basis the use of notes referring to the appropriate functional class due to alignment, where additives have a variety of functional classes. Such use of notes need to be justified and supported as there is a concern over having an excessive number of notes in the GSFA. This is now also an issue raised related to Table 3 notes (see Appendix 4).

e) Replace CXS 262-2007 with CXS 262-2006 in the three tables within Annex C of the GSFA, to correct an error.

f) A statement that all acidity regulators, emulsifiers, stabilizers and thickeners in Table 3 be allowed to be added to products conforming to CXS 288-1976 and covered by food category 01.4.3 is not considered appropriate. This is because no such statement is written in the commodity standard. Only those food additives listed in the standard and then added into Table 3 due to alignment are appropriate.

g) It is noted that at CCFA52, Codex Secretariat agreed to correct the notes EE and FF in Tables 1 and 2 of the GSFA, due to the CCFA51 Alignment work. This is noted in CRD3 page 10 from the CCFA52 meeting, so this information is provided for information as nothing further is needed (additional information is provided within Annex 3 item 13).

h) The GSFA EWG recommendation as an outcome of CCFA52 (CX/FA 21/52/7 Appendix 2, page 21) was to add lecithin, partially hydrolyzed (INS 322(ii)) into Table 3 of the GSFA. This was separately noted in CRD3 to CCFA52, page 9. This outcome changes the alignment work related to this food additive being linked to a number of commodity standards, and they have been made.

i) It is not to make reference in notes in column 5 of Table 3 of the GSFA to functional class tables in other dairy commodity standards than CXS 243, CXS 253 and CSX 262.

j) The earlier note A207 from the 1st circular (2020) was deemed not required. Further consideration identified that the current note 196 and the exclusion note XS207 provide appropriate coverage for alignment of both CXS 207 and CXS 290 related to FC 01.5.1.

k) Consideration of the most appropriate way to align the provisions in CXS 207 for the three food additives (ascorbic acid, L- (INS 300), sodium ascorbate (INS 301) and ascorbyl esters (INS 304 and 305)) related to the use of notes 10 and 317 was required. It was concluded that the simplest approach is to keep the appropriate note to the relevant food additives; so note 10 for ascorbyl esters, and note 317 for ascorbic acid, L- and sodium ascorbate. The new note D207 is also added to the provisions for the three food additives.

l) It is to continue the agreed practice of adding additional phosphates from the phosphate family of food additives (with a JECFA specification) and the same functional class as the phosphates in the commodity standard are added to provisions via notes in the GSFA.

m) Questions were raised about whether it is best to accept draft provisions (via GSFA EWG) or via alignment (Alignment EWG) when the same or similar proposals are suggested. It is suggested to stay with proposing provisions due to alignment, since that is the process being undertaken by the Alignment EWG but to also make note of the need for consistency. Close coordination is needed between the EWG Chairs of GSFA and Alignment to ensure consistent outcomes are reached. Sometimes different MLs and notes are used between the different EWGs (eg. curcumin provisions in FC 01.7 due to alignment with CXS 243 compared to draft provisions at a different ML).

n) An explanation is provided as to why no additional food additive provisions were made to FC 01.4.1 in the GSFA as part of alignment of CXS 288 (see fuller explanation in Annex 3 item 23).

o) Not to add phosphoric acid (INS 338) to note B243, since it does not have the function class of stabilizer or thickener, which is the function for the phosphate provisions in CXS 243, even though it is listed in CXS 243.

p) Isomalt (Hydrogenated isomaltulose) (INS 953) as a sweetener is not added to provisions in FC 01.2.1.2 due to alignment with CXS 243. There are no provisions for sweeteners for FC 01.2.1.2 via the functional class table in CXS 243 so the exclusion note XS243 has been added. The exclusion note XS243 has also been added to draft provisions for two other sweeteners, sorbitol (INS 420) and sorbitol syrup (INS 420(ii)).

q) There are a number of food additive provisions in CXS 243 related to FC 01.2.1.1 and 01.2.1.2 that did not require any changes to the GSFA so they have not been provided for information only in Appendix 3. The justification for this decision is the major amount of additional work and pages did not warrant the effort for the minor benefit. As well, additional entries that did not recommend changes to the GSFA have been removed from the 2nd circular (2020) to shorten the large Appendix 3 document. These have mainly been due to alignment with CXS 243.

r) The proposed nisin (INS 234) ML of 12.5 mg/kg is maintained in the alignment of CXS 243 in food categories 01.1.4 and 01.7 rather than 500 mg/kg as explained in Annex 3 item 27.

s) To make the changes relating to alignment of phosphates due to CXS 243 at higher subcategories being FC 01.2, rather than FC 1.2.1.1 and 1.2.1.2. This was done by adding the new note P243 (For fermented milks (plain), not heat-treated after fermentation conforming to the Standard for Fermented Milks (CXS 243), for use in reconstituted and recombined products only) along with B243 for FC 1.2, and removing phosphate provisions for FC 01.2.1.1 and 01.2.1.2.

t) A similar altered approach was made in relation to alignment of CXS 288 with FC 1.4 rather than FCs 1.4.1, 1.4.2 and 1.4.3.

u) Not to replace notes 234 and 235 with the new note H243 in FC 01.2.1.1 due to alignment with CXS 243 except those that have been currently added in amendments in Appendix 3. There did not seem to be justification for making such big changes since these current notes (234 and 235) had been added to the GSFA relatively recently, and satisfy alignment, though slight changes to note 235 has been proposed.

v) Not add a provision for INS 472e (diacetyltartaric and fatty acid esters of glycerol) to FC 01.2.1.2 due to alignment with CXS 243. This is because stabilizers and thickeners but not emulsifiers are listed in the food additive function class table in CXS 243 for FC 01.2.1.2. INS 472e is listed as an emulsifier but not as a stabilizer and thickener in the food additive provisions in CXS 243.

w) It is proposed not to remove the notes 3 (surface treatment only) and 80 (not exceeding 2 mg/dm^3 and absent at a depth of 5 mm) in FC 1.6.1 for the preservative natamycin (pimaricin) (INS 235) due to alignment of CXS 262. It is noted that the functional class table within CXS 262 permits preservatives to be used for both cheese mass and surface treatment for CXS 262. The provision for natamycin in CXS 262 uses the qualification note identical to note 80. It is understood that this refers only to surface treatment (by the reference to 'not present in a depth of 5 mm') so note 3 also applies.

x) To stay with aligning CXS 243 using the ML of GMP for the three food additives INS 405, 636 and 637 in new note D243, even though they have a numerical ADI and are not listed in Table 3, since doing so is consistent with alignment, and it is not clear what an alternative ML would be (see Annex 1 issue 3, and Annex 3 item 35).

y) To make slight amendments to note D290 relating to aligning provisions for anticaking agents in CXS 290-1995, noting they are slightly different to those in CXS 207-1999.

z) Slight amendments have been made to L243 relating to alignment of CXS 243-2003 for FCs 01.1.4 and 01.7. Different notes have been written depending on whether there was an existing provision in the GSFA or not. This included the new note S243, and slightly edited notes 355 and 235.

aa) A new note Q243 was added for the alignment of sweeteners from CXS 243-2003 and FCs 01.1.4 and 01.7 to ensure the footnote ("For products conforming to the Standard for Fermented Milks (CXS 243-2003): limited to milk- and milk derivative-based products energy reduced or with no added sugar") within the standard is not lost.

bb) A new note for flavour enhancers (for flavoured products only) is not added when aligning CXS 243-2003 with FCs 01.1.4 and 01.7 as they are only flavoured products.

cc) There is a provision for caramel IV – sulfite ammonia caramel (INS 150d) in the plain FC 01.2.1 – Fermented milks (plain) with note 12 "as a result of carryover from flavouring substances", which is

considered unusual. For alignment of CXS 243-2003 it was initially suggested that XS243 be added but now it is proposed to remove the provision completely.

dd) Aligning of food additives in CXS 243-2003 that were not in FC 01.2.1.2 required an new exclusive note, R243, while a number of exclusion notes XS243 were required for provisions already in FC 01.2.1.2 but not in CXS 243. This was not the situation for FC 01.2.1.1. This required a number of new entries in Appendix 3.

ee) Ammonium salts of phosphatidic acid (INS 442) has a provision in FC 01.7 with note 231 ("For use in flavoured fermented milks and flavoured fermented milks heat treated after fermentation only"). This seems to be in conflict with the exclusion note XS243 added due to alignment of CXS 243. The GSFA provision was added in 2012. It is proposed to keep the XS243 note due to alignment and note 231 for non-standardised products.

ff) Since no new use of note 236 are proposed due to alignment, it was not considered appropriate to replace note 236 with XS288 due to alignment. It is noted that there are many entries with note 236 that could be replaced by XS288 but that would need to be conducted via another process (i.e. by Codex secretariat replacing all note 236 with XS288) if agreed. Also noted in Annex 1.

gg) For the alignment of CXS 288-1976 and FC 01.4.1 the original notes E288 and F288 were added back. A different note for FC 01.4.3 was required, being G288.

hh) Alignment of CXS 331-2017 was only with FC 01.8.2 and not 01.5 since the GSFA indicates that FC 01.8.2 is only linked to CXS 289 and CXS 331. FC 01.5.1 is linked to CXS 207 and CXS 290 that are currently being aligned.

ii) Sodium sesquicarbonate (INS 500(iii)) is listed in CXS 253 as a stabilizer and thickener but these functional classes are not listed in the GSFA or in CXG 36-1989 for the additive. Therefore, it seems inappropriate to add INS 500(iii) to Table 3 as part of alignment until the technological justification as stabilizer and thickener is established which is outside Alignment. It is proposed that the issue could be forwarded for consideration by the EWG on INS relating to the functional class. Also noted in Annex 1.

jj) The track change addition of FC numbers at the top of the functional class table for CXS 243 for the four columns (different food categories) within Appendix 2 has been checked. It is considered correct and appropriate to list them (from left to right columns) as 01.2.1.1, 01.1.4, 01.2.1.2 and 01.7.

kk) Some amendments are proposed to the listing of the functional class tables for the different CCMMP standards (within Appendix 2). The functional classes will be listed alphabetically in CXS 262. Functional classes that have been struck through or do not have any provisions next to them will be removed from the tables.

ll) Alitame (INS 956) provisions were removed from FC 01.1.4 and 01.7 due to the EWG on the GSFA work at CCFA52 (September 2021). Therefore, it is inappropriate to add such provisions back due to alignment.

mm) This was an issue from Appendix 10 (alignment of CXS 325R) for FC 02.1.2. It was questioned whether to remove provisions for four food additives (472e, 314, 432-436 & 477) as they all have 4 exclusion notes (XS19, XS33, XS210 and XS325R) and no provisions. It was noted that FC 02.1.2 is linked only to these four standards. But removing provisions mean that non-standardised products also have no provisions. It is not proposed to remove the provisions but to stay with the exclusions notes. Also noted in Annex 1, issue 5.

nn) Entries for other adipates, sodium adipate (INS 356), potassium adipate (INS 357) and ammonium adipate (INS 359) that are listed in CXS 243-2003 have not been added due to alignment since they do not have a JECFA specification. Only adipic acid (INS 355) has been aligned as noted in Annex 1, issue 4 and Annex 3, item 41.

oo) It is proposed that note 15 (on the fat or oil basis) does not apply for the alignment of CXS 207 for butylated hydroxyanisole (INS 320) as it is not explicitly written in the standard so a new note has been written to replace note 15. This is E207 - On the fat or oil basis except for use in products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999).

pp) Questions raised about the nisin (INS 234) and sorbates (INS 200, 202, 203) provisions for FC 01.7 due to alignment of CXS 243 linked to note 220 ('For use in flavoured products heat treated after fermentation only') and use in non-standardised products. To ensure clarity a new note T243 'Except for products conforming to the Standard for Fermented Milks (CXS 243-2003), only for use in flavoured products heat treated after fermentation' has replaced note 220 in FC 01.7 for the preservatives benzoates, nisin and sorbates. See fuller discussion in Annex 3, item 62.

qq) Slightly different notes were appropriate for the tartrate (INS 334, 335(ii), 337) provisions due to alignment of CXS 243 with FC 01.1.4 compared to FC 01.7 rather than the proposed general note M243 proposed to cover both provisions. An amendment is made to M243 for FC 01.1.4 and a new note (U243) specific to FC 01.7. See fuller discussion in Annex 3, item 63.

rr) It is proposed not to remove note 359 ('Excluding dairy fat spreads with ≥ 70% milk fat content') for INS 472e and stearoyl lactylates(481(i), 482(i)) in FC 02.2.2 due to the alignment of CXS 253. This is because that the same entries using note 359 already exist in the GSFA for FC 02.2.2. for comparable food additive provisions (i.e. polyglycerol esters of fatty acids (475) and sorbitan esters of fatty acids (491-495). See fuller discussion in Annex 3, item 64.

ss) Talc (INS 553(iii)) is part of the family of INS 553, i.e. magnesium silicates, which includes talc, so all food additives within this family need to be included in provisions, provided they have the same functional class, are included in the same food additive family, have the same ML and have a JECFA specification. Therefore talc should be included in relevant permissions and note D262.

tt) Slight edits were made for proposed notes E288 and F288 related to the alignment of CXS 288 with some food additives in FC 01.4.2 and 01.4.3. As well new different notes G288 and H288 which are only slightly different were also required. See fuller discussion in Annex 3, item 65.

uu) The reason that all food additives with certain function classes have an entry in Table 3 due to alignment of CXS 243 relates to specific notes as explained within item 12. These general notes are below the functional class table in CXS 243 and the footnote in the Annex to Table 3. The outcome means that there are a number of functional classes within Table 3 that are permitted for specific products complying with CXS 243. See fuller discussion in Annex 3, item 66.

Annex 3

Detailed consideration of identified issues, including Chair's proposals

Sucrose esters

1. Amendments have been made to use the proposed food additive group of "sucrose esters" that contains INS 473 (sucrose esters of fatty acids), INS 473a (sucrose oligoesters, type I and type II) and INS 474 (sucroglycerides) for this alignment work. This was work that was proposed and endorsed by CCFA52 meeting in September 2021 by the EWG for the GSFA in CX/FA 21/52/7, Appendix 3 and published in REP21/FA, and now made in the 2021 update of the GSFA.

Anticaking agents (US alternative suggestion to use Table 3 notes)

2. The alignment of the following anticaking agents: calcium carbonate (INS 170(i)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)) for a number of the commodity standards (CXS 207, CXS 262 and CXS 290) has been made consistent with the decisions adopted at CCFA51 and added into CX/FA 21/52/6 which were endorsed at CCFA52. Using the alignment decision tree, it is appropriate that these food additives fit into Box I. However, the reason these provisions are not added into Table 3 is to ensure the conditions listed in the standards are captured by use of notes. The decision has been to propose adding them into Tables 1 and 2 at GMP, but with a note restricting their use to the ML and conditions in the Standard. These anticaking agents are able to be used singly or in combination.

If, and when, Table 3 notes are considered and endorsed by the CCFA, then changes to the GSFA can be made to address these changes. This is linked to the TOR for the Alignment EWG for CCFA53 to investigate the development of Table 3 notes (and discussed in Appendices 4 and 5).

The discussion in earlier versions of this document has been reduced since it is more fully explained and discussed in Appendices 4 and 5.

Chair's initial proposal: Add provisions for calcium carbonate (INS 170(i)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)) as anticaking agents related to alignment of CXS 207, CXS 262 and CXS 290 to Tables 1 and 2 at GMP but with new notes. This is to ensure that the appropriate condition notes in the standards are maintained in the GSFA.

Chair's proposal at 2nd circular (2020): Due to the USA proposal for a change in approach to what has been suggested, it is appropriate to receive EWG comments on it. As this potentially could require quite a major change to the operation of Table 3 and the GSFA, it seems that a broader discussion than just within the EWG on Alignment would be appropriate, such as also within the GSFA PWG. If the EWG on Alignment considers the USA proposal has merit then that could be a recommendation taken to the PWG on Alignment for discussion.

But at the present time, until a resolution is decided, the current approach is continued. This is also addressed with other examples in later items (items 19 and 21).

The EWG was therefore asked to provide comments on the 2nd circular (2020) related to the alternative suggestion of the USA of making amendments due to alignment in Table 3 if appropriate and developing specific Table 3 notes to deal with complicated conditions linked to provisions required in the original commodity standard. This was proposed as an alternative to aligning nominally Table 3 additives in Tables 1 and 2 due to ensuring complicated conditions are addressed by Table 1 and 2 notes.

The Chair's proposal to support of the USA proposal for use of Table 3 notes remains unchanged and should be implemented in the future (see Appendices 4 and 5). However, it is noted that this significant change to the operation of the GSFA has not yet been agreed by CCFA. The approach has not therefore been implemented at this stage of the alignment work.

JECFA specifications required

3. If the food additive either listed in the commodity standard, or listed in CXG 36-1989 as part of a food additive group does not have a JECFA specification, it is not added to the GSFA. This is the case for a number of food additives in these CCMMP standards, and consistent with earlier work.

Maintaining note 130 for alignment of CXS 253

4. During the alignment of CXS 253-2006 (*Standard for Dairy Fat Spreads*) which relates to food category 02.2.2, it was noted that CXS 256-2007 (*Standard for Fat Spreads and Blended Spreads*) also applies to this same food category. CCFO is the relevant committee for CXS 256. CXS 256 was aligned in CX/FA 21/52/6 at

CCFA52. It is noted that the current note 130 (*Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylated hydroquinone (INS 320), and propyl gallate (INS 310)*) does not apply to CXS 253, but it does apply to CXS 256. It is important to consider the alignment of both CXS 253 and CXS 256 together.

Chair's initial proposal: To maintain note 130 during the alignment for CXS 253, against specific provisions, noting it is relevant to CXS 256 which also applies to food category 02.2.2.

EWG comments on 1st circular (2020)

Support

NZ, IDF, Japan, USA

Additional comment:

Chile: Pointed out the current notes are not correct.

Japan: Noted that the alignment of CXS 256 had already occurred as part of CX/FA 21/52/6 (has now occurred post the comment). Note 130 was maintained in the provisions in Tables 1 and 2 for relevant food additives.

Additional suggestions:

IDF suggests that additional words referring to the relevant specific commodity standard should be added to note 130 (referring only to CXS 256). Separately it also suggests a similar addition for note 196 referring only to CXS 253. Initially these seemed reasonable suggestions, since the notes are already used in the GSFA and are not new ones. Proposed amendments are:

> **Note 130:** ***For use in products conforming to the Standard for Fat Spreads and Blended Spreads (CXS 256-2007) only****, singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylated hydroquinone (INS 319), and propyl gallate (INS 310).*
>
> **Note 196:** ***For used in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006) only,*** *singly or in combination: butylated hydroxyanisole (BHA, INS 320), butylated hydroxytoluene (BHT, INS 321) and propyl gallate (INS 310)*.

However, a check was made of the GSFA for notes 130 and 196 and they are used for more provisions than those just for CXS 256 and CXS 253, so it is inappropriate to make the proposed amendments to the notes.

USA: Linked to this issue, the USA observed that note B253 due to the alignment of CXS 253 with FC 02.2.2 was not accurate and that it did not adequately reflect the provisions and conditions. This relates to provisions for the antioxidants propyl gallate (INS 310), butylated hydroxyanisole (BHA, INS 320) and butylated hydroxytoluene (BHT, INS 321).

CXS 253 and the original note B253 has been reconsidered and it is agreed that it is inadequate and does not accurately reflect CXS 253. The original draft of the commodity standard CXS 253 was located which confirmed that the ML for BHT is 75 mg/kg and not 200 mg/kg, so this needed to be part of the amendment.

Further consideration of alignment of CXS 253, and the link also to CXS 256 (which was aligned in CX/FA 21/52/6) indicated that the current note 130 and proposed addition of note 196 are not appropriate since they do not link specifically to the relevant commodity standard. Therefore, a new note was written due to CXS 256 (being listed as B256) as well as B253 being amended as part of the alignment to ensure the note is more accurate.

Support was received from the EWG (IDF, USA and Japan)

Comments on the 1st circular (2022)

Support

IDF

Comment

Canada suggested making changes to note B253 to improve clarity, especially to prevent the inadvertent exclusion of non-standardised foods. The alternative wording proposes using the term 'Except for…' up front. It also proposed some restructuring of the note. The use of the term 'on a fat or oil basis' suggested is not required as that is captured by note 15. It further questions whether removal of note 130 again affects provisions for non-standardised foods.

Chair's response

It questions whether there would be any non-standardised foods since FC 02.2.2 (Fat spreads, dairy fat spreads and blended spreads) seems to fully capture the two commodity standards linked to it. That is CXS

253 – Dairy fat spreads and CXS 256 – Fat spreads and blended spreads. Therefore, there does not seem a reason to use the term 'Except' as the two notes apply to the relative standards.

The removal of note 130 which captures the singly or in combination is also addressed by the use of both new notes B253 as well as B256 (linked to CXS 256) which both use this term.

Other parts of the proposed restructure of note B253 do seem to improve clarity so they have been made.

The original note B253:

> "For use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006) only intended for cooking purposes, singly or in combination with the individual maximum limits: propyl gallate (INS 310) of 200 mg/kg, butylated hydroxyanisole (INS 320) of 200 mg/kg and butylated hydroxytoluene (INS 321) of 75 mg/kg, with the combined maximum level of 200 mg/kg."

The proposed amended note B253:

> "Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), only intended for cooking purposes: propyl gallate (INS 310) at 200 mg/kg, butylated hydroxyanisole (INS 320) at 200 mg/kg or butylated hydroxytoluene (INS 321) at 75 mg/kg, singly or in combination at 200 mg/kg."

Chair's proposal is slightly changed at this circular: The proposed outcome is to remove notes 130 and 196 for these provisions due to alignment of CXS 253 (and separately CXS 256) and create new notes that link explicitly to the relevant standards as proposed by the IDF. Separately noting that the alignment of CXS 256 already occurred in CX/FA 21/52/6, which will need to be amended to ensure alignment works for the two standards together.

Note B253 has been further amended to better reflect the condition notes in CXS 253 and the comments from Canada to use the term 'Except for ..'. An additional new note linked specifically to CXS 256 is also proposed, to aim to ensure appropriate consolidated alignment occurs.

Comments on the 2nd circular (2022)

Support

IDF

USA

Comments on the 3rd circular (2022)

Canada supported but noted that the change made reflecting Canada's earlier comments in Appendix 3 for note B253 is not reflected here [i.e. it has not been updated]. This uses the language 'Except for use…'.

Chair's note: the entry here has been slightly updated to reflect the change to note B253 made in Appendix 3 due to Canada's earlier comments.

Amendments due to outdated statements of MLs

5. The notes written relating to the provisions of phosphates listed in some of the standards (CXS 207, CXS 281 and CXS 282) appears old, out of date and inconsistent with more recent language, including as outcomes of recent alignment work. Therefore, it has been proposed to make these notes more consistent. The language in some of the standards refers to 'xxxx mg/kg singly or yyyy mg/kg in combination, expressed as anhydrous substances', while the new consistent notes state '4400 mg/kg, singly or in combination' with note 33 ('as phosphorous').

Chair's initial proposal: Use the more recent ML and statement for phosphate provisions as acidity regulators in the alignment of CXS 207, CXS 281 and CXS 282 of '4,400 mg/kg, singly or in combination'.

EWG comments on 1st circular (2020)

Support

NZ, USA, IDF

IDF further explains that the level of 4400 mg/kg was derived from similar provisions in the more recently drafted and aligned dairy commodity standards, being CXS 250, 251 and 252.

Not support

Malaysia raised issues, noting the differences to the provisions and qualifications in the commodity standards with those provided at alignment in comments in Appendix 3, related to this issue for notes to CXS 207, CXS 281 and CXS 282.

Chair's proposal at 2nd circular (2020): It is unchanged to that at the 1st circular (2020). That is, the changes proposed to phosphate provisions are to update them and to make them more consistent.

EWG comments on 2nd circular (2020)

Support

IDF, USA

Comments on the 1st circular (2022)

Support

IDF

Not support

Canada

It expressed concern that the MLs for phosphates proposed are too high and not consistent with the original MLs. For CXS 281 & CXS 282 depending on the phosphate used the ML of 2000 mg/kg (singly) translate to between 292-632 mg/kg as phosphorus and for 3000 mg/kg (in combination) to 438-948 mg/kg as phosphorus. It further notes that the current GSFA ML for the relevant FC 01.3.1 is 880 mg/kg as phosphorus, which was adopted in 2012. It therefore suggests that a ML of 1000 mg/kg as phosphorus is more appropriate.

The same issue applies for CXS 207 (but not CXS 290) and proposed note B207290. The suggestion is that the provisions for the two standards may be more appropriate separated and not tried to be combined, so that the note would also be split. The original ML for CXS 207 of 5000 mg/kg is calculated to between 729-1580 mg/kg as phosphorus. This is a lot less than the proposed ML of 4400 mg/kg as phosphorus. Canada didn't state a specific ML but taking the same approach as above possibly an ML of 1600 mg/kg as phosphorus is suggested.

It separately noted a contradiction related to provisions for polyphosphates between the proposed notes B207290 (ML 4400 mg/kg, including polyphosphates) and A290 (ML 2200 mg/kg specific for polyphosphates) related to the same polyphosphates.

Response

Noting the above information and suggestions from Canada, it seems appropriate that there is a need to split both the notes for phosphates due to alignment of both CXS 207 & 290 with FC 01.5.1. This is especially important due to the inadvertent contradiction in MLs for polyphosphates for CXS 290 which does complicate the alignment.

The current ML for FC 01.5.1 (Milk powders and cream powder (plain) in the GSFA for phosphates is 4400 mg/kg, as phosphorus (note 33), was adopted in 2012. CXS 207 – Milk powders and cream powders was adopted in 1999, and amended in 2010, 2013, 2014, 2016 and 2018. It is not known if the ML for phosphates was changed since initially adopted but it seems unlikely due to how it is written. The proposal is that the adoption of the phosphates in the GSFA of 4400 mg/kg as phosphorus is most recent and so should stand unless the EWG proposes a reason why a lower one (as Canada suggests) is more appropriate.

It is also proposed to reduce the MLs for phosphates as acidity regulators for FC 01.3.1 due to alignment of CXS 281 & 282 as explained above from Canada's comments. This would be an ML of 1000 mg/kg compared to the earlier proposed ML due to alignment of 4400 mg/kg (also compared to the current ML in FC 01.3.1 of 880 mg/kg) for note A281282. A question for the EWG is whether such a relatively small increase in the ML is required. EWG comments are sought on these proposed amendments in Appendix 3.

Chair's proposal is altered due to Canada's comments with EWG comments sought on proposed amendments to MLs and notes. That is to reduce the MLs for CXS 281 & 282 to be more consistent with the original ML. It is also to split the phosphate provisions for CXS 207 and 290 with their own different MLs and notes but that the current ML for FC 01.5.1 in the GSFA of 4400 mg/kg is maintained. Note B207290 has been split into separate notes B207 and B290. There is also the need to ensure there is no contradiction between different notes and MLs for the same phosphates linked to the same commodity standard as part of alignment.

EWG comments are sought on these various amendments and justifications.

EWG comments on 2nd circular (2022)

Support

IDF, it would not oppose (i.e. can support) the suggested amendments based on Canada's reasoning provided in summary above.

EWG comments on 3rd circular (2022)

Support

Canada supports the changes to the MLs for CXS 281 & 282 for FC 01.3.1 based on its earlier comments. Relating to the ML for FC 01.5.1 it notes the ML in the standard translates to a range of 729-1580 mg/kg as phosphorus which is significantly different to the proposed ML of 4,400 mg/kg [current permission in the GSFA for FC 01.5.1 is 4,400 mg/kg]. However, if the committee considers it to be technologically justified then Canada will not object.

Chair's proposal is unchanged, as above.

6. Other old and outdated conditions linked to MLs were also identified in CXS 207, CXS 281 and CXS 282 in relation to provisions for sodium and potassium citrates (INS 331 and 332 respectively) as stabilizers, and sodium and potassium carbonates (INS 500 and 501 respectively) as acidity regulators. Using the alignment decision tree, it is appropriate that these food additives fit into Box I. There are no technological reasons for using a numerical ML and so they have been added to Table 3, and not incorporated into Tables 1 & 2. Also the relevant food category numbers for these standards, 01.5.1 for CXS 207, and 01.3.1 for CXS 281 and CXS 282, are not listed in the annex to Table 3.

General support received for above, but error noted and amendment made.

Chair's proposal is slightly changed due to error noted, INS 331(ii) should be 331(iii): Add provisions for sodium citrates (INS 331(i) & 331(iii)), potassium citrates (332(i) & 332(ii)), sodium carbonates (INS 500(i) & 500(ii)) and potassium carbonates (INS 501(i) & 501(ii)) related to alignment of CXS 207, CXS 281 and CXS 282 to Table 3, and not to Tables 1 & 2.

EWG comments on 2nd circular (2022)

Support

IDF

EWG comments on 3rd circular (2022)

Support

Canada: it can support the proposal so long as there is no technological reasons for maintaining a numerical ML. It notes that there are some numerical MLs for specific food additives in other dairy standards, e.g. CXS 207, 262 and 290.

Chair's proposal is unchanged, as above.

Use of notes to limit provisions to certain function classes

7. IDF have requested that certain exclusion notes that maintain the functional class listed for the food additive provisions are incorporated when the provisions are aligned in the GSFA, especially when many of the food additives have a variety of functional classes. IDF does not propose that this approach is taken for all provisions but there are some it maintains are important for its industry and it does not want to lose these distinctions. There are examples in the GSFA where notes relating only to the functional class are used, but there are not that many. This issue has been raised and discussed before with the EWG with the decision, in general, not to produce such functional class only notes due to the concern that there would be a plethora of new notes if this became the policy. There does not seem to be policy on how to make such decisions and distinctions. A number of specific functional class notes suggested by the IDF have not been included in this circular. Comments and consideration of when it may be appropriate to include such notes into the GSFA are sought from the EWG.

Chair's proposal in 1st circular (2020): At this stage, not to make explicit new notes relating only to the functional class of the food additive provisions reflecting those in the commodity standards, reflecting earlier discussions and conclusions of the EWG. However, at the request of the IDF, the EWG is asked to comment explicitly on this issue. If there is support for having such notes, what justifications and maybe decision questions can be used for future consideration to make such decisions more consistent.

Chair's proposal at 2nd circular (2020): Support has been provided (but not unanimous) for use on case by case basis for new notes relating only to functional class of the food additive when a variety of functional classes are possible. Relevant uses of such notes provided by IDF in its comments have been used in amendments to Appendix 3 in the 2nd circular (2020). A case may be made for additives that have a variety of functional classes, and that have different provisions for these functional classes in the commodity standard, to make it explicit via notes what the provision relates to.

EWG comments on 2nd circular (2020)

Support Chair's proposal to make notes on a case-by-case basis relating only to functional class in Table 3, and only when justified via alignment with the commodity standard.

IDF

The IDF supported the Chair's proposal at the 2nd circular (2020). The IDF had specifically requested the use of the former note C243 (Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003) as a sweetener only) for sweeteners that also have the functional class as a flavour enhancer. This relates to the alignment of CXS 243 with the food categories 01.1.4 and 01.7. This was not supported and not made for the reasons explained earlier, that there seems no firm justification for making such a note. It is also noted that some of these provisions are linked to the note 161, which are currently going through their own evaluation for alternative replacement notes (consideration by the Note 161 EWG) or note 161 had already been replaced.

Support for not making notes only relating to function class

USA: It does not believe these notes are necessary but understands they can be considered on a case-by-case basis.

Comments on the 1st circular (2022)

Support

Alternative comment

IDF still of the view that for sweeteners that also have a flavour enhancing function, entries should have a note restricting use only for sweetening in those products that conform to CXS 243. Therefore, it suggests reinstating note C243 in Appendix 3 for those Table 1&2 sweeteners in FCs 01.7 and 01.1.4.

Not support

Canada: It supports the notes accurately reflecting the appropriate functional classes in the standards being reflected in the alignment amendments. This has not uniformly been applied. How such decisions are made on a case-by-case approach has not been described, nor clear to Canada.

Response

Canada's comment is correct since there is not such a structured approach to determining whether provisions have a note indicating the appropriate functional class. It has been an approach (explained above and in earlier EWG Alignment documents) not to make such distinctions as routine, unless there is a justified reason, to limit the size and number of notes.

Chair's proposal is unchanged: It is to consider on a case-by-case basis the use of notes where additives that have a variety of functional classes, and that have different provisions for these functional classes in the commodity standard, to make it explicit via notes what the provision relates to. The use of such notes would need to be justified and supported as the EWG concern is trying to limit the number of notes written for the GSFA. The Chair notes the IDF comments for the specific case identified of the former note C243. However, it is not proposed to add the note to the relevant sweeteners that also have the functional class of flavour enhancers during alignment of CXS 243. This is because this note was not thought required especially due to the recent and continuing work dealing with note 161 which is, and has, been linked to these provisions and also deals with sweeteners that also have a flavour enhancing function.

Comments on the 2nd circular (2022)

Support

USA

Comments on the 3rd circular (2022)

Not support

Canada: It re-iterates its comments provided in earlier submission, summarised above, so it is not repeated here. Its preference is to consistently apply appropriate conditional notes, which include functional class notes, as a minimum. It provided a number of comments where such conditional notes have not been applied within it comments to Appendix 3, specific to CXS 288.

Chair's proposal: Canada and other comments on this topic are noted. But as stated above a consistent approach has not been developed, especially as there are different views on whether such notes are required or appropriate. At this stage the proposal is unchanged, as above. This issue can be considered further by the committee, noting the large amount of current work alignment still needs to undertaken.

8. A similar issue to above relates to considering the requests to also include qualification notes relating to specific functional classes for Table 3 provisions, again to reflect the specific provisions in the commodity standards. For similar reasons, the EWG has not been supportive of adding such functional class notes to the right hand side column in the entries for Table 3 provisions as it will make the Table a lot longer and the question is also is there a technological justification for such restrictions for GMP food additives. For the alignment of a number of very complicated commodity standards (CXS 243, CXS 253 and some food additives in CXS 262) a different approach was taken. This was to use a note to refer back to the functional class table and any footnote(s) within the commodity standard as the provisions are dependent on the types of foods. This is as an alternative to making very long and detailed conditional notes in the right hand side column in Table 3.

Chair's initial proposal: Only to make important condition notes related to the provisions in the commodity standard for new entries into Table 3 in the right hand side column (Specific allowance in the following commodity standards1) and not related to specific functional class. For the complicated situation for the alignment of commodity standards such as CXS 243 and CXS 253, a reference was made to the functional class table and any footnote(s) in the commodity standard rather than having to write many long, detailed condition notes for each entry.

EWG comments on 2nd circular (2020)

IDF: It can support the Chair's proposal for complicated alignment provisions but it still maintains its view that notes should be used when aligning standards where a single function class use is specified for the additive, when provisions are added to Tables 1&2.

However, if the USA approach for adding notes to Table 3 is adopted then it would support the use of such notes in column 5 entries in Table 3, to simplify and shorten the length of entries in the Table.

Discussion: The USA comments in item 2 also seems appropriate for further consideration for this item. That is, use the new USA suggested approach for Table 3 notes (see earlier item 2). In this case, they would only be written relating to functional class and only when justified due to alignment as being consistent with provisions in the commodity standard where there are a variety of function classes for the additive, so on a case-by case basis.

Comments on the 1st circular (2022)

Support

IDF

Chair's proposal is unchanged: The proposal is similar to that proposed for item 2. It is proposed to take the general USA proposal of Table 3 notes to the PWG seeking approval in principle of the approach. That is, the suggestion 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. In this case it would be related to identifying the specific function class consistent with aligning the provision in the commodity standard but only on a case-by-case basis if there are a variety of possible functional classes and if justified and supported (see Appendices 4 & 5 for discussion of Table 3 notes, including this issue in the questions and responses at the back of Appendix 4).

Comments on the 2nd circular (2022)

Support

USA

Comments on the 3rd circular (2022)

Support

FIA supports the use of Table 3 notes as per the USA proposal. It separately does support the use of Table 3 notes to clarify which functional classes are permitted to ensure the details in the commodity standards are captured in a way that does not take up too much space.

Proposed amendments to Annex B and C of the GSFA

9. A minor suggested 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. The proposed changes are on pages 50, 57 and 60 of the current GSFA (2021 updated version).

Chair's proposal is unchanged: That Codex Secretariat replace CXS 262-2007 with CXS 262-2006 in the three tables within Annex C of the GSFA.

Additional discussion due to CXS 288

Like for CX/FA 21/52/6, it is proposed that some amendments to the tables in Annex C of the GSFA to clarify which food categories are related to which Codex Standard. These proposed changes also refer to the nomenclature of the food categories. During the alignment work, it has become clear that there was a lack of certainty and clarity which the proposed amendments seek to improve. As the technical experts for these standards, the IDF considered and proposed the amendments. A specific comment taken from IDF's comments to the 1st circular (2020) was that it had assumed that with respect to food category 01.4.1 (Pasteurised cream (plain)) the use of food additives is not justified in pasteurised plain cream made from milk obtained by physical separation (even if involving either reconstitution and/or recombination). Comments from the EWG were sought on these suggested amendments noted below.

10. One of the proposed changes is due to CXS 288 (*Standard for Cream and Prepared Creams*) which relates to food categories 01.4.1, 01.4.2 and 01.4.3. The descriptors for these food categories in Annex B and the names of the food categories in Annex C of the GSFA were found to be confusing and made the alignment work hard to complete. To help clarify the situation, IDF considered these descriptors and food categories and have proposed amendments. The main area of concern and confusion was where the 'recombined and/or reconstituted cream products' fit into the categories. For the alignment work it has been assumed that they do comply with the three food categories as listed below. If this is agreed by the EWG then the following changes within Annex B and Annex C are proposed (using bold and underlined, and strike through).

Annex B Food Category System, Part II: Food Category Descriptors

01.4 Cream (plain) and the like:

Cream, **reconstituted cream and/or recombined cream are** ~~is a~~ fluid dairy product**s**, relatively high in fat content in comparison to milk. Includes all plain fluid, semi-fluid and semi-solid cream and cream analogue products. Flavoured cream products are found in 01.1.4 (beverages) and 01.7 (desserts).

Annex C Cross-reference of Codex Standardised foods with the Food Category System used for the Elaboration of the GSFA

Three specific tables sorted by:

Codex Standard Number

Codex Standard Title [alphabetical]

Food Category Number

The amendments proposed are listed for the Codex Standard Number table; with consistent amendments needed to be made to the other tables.

288-1976	Cream and Prepared Creams (fermented cream, acidified cream) **made from cream, reconstituted cream and/or recombined cream**	01.4.3
288-1976	Cream and Prepared Creams (~~reconstituted cream, recombined cream,~~ prepackaged liquid cream) **made from cream, reconstituted cream and/or recombined cream**	01.4.1
288-1976	Cream and Prepared Creams (whipping cream, cream packaged under pressure, whipped cream) **made from cream, reconstituted cream and/or recombined cream**	01.4.2

Chair's proposal in 1st circular (2020): Propose the amendments above to both Annex B Part II and the three tables in Annex C to make the descriptors and food category names more helpful to remove uncertainty and allow the alignment work to proceed. Comments were sought from the EWG on these suggestions.

EWG comments on 1st circular (2020)

Support

IDF

IDF made these additional comments, which were also part of the original technical input for consideration relating to the alignment of CXS 288 linked to food categories 01.4.1, 01.4.2 and 01.4.3. That is, that the IDF have assumed that with respect to food category 01.4.1 (Pasteurised cream (plain)), limited use of food additives in pasteurised plain cream made from milk obtained by physical separation and involving either reconstitution and/or recombination.

In the earlier preparaToRy work considering the alignment of CXS 288 with FC 01.4.1, 01.4.2 and 01.4.3, IDF also made the comment and observation supporting its conclusion that there should be limited food additive

provisions for FC 01.4.1. This is since currently almost all of the food additives with the function class of stabilizer, thickener or emulsifier have note 236 (Excluding products conforming to the Standard for Cream and Prepared Creams (reconstituted cream, recombined cream, prepackaged liquid cream) (CXS 288-1976)) next to them. This note essentially excludes these additives from FC 01.4.1. The only other functional class listed for this FC is acidity regulators and there are a number of those without note 236. The suggestion has been that no other food additive provisions should be added to FC 01.4.1 due to alignment (further explanation is provided below in item 23).

Not support, or question

Malaysia, USA

Malaysia: Noted that making these proposed changes is not within the scope of the EWG. It favoured retaining the existing descriptors and titles without changes.

USA: The US seeks clarification regarding the need for the proposed changes to the descripToR for food category 01.4, and the changes to the commodity standard name in Annex C. Based on our review of the commodity standard 288-1976, we believe the proposed changes to the descripToR for food category 01.4 are intended to bring the GSFA food category into closer alignment with the commodity standard. We recommend that the WG and subsequently CCFA have a discussion pertaining to whether the proposed changes to the descriptors changes the scope of the food category and whether the existing provisions in the food category would apply under the revised descripToR or if those provisions would need to be re-examined for applicability. Such a discussion is necessary to determine if the change constitutes new work that would require approval by the CAC. If the changes to the descripToR are considered ediToRial only, and do not change the scope of the food category and the existing provisions in the food category would apply unchanged under the new descripToR, then it may not be necessary for the changes to be made through a proposal for new work to the CAC. However, if CCFA determines that the revisions to the descripToR for food category 01.4 do change the scope of the food category, and the existing provisions in the food category would not apply unchanged under the new descripToR, then it may be necessary to propose these changes to CAC as new work, which would also require the revocation of all provisions from the food category [due to the alignment work?].

Consideration

Due to concern raised that the original chair's proposal may be considered to be outside the remit of the EWG on Alignment, the EWG was asked how best to progress such amendments. Does this require CCFA agreeing to request new work be undertaken to deal with the issue(s) raised but outside of alignment? Or can the EWG for Alignment propose an alternative to CCFA as a recommendation to address this, before alignment is undertaken?

Chair's proposal at second circular (2020): Requested views of the EWG on alternative next steps. Is it reasonable and appropriate for the Alignment EWG to recommend CCFA consider the suggestion to amend the titles CXS 288-1976 linked to the food categories as proposed above, separately to the alignment work? Or should this issue be considered as requiring agreement of new work, outside of alignment? This issue covers item 10 and 11 (below). EWG comments sought on preferred approach, and hence next steps. It may require deferring alignment of CXS 288-1976 until the issues of the names and descriptions of the subcategories are resolved.

EWG comments on 2nd circular (2020)

Support making the proposed changes

IDF: IDF's intention in making the original recommendation was not intended to change the scope of the food category(ies) but merely to clarify the status of reconstituted/recombined products. However, if there is concern with the proposed changes then the IDF supports further discussion if it will help clarify the issue and whether it is outside the scope of the Alignment EWG and so constitutes new work.

Defer alignment of CXS 288 until issues of names and descriptions resolved

USA: It is supportive of the EWG recommendation but it suggests that the proposed changes to the descripToR for FC 01.4 and the name and descripToR for FC 01.4.3 should be brought to the broader CCFA for consideration and discussion.

Japan: It supports deferring alignment of CXS 288 until the issues are resolved.

Comments on the 1st circular (2022)

Support

IDF

Canada:

It believes the issues are larger than just the descriptions in FC 01.4 and subcategories.

It supports a proposal for new work to CCFA to examine the names and descriptors for FC 01.4, 01.4.1, 01.4.2 & 01.4.3, as they relate to the product categories described in the food additive functional class table in CXS 288.

There are additional issues related to the cross-referencing of the food standards with food categories in the GSFA (specifically, Annex C of the GSFA). For example, "prepackaged liquid cream" not only falls under FC 01.4.1 but would also fall under 01.4.2 since some of "all creams that have undergone a higher heat-treatment than pasteurization", including sterilized, UHT and ultrapasteurized cream would fall under the "prepackaged liquid cream" product category described in CXS 288. Use of note 236 in both FC 01.4.1 and 01.4.2 in the GSFA further suggests that "prepackaged liquid cream" falls under both food categories.

Canada also believe that IDF's original concerns regarding the status of reconstituted and recombined products would be better resolved through appropriate amendments to the food category descriptors, rather than modifying the food category names.

Comments on the 3rd circular (2022)

Support

Egypt: It supports the earlier view of Malaysia in its submission to the 1st circular (2020) that making the changes initially proposed is not within the scope of the Alignment EWG. It indicates the necessity of studying the Dairy Committee (CCMMP).

Chair's proposal: it is to suggest a proposal for new work to CCFA to examine the names and descriptors for FC 01.4, 01.4.1, 01.4.2 & 01.4.3, as they relate to the product categories described in the food additive functional class table in CXS 288. It should include the 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 above. This covers both items 10 and 11 (below).

Comments on the 2nd circular (2022)

IDF: its intention in recommending the text changes to the names and descriptors for the FCs mentioned was simply to clarify the status of recombined and reconstituted creams and prepared creams and the products made from them. As such, IDF was hoping that the recommended changes avoided the need for new work. However, if new work is warranted IDF would support such work recommending that alignment of CXS 288 be delayed until the new work has been completed.

IDF also notes that its recommendation to amend the names and descriptors of FC 01.4 and subcategories is the foundation for IDF not supporting the proposed changes to Notes E288 and F288 and new Note G288 (see discussion on item 49).

In response to Canada's suggestion that the issue would be better resolved through amendments to the FC descriptors rather than modifying the FC names, IDF did consider this option but thought it would be simpler and less confusing to modify the FC names.

Comments on the 3rd circular (2022)

Support

Canada

Chair's proposal: Similar to above. Noting the comments from both Canada and IDF and other EWG members, it is to suggest a proposal for new work to CCFA to examine the names [and possibly descriptors] for FC 01.4, 01.4.1, 01.4.2 & 01.4.3, as they relate to the product categories described in the food additive functional class table in CXS 288. It should include the 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 above. This covers both items 10 and 11 (below).

11. In addition, it is also considered that the current description of food category 01.4.3 in Annex B, Part II should be updated to better reflect current practices and products in this category. The suggested amendments are:

01.4.3 ~~Clotted cream (plain)~~ ***Fermented and acidified cream (plain):*** ~~Thickened, viscous cream formed from the action of milk coagulating enzymes. Includes sour cream (cream subjected to lactic acid fermentation achieved as described for buttermilk (01.1.3))[17].~~ ***Prepared cream products whereby the pH is reduced by means of fermentation with suitable microorganisms and/or by the use of suitable acidity regulators, with or without coagulation.***

Chair's proposal is amended: It is the same as for item 10.

11.1 IDF: in its submission to Appendix 2, section G, dealing with proposed amendments to CXS 288-1976 questioned how provisions for food category 01.4.3 should be considered. This related specifically to whether CXS 288-1976 can be understood that all acidity regulators, emulsifiers, stabilizers and thickeners in Table 3 have provisions for products captured by food category 01.4.3. This is because 01.4.3 is not listed in the annex to Table 3. The proposed paragraph to be added to CXS 288-1976 post alignment to refer to the GSFA is currently written to state only certain acidity regulators, emulsifiers, stabilizers and thickeners in Table 3 are acceptable to foods conforming to this standard. IDF suggests that all such acidity regulators, emulsifiers, stabilizers and thickeners are allowed.

Consideration

A concern is that there is no specific statement to that effect in CXS 288-1976. It is not believed that is how the statements written in the table to Annex 2 to Table 3 are and have been determined. Comments on this matter were sought from the EWG.

Chair's proposal at 2nd circular (2020): It does not believe the statement that all acidity regulators, emulsifiers, stabilizers and thickeners in Table 3 allowed to be added to products conforming to Standard CXS 288-1976 and covered by food category 01.4.3 is appropriate since such a statement is not written in the Standard and that is not how such statements are developed. The Chair believes only those food additives listed in the standard and then added into Table 3 due to alignment are appropriate.

Comments on the 1st circular (2022)

Support

IDF

Canada, to reflect CXS 288

Chair's proposal is unchanged: That is, since no such statement (all acidity regulators, emulsifiers, stabilizers and thickeners in Table 3) is written in the commodity standard only those food additives listed in the standard are appropriate to be added into Table 3 due to alignment of CXS 288 and FC 01.4.3.

Issues related specifically to CXS 243

The alignment of the *Standard for Fermented Milks* (CXS 243-2003) was particularly complicated due to the standard being linked to a large number of food categories, being 01.1.4, 01.2.1, 01.2.1.1, 01.2.1.2 and 01.7. As well, the functional class table includes a variety of product categories, detailed footnotes and an additional statement dealing with some of the food additive classes. Separately there is also an additional footnote linked to the food category 01.2 in the annex to Table 3 that also deals with specific food additive functional class provisions linked to the commodity standard and the specific food category 01.2.1.2. These statements and footnotes are not always consistent so careful consideration had been needed by IDF, as the dairy industry experts, to come up with some conclusions and assumptions so that the alignment can be completed. These are further explained below.

A working assumption is that, as for alignment of a number of other commodity standards, the requirements in the commodity standard takes precedence over conditions in conflict listed in the GSFA.

12. The statement in CXS 243 under the function class table reads:

> *Acidity regulators, colours, emulsifiers, packaging gases and preservatives listed in Table 3 of the* General Standard for Food Additives (CODEX STAN 192-1995) *are acceptable for use in fermented milk product categories as specified in the table above.*

The footnote linked to food category 01.2 (Fermented and renneted milk products (plain)) in the annex to Table 3 reads:

> *Acidity regulators, packaging gases, stabilizers and thickeners listed in Table 3 are acceptable for use in fermented milks, heat treated after fermentation, as defined in the Codex Standard for Fermented Milks (CODEX STAN 243-2004) that correspond to food category 01.2.1.2 "Fermented milks (plain), heat treated after fermentation".*

The CXS 243 statement includes all food categories, unlike the footnote in the annex to Table 3 that only refers to food category 01.2.1.2 (Fermented milks (plain), heat treated after fermentation) which also lists the food additive classes of acidity regulators, packaging gases, stabilizers and thickeners, so the two lists are not the same.

Taking the two notes together, as well as the detailed functional class table within CXS 243, the following conclusions have been reached and used for the alignment work.

The functional classes of acidity regulators and packaging gases are listed in both statements. Footnote 1 in the annex to Table 3 only refers to food category 01.2.1.2 (Fermented milks (plain), heat treated after fermentation). Food category 01.2 is listed in the annex to Table 3 so Table 3 food additives can only be prescribed in Tables 1 & 2, meaning food categories 01.2.1 and 01.2.1.1 are not captured, only 01.2.1.2 as detailed in the footnote as a special case.

- For the function class table in CXS 243, it has been concluded that the following GSFA food categories are linked to the columns:
    - Plain fermented milks and drinks based on fermented milk (01.2.1.1)
    - Flavoured fermented milks and drinks based on fermented milk (01.1.4)
    - Plain fermented milks heat treated after fermentation and drinks based on fermented milk heat treated after fermentation (01.2.1.2)
    - Flavoured fermented milks heat treated after fermentation and drinks based on fermented milk heat treated after fermentation (01.7)
- All Table 3 acidity regulators and packaging gases have provisions in plain fermented milks that have been heat treated after fermentation. From the functional class table in CXS 243, Table 3 acidity regulators and packaging gases also have provisions for flavoured products, both heat and not heat treated after fermentation.
- Stabilizers and thickeners are not in the note below the functional class table in CXS 243, so Table 3 stabilizers and thickeners do not have provisions for such products, except where there are provisions in the standard itself. The provisions for stabilizers and thickeners in CXS 243 that are already in Table 3 need to have an entry for CXS 243 added to them. These stabilizers and thickeners with provisions for plain products not heat treated after fermentation have the additional condition that they are used for reconstitution and recombination (and if permitted by national legislation in the country of sale to the final consumer).
- Colours, emulsifiers and preservatives are listed in the note in CXS 243. But the functional class table does not have provisions for the use of colours and emulsifiers in plain products, only flavoured products, both heat treated and non-heat treated after fermentation. The relevant food categories for these types of products, being 01.1.4 and 01.7 are not in the annex to Table 3 so all Table 3 colours and emulsifiers have provisions for these categories. Preservatives only have provisions in flavoured heat treated after fermentation, not for non-heat treated, so only FC 01.7, not 01.1.4.
- Other functional classes, being carbonating agents, flavour enhancers and sweeteners are not covered by the note in CXS 243. Therefore, the only provisions for such functional classes are those listed in the standard, not all relevant Table 3 food additives. The provisions for carbonating agents, flavour enhancers and sweeteners in CXS 243 that are already in Table 3 need to have an entry for CXS 243 added to them. There is an additional condition note required for carbonating agents, where they are justified only in drinks based on fermented milk.
- Rather than needing to make very long detailed notes in column five of individual provisions in Table 3 for each of the various food additives noted above, the required amendments were able to be simply made by making new table entries relating to food categories 01.1.4, 01.2.1.2 and 01.7 in section 2 of Table 3. This is the case for acidity regulators, colours, emulsifiers, packaging gases and preservatives for the food categories 01.1.4 and 01.7. This is also the case for acidity regulators and packaging gases for food category 01.2.1.2.
- Individual entries for certain flavour enhancers, stabilizers and thickeners, and sweeteners in Table 3 are still required. To simplify the entries in column 5 of Table 3, reference is made to the functional class table in CXS 243, where the differences in provisions for the different types of products and conditional notes are provided. It is considered doing this is preferable to needing to write very detailed notes in column 5 of Table 3 for each entry.
- Separately, an additional footnote was added to the functional class table in CXS 243, as footnote (c), linked to sweeteners, picking up footnote (a) in the list of food additive provisions in section 4 of CXS 243. This note is: 'The use of sweeteners is limited to milk- and milk derivative-based products energy reduced or with no added sugar.' It is important not to lose this note when the provisions are removed due to alignment. This proposed change is located in Appendix 2.

Chair's proposal at 1st circular (2020): Comments were sought from the EWG on the explanations and conclusions noted above and the suggested changes proposed within Appendix 3 (and a consequential change in Appendix 2) related to the alignment of CXS 243.

EWG comments to 1st circular (2020)

Questions and additional proposed amendments

Chile, NZ, Japan, IDF, USA

Chile suggested additional words are required to be added to note G243 to make it accurate. Amended wording was also recommended by Japan to make it clear that the provisions only applied to flavoured products, which has been accepted and made.

NZ supports most of the background, explanation and Chair's proposal, but with an additional suggestion related to some statements in the dot points. In summary they suggest that additional function classes (being carbonating agents, flavour enhancers and sweeteners) are needed to be added to the sentence relating to Table 3 provisions below the functional class table. Therefore the current sentence would be amended:

'Acidity regulators, **carbonating agents,** colours, emulsifiers, **flavour enhancers,** packaging gases**,** ~~and~~ preservatives **and sweeteners** listed in Table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in fermented milk product categories as specified in the table above.'

Japan: It noted that the usual standard alignment sentences referring to provisions in the GSFA provided in the commodity standard after alignment has occurred are missing and are required to be written. It provided suggested new paragraphs. One of them also dealt with the same sentence that refers to Table 3 of the GSFA, with additional edits.

Japan also provided a number of suggested amendments related to alignment in Appendix 3. One specific suggestion was that note 362 (Excluding plain products conforming to the Standard for Fermented Milks (CXS 243-2003)) was not needed for provision to FC 01.1.4 (Flavoured fluid milk drinks) and 01.7 (Dairy-base desserts (e.g. pudding, fruit or flavoured yoghurt) since these are flavoured categories which do not include plain products. This was accepted, and so note 362 has been removed from a number of provisions including colour, sweeteners and emulsifiers in FC 01.1.4 and 01.7 due to alignment with CXS 243. The same justification for removing the proposed new note I243 that also refers to excluding plain products was also accepted, and it has also been removed.

However, Japan's suggestion to add two additional notes, i.e. its new note L243 dealing with the sweetener note in CXS 243 was not supported as the current alternative sweetener notes replacing note 161 (either 477 or 478) essentially address this note. Also the suggestion of Japan to add its new notes M243 and N243 linking the various food additives explicitly to CXS 243 with a specific functional class was also not considered fully warranted. The reason for this view is similar to the reasons explained in earlier comments regarding adding comments specifically to functional class, or even to commodity standards, unless there is a good technological reason to do so (response to item 7). However, slightly different new notes were added.

IDF: IDF acknowledges and appreciates that because CXS 243 is such a complex standard, that this suggested approach of referencing the functional class table in the standard significantly reduces the need for extensive notes in column 5 of Table 3 and as such IDF can support this approach for the reasons given.

IDF also notes that this approach of referencing the functional class table has also been proposed by the EWG in the alignment of Table 3 provisions in the Standard for Dairy Fat Spreads, CXS 253. IDF can also support this proposal.

Furthermore, as all the dairy standards now contain a functional class table and to be consistent, IDF would recommend that the principle of referencing the table in the other dairy standards be adopted, particularly for the more complex CXS 262, Standard for Mozzarella and CXS 288, Standard for Cream and Prepared Creams.

USA: In general it supports the conclusions made by the EWG chair. However, it has a concern with the language taken from a footnote of the functional class table related to stabilizers and thickeners in CXS 243, to create the new note H243. This note uses the phrase 'national legislation in the country of sale to the final consumer'.

The USA states that CCFA has made a great effort to remove text from the GSFA that refers to "national legislation". As such, the USA does not think it is appropriate to add Note H243 to provisions in the GSFA based on its current text. It notes that the table of functional classes and the footnote referring to national legislation will remain in CXS 243. As a compromise, it proposed the following revision to Note H243 that removes the term "national legislation", but still refers to the commodity standard and footnotes contained therein.

Revised Note H243: For use in plain fermented milks as a stabilizer and/or thickener but restricted to reconstitution and recombination, **conforming to CXS 243-2003** ~~and if permitted by national legislation in the country of sale to the final consumer~~.

Chair's proposal at 2nd circular (2020): It is agreed that the standard new paragraphs added to the commodity standard after alignment with the GSFA has been completed need to be written. These paragraphs will be complicated due to the complicated nature of the provisions and functional class table. They need to be added to amendments in Appendix 2, dealing with changes to CXS 243 and are proposed as:

Carbonating agents, stabilizers and thickeners in food category 01.2.1.1 (Fermented milks (plain), not heat treated after fermentation), acidity regulators, packaging gases, stabilizers and thickeners in food category 01.2.1.2 (Fermented milks (plain), heat treated after fermentation), acidity regulators, colours, emulsifiers, flavour enhancers, stabilizers, sweeteners and thickeners in food category 01.1.4 (Flavoured fluid milk drinks) and acidity regulators, colours, emulsifiers, flavour enhancers, preservatives, stabilizers, sweeteners and thickeners in food category 01.7 (Dairy-based deserts (e.g. pudding, fruit or flavoured yoghurt)) used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in foods conforming to this standard.

For food category 01.2.1.2 all Table 3 acidity regulators and packaging gases, and–some Table 3 carbonating agents, stabilizers and thickeners are acceptable for use in foods conforming to this standard.

For flavoured products, all acidity regulators, colours, emulsifiers, packaging gases and preservatives listed in Table 3 of the General Standard for Food Additives (CXS 192-1995) and only certain carbonating agents, flavour enhancers, stabilizers, sweeteners and thickeners in Table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in fermented milk products categories as specified in the table below.

Comments from the EWG were sought on the appropriateness of these proposed new paragraphs.

The Chair supported the USA's suggested amendment to note H243, to remove reference to 'national legislation' and has made the changes in Appendix 3, along with additional editing due to other EWG comments.

EWG comments to 2nd circular (2020)

Support

USA: It is appreciative of the Chair's proposal supporting its earlier suggestion to remove mention of 'national legislation' in the revised note H243.

It also supports, in general, the proposals made to the standard paragraphs added to CXS 243 referencing the GSFA.

Additional comments

IDF: Suggests that due to the footnote 1 to the annex to Table 3, as well as the statement in the commodity standard and as outlined in the functional class table that certain Table 3 additives are allowed in 'plain' products. Therefore, it suggested the additional two sentences it provided, relating to FC 01.2.1.1 and 01.2.1.2 were also required (these were accepted and have been added to the proposed entries above).

Comments on the 1st circular (2022)

Support

IDF

Not support

Japan, it notes that it did not support for note H243 linked to FC 01.1.4 since this is a flavoured product and therefore there is no need. Note H243 should be removed, noting it is currently only linked to INS 405 and FC 01.1.4 due to alignment with CXS 243.

Canada, made the same comment, that it is not required for FC 01.1.4 linked to INS 405. It separately questioned whether it could be appropriate to add to FC 01.2.1

Response

The suggestions to remove H243 from FC 01.1.4 for INS 405 is agreed and will be removed.

A check was made whether it was appropriate for provisions for INS 405 in FC 01.2.1 was checked but it was noted different provisions and notes were required for the subcategories 01.2.1.1 and 01.2.1.2, and the proposed notes seem appropriate.

The proposal is therefore to remove note H243 completely from Appendix 3.

Canada questioned the proposed approach as explained above, in particular to the provisions and entries for Table 3. It noted that provisions from aligning CXS 243 had been made for FCs 01.2.1.1 and 01.2.1.2 in Tables 1&2, and so no provisions should be made in Table 3. Adding a section in annex to Table 3 for FC 01.2.1.2 would appear to broaden the scope of permitted Table 3 food additives, which is not considered necessary.

This appears to be linked to the new paragraphs added to the section referring to the GSFA in the CXS 243 post alignment, where reference is made to FCs 01.2.1.1 and 01.2.1.2 in Table 3.

Response

Further consideration of the IDF comments to the 2nd circular (2020) and Canada's questions noted the complicated nature of the standard and therefore alignment.

It was considered that Table 3 provisions for FC 01.2.1.1 and 01.2.1.2 need to be considered in light of the note below the functional class table of CXS 243, that refers only to acidity regulators, colours, emulsifiers, packaging gases and preservatives. Plus the footnote to FC 01.2 in the annex to Table 3 refers only to FC 01.2.1.2 and not FC 01.2.1.1. Because of this it has been concluded that food additive provisions are not listed in Table 3 but Tables 1 and 2 for FC 01.2.1.1. This is not the case for FC 01.2.1.2 where relevant provisions have been made to Table 3.

It is further thought that the provisions of the functional class table cannot be considered in isolation from the note. It has been assumed that the listed carbonating agents, stabilizers and thickeners only listed in CXS 243 for FC 01.2.1.2 can be added to Table 3.

~~For food category 01.2.1.1 some Table 3 carbonating agents, stabilizers and thickeners are acceptable for use in foods conforming to this standard.~~

For food category 01.2.1.2 all Table 3 acidity regulators and packaging gases, and some Table 3 carbonating agents, stabilizers and thickeners are acceptable for use in foods conforming to this standard.

Comments on the 2nd circular (2022)

IDF: IDF understands that as the Table 3 carbonating agents, stabilizers and thickeners covered by this statement will be duplicated in Tables 1 & 2 as part of the alignment process for CXS243 this statement [struck through] is redundant and therefore IDF can support its removal. It would however, have to be reinstated if the same Table 3 carbonating agents, stabilizers and thickeners were moved back to Table 3 (with appropriate notes) due to the proposal for creating Table 3 notes (see Appendix 4 & 5).

This also requires amendments to the entries to the table for FC 01.2.1.2 in the annex to Table 3.

As well, a number of provisions for FC 01.2.1.2 that were added in Tables 1&2 for Table 3 food additives were duplicated and so needed to be removed. This included acidity regulators in Table 3.

It is also important to note the relatively recent footnote 1 in column 5 of Table 3: "This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis or based on functional class, that information is contained in the "References to Commodity Standards for GSFA Table 3 Additives". The footnote reduces the number of new entries required to be added to Table 3 for CXS 243, to only being the specific carbonating agents, flavour enhancers, stabilizers, sweeteners and thickeners listed in CXS 243 that are Table 3 additives. But this is still a large list, provided in Appendix 3.

Chair's proposal is changed: There does not appear to be any requirement to include note H243 as other notes linked to provisions for alignment of CXS 243 for FC 01.1.4 as well as 01.2.1 and 01.2.2 seem appropriate using notes 235 and 236 [incorrect, it was meant to be notes 234 and 235] as required as well as note G243. Therefore note H243 is removed.

Following further consideration of the footnote below the function table in CXS 243, it is proposed to make changes to the sentences added to the section referring to the GSFA in CXS 243 post alignment. This has consequential changes to the table for FC 01.2.1.2 in the References to Commodity Standards for GSFA Table 3 Additives. The footnote applying to acidity regulators, colours, emulsifiers, packaging gases and preservatives below the functional class table in CXS 243 also apply for Table 3 provisions for FC 01.1.4 and 01.7 as listed in their own Tables.

Changes have also been made by removing a number of food additive provisions in Tables 1&2 for FC 01.2.1.2 since many are Table 3 additives, and so provisions had been duplicated.

If the EWG consider that the alignment of CXS 243 is still very complicated with different opinions on how to align the standard then it may be appropriate to defer alignment to a later meeting, so issues can be further considered and hopefully agreed.

Comments on the 2nd circular (2022)

IDF: IDF can support the removal of Note H243. However, IDF believes that the notes 234 & 235 (not 236) as well as note G243 are required to cover the removal of H243. Note 236 relates to the Creams and Prepared Creams standard, ie CXS 288, not CXS 243.

Comments on the 3rd circular (2022)

Canada: It agrees with the Chair's earlier proposal that the alignment of CXS 243 is very complicated and so it is best to defer the alignment for a later meeting so issues can be further considered and hopefully agreed [noted in Chair's above proposal].

Canada further repeats it comments to the 1st circular that questioned why entries are proposed in section 2 of Table 3 (References to Commodity Standards for GSFA Table 3 Additives) for FC 01.2.1.2 and not 01.2.1.1.

Chair's response: The response to the last point from Canada's submission is noted above in earlier responses. That is, that the footnote in the Annex to Table 3 for FC 01.2 refers only to FC 01.2.1.2 and not 01.2.1.1. The footnote is: 'Acidity regulators, packaging gases, stabilizers and thickeners listed in table 3 are acceptable for use in fermented milks, heat treated after fermentation, as defined in the Standard for fermented Milks (Codex STAN 243-2004) that correspond to food category 01.2.1.2 "Fermented milks (plain), heat treated after fermentation".

Chair's proposal: Note H243 is removed (as noted above) for the alignment of CXS 243 and FC 01.1.4, 01.2.1.1 & 01.2.1.2. It is appropriate to continue to use notes 234 and 235 [not 235 & 236 listed in error above] as well as note G243 (only for FC 01.1.4 & 01.7). Note 235 is slightly edited.

Separate suggested amendments to address errors in GSFA noted during alignment work (notes EE and FF in the GSFA)

13. Mention was made in the 2021 Alignment circular that notes EE and FF in the GSFA needed to be correctly amended due to the 2019 Alignment work (CCFA51). However, this was noted, discussed and endorsed due to comments received in the Alignment work for CCFA52 (CRD3, page 10). The Codex Secretariat has corrected the errors when the GSFA is updated after CCFA52. Therefore, this issue is no longer relevant but has been left so there is a record and also the numbering system of issues has not changed from the 2021 document.

Additional issues and comments from EWG member submissions to 1st circular (2020)

14. IDF proposed that the current sentence "Within each additive class, and where permitted according to the table, only those individual additives listed may be used and only within the limits specified" in the paragraph in the food additives sections of the commodity standards CXS 243, CXS 253, CXS 262 and CXS 288, is no longer required due to alignment.

Chair's proposal is unchanged due to earlier support: The indicated sentence was removed from the relevant paragraphs in section B (CXS 243), C (CXS 253), D (CXS 262) and G (CXS 288) in Appendix 2.

15. EFEMA correctly picked up an error made in Appendix 2, relating to the current list of provisions in CXS 207, where the emulsifier 471 is not potassium citrates, but mono- and diglycerides of fatty acids. This has been corrected. However, the alignment has been completed correctly. There are not new entries required for Table 1 or Table 2 in Appendix 3 for mono- and diglycerides of fatty acids (INS 471) due to alignment with CXS 207 since a new entry has been provided in Table 3 (page 104).

Comments on the 1st circular (2022)

Canada

Notes that CXS 207 has a numerical ML (2500 mg/kg) for INS 471, so wonders if this ML should be retained by use of notes in Tables 1&2 (or T3 note should be used if new proposal for Table 3 notes is accepted). CXS 290 has GMP for INS 471 so it already aligns with Table 3.

Response

Since INS 471 is a Table 3 food additive it seemed appropriate that an entry be made in Table 3 (as proposed above). A check of Table 1 of the GSFA confirmed that aside from infant formula and foods for infants (FC 13.1 subcategories and 13.2) all MLs are GMP. It seems an anomaly that the ML is 2500 mg/kg for CXS 207. It therefore proposes to stay with making a Table 3 entry.

Chair's proposal: It is unchanged from above, that is to make an entry for INS 471 in Table 3 for both CXS 207 and 290 due to alignment.

Lecithin, partially hydrolyzed (INS 322(ii))

16. EU Specialty Food Ingredients have requested that provisions be included for lecithin, partially hydrolyzed (INS 322(ii)) in Table 3 due to alignment with a number of commodity standards, similar to lecithin (INS 322(i)). Detailed explanations for the request were provided including the current consideration by the EWG for the GSFA at CCFA52 which supported the proposal as noted in CX/FA 21/52/7, Appendix 2 pages 21-23. This was also noted by the Alignment EWG in CRD3, page 9.

Chair's proposal is unchanged: For information. Since CCFA52 supported the recommendation of the GSFA EWG to add lecithin, partially hydrolyzed (INS 322(ii)) into Table 3 of the GSFA the alignment work related to this food additive needs to be amended. This relates to the commodity standards: CXS 207-1999, CXS 281-1971, CXS 282-1971, CXS 288-1976 (but only related to FC 01.4.3) and CXS 290-1995 (these are linked to lecithin provisions in Table 3 for these standards).

Reference to functional class tables

17 IDF acknowledges and appreciates that because CXS 243 is such a complex standard, that the suggested approach of referencing the functional class table in the standard in column 5 of Table 3 of the GSFA is reasonable. That is to the alternative of making many long and detailed notes in column 5 of Table 3. It also notes this approach has been proposed for the alignment of CXS 253, which it also supports.

Furthermore, as all the dairy standards now contain a functional class table and to be consistent, IDF would recommend that the principle of referencing the table in the other dairy standards be adopted, particularly for the more complex CXS 262, *Standard for Mozzarella* and CXS 288, *Standard for Cream and Prepared Creams*.

NZ also made the suggestion to include a copy of the functional class table from the commodity standards into a new section in Table 3 of the GSFA so it would remain the sole source for food additive provisions and people would not need to refer back to the commodity standard at all.

Consideration

The proposal to refer to the functional class table of the complex commodity standards CXS 243 and CXS 253 in column 5 of entries in Table 3 of the GSFA was a way to reduce the very long and complex notes that would have been required to be developed.

However, it is still considered desirable to aim for the GSFA to be the sole reference of information on food additive provisions for Codex standards. Therefore, the 3 cases to date, referring back to the functional class tables in CXS 243 and CXS 253 (and also for some provisions for CXS 262) should be considered the exception and not the rule. It is considered that the advantages of reducing the size of the notes in column 5 outweigh needing to consult the commodity standard.

Chair's proposal at the 2nd circular (2020): It is not to make reference in notes in column 5 of Table 3 of the GSFA to functional class tables in other commodity standards than CXS 243, CXS 253 and CSX 262 for the above reason. At this stage also not to duplicate the functional class tables of the commodity standards into a new section in Table 3 as proposed by New Zealand.

Comments on the 1st circular (2022)

Support

IDF with additional comments:

IDF agrees with the Chair's proposal in so far as CXS 243, CXS 253 & CXS 262 but maintains the view that a general reference within the Column 5 entry in Table 3 be made to the functional class table in all dairy standards, for reasons of consistency and a reduced need for notes. However, IDF does acknowledge that the acceptance of the US suggestion to have a separate 'Notes' table for Table 3 would have a major impact on this view and may well make it redundant.

Canada

Comments on the 3rd circular (2022)

Canada: It suggests that the Chair's proposal may need to be reconsidered depending on the outcome of the discussion on Table 3 notes [Appendix 4 & 5].

Chair's proposal is unchanged: The comments of the IDF and Canada are noted, but at this stage no changes are proposed. That is, not to make reference in notes in column 5 of Table 3 of the GSFA to functional class tables in other dairy commodity standards than CXS 243, CXS 253 and CSX 262.

Proposed new notes for Tables 1 and 2 considered superfluous

18. The USA provided an additional comment relating to some new notes which have been proposed to be added to Tables 1 and 2 of the GSFA due to alignment, in CX/FA 21/52/6 (CCFA52) and Appendix 3. The concern is that some new notes have been written that only indicate the use of a particular food additive in a commodity standard, without any additional clarification on use levels or additional restrictions required by the standard have been proposed for addition to the GSFA. The USA considers such notes are superfluous, are inconsistent with previous practices, and will serve to further complicate the GSFA. It further suggests that such notes do not provide any additional information beyond the provision implied by a lack of any exclusion "XS" note. The USA recommends that such notes not be added to the GSFA.

Two examples were provided:

A207: For use in products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999) only.

D253: For use in products conforming to the Standards for Dairy Fat Spreads (CXS 253-2006).

Consideration

Investigation of these notes, across CX/FA 21/52/6 and Appendix 3 indicated that the situation is not as straight forward as originally thought, and that there are not that many notes of the type suggested.

The specific case for D253 is explained further. In this case, simple notes have been written to make it explicit that the provisions in the aligned entries relate only to one of the possible commodity standards that apply to the food category (which can relate to two or more commodity standards) and also the MLs differ. Unfortunately, the alignment of two separate standards was performed separately and independently. This is the situation for CXS 256 (aligned in CX/FA 21/52/6) and then CXS 253 aligned in Appendix 3. In this case the MLs are different, so a consolidated alignment will be required.

Food category 02.2.2 (Fat spreads, dairy fat spreads and blended spreads) is linked to 2 commodity standards; CXS 253-2006 (Standard for Dairy Fat Spreads) and CXS 256-2007 (Standard for Spreads and Blended Spreads). CXS 256 (CCFO) was aligned as part of CX/FA 21/52/6, while CXS 253 (CCMMP) is being aligned in Appendix 3 as part of this circular. Relevant 'simple' notes are provided below, which had been written specifically for the commodity standard being aligned and independently of the other relevant commodity standard.

CX/FA 21/52/6: CXS 256

A-CXS256: For use in products conforming to the Standard for Spreads and Blended Spreads (CXS 256-2007)

Appendix 3: CXS 253

D253: For use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006).

There is also the situation of different MLs for the same food additive linked to different commodity standards and so different alignments; in this case the only identified additive was curcumin.

Curcumin (INS 101(i)):

CX/FA 21/52/6: 10 mg/kg, note A-CXS256

Appendix 3: 5 mg/kg, note D253, as well as a draft provision at step 4 of 10 mg/kg.

Therefore, a more complicated consolidated note will be required to address both sets of alignment for CXS 256 and CXS 253, where a decision will be required as to which ML to use as the reference and which to use in the note. In this situation it is proposed to keep both notes, as they will act to highlight that a consolidated alignment is needed to combine CXS 253 and CXS 256.

The only other note identified was A207 as noted by the USA, related to alignment of CXS 207 and food category 01.5.1 for the food additive BHA. CXS 290 is also linked to food category 01.5.1 and an XS290 note is used so it is agreed that A207 can be removed from Appendix 3 without having any impact.

No other explicit 'simple' note was identified that could be removed. A-CXS19 in CX/FA 21/52/6 seemed reasonable to keep related to food category 02.1.1 and CXS 19, as CXS 280 is also linked to 01.5.1.

List of such notes

CX/FA 21/52/6:

A-CXS256 (pages 95, 96 and 101 of CX/FA 21/52/6), propose to keep as linked to D253, needed to finalise consolidated alignment of CXS 253 and CXS 256

Appendix 3 of the 2nd circular (2020):

A207 (pages 1, 4, 80 and 82 of 1st circular), have removed, not required

D253 (pages 49, 55, 92 and 94 of 1st circular (2020)), propose to keep, as linked to A-CXS256, needed to finalise consolidated alignment of CXS 253 and CXS 256

Chair's proposal at 2nd circular (2020): The comments by the USA are noted and appreciated. A check has been made of CX/FA 21/52/6 and Appendix 3 to locate and identify any other such notes but limited ones were located. An assessment concluded that it is appropriate to remove A207 from Appendix 3, but that D253 (in Appendix 3) and A-CXS256 (in CX/FA 21/52/6) should be left to indicate that a consolidated alignment of CXS 253 and CXS 256 is required.

EWG comments to 2nd circular (2020)

Comments

Support

USA: It appreciates the Chair's efforts to consider the USA's earlier comment.

Japan

El Salvador: Questioned why note 196 is included for the BHA provision for food category 01.5.1, since the food additive INS 310 cannot be used for CXS 207.

The explanation for this is partly explained above. This involved removal of the original note A207 which had been written to relate only to CXS 207 and not CXS 290. But it was agreed that it is superfluous, since there is an XS207 note for the other 2 food additives, being INS 321 and 310 linked to the current note 196. Note 196 does apply for CXS 290.

Comments on the 1st circular (2022)

Support

IDF

Chair's proposal is unchanged: That is the original note written in the1st circular (2020), A207 was deemed not required, as noted in the explanation above. Further consideration identified that the current note 196 and the exclusion notes XS 207 provide appropriate coverage for alignment of both CXS 207 and CXS 290 related to FC 01.5.1.

Ascorbyl esters, ascorbic acid and sodium ascorbate

19 The USA pointed out some inconsistencies in the alignment of CXS 207 related to its provisions for the antioxidants; ascorbic acid, L- (INS 300), sodium ascorbate (INS 301) and ascorbyl palmitate (INS 304), which has a joint provision of 500 mg/kg expressed as ascorbic acid.

As has been done as part of alignment for members of a chemical group a provision for one of the group in a standard has been considered a provision for all members of the chemical group. This has been the case for ascorbyl palmitate (INS 304) and ascorbyl stearate (INS 305), as members of ascorbyl esters (INS 304, 305). The added complication is having ascorbic acid, L- and sodium ascorbate also linked as part of the joint provision. Plus the ML is expressed as ascorbic acid. This is unusual since the ML for ascorbyl esters is expressed as ascorbyl stearate (ie note 10). The USA therefore have noted that the proposed alignment for ascorbyl esters for CXS 207 in food category 01.5.1 has two inconsistent notes, being notes 10 (as ascorbyl stearate) and note 317 (as ascorbic acid).

Japan also noted concerns with the alignment of these food additives with CXS 207. It considered that since ascorbic acid and sodium ascorbate are Table 3 additives the ML should be GMP and not 500 mg/kg. The ML of 500 mg/kg should be included in the note. It also noted the inconsistency with notes 10 and 317.

The suggestion of Japan to add the ML as GMP and with the ML of 500 mg/kg due to alignment to be added in the note is supported and has been made. The reason the two additives are not added directly to Table 3 is due to the complicated conditions of the ML linked with ascorbyl esters. This is similar to issues noted earlier in item 2 and below in item 21.

Chile also noted the complication of this issue.

Chair's proposal at 2nd circular (2020): The ML for ascorbic acid and sodium ascorbate has been changed to GMP, with the ML of 500 mg/kg due to CXS 207 added via a new note.

Consideration of the most appropriate way to further align the provisions in CXS 207 for the antioxidants ascorbic acid, L-, sodium ascorbate and ascorbyl palmitate specifically related to the use of notes 10 and 317 was required. It was proposed that the simplest approach was to keep the appropriate note to the relevant food additives; so note 10 for ascorbyl esters and note 317 for the ascorbic acid, L- and sodium ascorbate,

which was what had been done in the 2nd circular. Comments from the EWG on the most appropriate approach was sought.

EWG comments to 2nd circular (2020)

Support

IDF: it supports using note 10 for INS 304 & 305, and note 317 for INS 300 & 301.

USA

Not support

El Salvador: It proposed that a new note was required regarding the analytical method authorized for the ascorbyl esters which according to the food additive database should be expressed as 'ascorbyl palmitate', therefore, leave note 10 (as ascorbyl stearate) without effect.

The response proposed relates to both notes for ascorbic acid and also ascorbyl esters, as they are linked together in CXS 207, therefore complicating the alignment. What is proposed at the 2nd circular aims to address both.

Comments on the 1st circular (2022)

Support

IDF

Comment

Canada

It suggests a rewording of note D207 to improve clarity, by using the term 'Except for use in..', add 'expressed as ascorbic acid' and noting that note 317 (as ascorbic acid) is redundant for the food additive ascorbic acid, L-.

Response: Canada's suggestions are supported and amendments have been made in Appendix 3 to reflect these.

Chair's proposal is changed to reflect Canada's suggestions noted above: That is the new note D207 has been amended but is still added to the provisions for the three food additives. It is also proposed that the simplest approach is to keep the appropriate note to the relevant food additives; so note 10 for ascorbyl esters and note 317 for sodium ascorbate as it is redundant for ascorbic acid, L-.

Additional phosphates added into notes linked to provisions due to same functional class

20. As has been the policy and the situation over the last several years for alignment work, additional members of a food additive family have been added to notes linked to provisions when such members of the chemical food additive family have the same function class. This is expressly detailed in the Codex CCFA Information document "Guidance to Commodity Committees on the Alignment of Food Additive Provisions" second dot point on page 9[5].

> If a commodity standard lists an individual additive that is included under a "group" additive in the GSFA (e.g., sulfites, ascorbyl esters), and the individual additives in the group that have the same functional class(es) as the additive listed in the relevant commodity standard are expected to be appropriate for the use specified in the relevant commodity standard, then the alignment should include all the individual additives with the appropriate functional class(es) in the group.

It has also been noted in the various explanation documents (Appendix 1, accompanying the alignment documents) to explain the policy and approach. For example, item 3 in Appendix 1 of the 2019 alignment document CX/FA 19/51/6[6] related to phosphate provisions states: *For alignment work, CCFA has taken the decision where there is provision for one or more substances of a food additive group to have provisions for all of the substances in that group, provided they have the appropriate technological purpose and are captured by a group ADI.*

In the case for phosphates, sometimes only a limited number of phosphates are listed in the commodity standard but additional members with the same function class have been added during alignment.

[5] http://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CCFA_e_01.pdf
[6] http://www.fao.org/fao-who-codexalimentarius/sh-proxy/jp/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-51%252FWD%252Ffa51_06e.pdf

This has been questioned, in particular by the USA comments in Appendix 3, related to various phosphate provisions in its introducToRy comments and also within entries in Appendix 3.

To date that is how the current and recent alignment has been conducted, including for phosphate provisions.

That is, additional phosphates out of the phosphate family of food additives that have the same functional class as listed in the commodity standard for the phosphate food additives have been added to notes as part of aligning provisions into the GSFA.

EWG comments (USA and Japan) supported this approach.

Comments on the 1st circular (2022)

Support

IDF

Chair's proposal is unchanged: It is to continue the agreed practice of adding additional phosphates from the phosphate family of food additives (with a JECFA specification) and the same functional class as the phosphates in the commodity standard are added to provisions via notes in the GSFA.

Alignment of Table 3 additives in Tables 1 & 2 using notes e.g.

- **Anticaking agents due to CXS 207, CXS 262 and CXS 290 (see item 2)**
- **Ascorbyl esters, ascorbic acid and sodium ascorbate due to CXS 207 (see item 19)**
- **three lycopene colours due to CXS 243**
- **Anticaking agents due to CXS 262**

21. The USA raised additional examples about why certain food additives that are Table 3 additives and the food category is not in the annex to Table 3 have been aligned in Tables 1 and 2. It had been noted that these additives had numeric MLs in the commodity standard but it questioned the approach taken (see earlier discussion on some of these situations in items 2 and 19).

One additional such case was the three lycopene colours, 160d(i), (ii) & (iii) for the alignment of CXS 243 with food categories 01.1.4 and 01.7 (also raised by NATCOL, along with other comments it made related to colours).

Another case was that of certain anticaking agents, silicon dioxide, amorphous (551), calcium silicate (552), magnesium silicate, synthetic (553(i)) and talc (553(ii)) for the alignment of CXS 262 and food category 01.6.1.

CXS 243 is a very complicated commodity standard with the function class table and different provisions related to different food categories. This situation has required very complicated notes as part of alignment to ensure the provisions and restrictions within the detailed functional class table are carried over when aligned in the GSFA. It is also noted that the ML for the three lycopene colours in CXS 243 are 30 mg/kg and not GMP. Because of the complexity, it was determined during alignment that it was better to provide provisions in Tables 1 and 2 rather than Table 3 where sometimes very complicated additional notes would be required.

An alternative that has not been directly considered during alignment is to simply add provisions for the three lycopene colours to Table 3, without any note, i.e. simply GMP, linked to CXS 243 (food categories 01.1.4 and 01.7).

The alternative suggested by the USA was to add the provisions at GMP in Tables 1 and 2, but with a new note indicating they have a specific numerical ML and any other conditions linked to the commodity standard, in this case CXS 243. That suggestion seems a reasonable compromise approach since it allows conditional notes due to CXS 243 to be addressed via notes and that suggestion was taken up by amending the entries and using a new note (N243) for these provisions aligned in Tables 1 and 2, and not Table 3.

For the alignment of the anticaking agents in CXS 262, they also did not have a GMP ML but required a note since the ML is linked to the four additives, singly or in combination as silicon dioxide. Again, it was considered more appropriate to align these linked provisions in Table 1 and 2 so the ML and condition would be reflected in a reasonably complicated note D262, and not Table 3.

The USA proposal of Table 3 notes (see item 2) is also relevant here. This suggestion is being considered for the CCFA53 meeting (see Appendices 4 & 5). But as already noted, since it has not been formally considered or agreed by CCFA the current proposed approach is continued.

Chair's proposal at 2nd circular (2020): It was to continue with aligning some Table 3 food additives in Tables 1 and 2 due to the requirement of adding complicated additional conditions due to alignment with complicated commodity standards such as CXS 243. But the suggestion to use GMP as the ML seems reasonable for such Appendix 3 food additives, but with a new note listing a numerical ML if listed in the commodity standard. This

approach can be altered if the alternative, broader suggestion of the USA to also add notes to Table 3 is discussed and agreed by the EWG and PWG for Alignment and maybe also the GSFA, as a recommendation. As noted earlier comments from the EWG was sought.

EWG comments to 2nd circular (2020)

Support

IDF: repeats its earlier support for the USA proposal to add notes to Table 3.

USA: It also repeats its earlier comments where it does not support inclusion of provisions in Tables 1 and 2 for Table 3 additive in food categories not listed in the annex to Table 3. Its suggested alternative is the use of notes in Table 3 as explained in item 2 (and repeated in some other items).

Comments on the 1st circular (2022)

Support

IDF

Chair's proposal is unchanged: As noted earlier 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, is being considered in the Terms of Reference for CCFA53 (see Appendices 4 & 5).

But at the present time, until a resolution is decided, the current approach is continued, that is making entries in Tables 1 and 2 and using notes to address the commodity standard conditions.

Propose amendments due to alignment or accept draft provision

22. The USA comments have suggested that there is no need to add a new provision for adoption for a number of provisions which are consistent with draft provisions. We should just adopt the Step 7 provision shown in Green with Note 362 (related to alignment of CXS 243). The GSFA EWG is also working on these provisions, so as long as we are consistent with the final decision, the provision at Step 7 can be put forward. These comments have been made to a number of colour provisions due to CXS 243 and related to food category 01.7.

It is agreed, that so long as the consistent provisions are made then it does not matter which process achieves the outcome. This situation has occurred before and the decision was made by the EWG to stay with proposing the provisions due to alignment, since that is the process being undertaken by the Alignment EWG and make note of the need for consistency. Close coordination will be needed between the EWG Chairs of GSFA and Alignment to ensure consistent outcomes are reached which occurred at CCFA52. Sometimes different MLs and notes are used between the different EWGs (e.g. curcumin provisions in FC 01.7 due to alignment with CXS 243 compared to draft provisions at a different ML). This is noted for information only.

Limited provisions for food additives for food category 01.4.1 linked to alignment CXS 288

23. There have been questions raised in submissions that proposed amendments to FC 01.4.1 did not include all the provisions listed in CXS 288 as part of the alignment. The below information is provided to explain the justification and assumptions used for this decision. This has also been discussed within item 10.

In the earlier preparaToRy work considering the alignment of CXS 288 with FC 01.4.1, 01.4.2 and 01.4.3, IDF also made the comment and observation supporting its conclusion that there should be limited food additive provisions for FC 01.4.1. IDF spent time searching archive materials but were unable to locate justifications for the use of note 236 (Excluding products conforming to the Standard for Cream and Prepared Creams (reconstituted cream, recombined cream, prepackaged liquid cream) (CXS 288-1976)) for many additive provisions listed in FC 01.4.1, but not listed against many additives in FC 01.4.2. IDF assumed that limited additive provisions were justified for FC 01.4.1 because it covered the 'plain' products – plain fresh, plain reconstituted, plain recombined cream. This category with limited food additive provisions is different to the other 'more processed' cream products which are covered in FC 01.4.2 (as well as 01.4.3). This is since currently almost all of the food additives with the function class of stabilizer, thickener or emulsifier have note 236 next to them in FC 01.4.1, but not many in FC 1.4.2. This note essentially excludes these additives from FC 01.4.1. The only other functional class listed for this FC is acidity regulators and there are a number of those without note 236. The suggestion has been that no other food additive provisions should be added to FC 01.4.1 due to alignment.

Chair's proposal at 2nd circular (2020): A belated explanation as to why no additional food additive provisions were made to FC 01.4.1 in the GSFA as part of alignment of CXS 288 is provided above. The EWG are welcome to provide comments and thoughts on these assumptions and conclusions.

EWG comments to 2nd circular (2020)

Support

USA

Additional comments

Japan: It notes that according to page 60 of the GSFA (Annex C sorted by GSFA Food Category Number): CXS 288-1976 is titled Cream and Prepared Creams (reconstituted cream, recombined cream, prepackaged liquid cream). Food category 01.4.1, includes prepackaged liquid cream. Stabilizers, acidity regulators, thickeners and emulsifiers are permitted in prepackaged liquid cream (in the function class table within CXS 288). It is not clear why note 236 is necessary for so many food additive provisions in FC 01.4.1. [see further explanation within issue 10]

Comments on the 1st (2022)

Support

IDF

Chair's proposal is unchanged: No change to that proposed at the 2nd circular (2020).

Phosphoric acid

24. The USA noted that phosphoric acid (INS 338) is not added to the phosphate note, note B243, as part of the alignment of CXS 243 with FC 01.1.4, 01.2 (captures 01.2.1.1 and 01.2.1.2) and 01.7 even though it listed in CXS 243.

The reason for this omission is that the various phosphates have provisions in CXS 243 as stabilizers and thickeners. But during alignment only the phosphates that have the functional class of stabilizer or thickener have been added to the note, and phosphoric acid does not have such functions.

Support was received from the EWG (the IDF and USA).

Comments on the 1st circular (2022)

Support

IDF

Canada

Chair's proposal is unchanged: It is not to add phosphoric acid (INS 338) to note B243, since it does not have the function class of stabilizer or thickener, which is the function for the phosphate provisions in CXS 243, even though it is listed in CXS 243.

Isomalt (hydrogenated isomaltulose)

25. The USA noted that isomalt (hydrogenated isomaltulose) (INS 953) has a provision in CXS 243 and as such it should not be listed for the draft provision in FC 01.2.1.2 as 'suggest no provision in CXS 243 for FC 01.2.1.2' as part of alignment.

Consideration

The justification for adding this comment as part of the alignment work is that sweeteners are not appropriate as there are no provisions for them for FC 01.2.1.2 via the functional class table in CXS 243.

Support was received from the EWG (Japan and USA).

Comments on the 1st circular (2022)

Support

IDF

Chair's proposal is unchanged: It is not to add note 362, but to stay with XS243 for the draft provision at step 7 for isomalt in FC 01.2.1.2 for the above reason. The explanation in the recommendation column has been expanded to add 'for sweeteners'. The exclusion note XS243 has also been added to draft provisions for two other sweeteners, sorbitol and sorbitol syrup.

Limited listing of entries showing no amendments to GSFA needed, for information only

26. The USA noted that there were a lack of food additives listed in FC 01.2.1.1 and 01.2.1.2 in Tables 1 and 2 of the GSFA due to alignment with CXS 243. CXS 243 contains a large number of additive provisions. It indicated that these additional entries needed to be added into the alignment document.

Consideration

These were checked and it was realised that the many additive entries mentioned by the USA were not added to the documents because no changes were proposed to the GSFA due to alignment with CXS 243. That is, the entries already in Tables 1 and 2 are already consistent with provisions in CXS 243. It was decided during the alignment exercise that though it is helpful for information and completeness to include all food additive entries it was considered that adding many entries that did not propose any changes was not worth the considerable effort and additional pages. It is recognised that Appendix 3 is very large as it is.

It is noted that some other entries have been provided for information, even when no changes are proposed as part of alignment of some easier commodity standards. It is conceded that the approach taken has been inconsistent. Also this information should have been made clear in the 1st circular (2020). But the additional work is still not thought warranted in the case of the alignment of CXS 243.

Chair's note to the 2nd circular (2020): This explanation is provided for information only. That is, there are a number of food additive provisions in CXS 243 related to FC 01.2.1.1 and 01.2.1.2 that did not require any changes to the GSFA so they have NOT been provided for information only in Appendix 3. The justification for this decision is the major amount of additional work and pages did not to warrant the effort for the minor benefit.

EWG comments to 2nd circular (2020)

Support

USA: appreciated the explanation provided

Additional comments linked to this item.

IDF, noted that there were a number of entries in Appendix 3 where ultimately no changes to the GSFA were recommended (either initially or after removal of inappropriate initial proposed changes). To shorten the very long Appendix 3 the IDF recommended that such entries that did not recommend any changes to Tables 1 and 2 of the GSFA be removed. There were a number of these, especially related to the alignment of CXS 243. This suggestion was accepted and acted upon.

Comments on the 1st circular (2022)

Support

IDF

Canada, in principle, but re-iterates its recommendation discussed in comments under item 7.

Chair's note: Removal of additional entries that did not recommend changes to the GSFA has occurred to shorten the large Appendix 3 document. In the main these have been due to alignment with CXS 243.

Nisin, ML, 500 mg/kg compared to 12.5 mg/kg

27. Questions were raised in a number of EWG submissions stating that the ML for the preservative nisin (INS 234) when aligned in the GSFA was not consistent with the ML in the commodity standard. The particular case is the alignment of CXS 243 with food categories 01.1.4 and 01.7. During the initial alignment exercise, IDF noted that the ML for nisin in CXS 243 is in error as it explained. IDF believes that the 500 mg/kg ML refers to the level of nisin preparation (called nisaplin) used and not of (pure) nisin. The commercial brand Nisaplin contains 2.5% of the antimicrobial peptide nisin and thus adding 500 mg/kg of Nisaplin is the equivalent of adding 12.5 mg/kg of pure nisin. On this basis, IDF can support the proposed ML of 12.5 mg/kg. CXS 262 also has this ML for nisin, which has been made as part of this alignment. It is further noted that this ML of 12.5 mg/kg or similar low concentrations are in the GSFA for other food categories.

Support was received from the EWG (Japan and USA).

Comments on the 1st circular (2022)

Support

IDF

Chair's proposal is unchanged: The proposed nisin ML of 12.5 mg/kg is maintained in the alignment of CXS 243 in food categories 01.1.4 and 01.7 rather than 500 mg/kg as explained above.

Comments on the 2nd circular (2022)

Support

USA

Phosphate provisions in categories and subcategories

CXS 243

28. As noted earlier dealing with phosphate provisions during alignment is always complex (see items 5, 20 and 24). For alignment with CXS 243, the relevant food categories are 01.2.1.1 and 01.2.1.2. The parent category 01.2 also contains phosphate provisions, so it needed to be considered as part of alignment.

The entry in category 01.2 introduces the alignment note relevant to CXS 243, being B243. This entry for FC 01.2 also applies to the subcategories 01.2.1.1 and 01.2.1.2. The entry for category 01.2.1.1 requires note 235 relating to use for reconstituted and recombined products only which picks up the condition note in the functional class table in CXS 243. There is no need for an entry for FC 01.2.1.2 since note 235 does not apply and the provisions from B243 in FC 1.2 apply.

EWG comments to 2nd circular (2020)

USA: It provided detailed additional explanations not supporting the proposal in the 2nd circular (2020).

Its concern is that it is not possible, based on the hierarchical rules of the GSFA, to have adopted provisions for phosphates in both the higher parent category FC 01.2 and in subcategories (FC 1.2.1.1 and 1.2.1.2). The provision in FC 01.2 is currently adopted in the GSFA. It proposes a better option than that proposed in the 2nd circular (2020) of adding provisions in FC 1.2.1.1 and 1.2.1.2. Its suggestion is to only have a provision in FC 01.2 with notes added to it to address use in CXS 243 (existing Note B243), and to address the issue pertaining to use only in reconstituted and recombined products due to FC 1.2.1.1 (Fermented milks (plain), not heat-treated after fermentation). It believes its proposal will achieve the purposes of Alignment, but will only require revisions to the existing provision in FC 01.2 without the addition of provisions in FC 1.2.1.1 and FC 1.2.1.2. It is to add B243 and a new note (see below) for FC 01.2.

New note (P243): For fermented milks (plain), not heat-treated after fermentation conforming to the Standard for Fermented Milks (CXS 243), for use in reconstituted and recombined products only.

Comments on the 1st circular (2022)

Support

IDF

Comments

Canada notes that the current phosphates provisions also applies to FC 01.2.2 (renneted milk) but the proposed new note P243 appears to prevent use for products under FC 01.2.2. Therefore, it suggests a minor edit to rectify this by using 'Except for use..'

Its proposed edited P243 is:

P243: Except for use in products conforming to the Standard for Fermented Milks (CXS 243): for use only in reconstituted and recombined fermented milks (plain), not heat-treated after fermentation.

It is not clear that the original P243 excluded use in FC 01.2.2 but if the amended note P243 clarifies the issue then it seems appropriate. The suggested amended note P243 appears to work, noting it also operates in conjunction with B243 so it is proposed to make edits provided by Canada.

Chair's proposal is changed to Canada's suggested edit to ensure certainty: To make the changes proposed by the USA (with Canada's edits) relating to alignment of phosphates in CXS 243 with FC 01.2, by adding the new note P243 ("Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003): for use only in reconstituted and recombined fermented milks (plain), not heat-treated after fermentation.") along with B243, and removing phosphate provisions for FC 01.2.1.1 and 01.2.1.2.

Comments on the 2nd circular (2022)

IDF: IDF can support

CXS 288

29 Similar issues needed to also be considered for the alignment of CXS 288 and FCs 01.4.1, 01.4.2 and 01.4.3. As noted earlier it was considered appropriate not to add new food additive provisions to FC 01.4.1, so phosphate provisions due to CXS 288 could not be added to FC 01.4. They were subsequently added to FC 01.4.2 and 01.4.3.

Chair's proposal at 2nd circular (2020): For information and explanation of how alignment for phosphates is proposed for higher order categories and subcategories due to CXS 288.

EWG comments to 2nd circular (2020)

IDF: As indicated earlier, the IDF notes there are some acidity regulators, emulsifiers, stabilizers and thickeners that appear to be allowed for 01.4.1. It was unable to locate any recorded discussion or rationale as to why note 236 applied to some additives in these function classes but not others. Therefore, it has assumed that

some are required for use mainly in reconstituted and recombined products but may be also (rarely) needed in fresh creams to ensure stability and integrity of the emulsion as outlined in footnote (a) in the function class table for CXS 288. Therefore, it supports keeping note 236, and does not recommend the addition of any new food additives to FC 01.4.1, other than INS 437.

Consequently it accepts that phosphates are allowed in FC 01.4.1, noting they have provisions in the higher category 01.4. Therefore, it does not support what has been proposed in the 2nd circular (2020), in Appendix 3.

Discussion: To achieve this it is considered appropriate to reinstate the phosphate provisions for the higher category being 01.4, and remove XS288 from FC 01.4.1, and the proposed phosphate provisions in 01.4.2 and 01.4.3. It was also noted by the IDF that the ML for the phosphate provisions in CXS 288 is 1,100 mg/kg so this needs to be added into the new note D288.

Comments on the 1st circular (2022)

Support

IDF

Chair's proposal is unchanged: Amendments have been made to the phosphate provisions aligning CXS 288 with FCs 01.4.1, 01.4.2 and 01.4.3 due to the clarified comments of the IDF. That is, phosphate provisions have been added back to FCs 01.4, and removed XS288 from FC 01.4 and 01.4.1, as well as removed the proposed phosphate provisions in 01.4.2 and 01.4.3. It was also noted that the ML for the phosphate provisions in CXS 288 is 1,100 mg/kg so this has been added into the new note D288.

Additional issues and comments from EWG member submissions to 2nd circular (2020)

Replace exclusion notes with current notes

30. El Salvador raised a number of times the idea of replacing proposed exclusion notes with alternative notes that are already used in the GSFA. The justification was that the exclusion notes, e.g. XS243 compared to note 170, excludes 'natural' products related to alignment of CXS 243. The same issue was identified for the alignment of CXS 253, with XS253 and note 214. It is unclear what is meant here as the wording in XS243 and note 170 (and XS253 and 214) are identical.

It is also noted that there has been a policy to use exclusion notes in preference to alternative notes, where they say exactly the same thing. This has been noted in earlier alignment work. For example, see the explanation and Chair's proposal for item 14 in CX/FA 21/52/6: "*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."*

This information is provided for information only. Exclusion notes are proposed to be used when appropriate and not replaced by alternative notes if they say exactly the same thing.

Replace notes 234 and 235 with new note H243

31. El Salvador proposed consideration of replacing the current notes 234 (*for use as a stabilizer or thicker only*) and 235 (*for use in reconstituted and recombined products only*) with the new note H243 (*for use in plain and flavoured fermented milks and plain and flavoured drinks based on fermented milks, not heat treated after fermentation as a stabilizer and/or thickener but in the case of plain fermented milks and plain drinks based on fermented milks use is restricted to reconstitution and recombination, conforming to the Standard for Fermented Milks (CXS 243-2003)*) for many food additives in CXS 243 with the functional class of stabilizer and thickener.

This suggestion was considered but because these notes were specifically added to the relevant food category 01.2.1.1 in Tables 1 and 2 of the GSFA, it was considered appropriate to stay with what was decided then. Replacing them with H243 did not seem to provide any extra additional value, as H243 is quite a complicated and involved note.

Comments on the 1st circular (2022)

Support

IDF

Chair's proposal is unchanged: Not to replace notes 234 and 235 with the new note H243 in FC 01.2.1.1 due to alignment with CXS 243 except those that have been currently added in amendments in Appendix 3. There did not seem to be justification for making such big changes since these current notes had been added to the

GSFA relatively recently, and satisfy alignment. See the earlier discussion within issue number 12 where the proposed note H243 has been determined not to be required so it has been removed from Appendix 3.

Provision for INS 472e for FC 01.2.1.2 due to alignment with CXS 243

32. El Salvador suggested that INS 472e (diacetyltartaric and fatty acid esters of glycerol) needed to be added to FC 01.2.1.2 due to alignment with CXS 243.

This had been considered but it was noted that stabilizers and thickeners but not emulsifiers are listed in the food additive function class table in CXS 243 for FC 01.2.1.2. INS 472e is listed as an emulsifier but not as a stabilizer and thickener in the food additive provisions in CXS 243. Therefore, there is no provision for INS 472e in FC 01.2.1.2 due to alignment with CXS 243 so the XS243 note has been added.

Comments on the 1st circular (2022)

Support

IDF: with additional comment questioning whether XS243 was proposed or removal of the provision all together. It stated it could support either, noting there may be a need to include a provision of INS 472e in FC 01.2.1.2 it is not aware of.

Chair's proposal is unchanged, but further explained: The IDF comment was noted, so the explanation was expanded to include the XS243 note. Not add a provision for INS 472e (diacetyltartaric and fatty acid esters of glycerol) to FC 01.2.1.2 due to alignment with CXS 243 for reasons explained above, but to add the XS243 note.

Sorbate provisions linked to 'as sorbic acid'

33. It was noted that sorbates (200, 202 and 203) need to be expressed as 'sorbic acid' linked to provisions. This was noted by El Salvador for alignment of CXS 243 with FC 01.7.

The current note 42 (as sorbic acid) linked to the provision does this. For information only.

Surface treatment of natamycin (INS 235) for Mozzarella

34. Concern was expressed by El Salvador that the functional class table within CXS 262 permits preservatives to be used for both cheese mass and surface treatment for CXS 262 (Mozzarella). It therefore considered the notes 3 (surface treatment only) and 80 (not exceeding 2 mg/dm^3 and absent at a depth of 5 mm) in FC 1.6.1 for the preservative natamycin (pimaricin) (INS 235) to be inconsistent with CXS 262 and so need to be removed.

The provision for natamycin in CXS 262 uses the qualification note identical to note 80. It is understood that this refers only to surface treatment (by the reference to 'not present in a depth of 5 mm') so note 3 applies.

Comments on the 1st circular (2022)

Canada proposed changes to note B262 for clarity. It believes the application of proposed Note B262 requires clarification, we recommend the following modification "Includes use in products conforming to the Standard for Mozzarella (CXS 262-2006) except for the surface treatment of high moisture products packaged in liquid". This modification would continue to allow the use of natamycin in non-standardized products falling under FC 01.6.1, and allow its use in those products conforming to CXS 262 where it is permitted, while excluding the products in which it is not permitted.

Canada also notes the comments within issue 17 related to the apparent contradiction of the use of Note 3 with those provisions appearing in the functional class table for CXS 262 (i.e., preservative use in cheese mass as well as surface treatment). Perhaps note B262 could also refer to the functional class table in CXS 262 due to the complicated nature of the functional class table within the standard.

Response

Current note B262:

B262: Except for use for surface treatment of high moisture products packaged in liquid conforming to the Standard for Mozzarella (CXS 262-2006).

Canada's proposed B262:

B262: Includes use in products conforming to the Standard for Mozzarella (CXS 262-2006) except for the surface treatment of high moisture products packaged in liquid.

The proposed amendments to note B262 by Canada seem reasonable as well as the additional suggestion to add reference to the functional class table within CXS 262.

Combining the two suggestions provides an amended note B262.

B262: Includes use in products conforming to the Standard for Mozzarella (CXS 262-2006) except for the surface treatment of high moisture products packaged in liquid, noting the functional class table in CXS 262-2006.

Chair's proposal: Make the amendment to note B262 due to the above explanation.

Comments on the 2nd circular (2022)

IDF: IDF can support

GMP for INS 405, 636 and 637 due to alignment with CXS 243

35. Japan noted that the alignment of the three food additives INS 405 (propylene glycol alginate), INS 636 (maltol) and INS 637 (ethyl maltol) in CXS 243 have a ML of GMP, which is what the note D243 due to alignment uses. However, these three additives have a numerical ADI and are not listed in Table 3 so Japan does not believe an ML of GMP is appropriate, even if that is listed in CXS 243.

The simple alignment with CXS 243 provides an ML of GMP but Japan is correct that this may be inappropriate due to these three food additives having a numerical ADI and not being listed in Table 3. It is unclear if this situation occurs sometimes in the GSFA and commodity standards and if so how it is addressed. This seems outside the role of the Alignment EWG to dispute an ML of GMP and in particular to determine what an appropriate ML for this particular food category should be for these three food additives.

Unless alternative suggestions are made the Alignment EWG can only align with the commodity standard so note D243 will stay with the ML of GMP.

Comments on the 1st circular (2022)

Canada

It suggests that the EWG be asked what the appropriate MLs are for these food additives aligned with CXS 243, in a similar way to curcumin (INS 100(i)) aligned with CXS 306.

Chair's initial proposal: Noting Canada's suggestion the EWG is asked what MLs are appropriate for the food additives INS 405, 636 and 637 in relation to CXS 243. If no suitable suggestions are received then to stay with aligning CXS 243 using the ML of GMP for the three food additives INS 405, 636 and 637 with new note D243.

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? Is this outside the scope of Alignment and so needs to be considered by the EWG on the GSFA?

Comments on the 2nd circular (2022)

Stay with GMP due to Alignment

FIA: supported staying with GMP consistent with alignment with CXS 243. It considered changing the ML to be outside the scope of Alignment.

IDF: The current proposed MLs reflect what is in CXS 243 and therefore this issue is outside the scope of Alignment and as such should be handled by the EWG on the GSFA if EWG members believe a change in levels is required.

Chair's final proposal: Since no suitable suggestions are received then to stay with aligning CXS 243 using the ML of GMP for the three food additives INS 405, 636 and 637 with new note D243. If the Committee agree, the questions could be directed to the EWG on the GSFA to seek a ML for these food additives in FCs 01.1.4, 01.2.1.1, 01.2.1.2 and 01.7 due to alignment of CXS 243.

Additional issues and comments for EWG members for the 1st circular (2022)

Apparent inconsistency in condition notes for CXS 207 and CXS 290: C207 & D290

36. It was noted that the condition statements with the ML columns for the anticaking agents for CXS 207-1999 and CXS 290-1995 are reasonably similar but not identical. How they are currently written in the commodity standards has been written into notes as part of this alignment work. However, it has been belatedly recognised that the current note D290 has needed to be amended to more fully reflect the condition statement, '4,400 mg/kg singly or in combination*' to include the asterisk (*) linked, which states 'The amount of phosphorus shall not exceed 4,400 mg/kg'. This is not listed for the anticaking agent conditions for CXS 207-1999, which is simply '10,000 mg/kg singly or in combination'.

Is there any reason to believe the maximum levels and condition statements for the two commodity standards for anticaking agents, which have almost identical food additives lists are meant to be (almost) identical?

Or, as has been the case in the current alignment work in Appendix 3, the new notes need to reflect the MLs and condition statements exactly as written in the two commodity standards? To do that slight amendments have been made to D290.

Comments on the 1st circular (2022)

Support

IDF: with additional explanation noting it had conducted a brief review into the history of the 2 standards, which were last reviewed in 2010, however it did not find any conclusive evidence of why the MLs are expressed as they are. It notes potential problems and possible impacts beyond these 2 standards of trying to make the condition statement more consistent. Consequently, any potential changes would need to be considered carefully before being adopted. It also pointed out that any rationalisation of the 2 condition statements to make them more consistent would probably involve the adoption of new MLs and/or new text in either or both standards which would then put this work outside the scope of the current alignment work. However, such work could go through the EWG on the GSFA. Consequently, IDF suggests that, in answer to the EWG's question, and from an alignment perspective, any action here, for the time being, should only reflect what is currently stated in the 2 commodity standards. Therefore, it supports the chair's proposal.

Canada

Chair's proposal is unchanged: To make the slight amendments to D290 to more accurately reflect the ML and condition statements relating to anticaking agents as written in CXS 290-1995, noting they are different to comparable provisions in CXS 207-1999. Alignment will only change the notes if any EWG member can provide reasons why they should be changed.

Additional question related to CCPFV commodity standards (Standard for chili sauce), Appendix 7

37. The alignment work within Appendix 7 for the *Standard for Chili Sauce* (CXS 306-2011) notes that the Standard includes a provision for the colour curcumin (INS 100(i)) with a ML of GMP. However, JECFA has assigned curcumin with a numerical ADI of 0-3 mg/kg bw so the ML of GMP is not appropriate, but it requires a numerical ML. The issue that Alignment faces is what is the appropriate ML that should be added to curcumin for this standard and in particular for the food category 12.6.2 once aligned. Therefore, the Alignment Chair requests comments and suggestions as to:

What ML for curcumin is appropriate to align CXS 306-2011 with the GSFA?

Comments on the 1st circular (2022)

NATCOL: suggested the appropriate ML was 500 mg/kg.

Response

See Appendix 7, 2nd circular (2022), discussion and comments section, issue 2 on page 1. The chair's proposal is copied here.

Chair's proposal: Since the use of curcumin in food category 12.6.2 is currently under review by the GSFA on the EWG, the current level of GMP will serve as a place holder in the Alignment work until a recommendation is made by the GSFA on the EWG on the appropriate use level.

Additional issues and comments from EWG members to the 1st circular (2022)

38. Chile noted that proposed new note L243 (*For use in products conforming to the Standard for fermented Milks (CXS 243-2003) as an emulsifier only in flavoured fermented milks and flavoured drinks based on fermented milks, heat treated or not after fermentation*) for CXS 243-2003 for diacetyltartaric and fatty acid esters of glycerol (INS 472e) needed the ML of 10,000 mg/kg added to it to be consistent with the standard. It is noted there is the existing note 399 (*For use in products conforming to the Standard for Fermented Milk (CXS 243-2003*) at 10,000 mg/kg.

Chair's Response: Note L243 has been applied to a number of other emulsifiers which have different MLs, so it is not appropriate to add it. The other MLs are addressed via other notes or different MLs added with the new entries to the GSFA to ensure alignment. Changes related to MLs in the GSFA are best addressed via notes as the current ML applies to non-standardized products. Therefore, no changes are required.

39. Chile noted what appears to be Spanish translation issues, as it 'requests that notes 234 and 235 in CXS 192-1995 in Spanish be modified, since the same meaning appears'.

Chair's Response: This seems outside the EWG Alignment remit but the issue will be communicated to Codex secretariat to investigate and remedy. It is noted that corrections to Notes 234 and 235 in the GSFA (2021 version) in the Spanish version have been made so the problem in this regard no longer exits.

40. Chile made the general statement in relation to proposed amendments to Table 3 entries for alignment of the various standards. Specifically it requested if the ML in the commodity standard is not GMP but numerical this needs to be identified via notes. It noted that for some food additives the MLs may be GMP in one standard and numerical in another. Specifically it mentioned the following food additives: INS 331(i), 331(iii), 332(i), 332(ii), 471, 500(i), 500(ii), 500(iii), 501(i) and 501(ii). It also noted that magnesium citrate (INS 345) is listed as GMP in CXS 290 but it is not listed in Table 3. INS 437 was also noted not to be permitted in CXS 288 so it should not be added to Table 3.

Chair's Response: Checks were made with the following comments and conclusions. This issue is part of the discussion of using Table 3 notes for alignment (if and hopefully when that is agreed by CCFA) for some of these complicated standards. For calcium citrates, only tricalcium citrate (333(iii)) has a JECFA specification so only it has been added. Plus magnesium citrate also does not have a JECFA specification so it also has not been added. CFA52 REP21/FA (page 133) added INS 437 to FCs 01.4.1 and 01.4.2 in the GSFA via the EWG on the GSFA in September 2021. FC 1.4.3 is not in the annex to Table 3, while FCs 1.4.1 and 1.4.2 are so provisions for FC 1.4.3 can be added to Table 3.

Comments from Canadian submission to 1st circular 2022

41. It notes that the name of the food additive adipates (INS 355) should be changed to adipic acid since there is not a group of adipates.

Comments on the 3rd circular (2022)

Brazil: It notes that the issue is not directly within the scope of the EWG on Alignment but it supports making the highlighted correction as it is well justified and will avoid inconsistency between standards.

IDF: It notes that CXS 243-2003 refers to INS 355 as adipic acid as does CXG 36-1989. Therefore, for the alignment exercise to accurately reflect the standard in the GSFA there is a good argument to accept Canada's proposal.

Canada: It reiterates its support for making the change.

Chair's proposal: Noting support from Brazil and the IDF, unless alternatives views are provided, it is proposed to make the change as suggested by Canada. That is change adipates to adipic acid (INS 355) as part of the changes due to alignment. See also item 58 where it is noted that the adipates 356, 357 and 359 do not have JECFA specification so they cannot be added to the GSFA.

42. The footnote c below the functional class table of CXS 243 needs to be added as notes so that it is not lost when aligned into the GSFA. This note applies to the use of sweeteners in milk- and milk derivative-based products energy reduced or with no added sugar. The note is "For products conforming to the Standard for Fermented Milks (CXS 243-2003): limited to milk- and milk derivative-based products energy reduced or with no added sugar". This note should be added for specific sweeteners with provisions in FCs 01.1.4 and 01.7. It is noted that some of the sweeteners are listed in Table 3.

Comments on the 3rd circular (2022)

IDF: supports chair's proposal

Chair's proposal: This suggestion was supported and a new note Q243 added for relevant sweeteners aligned in FCs 01.1.4 and 01.7. The note was not required for some of the provisions due to comparable notes already listed. Plus the note has not been applied to provisions in Table 3, though it could be added as new Table 3 notes in the future if their development is supported by CCFA.

43. A suggestion for the alignment of CXS 243 was that a new note be added for flavour enhancers aligned in FCs 01.1.4 and 01.7 stating they are for use in flavoured products only.

Comments on the 3rd circular (2022)

IDF: supports chair's proposal

Chair's proposal: This suggestion is not agreed as the FC are only for flavoured products, therefore the note is superfluous.

44. For the alignment of CXS 243 and FCs 01.1.4 and 01.7 there were suggestions to slightly alter the note L243 to ensure use in non-standardised products is not prohibited.

Comments on the 3rd circular (2022)

IDF: supports chair's proposal. However, it also stresses the need for commentary clearly explaining the intention of these and similar notes as outlined under item 55.

Response

The appreciates the comment from the IDF and the discussions it has held related to such matters. This is explained in a bit more detail under item 55. Unfortunately, this is not solely an Alignment issue.

The justifications and reasons for the slightly different notes is expanded on so hopefully it can be better understood.

When there was already a provision for a food additive in the relevant FC within the GSFA prior to alignment then note L243 was use. Then the term 'Except for..' was used to make it clear that the provisions due to alignment was different to what originally was in the GSFA. But if there was no original provision already in the GSFA then the note S243 'For use in..' was used, which applies only to product conforming to the commodity standard.

Chair's proposal: The solution was for a slight amendment to L243 for existing provisions of food additives in the GSFA to make it clear the new aligned provisions applies only to products conforming to CXS 243 as emulsifiers. For new provisions to the GSFA due to alignment of CXS 243 the new note was needed to be written slightly differently, being S243. Like for many of the notes it is about where the word 'only' is added. In a similar way notes 355 and 235 have been slightly edited to make their purpose more appropriate.

45. It is considered peculiar that there is a provision for the colour caramel IV – sulfite ammonia caramel (INS 150d) in a plain category FC 01.2.1 – Fermented milks (plain). It has the note 12 – as a result of carryover from flavouring substances. It has not been considered as part of alignment but a suggestion was made that a note XS243 be added.

Comments on the 3rd circular (2022)

IDF: It can support the addition of XS243 for the reasons discussed. However, this does not address non-standardised products. If XS243 is added and note 12 is maintained then it would appear to indicate that non-standardised products permit the addition of flavouring substances to plain products since carry-over of the colour (INS 150d) is allowed. The alternative options proposed appear to be:

1. INS 150d is carried over from other ingredients consistent with a plain product (i.e., not a flavouring substance). Note 12 is removed and replaced by a new note allowing carry-over, but not from flavouring substances, i.e., 'as a result of carry-over ~~from flavouring substances~~'.
2. If INS 150d is only carried over from flavouring substances and flavouring substances are not permitted in plain products then the provision could be removed.

Chair's proposal: The discussion and suggestions from the IDF are appreciated. Unless there are alternatives proposed option 2 above seems the most appropriate and is proposed. That is, to remove provisions for INS 150d in FC 01.2.1.

46. For alignment of CXS 243 with FC 01.2.1.2, it is noted that there are a number of food additive provisions in CXS 243 that are not listed in FC 01.2.1.2. It is therefore suggested that an exclusive note is required, "for use in products conforming to the Standard for Fermented milks (CXS 243-2003) only". As well a number of exclusions notes, XS243, are required where a provision exists in FC 01.2.1.2 in the GSFA but not in CXS 243. It questioned whether similar notes are required for FC 01.2.1.1. It specifically mentioned ammonium hydroxide (527) and calcium hydroxide (526).

Comments on the 3rd circular (2022)

IDF: supports chair's proposal

Canada: it has some reservations to what is proposed by the Chair so reiterates its earlier comment supporting the Chair's previous proposal that the alignment of CXS 243 should be deferred to a later meeting so issues can be further considered. This is because it's alignment has been very complicated with different views expressed.

It repeats its earlier comments made to the 1st circular 2022 that XS243 notes are required for some provisions in FC 01.2.1.2 (and maybe 01.2.1.1).

Chair's proposal: Further consideration of this issue occurred and has been explained in issue 12. It was identified that many [identified as 25] provisions for FC 01.2.1.2 are actually Table 3 entries and so these provisions that were proposed due to alignment needed to be removed from Tables 1 & 2. For the small number remaining a new note was added, being R243. No such exclusive note was required for FC 01.2.1.1. After this work there was not a need to add any additional exclusion notes i.e. XS243. No changes were required for the alignment of FC 01.2.1.1 after a check was made.

47. For the alignment of CXS 243 and FC 01.7 it is noted that food additive ammonium salts of phosphatidic acid (INS 442) has the note 231 "For use in flavoured fermented milks and flavoured fermented milks heat treated after fermentation only". This seems to be in conflict with CXS 243 which does not have a provision for it, so at alignment it is proposed to add the exclusion note XS243. The provision was adopted in

the GSFA in 2012 which may have been after the food additive provisions for CXS 243 standard were finalised, in which case the XS243 note should be removed.

Comments to 2nd circular (2022)

IDF did not support this proposal as it notes that CXS 234 does not have a provision for INS 442, so the XS243 note is appropriate and should not be removed. Note 231 could be removed, or left as it would apply for non-standardized product.

Comments on the 3rd circular (2022)

IDF: supports chair's proposal.

Chair's amended proposal: Noting the IDF comments the proposal is to keep both notes, i.e. XS243 (due to alignment) and the original note 231 which can apply to non-standardized product.

48. For the alignment of CXS 288 for FCs 01.4.1 and 01.4.2 it is considered that there are a number of food additives in the GSFA FCs that have not been aligned in Appendix 3, since they require an exclusion note, XS288 to be added to them.

Chair's proposal: This was not considered required as these food additives already have the exclusion note 236 (Excluding products conforming to the Standard for Cream and Prepared Creams (reconstituted cream, recombined cream, prepackaged liquid cream) (CXS 288-1976)) that has been edited as proposed in earlier issue 10. Note 236 has also been discussed earlier in issues 10 and 23.

Comments on the 2nd circular (2022)

Not support, with comment

USA, for consistency it supports replacement of existing note 236 with an "XS type" (i.e. XS288) note.

Comments on the 3rd circular (2022)

Supports

Canada: fully supports replacing note 236 with XS288 for transparency reasons, and given the discussion of new work mentioned in item 10 to revise the terms. It further requested that additional XS288 notes be added to various provisions in FC 01.4.1 and 01.4.2 where provisions are currently listed for food additives but they are not permitted in CXS 288. It notes that if these food additives are not listed in Appendix 3 due to alignment with an XS288 note they will erroneously be permitted in CXS 288. Canada added mention of these food additives in its comments. For both 01.4.1 and 01.4.2 they are: konjac flour (425), tara gum (417) and tragacanth gum (413). For FC 01.4.2 they are: acid-treated starch (1401), bleached starch (1403), dextrins, roasted starch (1400), oxidised starch (1404) and polydextrose (1200).

Chair's amended proposal: Noting the USA and Canadian comments, which are correct, alignment has tended to use XS notes compared to other notes, therefore the proposal in general is supported to replace note 236 with XS288 as part of the alignment work. However, when checks were made no additional new entries of note 236 were proposed due to Alignment. It is separately noted that the Chair had made amendments IDF and Canada had proposed of a slight edit of note 236 which is provided in Appendix 3. Therefore, no change was proposed as part of alignment.

The food additives listed by Canada's comments already have note 236 added to them so as noted above it is not proposed to make the changes explicitly as part of alignment, as all the changes can be made at the one time as noted below.

However, if agreed, a general replacement of note 236 with XS288 by Codex secretariat could be performed outside of alignment for consistency of the GSFA (noting there are many entries with note 236).

49. For the alignment of CXS 288 for FC 01.4.2, it is considered that the notes E288 and F288 need to be slightly amended, when adding new provisions for stabilizers and thickeners (E288) and emulsifiers (F288) that could provide provisions for non-standardized products (if there is not a 1:1 relation between CXS 288 and FC 1.4.2). Separately, different amended notes are required for adding provisions to FC 01.4.3. A question was asked whether alternative notes were required for adding alignment provisions to current entries already in the GSFA, only to identify the function class, noting that this has been done inconsistently during alignment.

Chair's initial response and proposal: Like many of these questions relating to non-standardized products it depends on whether there is a 1:1 relationship between the commodity standard and the FC, in this case CXS 288 and FCs 01.4.2 and 1.4.3. This is unclear, so responses have been taken assuming there is not such a 1:1 relationship. Slight amendments to E288 and F288 as suggested have been made, for the addition of new entries and provisions due to alignment with CXS 288 (i.e. no original provisions for the food additive were already in the FC within the GSFA). A different note has been required for alignment to FC 01.4.3, being G288

(emulsifiers). But as also noted these notes are not appropriate for aligning a provision to current entries for the food additive already listed for the FC in the GSFA, where the note is only to state the functional class. In this case it was decided not to add further notes just to make explicit the functional class. As explained in earlier discussions (issue 7) this has been a case by case situation since otherwise the GSFA would be overwhelmed with notes that only refer to functional class.

Comments to 2nd circular (2022)

The IDF referenced item 10 as background to understanding the intent behind the alignment of CXS 288 and the proposed amendments. This item is directly linked to the explanation and justification provided. The important conclusion relevant to this item is that it is understood that function class table in CXS 288 permits emulsifiers, stabilizers and thickeners (EST) in all relevant food categories, 01.4.1, 01.4.2 and 01.4.3. That is that all categories of cream and prepared creams can be produced using reconstituted and recombined creams. Using that premise the IDF requests that the original notes E288 and F288 be reinstated and not the amended versions proposed in the 2nd circular (2022). This also means that the proposed new note G288 is not required for provisions within 01.4.3, but either E288 or F288 is needed.

Comments on the 3rd circular (2022)

IDF: supports chair's proposal.

Canada: it does not object in principle, but it has made some slight modifications to these notes in its comments to Appendix 3 which it believes improves clarity.

Chair's amended proposal: Due to the response of the IDF which have been accepted, the original notes E288 and F288 have been reinstated and G288 removed, as per the 1st circular (2022).

Canada's proposed edits to E288 and F288 within its comments to Appendix 3 have needed to be separately checked and amendments made (see issue 66) and amendments made in Appendix 3 for notes E288, F288, and new notes G288 and H288.

50. For the alignment of CXS 331, Canada questioned whether other FCs in addition to 01.8.2 are involved, such as 01.5 – Milk powder and cream powder and powder analogues (plain).

Comments on the 3rd circular (2022)

IDF: supports chair's proposal.

Not support and request further consideration

Canada: it reiterates its earlier concerns as it strongly believes that there are other FCs in addition to 01.8 (Whey and whey products, excluding whey cheeses) and 01.8.2 (Dried whey and whey products, excluding whey cheeses) that are directly associated with CXS 331-2017. It notes that the GSFA does not list other FCs within Annex C (Cross-reference of Codex Standardised Foods with the Food Category System Used for the Elaboration of the GSFA) but it suggests that this was inadvertently missed. It considers 'whey permeate powders' fall under FC 01.8.2 but other 'Dairy permeate powders' and 'Milk permeate powders' sourced from milk and cream do not but almost certainly fall under FC 01.5 (Milk powder and cream powder and cream powder analogues (plain)). It therefore requests that Codex Secretariat or CCFA make a determination as to whether the information in Annex C of the GSFA concerning CXS 331-2017 and its associated FC is correct or not. It considers alignment needs to also be conducted for the permeate powders falling under FC 01.5 as well.

Response

The Chair's questions how CXS 331-2017 relates to CXS 207-1999 as surely it is a different and distinct standard with distinct products (dairy permeate powders) not captured by CXS 207-1999. The difference seems to be that the products captured by CXS 331 are obtained from permeates only. It is further noted that CXS 331 does not allow any food additives for its products while CXS 207 does allow a specific list of additives. But the Chair is happy for the EWG/PWG or Committee to provide thoughts on the matter.

Chair's original response: A check of the tables in Annex C in the GSFA indicated that FC 01.8.2 is linked only to CXS 289 (already been aligned, but not via the Alignment EWG) and CXS 331. Plus FC 01.5.1 is linked to CXS 207 and CXS 290 being aligned in this circular. Therefore, no change is proposed.

Noting Canada's further insistence that the Annex C tables in the GSFA may be incorrect, it is happy to seek EWG/PWG or Committee views on whether such information needs to be amended and CXS 331-2017 should also be linked to FC 01.5, and so alignment is also required for such FC.

51. Sodium sesquicarbonate (INS 500(iii)) is listed in CXS 253 as a stabilizer and thickener but these functional classes are not listed in the GSFA or in CXG 36-1989. Are these two functional classes

technologically justified for the food additive? If so, then they should be proposed to be added into CXG 36 - 1989 and ultimately the GSFA [via the EWG on INS?].

Chair's proposal: This issue is outside Alignment, but seems like something that could be considered by the EWG on INS, but would require technological justification (initially via EWG on the GSFA?). Is this something the EWG on Alignment needs to consider; seeking comments on this? If not then alignment should not add INS 500(iii) to Table 3 due to aligning with CXS 253 until the technological justification as stabilizer and thickener is established.

Comments to 2nd circular (2022)

USA comment

It suggested that it may be best to make a request that the INS EWG consider this issue. If it agrees that the functional class of stabiliser and thickener can be added to INS 500(iii), then the association could be made in Table 3.

Comments on the 3rd circular (2022)

IDF and Canada: supports chair's proposal.

Chair's amended proposal: Noting the USA comment, it is proposed that this issue is outside Alignment, but it could be forwarded for consideration by the EWG on INS relating to the functional class. That is, can sodium sesquicarbonate (INS 500(iii)) be considered to have the function class of stabiliser and thickener. Until that has occurred alignment should not consider adding INS 500(iii) to Table 3 due to aligning with CXS 253.

Additional issues and comments from EWG members to the 2nd circular (2022)

CXS 243 alignment, food categories for function class table

52. In Appendix 2, for CXS 243, Chile questioned whether the Function Class table that had been amended using track changes by the Chair with the GSFA Food Class numbers should be amended. It questioned whether the fourth (right hand) column listed as 01.7 should also include 01.1.4.

A check of the definitions within the GSFA notes the titles and definitions of the two categories.

01.14 Flavoured fluid milk drinks

01.7 Dairy-based desserts (e.g. pudding, fruit or flavoured yogurt).

Further consideration of the issue as well as communications with IDF indicates that what was proposed by Alignment is viewed as correct. That is only FC 01.7 is appropriate for the 4th column, not with FC 01.1.4. The issue is more about the heat treated versus not heat treated. The table is split into 2 halves – 'Plain and flavoured fermented milks and drinks based on fermented milks'….and…'Plain and flavoured milks and drinks based on fermented milks **heat treated after fermentation'** (only).

The FC descriptor FC 01.1.4 while making reference to flavouring makes no reference to heat treatment. This omission is understood that heat treated flavoured products are not covered by FC 01.1.4. The descriptor for FC 01.7 does mention heat treatment and references CXS 243 via footnote 27. Therefore, flavoured products (Fermented milks and drinks based on fermented milks) that have been heat treated after fermentation are covered by FC 01.7 (and not FC 01.1.4). Those that haven't been heat treated are covered by FC 01.1.4 hence the distinction which has been used to decide the alignment outcomes.

Comments on the 3rd circular (2022)

IDF: supports chair's proposal.

Chair's proposal: Maintain the FC entries as originally proposed in track changes. The addition of the FC entries was proposed by the Chair to help to better understand CXS 243. It is therefore not appropriate to add a provision to preservatives in FC 01.1.4 in the paragraph above the FC table referring to provisions in the GSFA in Appendix 2.

Functional class table issues for CCMMP standards

53. The US made a number of comments relating to the Functional Class tables within Appendix 2, noting some inconsistencies and seeking comments to some questions. These are copied below, with responses provided beneath each.

1. Some functional class tables list the functional classes in alphabetical order while others are not, e.g., CXS 262-2006 and CXS 288-1976. Alphabetical listing of functional classes should be consistent.

This comment is noted and the Chair agrees it would be best if all FC tables are as consistent as deemed appropriate. Listing in alphabetical order seems appropriate. This requires amending of the Commodity Standard CXS 262 but it is not proposed to alter CXS 288 as its structure is quite different.

2. The functional class table formatting is inconsistent between standards. Additionally, the US considers whether the functional class tables are necessary for all standards if the reference to the GSFA describes the functional class for which specific food additives are technologically justified.

The question of whether all CCMMP standards should require FC tables was considered earlier and it was agreed by the WG that all would contain such tables to be consistent, but only for relevant CCMMP standards. Again, formatting is slightly different but due to differences in columns. No additional changes, except noting other comment above, will be made due to Alignment.

3. For some standards, the functional class table includes only certain functional classes, while other standards list a different set of functional classes, e.g., compare CSX 207-1999 and CXS 281-1971. The US requests a rationale for the differences in these functional class tables.

This question had also been considered. It is noted and agreed that which functional classes used for different CCMMP standards is variable. However, Alignment chair had earlier taken advice from the relevant industry group (IDF for CCMMP which is adjourned – sine die). It was initially proposed to use a generic list of functional classes for every CCMMP standard, but this does not seem that useful so ones that are not relevant will be removed..

4. For CXS 253-2006, certain functional classes are struck through, e.g., Bleaching agents. The US requests a rationale for why these functional classes are struck through.

Similar to the above response Alignment questioned which functional classes were appropriate for the different CCMMP standards. Functional classes that have been struck through or those have do not have a provision will be removed as they do not appear to add useful information. The original idea was to come up with a generic list of functional classes for all CCMMP standards (as per above), but that does not seem a worthwhile approach when put in practice.

Comments on the 3rd circular (2022)

IDF: supports chair's proposal.

Chair's proposal: Make minor changes as noted above to the different functional class tables in the relevant CCMMP standards due to Alignment within Appendix 2. Making changes to CXS 262 to make the entries in alphabetical order will be made, though it does cause some reorganisation within the standard. Entries with strikethrough or that have no provisions will be removed, as they do not add value to the tables.

Revocation of alitame provisions in FC 01.1.4 & 01.7

54. IDF questioned why alitame provisions in FC 01.7 (and 01.1.4) due to alignment of CXS 243 were struck through, as it proposed removing the strikethrough and restoring proposed provisions.

The explanation has now been provided, when it was not in the 2nd circular (2022). Provisions had been removed at CCFA52, noted in REP21/FA, page 159, due to EWG GSFA work. Therefore, it is not appropriate to add back the revoked provisions. This explanation has been added into the relevant entries within Appendix 3 in the RHS column.

Comments on the 3rd circular (2022)

IDF: supports chair's proposal.

Chair's proposal: The strikethrough for alitame provisions due to alignment of CXS 243 and FC 01.1.4 and 01.7 is maintained but with an explanation as noted above.

Understanding slight nuances of notes, 'for use in..' 'Except for use…'

55. IDF would suggest that the EWG consider adding an addendum to the alignment document clarifying that such standard phrases as 'For use'… and …'Except for use'… denote certain use criteria? Otherwise, IDF would suggest that those readers not as familiar with the GSFA may not appreciate the subtle difference, especially those that have English as a second language.

Comments on the 3rd circular (2022)

IDF: It supports any action that helps users of the GSFA better understand the complicated document the GSFA is. Standardisation of text used in notes and some accompanying explanation as to the difference in meaning between notes with similar text would be welcome and helpful.

Chair's proposal: IDF's comment is understood and appreciated. This is something that can be considered in more detail at a later time, to see whether some advisory commentary relating to how notes in the GSFA can be written and interpreted. It is understood the suggestion is for this explanation to be written into the Information document on Alignment ('Guidance to Commodity Committees on the Alignment of Food Additive Provisions'). It is not clear if that would be the best position for such advisory information or even what is most appropriate to communicate. It is fully understood that the writing of notes is complicated but also that it is not an Alignment only issue.

Appendix 10, removal of provisions when only have XS notes?

56. For the alignment of CXS 325R-2017 the Chair has questioned whether it is appropriate to remove food additive provisions for four food additives in the GSFA for FC 02.1.2 (Vegetable oils and fats). The additives are: Diacetyltartaric and fatty acid esters of glycerol (472e), guaiac acid (314), polysorbates (432-436) and propylene glycol esters of fatty acids (477).

The reason for the question is that these all have exclusion notes: XS19, XS33, XS210 and now XS325R, and no other notes providing a provision. FC 02.1.2 is only linked to these four standards. Therefore, only non standardised products would be permitted.

Japan in its comments to the 2nd circular (2022) sought clarification for why these four additives were proposed to be removed, i.e. they have strikethrough added to them. The response is as explained above. This may have been overreach by Alignment, if it is considered important that non-standardized products have these food additive provisions. Therefore, the strikethrough has been removed from these provisions. But the Chair's seeks the view of the EWG on this issue; should provisions stay in the GSFA even when there are only XS notes, so provisions exist for non-standardised products?

Comments on the 3rd circular (2022)

IDF: It notes the broader issue of removing food additive provisions that are not allowed in commodity standards that have a 1:1 relationship with a FC, but it notes there is still the principle of catering for future non-standardised products even though none exist currently.

Canada: it supports Japan's comments that removing provisions in non-standardised foods is not appropriate and as such is an overreach.

Chair's proposal: Further consideration of the issue, including the relevant IDF and Canada's comments, caused a change in approach to not make any changes due to alignment but to leave the existing XS notes and not remove any provisions.

Provisions for sucrose esters for FC 01.5.1

57. Chile in its comments to the 3rd circular (2022) questioned note 536 (for use as an emulsifier only) seeking clarification for other function classes for sucrose esters (INS 473, 473a and 474). This is for the alignment of CXS 207 and CXS 290 and the FC 01.5.1 in the GSFA.

Chair's response: On investigating this query it was identified that the amendments for sucrose esters came out of CCFA52, specifically in REP21/FA and the EWG on GSFA. Explicitly on page 128, Appendix VI, section D.4 from CX/FA 21/52/7. No changes were therefore needed due to alignment. But the entries has been left in Appendix 3, for information only, but no changes are required.

Provisions for other adipates listed in CXS 243-2003, not aligned

58. Chile in its comments to the 3rd circular (2022) noted that CXS 243-2003 has entries for other adipates, not just adipic acid, but also sodium adipate (INS 356), potassium adipate (INS 357) and ammonium adipate (INS 359). These have not been aligned.

Chair's response: The three adipates listed in CXS 243-2003 do not have a JECFA specification, only adipic acid so only it has been aligned. There is an entry for adipates in the GSFA but as noted in the earlier issue 4 and item 41 it is proposed to be replace with adipic acid (INS 355) only.

Additional comments from Canadian submission to 3rd circular 2022

59. It noted that calcium carbonate (170(i)) [or calcium carbonates (170)] are not listed as acidity regulators in CXS 290, but calcium carbonate is listed as an anticaking agent. Therefore, note E290 in Appendix 3 and T3-10 note in Appendix 4 needs to be reconsidered and amended.

Chair's response: It has considered that the entry for INS 170 as an acidity regulator in CXS 290 listed as calcium citrates is an error and it should refer to calcium carbonates. It further notes that calcium citrates (INS 333) is listed further down the acidity regulators list in CXS 290. Therefore, it has determined the alignment by correcting that entry. Therefore, no change is proposed.

60. It questions whether note 15 (on the fat or oil basis) applies for the alignment of CXS 207 for butylated hydroxyanisole (INS 320) for FC 01.5.1. Such a condition is not explicitly listed within CXS 207. Clarification should be sought whether it is applicable.

Chair's response: Canada is correct, such a condition is not explicitly listed in CXS 207. Advice is sought from the EWG whether it is expected to be the situation. Unless information is provided to the contrary from the EWG then it is assumed not to be the case, therefore a new note is required, which has been added into Appendix 3.

The new note would replace note 15, being the ***new note E207 – On the fat or oil basis except for use in products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999).***

61. Unless there is known to be a 1:1 correspondence between CXS 243 and the FCs 01.2.1.1 and 01.2.1.2 which are both sub categories of FC 01.2 which is in the annex to Table 3 then specific exclusion notes should be written to prevent the inadvertent provisions of various food additives in non-standardised products. These relate to new entries added to the FCs due to alignment.

This is a repeat of Canada's comments to the 1st circular (2022) which has been addressed in issue 46.

For FC 01.2.1.1 such a note is proposed as an alternative to note 235 (For use in reconstituted and recombined products only). The suggestion of the exclusive note is: 'For use only in reconstituted and recombined products conforming to the Standard for Fermented Milks (CXS 243-2003)'. [This is the amended note 235 added in Appendix 3.]

For FC 01.2.1.2 such an exclusive note is proposed as: 'For use in products conforming to the Standard for Fermented Milks (CXS 243-2003) only'. [This is note R243.]

Chair's response: Canada's suggestion and proposed notes seems appropriate to ensure clarity, as it is not clear whether a 1:1 relationship exists between CXS 243 and the various FCs. These had already been made to Appendix 3 in the 3rd circular as proposed by Canada above. The Chair notes that the amended note 235 has been made so no new note is required (for FC 01.2.1.1). Note R243 is consistent with the second suggested note for FC 01.2.1.2.

62. It repeated its comment to the 1st circular (2022) that for the nisin and sorbates provisions for FC 01.7 due to alignment of CXS 243 that adding the proposed note 220 ('For use in flavoured products heat treated after fermentation only') could inadvertently eliminate acceptable use in non-standardized products. To prevent this, it suggests that a new note replaces note 220, to state: 'Except for products conforming to the Standard for Fermented Milks (CXS 243-2003), only for use in flavoured products heat treated after fermentation'.

Chair's response: To ensure clarity due to uncertainty the proposed note has been added as proposed (note T243) within Appendix 3 as a replacement for note 220 in FC 01.7 for the preservatives benzoates, nisin and sorbates. CXS 243 does not have provisions for preservatives for FC 01.1.4 due to the function class table within CXS 243. However, there are existing provisions in FC 01.1.4 for nisin and sorbates but not benzoates. Nisin has the current note 403 ('Excluding fermented milks and drinks not heat-treated after fermentation') which is considered a more appropriate note for FC 01.1.4 than note 220 so it is proposed to replace note 220 with note 430 in the provision for sorbates.

63. It suggested that slightly different notes were appropriate for the tartrate provisions due to alignment of CXS 243 with FC 01.1.4 (new provision added since no existing provisions) compared to FC 01.7 where there is an existing provision. That is, that the proposed general note M243 proposed to cover both provisions is not appropriate. Therefore, it proposed that a slightly altered new note was required for the tartrate provision for FC 01.7.

Chair's response: Canada's suggestion is appropriate. But it does require an amendment to M243 to make it specific to FC 01.1.4 and a new note (U243) specific to FC 01.7 as suggested. Again, as noted in issue 44 and 55 how the notes are written is dependent on whether there exists an initial provision or not. The amendment to M243 and new note U243 have been added to Appendix 3 picking up Canada's comment.

64. It repeated its comment to the 1st circular (2022) questioning whether adding note 359 ('Excluding dairy fat spreads with ≥ 70% milk fat content') for INS 472e and stearoyl lactylates(INS 481(i), 482(i)) in FC 02.2.2 is the alignment of CXS 253 inadvertently excludes non-standardized foods. A comment is also made for the use of note 360 ('In dairy fat spreads limited to products with <70% fat content or baking purposes only') for sucrose esters, though it is unclear what the purpose of the comment refers to.

Chair's response: It is noted that the same entries using note 359 already exist in the GSFA for FC 02.2.2. for comparable food additive provisions (i.e. polyglycerol esters of fatty acids (INS 475) and sorbitan esters of fatty acids (INS 491-495). Therefore, it is proposed not to make any changes that had been suggested.

65. It repeated its comment to the 1st circular (2022) questioning whether talc (553(iii)) should be considered to be included in new note D262 due to alignment of CXS 262 with FC 01.6.1. This is because talc is not listed within CXS 262. It seeks clarification on the decision making.

Chair's response: The reason for the proposed change was that it was considered that Talc is part of the family of INS 553, i.e. magnesium silicates due to the listing in CXS 36-1989, which includes talc. , This has been the approach alignment has taken as explained in earlier documents. Separate questions were raised whether this is actually the case since there are separate JECFA specifications for talc and magnesium silicate. Changes have needed to be made to the alignment, specifically to note D262 to not include talc. It would be appreciated if JECFA can confirm whether talc is considered part of the magnesium silicate food additive family.

66. Comments were provided that slight edits are required for proposed notes E288 and F288 related to the alignment of CXS 288 with some food additives in FC 01.4.2 and 01.4.3. These changes relate to whether there was an existing provision in the FC or whether a new entry was proposed due to alignment. Like earlier discussion in issues 44 and 55 it relates to whether the note starts with 'For use in …' for new entries, or 'Except for use in …' when there is an existing provision.

Chair's response: Canada's suggested amendments to notes E288 and F288 were noted and supported. This required some slight amendments to both as well as slightly new different notes G288 and H288, as provided in Appendix 3.

67. Canada repeats its comments made to the 1st circular (2022) that not all food additives with certain function classes should have an entry in Table 3 due to alignment of CXS 243. It recommends that only food additives listed in the standard should be added to Table 3 as part of the alignment process. Some examples it noted were INS 472a (acetic and fatty acid esters of glycerol) which is not listed in the standard, while INS 1422 (acetylated distarch adipate) is and so should be added.

Chair's response: It had not specifically responded to Canada's earlier submission; however, it had considered the issue raised. The reason changes were not made is due to the earlier explanation in item 12 as well as the general note below the functional class table in CXS 243. The note states that 'Acidity regulators, colours, emulsifiers, packaging gases and preservatives listed in table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in fermented milk product categories as specified in the table above.' Due to this general statement, along with the footnote in the Annex to Table 3 there are a number of functional classes within Table 3 that are permitted for specific products complying with CXS 243.

Appendix 2

PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE CODEX COMMODITY STANDARDS FOR MILK AND MILK PRODUCTS (CCMMP) DUE TO ALIGNMENT WITH THE GSFA

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
207-1999	Milk powders and cream powder	01.5.1
243-2003	Fermented milks	01.1.4, 01.2.1, 01.2.1.1, 01.2.1.2, 01.7
253-2006	Dairy fat spreads	02.2.2
262-2006	Mozzarella	01.6.1
281-1971	Evaporated milks	01.3.1
282-1971	Sweetened condensed milks	01.3.1
288-1976	Cream and prepared creams	01.4.1, 01.4.2, 01.4.3
290-1995	Edible casein products	01.5.1
331-2017	Dairy permeate powders	01.8.2

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 *STANDARD FOR MILK POWDERS AND CREAM POWDER* (CXS 207-1999)

The following amendments to Section 4 of the *Standard for Milk Powders and Cream Powder* (CXS 207-1999) are proposed.

4. FOOD ADDITIVES

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

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~**Stabilizers**~~		
~~331~~	~~Sodium citrates~~	~~5000 mg/kg singly or in combination, expressed as anhydrous substances~~
~~332~~	~~Potassium citrates~~	
~~**Firming agents**~~		
~~508~~	~~Potassium chloride~~	~~Limited by GMP~~
~~509~~	~~Calcium chloride~~	~~Limited by GMP~~
~~**Acidity regulators**~~		
~~339~~	~~Sodium phosphates~~	~~5000mg/kg singly or in combination, expressed as anhydrous substances~~
~~340~~	~~Potassium phosphates~~	
~~450~~	~~Diphosphates~~	
~~451~~	~~Triphosphates~~	
~~452~~	~~Polyphosphates~~	
~~500~~	~~Sodium carbonates~~	
~~501~~	~~Potassium carbonates~~	
~~**Emulsifiers**~~		
~~322~~	~~Lecithins~~	~~Limited by GMP~~
~~471~~	~~Mono- and diglycerides of fatty acids~~	~~2500 mg/kg~~
~~**Anticaking agents**~~		
~~170(i)~~	~~Calcium carbonate~~	~~10 000 mg/kg singly or in combination~~
~~341(iii)~~	~~Tricalcium phosphate~~	
~~343(iii)~~	~~Trimagnesium phosphate~~	
~~504(i)~~	~~Magnesium carbonate~~	
~~530~~	~~Magnesium oxide~~	
~~551~~	~~Silicon dioxide, amorphous~~	
~~552~~	~~Calcium silicate~~	
~~553~~	~~Magnesium silicates~~	
~~554~~	~~Sodium aluminium silicate~~	~~265 mg/kg, expressed as aluminium~~

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~Antioxidants~~		
~~300~~	~~Ascorbic acid, L-~~	~~500 g/kg expressed as ascorbic acid~~
~~301~~	~~Sodium ascorbate~~	
~~304~~	~~Ascorbyl palmitate~~	
~~320~~	~~Butylated hydroxyanisole~~	~~100 mg/kg~~

Only those additive functional classes indicated as technologically 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 01.5.1 (Milk powder and cream powder (plain)) and only certain acidity regulators, anticaking agents, antioxidants, emulsifiers, firming agents and stabilizers in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use in Milk Powders and Cream Powder
Acidity regulators	**X**
Anticaking agents	**X**
~~Antifoaming agents~~	**-**
Antioxidants	**X**
~~Carbonating agents~~	**-**
~~Colours~~	**-**
Emulsifiers	**X**
Firming agents	**X**
~~Flavour enhancers~~	**-**
~~Foaming agents~~	**-**
~~Preservatives~~	**-**
~~Propellants~~	**-**
Stabilizers	**X**
~~Thickeners~~	**-**

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

B. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR FERMENTED MILKS* (CXS 243-2003)

The following amendments to Section 4 of the *Standard for Fermented Milks* (CXS 243-2003) are proposed.

4. FOOD ADDITIVES

Only those additives classes indicated 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 individual additives listed may be used and only within the limits specified.~~

In accordance with Section 4.1 of the Preamble to the *General Standard for Food Additives* (CXS 192-1995), additional additives may be present in the flavoured fermented milks and drinks based on fermented milk as a result of carry-over from non-dairy ingredients.

Carbonating agents, stabilizers and thickeners in food category 01.2.1.1 (Fermented milks (plain), not heat treated after fermentation), acidity regulators, packaging gases, stabilizers and thickeners in food category 01.2.1.2 (Fermented milks (plain), heat treated after fermentation), acidity regulators, colours, emulsifiers, flavour enhancers, stabilizers, sweeteners and thickeners in food category 01.1.4 (Flavoured fluid milk drinks) and acidity regulators, colours, emulsifiers, flavour enhancers, preservatives, stabilizers, sweeteners and thickeners in food category 01.7 (Dairy-based deserts (e.g. pudding, fruit or flavoured yoghurt)) used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in foods conforming to this standard.

For plain **fermented milks heat treated after fermentation and drinks based on fermented milk heat treated after fermentation, all Table 3 acidity regulators and packaging gases, and some Table 3 carbonating agents, stabilizers and thickeners are acceptable for use in foods conforming to this standard.**

For flavoured products, all acidity regulators, colours, emulsifiers, packaging gases and preservatives listed in Table 3 of the General Standard for Food Additives (CXS 192-1995) and only certain carbonating agents, flavour enhancers, stabilizers, sweeteners and thickeners in Table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in fermented milk products categories as specified in the table below.

Additive class	**Fermented Milks and Drinks based on Fermented Milk**		**Fermented Milks Heat Treated After Fermentation and Drinks based on Fermented Milk Heat Treated After Fermentation**	
	Plain	**Flavoured**	**Plain**	**Flavoured**
GSFA FC	01.2.1.1	01.1.4	01.2.1.2	01.7
Acidity regulators:	–	X	X	X
Carbonating agents:	X(b)	X(b)	X(b)	X(b)
Colours:	–	X	–	X
Emulsifiers:	–	X	–	X
Flavour enhancers:	–	X	–	X
Packaging gases:	–	X	X	X
Preservatives:	–	–	–	X
Stabilizers:	X(a)	X	X	X
Sweeteners:	–	X**(c)**	–	X**(c)**
Thickeners:	X(a)	X	X	X

(a) Use is restricted to reconstitution and recombination and if permitted by national legislation in the country of sale to the final consumer.

(b) Use of carbonating agents is technologically justified in Drinks based on Fermented Milk only.

(c) The use of sweeteners is limited to milk and milk derivatives-based products energy reduced or with no added sugar.

X The use of additives belonging to the class is technologically justified. In the case of flavoured products the additives are technologically justified in the dairy portion.

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

Acidity regulators, colours, emulsifiers, packaging gases and preservatives listed in Table 3 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in fermented milk products categories as specified in the table above.

INS no.	**Name of additive**	**Maximum level**
Acidity regulators		
334	Tartaric acid, L(+)-	2 000 mg/kg as tartaric acid
335(ii)	Sodium L(+)-tartrate	
337	Potassium sodium L(+)-tartrate	
355	Adipic acid	1 500 mg/kg as adipic acid
356	Sodium adipate	
357	Potassium adipate	
359	Ammonium adipate	
Carbonating agents		
290	Carbon dioxide	GMP
Colours		
100(i)	Curcumin	100 mg/kg
101(i)	Riboflavin, synthetic	300 mg/kg
101(ii)	Riboflavin 5'-phosphate, sodium	
102	Tartrazine	
104	Quinoline yellow	150 mg/kg
110	Sunset yellow FCF	300 mg/kg
120	Carmines	150 mg/kg
122	Azorubine (Carmoisine)	
124	Ponceau 4R (Cochineal red A)	
129	Allura red AC	300 mg/kg
132	Indigotine	100 mg/kg
133	Brilliant blue FCF	150 mg/kg
141(i)	Chlorophylls, copper complexes	500 mg/kg
141(ii)	Chlorophylls, copper complexes, sodium and potassium salts	
143	Fast green FCF	100 mg/kg
150b	Caramel II – sulphite caramel	150 mg/kg
150c	Caramel III – ammonia caramel	2 000 mg/kg
150d	Caramel IV – sulphite ammonia caramel	2 000 mg/kg
151	Brilliant black (Black PN)	150 mg/kg
155	Brown HT	150 mg/kg
160a(i)	Carotene, *beta*-, synthetic	100 mg/kg
160e	Carotenal, *beta*-apo-8'-	
160f	Carotenoic acid, methyl or ethyl ester, *beta*-apo-8'-	
160a(iii)	Carotenes, *beta*-, *Blakeslea trispora*	
160a(ii)	Carotenes, *beta*-, vegetable	600 mg/kg
160b(i)	Annatto extract, bixin based	20 mg/kg as bixin
160b(ii)	Annatto extract, norbixin based	20 mg/kg as norbixin
160d	Lycopenes	30 mg/kg as pure lycopene
161b(i)	Lutein from *Tagetes erecta*	150 mg/kg
161h(i)	Zeaxanthin, synthetic	150 mg/kg
163(ii)	Grape skin extract	100 mg/kg
172(i)	Iron oxide, black	
172(ii)	Iron oxide, red	
172(iii)	Iron oxide, yellow	
Emulsifiers		
432	Polyoxyethylene (20) sorbitan monolaurate	3 000 mg/kg
433	Polyoxyethylene (20) sorbitan monooleate	
434	Polyoxyethylene (20) sorbitan monopalmitate	
435	Polyoxyethylene (20) sorbitan monostearate	

INS no.	Name of additive	Maximum level
436	Polyoxyethylene (20) sorbitan tristearate	
472e	Diacetyltartaric and fatty acid esters of glycerol	10 000 mg/kg
473	Sucrose esters of fatty acids	5 000 mg/kg
474	Sucroglycerides	5 000 mg/kg
475	Polyglycerol esters of fatty acids	2 000 mg/kg
477	Propylene glycol esters of fatty acids	5 000 mg/kg
481(i)	Sodium stearoyl lactylate	10 000 mg/kg
482(i)	Calcium stearoyl lactylate	10 000 mg/kg
491	Sorbitan monostearate	5 000 mg/kg
492	Sorbitan tristearate	
493	Sorbitan monolaurate	
494	Sorbitan monooleate	
495	Sorbitan monopalmitate	
900a	Polydimethylsiloxane	50 mg/kg
Flavour enhancers		
580	Magnesium gluconate	GMP
620	Glutamic acid, (L+)-	
621	Monosodium L-glutamate	
622	Monopotassium L-glutamate	
623	Calcium di-L-glutamate	
624	Monoammonium L-glutamate	
625	Magnesium di-L-glutamate	
626	Guanylic acid, 5'-	
627	Disodium 5'-guanylate-	
628	Dipotassium 5'-guanylate-	
629	Calcium 5'-guanylate	
630	Inosinic acid, 5'-	
631	Disodium 5'-inosinate	
632	Dipotassium 5'-inosinate	
633	Calcium 5'-inosinate	
634	Calcium 5'-ribonucleotides-	
635	Disodium 5'-ribonucleotides-	
636	Maltol	
637	Ethyl maltol	
Preservatives		
200	Sorbic acid	1 000 mg/kg as sorbic acid
202	Potassium sorbate	
203	Calcium sorbate	
210	Benzoic acid	300 mg/kg as benzoic acid
211	Sodium benzoate	
212	Potassium benzoate	
213	Calcium benzoate	
234	Nisin	500 mg/kg
Stabilizers and Thickeners		
170(i)	Calcium carbonate	GMP
331(iii)	Trisodium citrate	GMP
338	Phosphoric acid	1 000 mg/kg, singly or in combination, as phosphorous
339(i)	Sodium dihydrogen phosphate	
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)	Monocalcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium orthophosphate	
342(i)	Ammonium dihydrogen phosphate	
342(ii)	Diammonium hydrogen phosphate	

INS no.	Name of additive	Maximum level
343(i)	Monomagnesium phosphate	
343(ii)	Magnesium hydrogen phosphate	
343(iii)	Trimagnesium 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 polyphosphate	
452(v)	Ammonium polyphosphate	
542	Bone phosphate	
400	Alginic acid	
401	Sodium alginate	
402	Potassium alginate	
403	Ammonium alginate	
404	Calcium alginate	
405	Propylene glycol alginate	
406	Agar	
407	Carrageenan	
407a	Processed euchema seaweed (PES)	
410	Carob bean gum	GMP
412	Guar gum	
413	Tragacanth gum	
414	Gum Arabic (Acacia gum)	
415	Xanthan gum	
416	Karaya gum	
417	Tara gum	
418	Gellan gum	
425	Konjac flour	
440	Pectins	
459	Cyclodextrin, *-beta*	5 mg/kg
460(i)	Microcrystalline cellulose (Cellulose gel)	
460(ii)	Powdered cellulose	
461	Methyl cellulose	
463	Hydroxypropyl cellulose	
464	Hydroxypropyl methyl cellulose	
465	Methyl ethyl cellulose	
466	Sodium carboxymethyl cellulose (Cellulose gum)	
467	Ethyl hydroxyethyl cellulose	
468	Cross-linked sodium carboxymethylcellulose (Cross-linked cellulose gum)	
469	Sodium carboxymethyl cellulose, enzymatically hydrolyzed (Cellulose gum, enzymatically hydrolyzed)	GMP
470(i)	Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium	
470(ii)	Salts of oleic acid with calcium, potassium and sodium	
471	Mono- and di- glycerides of fatty acids	
472a	Acetic and fatty acid esters of glycerol	
472b	Lactic and fatty acid esters of glycerol	

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~472c~~	~~Citric and fatty acid esters of glycerol~~	
~~508~~	~~Potassium chloride~~	
~~509~~	~~Calcium chloride~~	
~~511~~	~~Magnesium chloride~~	
~~1200~~	~~Polydextrose~~	
~~1400~~	~~Dextrins, roasted starch~~	
~~1401~~	~~Acid treated starch~~	
~~1402~~	~~Alkaline treated starch~~	
~~1403~~	~~Bleached starch~~	
~~1404~~	~~Oxidized starch~~	
~~1405~~	~~Starches, enzyme treated~~	
~~1410~~	~~Mono starch phosphate~~	
~~1412~~	~~Distarch phosphate~~	
~~1413~~	~~Phosphated distarch phosphate~~	
~~1414~~	~~Acetylated distarch phosphate~~	
~~1420~~	~~Starch acetate~~	
~~1422~~	~~Acetylated distarch adipate~~	
~~1440~~	~~Hydroxypropyl starch~~	
~~1442~~	~~Hydroxypropyl distarch phosphate~~	
~~1450~~	~~Starch sodium octenyl succinate~~	
~~1451~~	~~Acetylated oxidized starch~~	
~~**Sweeteners**~~[~~(a)~~]		
~~420~~	~~Sorbitol~~	~~GMP~~
~~421~~	~~Mannitol~~	~~GMP~~
~~950~~	~~Acesulfame potassium~~	~~350 mg/kg~~
~~951~~	~~Aspartame~~	~~1 000 mg/kg~~
~~952~~	~~Cyclamates~~	~~250 mg/kg~~
~~953~~	~~Isomalt (Hydrogenated isomaltulose)~~	~~GMP~~
~~954~~	~~Saccharin~~	~~100 mg/kg~~
~~955~~	~~Sucralose (Trichlorogalactosucrose)~~	~~400 mg/kg~~
~~956~~	~~Alitame~~	~~100 mg/kg~~
~~961~~	~~Neotame~~	~~100 mg/kg~~
~~962~~	~~Aspartame-acesulfame salt~~	~~350 mg/kg on an acesulfame potassium equivalent basis~~
~~964~~	~~Polyglycitol syrup~~	~~GMP~~
~~965~~	~~Maltitols~~	
~~966~~	~~Lactitol~~	
~~967~~	~~Xylitol~~	
~~968~~	~~Erythritol~~	

~~(a) The use of sweeteners is limited to milk- and milk derivative-based products energy reduced or with no added sugar.~~

C. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *CODEX STANDARD FOR DAIRY FAT SPREADS* (CXS 253-2006)

The following amendments to Section 4 of the *Standard for Dairy Fat Spreads* (CXS 253-2006) are proposed.

4. FOOD ADDITIVES

Only those additive functional classes indicated as technologically 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 the table may be used and only within the functions and limits specified.~~

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) and only certain acidity regulators, emulsifiers, flavour enhancers stabilizers and thickeners, in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	Justified use in dairy fat spreads:	
	< 70% milk fat content(a)	**≥ 70% milk fat content**
Acidity regulators	X	X
~~Anticaking agents~~	**–**	**–**
Antifoaming agents	X	X
Antioxidants	X	X
~~Carbonating agents~~	**–**	**–**
Colours	X	X
Emulsifiers	X	–
~~Firming agents~~	**–**	**–**
Flavour enhancers	X	–
~~Foaming agents~~	**–**	**–**
Preservatives	X	X
Propellants	X	X
Stabilizers	X	–
Thickeners	X	–

(a) The application of GMP in the use of emulsifiers, stabilizers, thickeners and flavour enhancers includes consideration of the fact that the amount required to obtain the technological function in the product decreases with increasing fat content, fading out at fat content about 70%.

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**~~
~~**Colours**~~		
~~100(i)~~	~~Curcumin~~	~~5 mg/kg~~
~~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, methyl or ethyl ester, *beta*-apo-8'-~~	
~~160b(i)~~	~~Annatto extract, bixin-based~~	~~20 mg/kg~~
~~**Emulsifiers**~~		

INS no.	Name of additive	Maximum level
432	Polyoxyethylene (20) sorbitan monolaurate	10 000 mg/kg, singly or in combination (Dairy fat spreads for baking purposes only)
433	Polyoxyethylene (20) sorbitan monooleate	
434	Polyoxyethylene (20) sorbitan monopalmitate	
435	Polyoxyethylene (20) sorbitan monostearate	
436	Polyoxyethylene (20) sorbitan tristearate	
471	Mono and diglycerides 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
473	Sucrose esters of fatty acids	10 000 mg/kg, dairy fat spreads for baking purposes only
474	Sucroglycerides	10 000 mg/kg, dairy fat spreads for baking purposes only
475	Polyglycerol esters of fatty acids	5 000 mg/kg
476	Polyglycerol esters of interesterified ricinoleic acid	4 000 mg/kg
481(i)	Sodium stearoyl lactylate	10 000 mg/kg, singly or in combination
482(i)	Calcium stearoyl lactylate	
491	Sorbitan monostearate	10 000 mg/kg, singly or in combination
492	Sorbitan tristearate	
493	Sorbitan monolaurate	
494	Sorbitan monooleate	
495	Sorbitan monopalmitate	
Preservatives		
200	Sorbic acid	2 000 mg/kg, singly or in combination (as sorbic acid) for fat contents <59% and 1 000 mg/kg singly or in combination (as sorbic acid) for fat contents ≥ 59%
202	Potassium sorbate	
203	Calcium sorbate	
Stabilizers and Thickeners		
340(i)	Potassium dihydrogen phosphate	880 mg/kg, singly or in combination, as phosphorous
340(ii)	Dipotassium hydrogen phosphate	
340(iii)	Tripotassium phosphate	
341(i)	Monocalcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium orthophosphate	
450(i)	Disodium diphosphate	
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
406	Agar	Limited by GMP
405	Propylene glycol alginate	3 000 mg/kg
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
414	Gum Arabic (Acacia gum)	Limited by GMP
415	Xanthan gum	Limited by GMP
418	Gellan gum	Limited by GMP
422	Glycerol	Limited by GMP
440	Pectins	Limited by GMP
460(i)	Microcrystalline cellulose (Cellulose gel)	Limited by GMP
460(ii)	Powdered cellulose	Limited by GMP

INS no.	Name of additive	Maximum level
461	Methyl cellulose	Limited by GMP
463	Hydroxypropyl cellulose	Limited by GMP
464	Hydroxypropyl methyl cellulose	Limited by GMP
465	Methyl ethyl cellulose	Limited by GMP
466	Sodium carboxymethyl cellulose (Cellulose gum)	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
1400	Dextrins, roasted starch	Limited by GMP
1401	Acid treated starch	Limited by GMP
1402	Alkaline treated starch	Limited by GMP
1403	Bleached starch	Limited by GMP
1404	Oxidized starch	Limited by GMP
1405	Starches, enzyme treated	Limited by GMP
1410	Mono starch 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
Acidity regulators		
325	Sodium lactate	Limited by GMP
326	Potassium lactate	Limited by GMP
327	Calcium lactate	Limited by GMP
329	Magnesium lactate, DL-	Limited by GMP
331(i)	Sodium dihydrogen citrate	Limited by GMP
331(ii)	Disodium monohydrogen citrate	Limited by GMP
334	Tartaric acid, L(+)-	5 000 mg/kg, singly or in combination as tartaric acid
335(ii)	Disodium tartrate	
337	Potassium sodium (L+)-tartrate	
339(i)	Sodium dihydrogen phosphate	880 mg/kg, singly or in combination as phosphorous
339(ii)	Sodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
338	Phosphoric acid	
524	Sodium hydroxide	Limited by GMP
526	Calcium hydroxide	Limited by GMP
Antioxidants		
304	Ascorbyl palmitate	500 mg/kg. as ascorbyl stearate
305	Ascorbyl stearate	
307	Tocopherols	500 mg/kg
310	Propyl gallate	200 mg/kg, singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), and propyl gallate (INS 310) as a combined maximum level of 200 mg/kg on a fat or oil basis. May be used only in dairy fat spreads intended for cooking purposes.
320	Butylated hydroxyanisole	200 mg/kg, singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), and propyl gallate (INS 310) as a combined maximum level of 200 mg/kg on a fat or oil basis. May be used only in dairy fat spreads intended for cooking purposes.
321	Butylated hydroxytoluene	75 mg/kg, singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), and propyl gallate

INS no.	Name of additive	Maximum level
		(INS 310) as a combined maximum level of 200 mg/kg on a fat or oil basis. May be used only in dairy fat spreads intended for cooking purposes.
Anti-foaming agents		
900a	Polydimethylsiloxane	10 mg/kg in dairy fat spreads for frying purposes, only
Flavour enhancers		
627	Disodium 5'-guanylate	Limited by GMP
628	Dipotassium 5'-guanylate	Limited by GMP

D. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *CODEX STANDARD FOR MOZZARELLA* (CXS 262-2006)

The following amendments to Section 4 of the *Standard for Mozzarella* (CXS 262-2006) are proposed.

4. FOOD ADDITIVES

Only those additive classes indicated as justified in the table below may be used for the product categories specified. 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, anticaking agents, colours, 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, anticaking agents, colours, preservatives and stabilizers in Table 3 are acceptable for use in foods conforming to this standard

(The functional class table has been reorganized to be listed in alphabetical order, with removal of entries with no provisions)

	JUSTIFIED USE			
Additive functional class	**Mozzarella with low moisture content**		**Mozzarella with high moisture content**	
	Cheese mass	**Surface treatment**	**Cheese mass**	**Surface treatment**
Colours:	X(a)	–	X(a)	–
Bleaching agents:	–	–	–	–
Acidity regulators:	X	–	X	–
Stabilizers:	X	–	X	–
Thickeners:	X	–	X	–
Emulsifiers:	–	–	–	–
Antioxidants:	–	–	–	–
Preservatives:	X	X	X	**X(c)**
Foaming agents:	–	–	–	–
Anti-caking agents:	–	X(b)	–	**X(d)**

	JUSTIFIED USE			
Additive functional class	**Mozzarella with low moisture content**		**Mozzarella with high moisture content**	
	Cheese mass	**Surface treatment**	**Cheese mass**	**Surface treatment**
Acidity regulators:	X	–	X	–
Anti–caking agents:	–	X(b)	–	**X(d)**
Colours:	X(a)	–	X(a)	–
Preservatives:	X	X	X	**X(c)**
Stabilizers:	X	–	X	–
Thickeners:	X	–	X	–

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

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

(c) Only for high moisture Mozzarella not packaged in liquid

(d) For the surface treatment of shredded and/or diced cheese 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~~	~~1 000 mg/kg singly or in combination as sorbic acid~~
~~202~~	~~Potassium sorbate~~	
~~203~~	~~Calcium sorbate~~	
~~234~~	~~Nisin~~	~~12.5 mg/kg~~
~~235~~	~~Natamycin (pimaricin)~~	~~Not exceeding 2 mg/dm^2 and not present in a depth of 5 mm~~
~~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 as phosphorous~~
~~350(i)~~	~~Sodium hydrogen DL-malate~~	~~Limited by GMP~~
~~350(ii)~~	~~Sodium 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~~

INS no.	Name of additive	Maximum level
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	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 dihydrogen phosphate	4 400 mg/kg, singly or in combination, expressed as phosphorus
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)	Monocalcium dihydrogen phosphate	
341(ii)	Calcium hydrogen phosphate	
341(iii)	Tricalcium orthophosphate	
342(i)	Ammonium dihydrogen phosphate	
342(ii)	Diammonium hydrogen phosphate	
343(ii)	Magnesium hydrogen phosphate	
343(iii)	Trimagnesium phosphate	
450(i)	Disodium diphosphate	
450(iii)	Tetrasodium diphosphate	
450(v)	Tetrapotassium diphosphate	
450(vi)	Dicalcium diphosphate	
451(i)	Pentasodium triphosphate	
451(ii)	Pentapotassium triphosphate	
452(i)	Sodium polyphosphate	
452(ii)	Potassium polyphosphate	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
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
Colours		
140	Chlorophylls	Limited by GMP
141(i)	Chlorophyll copper complexes	5 mg/kg Singly or in combination
141(ii)	Chlorophyllin copper complex, sodium and potassium salts	
171	Titanium dioxide	Limited by GMP
Anticaking agents		
460(i)	Microcrystalline cellulose (Cellulose gel)	Limited by GMP
460(ii)	Powdered cellulose	Limited by GMP
551	Silicon dioxide, amorphous	10 000 mg/kg Singly or in combination as silicon dioxide
552	Calcium silicate	
553(i)	Magnesium silicate, synthetic	

* For the definition of cheese surface and rind see Appendix to the *General Standard for Cheese* (CXS 283-1978).

E. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *CODEX STANDARD FOR EVAPORATED MILKS* (CXS 281-1971)

The following amendments to Section 4 of the *Standard for Evaporated Milks* (CXS 281-1971) are proposed.

4. FOOD ADDITIVES

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

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

Acidity regulators used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.3.1 (Condensed milk (plain))) and only certain acidity regulators, emulsifiers, firming agents, stabilizers and thickeners, in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	**Justified use in evaporated milks:**
Acidity regulators	**X**
~~**Anticaking agents**~~	**-**
~~**Antioxidants**~~	**-**
~~**Bleaching agents**~~	**-**
~~**Colours**~~	**-**
Emulsifiers	**X**
Firming agents	**X**
~~**Preservatives**~~	**-**
~~**Sequestrants**~~	**-**
Stabilizers	**X**
Thickeners	**X**

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**~~
~~**Firming agents**~~		
~~508~~	~~Potassium chloride~~	

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~509~~	~~Calcium chloride~~	~~2 000 mg/kg singly or 3 000 mg/kg in combination, expressed as anhydrous substances~~
~~**Stabilizers**~~		
~~331~~	~~Sodium citrates~~	~~2 000 mg/kg singly or 3 000 mg/kg in combination, expressed as anhydrous substances~~
~~332~~	~~Potassium citrates~~	
~~333~~	~~Calcium citrates~~	
~~**Acidity regulators**~~		
~~170~~	~~Calcium carbonates~~	
~~339~~	~~Sodium phosphates~~	
~~340~~	~~Potassium phosphates~~	
~~341~~	~~Calcium phosphates~~	
~~450~~	~~Diphosphates~~	~~2 000 mg/kg singly or 3 000 mg/kg in combination, expressed as anhydrous substances~~
~~451~~	~~Triphosphates~~	
~~452~~	~~Polyphosphates~~	
~~500~~	~~Sodium carbonates~~	
~~501~~	~~Potassium carbonates~~	
~~**Thickener**~~		
~~407~~	~~Carrageenan~~	~~150 mg/kg~~
~~**Emulsifier**~~		
~~322~~	~~Lecithins~~	~~Limited by GMP~~

F. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *CODEX STANDARD FOR SWEETENED CONDENSED MILKS* (CXS 282-1971)

The following amendments to Section 4 of the *Standard for Sweetened Condensed Milks* (CXS 282-1971) are proposed.

4. FOOD ADDITIVES

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

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

Acidity regulators used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.3.1 (Condensed milk (plain))) and only certain acidity regulators, emulsifiers, firming agents, stabilizers and thickeners, in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	**Justified use in sweetened condensed milks:**
Acidity regulators	**X**
~~**Anticaking agents**~~	**-**
~~**Antioxidants**~~	**-**
~~**Bleaching agents**~~	**-**
~~**Colours**~~	**-**
Emulsifiers	**X**

Firming agents	**X**
~~Preservatives~~	**-**
~~Sequestrants~~	**-**
Stabilizers	**X**
Thickeners	**X**

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~~
~~Firming agents~~		
~~508~~	~~Potassium chloride~~	~~2 000 mg/kg singly or 3 000 mg/kg in combination, expressed as anhydrous substances~~
~~509~~	~~Calcium chloride~~	
Stabilizers		
~~331~~	~~Sodium citrates~~	~~2 000 mg/kg singly or 3 000 mg/kg in combination, expressed as anhydrous substances~~
~~332~~	~~Potassium citrates~~	
~~333~~	~~Calcium citrates~~	
~~Acidity regulators~~		
~~170~~	~~Calcium carbonates~~	~~2 000 mg/kg singly or 3 000 mg/kg in combination, expressed as anhydrous substances~~
~~339~~	~~Sodium phosphates~~	
~~340~~	~~Potassium phosphates~~	
~~341~~	~~Calcium phosphates~~	
~~450~~	~~Diphosphates~~	
~~451~~	~~Triphosphates~~	
~~452~~	~~Polyphosphates~~	
~~500~~	~~Sodium carbonates~~	
~~501~~	~~Potassium carbonates~~	
~~Thickener~~		
~~407~~	~~Carrageenan~~	~~150 mg/kg~~
~~Emulsifier~~		
~~322~~	~~Lecithins~~	~~Limited by GMP~~

G. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *CODEX STANDARD FOR CREAM AND PREPARED CREAMS* (CXS 288-1976)

The following amendments to Section 4 of the *Standard for Cream and Prepared Creams* (CXS 288-1976) are proposed.

4. FOOD ADDITIVES

Only those additives classes indicated 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 additives listed below may be used and only within the limits specified.~~

Stabilizers and thickeners, including modified starches may be used singly or in combination, in compliance with the definitions for milk products and only to the extent that they are functionally necessary, taking into account any use of gelatine and starch as provided for in Section 3.2.

Acidity regulators, emulsifiers, stabilizers and thickeners in food category 01.4.1 (Pasteurized cream (plain)), acidity regulators, emulsifiers, packaging gases, propellants, stabilizers and thickeners in food category 01.4.2 (Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)) and acidity regulators, emulsifiers, stabilizers and thickeners in food category 01.4.3 (Clotted cream (plain)) used in accordance with Tables 1 and 2 of the

***General Standard for Food Additives* (CXS 192-1995) and only certain acidity regulators, emulsifiers, stabilizers and thickeners in food category 01.4.3 (Clotted cream (plain)) in Table 3 are acceptable for use in foods conforming to this standard.**

Product category	Additive functional class			
	Stabilizers[(a)]	Acidity regulators[(a)]	Thickeners[(a)] and emulsifiers[(a)]	Packaging gases and propellants
Prepackaged liquid cream (2.4.1):	X	X	X	–
Whipping cream (2.4.2):	X	X	X	–
Cream packed under pressure (2.4.3):	X	X	X	X
Whipped cream (2.4.4):	X	X	X	X
Fermented cream (2.4.5):	X	X	X	–
Acidified cream (2.4.6):	X	X	X	–

(a) These additives may be used when needed to ensure product stability and integrity of the emulsion, taking into consideration the fat content and durability of the product. With regard to the durability, special consideration should be given to the level of heat treatment applied since some minimally pasteurized products do not require the use of certain additives.

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~~
~~**Acidity regulators**~~		
~~270~~	~~Lactic acid, L-,D- and DL-~~	~~GMP~~
~~325~~	~~Sodium lactate~~	~~GMP~~
~~326~~	~~Potassium lactate~~	~~GMP~~
~~327~~	~~Calcium lactate~~	~~GMP~~
~~333~~	~~Calcium citrates~~	~~GMP~~
~~330~~	~~Citric acid~~	~~GMP~~
~~500(i)~~	~~Sodium carbonate~~	~~GMP~~
~~500(ii)~~	~~Sodium hydrogen carbonate~~	~~GMP~~
~~500(iii)~~	~~Sodium sesquicarbonate~~	~~GMP~~
~~501(i)~~	~~Potassium carbonate~~	~~GMP~~
~~501(ii)~~	~~Potassium hydrogen carbonate~~	~~GMP~~
~~**Stabilizers and thickeners**~~		
~~170(i)~~	~~Calcium carbonate~~	~~GMP~~
~~331(i)~~	~~Sodium dihydrogen citrate~~	~~GMP~~
~~331(iii)~~	~~Trisodium citrate~~	~~GMP~~
~~332(i)~~	~~Potassium dihydrogen citrate~~	~~GMP~~
~~332(ii)~~	~~Tripotassium citrate~~	~~GMP~~
~~516~~	~~Calcium sulphate~~	~~GMP~~
~~339(i)~~	~~Sodium dihydrogen phosphate~~	~~1 100 mg/kg expressed as phosphorus~~
~~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)~~	~~Monocalcium dihydrogen phosphate~~	
~~341(ii)~~	~~Calcium hydrogen phosphate~~	
~~341(iii)~~	~~Tricalcium orthophosphate~~	
~~450(i)~~	~~Disodium diphosphate~~	
~~450(ii)~~	~~Trisodium phosphate~~	
~~450(iii)~~	~~Tetrasodium diphosphate~~	
~~450(v)~~	~~Tetrapotassium diphosphate~~	
~~450(vi)~~	~~Calcium diphosphate~~	

INS no.	Name of additive	Maximum level
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 polyphospahte	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
400	Alginic acid	GMP
401	Sodium alginate	GMP
402	Potassium alginate	GMP
403	Ammonium alginate	GMP
404	Calcium alginate	GMP
405	Propylene glycol alginate	5 000 mg/kg
406	Agar	GMP
407	Carrageenan	GMP
407a	Processed euchema seaweed (PES)	GMP
410	Carob bean gum	GMP
412	Guar gum	GMP
414	Gum arabic (Acacia gum)	GMP
415	Xanthan gum	GMP
418	Gellan gum	GMP
440	Pectins	GMP
460(i)	Microcrystalline cellulose (Cellulose gel)	GMP
460(ii)	Powdered cellulose	GMP
461	Methyl cellulose	GMP
463	Hydroxypropyl cellulose	GMP
464	Hydroxypropyl methyl cellulose	GMP
465	Methyl ethyl cellulose	GMP
466	Sodium carboxymethyl cellulose (Cellulose gum)	GMP
472e	Diacetyltartaric and fatty acid esters of glycerol	5 000 mg/kg
508	Potassium chloride	GMP
509	Calcium chloride	GMP
1410	Monostarch phosphate	GMP
1412	Distarch phosphate	GMP
1413	Phosphated distarch phosphate	GMP
1414	Acetylated distarch phosphate	GMP
1420	Starch acetate	GMP
1422	Acetylated distarch adipate	GMP
1440	Hydroxypropyl starch	GMP
1442	Hydroxypropyl distarch phosphate	GMP
1450	Starch sodium octenyl succinate	GMP
Emulsifiers		
322(i)	Lecithin	GMP
432	Polyixyethylene (20) sorbitan monolaurate	1 000 mg/kg
433	Polyixyethylene (20) sorbitan monooleate	
434	Polyixyethylene (20) sorbitan monopalmitate	
435	Polyixyethylene (20) sorbitan monostearate	
436	Polyixyethylene (20) sorbitan tristearate	
471	Mono- and diglycerides of fatty acids	GMP
472a	Acetic and fatty acid esters of glycerol	GMP
472b	Lactic and fatty acid esters of glycerol	GMP
472c	Citric and fatty acid esters of glycerol	GMP
473	Sucrose esters of fatty acids	5 000 mg/kg
475	Polyglycerol esters of fatty acids	6 000 mg/kg
491	Sorbitan monostearate	5 000 mg/kg
492	Sorbitan tristearate	
493	Sorbitan monolaurate	
494	Sorbitan monooleate	

~~INS no.~~	~~Name of additive~~	~~Maximum level~~
~~495~~	~~Sorbitan monopalmitate~~	
~~Packing gases~~		
~~290~~	~~Carbon dioxide~~	~~GMP~~
~~941~~	~~Nitrogen~~	~~GMP~~
~~Propellant~~		
~~942~~	~~Nitrous oxide~~	~~GMP~~

H. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *CODEX STANDARD FOR EDIBLE CASEIN PRODUCTS* (CXS 290-1995)

The following amendments to Section 4 of the *Standard for Edible Casein Products* (CXS 290-1995) are proposed.

4. FOOD ADDITIVES

~~Only those additives listed below may be used within the limits specified.~~

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

Acidity regulators and anticaking agents used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.5.1 (Milk powder and cream powder (plain)) and only certain acidity regulators, anticaking agents, bulking agents and emulsifiers in Table 3 are acceptable for use in foods conforming to this standard.

Additive functional class	**Justified use in edible casein products:**
Acidity regulators	**X**
Anticaking agents	**X**
~~Antioxidants~~	**-**
~~Bleaching agents~~	**-**
Bulking agents	**X**
~~Colours~~	**-**
Emulsifiers	**X**
~~Firming agents~~	**-**
~~Preservatives~~	**-**
~~Sequestrants~~	**-**
~~Stabilizers~~	**-**
~~Thickeners~~	**-**

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
Acidity regulators		
170	Calcium citrates-	Limited by GMP
261(i)	Potassium acetate	
262(i)	Sodium acetate	
263	Calcium acetate	
325	Sodium lactate	
326	Potassium lactate	
327	Calcium lactate	
329	Magnesium lactate, DL-	
331	Sodium citrates	
332	Potassium citrates	
333	Calcium citrates	
345	Magnesium citrates	
380	Triammonium citrates	
339	Sodium phosphates	4 400 mg/kg singly or in combination expressed as phosphorous*
340	Potassium phosphates	
341	Calcium phosphates	
342	Ammonium phosphates	
343	Magnesium phosphates	
452	Polyphosphates	2 200 mg/kg singly or in combination expressed as phosphorous*
500	Sodium carbonates	Limited by GMP
501	Potassium carbonates	
503	Ammonium carbonates	
504	Magnesium carbonates	
524	Sodium hydroxide	
525	Potassium hydroxide	
526	Calcium hydroxide	
527	Ammonium hydroxide	
528	Magnesium hydroxide	
Emulsifiers		
322	Lecithins	Limited by GMP
471	Mono- and di-glycerides of fatty acids	
Bulking agents		
325	Sodium lactate	Limited by GMP
Anticaking agents		
170(i)	Calcium carbonate	4 400 mg/kg singly or in combination*
341(iii)	Tricalcium phosphate	
343(iii)	Trimagnesium phosphate	
460	Cellulose	
504(i)	Magnesium carbonate	
530	Magnesium oxide	
551	Silicon dioxide, amorphous	
552	Calcium silicate	
553	Magnesium silicates	
554	Sodium aluminium silicate	265 mg/kg, expressed as aluminum
1442	Hydroxypropyldistarch phosphate	4 400 mg/kg singly or in combination*

* Total amount of phosphorous shall not exceed 4400 mg/kg

I. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *CODEX STANDARD FOR DAIRY PERMEATE POWDERS* (CXS 331-2017)

The following amendments to Section 4 of the *Standard for Dairy Permeate Powders* (CXS 331-2017) are proposed.

There are no food additive provisions for CXS 331-2017 so no changes are required for section 4.1. However, a minor change is required in section 4.2 to be consistent with recent alignment amendments and to be in line with the Procedural Manual (specific reference is to flavourings but can also apply to processing aids).

4.2 Processing aids

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

Appendix 3

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)

The following amendments to the food additive provisions in the GSFA are proposed. If no changes are proposed, then the entry has NOT been added to the document.

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 a small number of other entries that are provided for information only that do not require any changes to the GSFA. Plus there are some proposed provisions that are being further considered outside of Alignment so comments have been provided in the recommendation column for information.

Alignment of commodity standards for the same food category have been grouped together, for ease of future amendments to the GSFA.

A PROPOSED AMENDMENTS TO TABLE 1

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.5.1

Amendments related to the *Standard for Milk Powders and Cream Powder* (CXS 207-1999) and

Amendments related to the *Standard for Edible Casein Products* (CXS 290-1995)

Ascorbic acid, L- **INS 300: Functional class: Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**D207, XS290**	Adopt

Ascorbyl esters **INS 304, 305: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	Milk powder and cream powder (plain)	500 mg/kg	10, **D207, XS290**	Adopt

Butylated hydroxyanisole **INS 320: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	Milk powder and cream powder (plain)	100 mg/kg	~~15,~~ 196, **E207, XS290**	Adopt

Butylated hydroxytoluene **INS 321: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	Milk powder and cream powder (plain)	200 mg/kg	15, 196, **XS207, XS290**	Adopt

Calcium carbonate

INS 170(i): Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**C207, D290, E290**	Adopt

Calcium silicate **INS 552: Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**C207, D290**	Adopt

Diacetyltartaric and fatty esters of glycerol **INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	Milk powder and cream powder (plain)	10000 mg/kg	**XS207, XS290**	Adopt

Hydroxypropyl distarch phosphate **INS 1442: Functional class: Anticaking agent, Emulsifier, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**D290, XS207**	Adopt

Magnesium carbonate **INS 504(i): Functional class: Acidity regulator, Anticaking agent, Colour retention agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**C207, D290, E290**	Adopt

Magnesium hydroxide carbonate **INS 504(ii): Functional class: Acidity regulator, Anticaking agent, Carrier, Colour retention agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**E290**	Adopt

Magnesium oxide **INS 530: Functional class: Acidity regulator, Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**C207, D290**	Adopt

Magnesium silicate, synthetic **INS 553(i): Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**C207, D290**	Adopt

Microcrystalline cellulose (Cellulose gel) **INS 460(i): Functional class: Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**D290, XS207**	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**
01.5.1	Milk powder and cream powder (plain)	4400 mg/kg	33, **B207, B290, C207, A290, C290**	Adopt

Polydimethylsiloxane **INS 900a: Functional class: Anticaking agent, Antifoaming agent, Emulsifier**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	Milk powder and cream powder (plain)	10 mg/kg	**XS207, XS290**	Adopt

Powdered cellulose **INS 460(ii): Functional class: Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**D290, XS207**	Adopt

Propyl gallate **INS 310: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	Milk powder and cream powder (plain)	200 mg/kg	15, 75, 196, **XS207, XS290**	Adopt

Silicon dioxide, amorphous

INS 551: Functional class: Anticaking agent, Antifoaming agent, Carrier,				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**C207, D290**	Adopt

Sodium ascorbate **INS 301: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**317, D207, XS290**	Adopt

Sucrose esters **INS 473, 473a, 474: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	Milk powder and cream powder (plain)	10000 mg/kg	536, XS207, XS290	Already adopted in 2021, FYI

Talc **INS 553(iii): Functional class: Anticaking agent, Glazing agent, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**C207, D290**	Adopt

NOTES

XS207 **Excluding products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999).**

XS290 **Excluding products conforming to the Standard for Edible Casein Products (CXS 290-1995).**

B207: **For use in products conforming to the Standards for Milk Powders and Cream Powder (CXS 207-1999) and Edible Casein Products (CXS 290-1995): 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 (INS343(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, singly or in combination at 4,400 mg/kg.**

C207 **Except for use in products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999): bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), as anticaking agents only, singly or in combination at 10,000 mg/kg.**

D207 **Except for use in products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999): ascorbic acid, L- (INS 300), ascorbyl palmitate (INS 304), ascorbyl stearate (INS 305) and sodium ascorbate (INS 301), as antioxidants only, singly or in combination at 500 mg/kg, expressed as ascorbic acid.**

E207 **On the fat or oil basis except for use in products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999).**

A290 **Except for use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): 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, singly or in combination at 2,200 mg/kg.**

B290: **For use in products conforming to the Edible Casein Products (CXS 290-1995): 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 (INS343(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)), as acidity regulators only, singly or in combination at 4,400 mg/kg.**

C290 **For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): bone phosphate (INS 542), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)) and trimagnesium phosphate (INS 343(iii)), as anticaking agents only, singly or in combination at 4,400 mg/kg.**

D290 **Except for use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium silicate (INS 552), hydroxypropyldistarch phosphate (INS 1442), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), microcrystalline cellulose (cellulose gel) (INS 460(i)), powdered cellulose (INS 460(ii)), silicon dioxide, amorphous (INS 551),), talc (INS 553(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)) magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)) and trimagnesium phosphate (INS 343(iii)), as anticaking agents only, singly or in combination at 4,400 mg/kg, noting the total amount of phosphorus shall not exceed 4,400 mg/kg.**

E290: **For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995) as an acidity regulator.**

PROPOSED AMENDMENTS TO FOOD CATEGORIES 01.1.4, 01.2, 01.2.1.1, 01.2.1.2, 01.7

Amendments related to the *Standard for Fermented Milks* (CXS 243-2003)

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.1.4

Acesulfame potassium **INS 950: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	350 mg/kg	478, 188, **Q243**	Adopt

~~Adipates~~ Adipic acid **INS 355: Functional class: Acidity regulator**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**1500 mg/kg**	**1**	Adopt

Advantame **INS 969: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**6 mg/kg**	**XS243**	**DRAFT, Step 2**

~~Alitame~~ **~~INS 956: Functional class: Sweetener~~**				
~~Food Category No.~~	**~~Food Category~~**	**~~Max Level~~**	**~~Notes~~**	**~~Recommendations~~**
~~01.1.4~~	~~Flavoured fluid milk drinks~~	~~100 mg/kg~~	~~161,~~ **~~Q243~~**	Provision was revoked in REP21/FA due to EWG GSFA. Not appropriate to re-add via alignment.

Amaranth **INS 123: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	50 mg/kg	52, **XS243**	Adopt

Annatto extracts, norbixin-based **INS 160b(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	10 mg/kg	52, 185, **A243**	Adopt

Aspartame **INS 951: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	600 mg/kg	478, 191, 405, **Q243**	Adopt

Aspartame-acesulfame salt **INS 962: Functional class: Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	350 mg/kg	113, 477, **Q243**	Adopt

~~**Benzoates**~~ ~~**INS 210-213: Functional class: Preservative**~~				
~~**Food Category No.**~~	~~**Food Category**~~	~~**Max Level**~~	~~**Notes**~~	~~**Recommendations**~~
~~**01.1.4**~~	~~**Flavoured fluid milk drinks**~~	~~**300 mg/kg**~~	~~**13, 220**~~	~~Adopt~~

Canthaxanthin **INS 161g: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	15 mg/kg	52, ~~170,~~ **XS243**	Adopt

beta-Carotene-rich extract from Dunaliella salina **INS 160a(iv): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	150 mg/kg	52, XS243	DRAFT, Step 2

Cyclamates **INS 952(i), (ii), (iv): Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	250 mg/kg	17, 477, **Q243**	Adopt

Cyclodextrin, -beta **INS 459: Functional class: Carrier, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**5 mg/kg**	**G243**	Adopt

Diacetyltartaric and fatty acid esters of glycerol **INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	5000 mg/kg	399, **L243**	Adopt

Ethyl maltol **INS 637: Functional class: Flavour enhancer**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.1.4	**Flavoured fluid milk drinks**	**GMP**	**R243**	Adopt

Grape skin extract **INS 163(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	100 mg/kg	52, 181~~, 402~~	Adopt

Lycopene, *Blakeslea trispora* **INS 160d(iii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**GMP**	**N243**	Adopt

Lycopene, synthetic **INS 160d(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**GMP**	**N243**	Adopt

Lycopene, tomato **INS 160d(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**GMP**	**N243**	Adopt

Maltol **INS 636: Functional class: Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**GMP**	**R243**	Adopt

Neotame **INS 961: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	20 mg/kg	478, **406, Q243**	Adopt

Nisin **INS 234: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	12.5 mg/kg	233, 403~~, **220**~~	Unchanged, but provided for information as

				initially proposed to add note 220

Paprika extract **INS 160c(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	10 mg/kg	39, **XS243**	DRAFT, 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**
01.1.4	Flavoured fluid milk drinks	1500 mg/kg	33, ~~364, 398~~ **B243**	Adopt

Polydimethylsiloxane **INS 900a: Functional class: Anticaking agent, Antifoaming agent, Emulsifier**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**50 mg/kg**	**S243**	Adopt

Polyglycerol esters of fatty acids **INS 475: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	2000 mg/kg	**L243**	Adopt

Polysorbates **INS 432-436: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	3000 mg/kg	**L243**	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**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	1300 mg/kg	~~XS243~~ **D243, G243**	Adopt

Quinoline yellow **INS 104: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**

01.1.4	Flavoured fluid milk drinks	10 mg/kg	52, **400**	Adopt

Sorbates **INS 200, 202, 203: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	1000 mg/kg	42, ~~220,~~ **403**	Adopt

Sorbitan esters of fatty acids **INS 491-495: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	5000 mg/kg	**L243**	Adopt

Stearoyl lactylates **INS 481(i), 482(i): Emulsifier, Flour treatment agent, Foaming agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	1000 mg/kg	**355, L243**	Adopt

Sucrose esters **INS 473, 473a, 474: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	5000 mg/kg	**L243**	Adopt

Tartrates **INS 334, 335(ii), 337: Acidity regulator, Antioxidant, Emulsifying salt, Flavour enhancer, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	**Flavoured fluid milk drinks**	**2000 mg/kg**	**45, M243**	Adopt

Tocopherols **INS 307a, b, c: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.1.4	Flavoured fluid milk drinks	200 mg/kg	15, **XS243**	Adopt

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.2

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**

01.2	Fermented and renneted milk products (plain)	1000 mg/kg	33, **B243, P243**	Adopt

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.2.1

~~**Caramel IV – sulfite ammonia caramel**~~ ~~**INS 150d: Functional class: Colour**~~				
~~**Food Category No.**~~	~~**Food Category**~~	~~**Max Level**~~	~~**Notes**~~	~~**Recommendations**~~
~~01.2.1~~	~~Fermented milks (plain)~~	~~150 mg/kg~~	~~12, **XS243**~~	~~Adopt~~

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.2.1.1

Acetic and fatty acid esters of glycerol **INS 472a: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Acetylated oxidised starch **INS 1451: Functional class: Emulsifier, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Alginic acid **INS 400: Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Ammonium alginate **INS 403: Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Calcium alginate **INS 404: Functional class: Antifoaming agent, Bulking agent, Carrier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Calcium carbonate **INS 170(i): Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Calcium chloride **INS 509: Functional class: Firming agent, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Carbon dioxide **INS 290: Functional class: Carbonating agent, Foaming agent, Packaging gas, Preservative, Propellant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**J243**	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**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Cross-linked carboxymethylcellulose (Cross-linked cellulose gum) **INS 468: Functional class: Stabilizer, Thickener**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**235**	Adopt

Cyclodextrin, -beta **INS 459: Functional class: Carrier, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**5 mg/kg**	**234, 235**	Adopt

Ethyl hydroxyethyl cellulose **INS 467: Functional class: Emulsifier, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Hydroxypropyl cellulose **INS 463: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Hydroxypropyl methyl cellulose **INS 464: Functional class: Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Karaya gum **INS 416: Functional class: Emulsifier, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	Fermented milks (plain), not heat treated after fermentation	200 mg/kg	234, 235, **D243**	Adopt

Lactic and fatty acid esters of glycerol **INS 472b: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Magnesium chloride **INS 511: Functional class: Colour retention agent, Firming agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Methyl cellulose **INS 461: Functional class: Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Methyl ethyl cellulose **INS 465: Functional class: Emulsifier, Foaming agent, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Potassium alginate **INS 402: Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Potassium chloride **INS 508: Functional class: Firming agent, Flavour enhancer, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not**	**GMP**	**234, 235**	Adopt

	heat treated after fermentation			

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**	**Recommendations**
01.2.1.1	Fermented milks (plain), not heat treated after fermentation	5000 mg/kg	234, 235, **D243**	Adopt

Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium **INS 470(i): Functional class: Anticaking agent, Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Salts of oleic acid with calcium, potassium and sodium **INS 470(ii): Functional class: Anticaking agent, Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Sodium carboxymethyl cellulose, enzymatically hydrolyzed (Cellulose gum, enzymatically hydrolyzed) **INS 469: Functional class: Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

~~**Tamarind seed polysaccharide**~~ ~~**INS 437: Functional class: Emulsifier, Gelling agent, Stabilizer, Thickener**~~				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
~~01.2.1.1~~	~~Fermented milks (plain), not heat treated after fermentation~~	~~GMP~~	~~234, 235~~	Entry already made, due to CCFA52

Tragacanth gum **INS 413: Functional class: Emulsifier, Stabilizer, Thickener**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

Trisodium citrate **INS 331(iii): Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.1	**Fermented milks (plain), not heat treated after fermentation**	**GMP**	**234, 235**	Adopt

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.2.1.2

Carbon dioxide **INS 290: Functional class: Carbonating agent, Foaming agent, Packaging gas, Preservative, Propellant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.2	Fermented milks (plain), heat treated after fermentation	GMP	59, **J243**	Adopt

Cyclodextrin, *-beta* **INS 459: Functional class: Carrier, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.2	**Fermented milks (plain), heat treated after fermentation**	**5 mg/kg**	**234, R243**	Adopt

Diacetyltartaric and fatty acid esters of glycerol **INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.2	Fermented milks (plain), heat treated after fermentation	5000 mg/kg	**XS243**	Adopt

Isomalt (Hydrogenated isomaltulose) **INS 953: Functional class: Anticaking agent, Bulking agent, Glazing agent, Stabilizer, Sweetener, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**

01.2.1.2	Fermented milks (plain), heat treated after fermentation	GMP		DRAFT, Step 7 Table 3 additive, if approved, add ref of CS 243

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**	**Recommendations**
01.2.1.2	Fermented milks (plain), heat treated after fermentation	5000 mg/kg	234, **D243**	Adopt

Sorbitol **INS 420(i): Functional class: Bulking agent, Humectant, Stabilizer, Sweetener, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.2	Fermented milks (plain), heat treated after fermentation	GMP		DRAFT, Step 7 Table 3 additive, if approved, add ref of CS 243

Sorbitol syrup **INS 420(ii): Functional class: Bulking agent, Humectant, Stabilizer, Sweetener, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.2	Fermented milks (plain), heat treated after fermentation	GMP		DRAFT, Step 7 Table 3 additive, if approved, add ref of CS 243

~~**Tamarind seed polysaccharide**~~ ~~**INS 437: Functional class: Emulsifier, Gelling agent, Stabilizer, Thickener**~~				
~~**Food Category No.**~~	~~**Food Category**~~	~~**Max Level**~~	~~**Notes**~~	**Recommendations**
~~01.2.1.2~~	~~Fermented milks (plain), heat treated after fermentation~~	~~GMP~~	~~234, **R243**~~	Entry already made, due to CCFA52 Add CS 243 to Table 3

Xylitol **INS 967: Functional class: Emulsifier, Humectant, Stabilizer, Sweetener, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.2.1.2	Fermented milks (plain), heat treated after fermentation	GMP		DRAFT, Step 7 Table 3 additive, if approved, add ref of CS 243

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.7

Acesulfame potassium

INS 950: Functional class: Flavour enhancer, Sweetener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	350 mg/kg	478, 188, **Q243**	Adopt

~~Adipates~~ Adipic acid **INS 355: Functional class: Acidity regulator**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**1500 mg/kg**	**1**	Adopt
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	6000 mg/kg	1**, E243**	DRAFT, Step 7

Advantame **INS 969: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	10 mg/kg	478, **XS243**	Adopt

~~Alitame~~ **~~INS 956: Functional class: Sweetener~~**				
~~Food Category No.~~	**~~Food Category~~**	**~~Max Level~~**	**~~Notes~~**	**~~Recommendations~~**
~~01.7~~	~~Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)~~	~~100 mg/kg~~	~~161, **145**~~	Provision was revoked in REP21/FA due to EWG GSFA. Not appropriate to re-add via alignment.

Amaranth **INS 123: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	300 mg/kg	**XS243**	DRAFT, Step 7

Ammonium salts of phosphatidic acid **INS 442: Functional class: Emulsifier**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	5000 mg/kg	231, **XS243**	Adopt

Annatto extracts, bixin-based **INS 160b(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	500 mg/kg	8, **A243**	DRAFT, Step 4

Annatto extracts, norbixin-based **INS 160b(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	10 mg/kg	185, **A243**	DRAFT, Step 4

Ascorbyl esters **INS 304, 305: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	500 mg/kg	2, 10, **XS243**	Adopt

Aspartame **INS 951: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	1000 mg/kg	478, 191, **Q243**	Adopt

Aspartame-acesulfame salt **INS 962: Functional class: Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	350 mg/kg	113, 477, **Q243**	Adopt

Azorubine (carmoisine) **INS 122: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**150 mg/kg**		Adopt (noting consistent with GSFA EWG)
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	150 mg/kg		DRAFT, Step 7 Being discussed at GSFA EWG, same ML

Benzoates **INS 210-213: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	300 mg/kg	13, **~~220~~ T243**	Adopt

Brilliant black (Black PN) **INS 151: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**150 mg/kg**		Adopt
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	150 mg/kg		DRAFT, Step 7 Being discussed at GSFA EWG, same ML

Brown HT **INS 155: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**150 mg/kg**		Adopt
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	150 mg/kg		DRAFT, Step 7

Canthaxanthin

INS 161g: Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	15 mg/kg	~~170,~~ **XS243**	Adopt

Caramel II – sulfite caramel **INS 150b: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	50000 mg/kg	**400**	DRAFT, Step 4

Carotenes, beta-, vegetable **INS 160a(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	1000 mg/kg	**401**	Adopt

Curcumin **INS 100(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**100 mg/kg**	**R243**	Adopt
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	150 mg/kg		DRAFT, Step 7

Cyclamates **INS 952(i), (ii), (iv): Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	250 mg/kg	17, 477, **Q243**	Adopt

Cyclodextrin, -*beta* **INS 459: Functional class: Carrier, Stabilizer, Thickener**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**5 mg/kg**	**G243**	Adopt

Diacetyltartaric and fatty acid esters of glycerol INS 472e: Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Stabilizer, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	10000 mg/kg	**L243**	Adopt

Ethyl maltol INS 637: Functional class: Flavour enhancer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	200 mg/kg	**D243**	Adopt

Grape skin extract INS 163(ii): Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	200 mg/kg	181**, 402**	Adopt

Hydroxybenzoates, para INS 214, 218: Functional class: Preservative				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	120 mg/kg	27, **XS243**	Adopt

Indigotine (Indigo carmine) INS 132: Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or	150 mg/kg	**402**	Adopt

	flavoured yoghurt)			

Lauric arginate ethyl ester **INS 243: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	200 mg/kg	~~170,~~ **XS243**	Adopt

Lutein from *Tagetes erecta* **INS 161b(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**150 mg/kg**		Adopt Noting REP21/FA para 155, has been added to Table 3, candidate for future T3 notes?
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	150 mg/kg		DRAFT, Step 4

Lycopene, *Blakeslea trispora* **INS 160d(iii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**GMP**	**N243**	Adopt

Lycopene, synthetic **INS 160d(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**GMP**	**N243**	Adopt

Lycopene, tomato **INS 160d(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or**	**GMP**	**N243**	Adopt

	flavoured yoghurt)			
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	5000 mg/kg	**N243**	DRAFT, Step 3

Maltol **INS 636: Functional class: Flavour enhancer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	200 mg/kg	**D243**	Adopt

Neotame **INS 961: Functional class: Flavour enhancer, Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	100 mg/kg	478, **Q243**	Adopt

Nisin **INS 234: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	12.5 mg/kg	233~~, 362~~, ~~**220**~~ **T243**	Adopt

Paprika extract **INS 160c(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	50 mg/kg	39, **XS243**	DRAFT, 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**
01.7	Dairy-based desserts (e.g.	1500 mg/kg	33, **B243**	Adopt

	pudding, fruit or flavoured yoghurt)			

Polydimethylsiloxane **INS 900a: Functional class: Anticaking agent, Antifoaming agent, Emulsifier**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**50 mg/kg**	**S243**	Adopt

Polyglycerol esters of fatty acids **INS 475: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	5000 mg/kg	354 ~~& XS243~~, **L243**	Adopt

Polysorbates **INS 432-436: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	3000 mg/kg	**L243**	Adopt

Propyl gallate **INS 310: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	90 mg/kg	2, 15, **XS243**	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**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	6000 mg/kg	**D243, G243**	Adopt

Quinoline yellow

INS 104: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**150 mg/kg**		Adopt
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	150 mg/kg		DRAFT, Step 7

Sorbates **INS 200, 202, 203: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	1000 mg/kg	42, **~~220~~ T243**	Adopt

Sorbitan esters of fatty acids **INS 491-495: Acidity regulator, Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	5000 mg/kg	~~362,~~ **S243**	Adopt

Stearoyl lactylates **INS 481(i), 482(i): Emulsifier, Flour treatment agent, Foaming agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	5000 mg/kg	355, **L243**	Adopt

Steviol glycosides **INS 960a, 960b, 960c, 960d: Sweetener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	330 mg/kg	26, **XS243**	Adopt

Sucrose esters **INS 473, 473a, 474: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	5000 mg/kg	**S243**	Adopt

Tartrates **INS 334, 335(ii), 337: Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	2000 mg/kg	45, ~~449~~, **U243**	Adopt

Tartrazine **INS 102: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**300 mg/kg**		Adopt
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	300 mg/kg		DRAFT, Step 7

Zeaxanthin, synthetic **INS 161h(i): Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.7	**Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)**	**150 mg/kg**		Adopt Noting REP21/FA para 155, has been added to Table 3, candidate for future T3 notes?
01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)	150 mg/kg		DRAFT, Step 4

NOTES

XS243 **Excluding products conforming to the Standard for Fermented Milks (CXS 243-2003).**

A243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003), at 20 mg/kg.**

B243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-243): 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 phosphate (INS 450(vi), calcium dihydrogen phosphate (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)) and bone phosphate (INS 542), as stabilizers and/or thickeners only, singly or in combination, at 1,000 mg/kg.

D243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003) at GMP.**

E243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003), at 1,500 mg/kg.**

G243 **For use in flavoured products conforming to the Standard for Fermented Milks (CXS 243-2003) only, as a stabilizer and/or thickener.**

J243 **For use in products conforming to the Standard for Fermented Milks (CXS 243-2003) only, as a carbonating agent in drinks based on fermented milks.**

L243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003) only, as an emulsifier in flavoured fermented milks and flavoured drinks based on fermented milks, heat treated or not after fermentation.**

M243 **For use in products conforming to the Standard for fermented Milks (CXS 243-2003) only, as an acidity regulator in flavoured fermented milks and flavoured drinks based on fermented milks, not heat treated after fermentation.~~ and plain and flavoured milks and drinks based on fermented milks, heat treated after fermentation~~.**

N243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003): lycopene, synthetic (INS 160d(i)), lycopene, tomato (INS 160d(ii)) and lycopene, *Blakeslea trispora* (INS 160d(iii)), singly or in combination at 30 mg/kg, expressed as pure lycopene.**

P243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003): for use only in reconstituted and recombined fermented milks (plain), not heat-treated after fermentation.**

Q243 **Except for products conforming to the Standard for Fermented Milks (CXS 243-2003): limited to milk- and milk derivative-based products energy reduced or with no added sugar.**

R243 **For use in products conforming to the Standard for Fermented Milks (CXS243-2003) only.**

S243 **For use in products conforming to the Standard for Fermented Milks (CXS 243-2003) only, as an emulsifier in flavoured fermented milks and flavoured drinks based on fermented milks, heat treated or not after fermentation.**

T243: **Except for products conforming to the Standard for Fermented Milks (CXS243-2003), only for use in flavoured products heat treated after fermentation.**

U243 **Except for use in products conforming to the Standard for fermented Milks (CXS 243-2003) as an acidity regulator, only in flavoured milks and drinks based on fermented milks, heat treated after fermentation.**

355 **Except f**or use at 10,000 mg/kg in flavoured products conforming to the Standard for Fermented Milks (~~CODEX STAN~~ **CXS** 243-2003) ~~only~~.

235 For use **only** in reconstituted and recombined products **conforming to the Standard for Fermented Milks (CXS 243-2003)**. ~~only~~

PROPOSED AMENDMENTS TO FOOD CATEGORY 02.2.2

Amendments related to the *Standard for Dairy Fat Spreads* (CXS 253-2006)

Annatto extracts, bixin-based **INS 160b(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	100 mg/kg	8, **A253**	

Benzoates **INS 210-213: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	1000 mg/kg	13, 529, **XS253**	Adopt

Butylated hydroxyanisole **INS 320: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	200 mg/kg	15, ~~130,~~ **B253, B256**	Adopt

Butylated hydroxytoluene **INS 321: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	200 mg/kg	15, ~~130,~~ **B253, B256**	Adopt

Canthaxanthin **INS 161g: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads	15 mg/kg	~~214,215,~~ **XS256**, **XS253**	Adopt

	and blended spreads			

Caramel II, sulfite caramel **INS 150b: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	500 mg/kg	528, **XS253**	Adopt

Caramel III, ammonia caramel **INS 150c: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	500 mg/kg	**XS253**	Adopt

Caramel IV, sulfite ammonia caramel **INS 150d: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	500 mg/kg	~~214,~~ **XS253**	Adopt

Carmines **INS 120: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	500 mg/kg	161, 178, **XS253**	Adopt

Carotenes, *beta*-, vegetable **INS 160a(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	1000 mg/kg	**XS253**	Adopt

Carotenoids **INS 160a(i) Carotenes, beta-, synthetic Functional Class: Colour** **INS 160a(iii): Carotenes, beta-, Blakeslea trispora Functional Class: Colour** **INS 160e Carotenal, beta-apo-8' Functional Class: Colour** **INS 160f Carotenoic acid, ethyl ester, beta- Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**

02.2.2	Fat spreads, dairy fat spreads and blended spreads	35 mg/kg		Already aligned, with both CXS 253 & CXS 256, for information only

Beta-**Carotene-rich extract from Dunaliella Salina** **INS 160a(iv): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	35 mg/kg	XS253, XS256	DRAFT, Step 2

Curcumin **INS 100(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10 mg/kg	528, **D253**	Adopt

Diacetyltartaric and fatty acid esters of glycerol **INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10000 mg/kg	**359, H253**	Adopt

Ethylene diamine tetra acetates **INS 385, 386: Functional class: Antioxidant, Colour retention agent, Preservative, Sequestrant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	100 mg/kg	21, **XS253**	Adopt

Hydroxybenzoates, Para- **INS 214, 218: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	300 mg/kg	27, XS256, **XS253**	Adopt

Isopropyl citrates **INS 384: Functional class: Antioxidant, Preservative, Sequestrant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads	100 mg/kg	**XS253**	Adopt

	and blended spreads			

Lauric arginate ethyl ester **INS 243: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	200 mg/kg	~~214,~~ ~~215,~~ **XS256**, **XS253**	Adopt

Lycopene, tomato **INS 160d(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10000 mg/kg	**XS253**	DRAFT, Step 3

Paprika extract **INS 160c(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	40 mg/kg	39**, XS253**	DRAFT, 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**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	2200 mg/kg	33, 530, **E253, F253**	Adopt

Polydimethylsiloxane **INS 900a: Functional class: Anticaking agent, Antifoaming agent, Emulsifier**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10 mg/kg	152**, I253**	Adopt

Polyglycerol esters of fatty acids **INS 475: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**

02.2.2	Fat spreads, dairy fat spreads and blended spreads	5000 mg/kg	359**, H253**	Adopt

Polysorbates **INS 432-436: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10000 mg/kg	360, ~~364~~**, H253**	Adopt

Propyl gallate **INS 310: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	200 mg/kg	15, ~~130~~**, B253, B256**	Adopt

Propylene glycol esters of fatty acids **INS 477: Functional class: Emulsifier**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	20000 mg/kg	**XS253**	Adopt

Riboflavins **INS 101(i), (ii), (iii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	300 mg/kg	**XS253**	Adopt

Sorbates **INS 200, 202, 203: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	2000 mg/kg	42, 529, **G253**	Adopt

Sorbitan esters of fatty acids **INS 491 -- 495: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads	10000 mg/kg	359**, H253**	Adopt

	and blended spreads			

Stearoyl lactylates **INS 481(i), 482(i): Functional class: Emulsifier, Foaming agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10000 mg/kg	**359, H253**	Adopt

Stearyl citrate **INS 484: Functional class: Antioxidant, Emulsifier, Sequestrant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	100 mg/kg	15, **XS253**	Adopt

Sucrose esters **INS 473, 473a, 474: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10000 mg/kg	360**, H253**	Adopt

Tertiary butylhydroquinone **INS 319: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	200 mg/kg	15, ~~130,~~ **XS253, B256**	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**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	5000 mg/kg	531, **XS253**	Adopt

Thiodipropionates **INS 388, 389: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	200 mg/kg	46, **XS253**	Adopt

Zeaxanthin, synthetic INS 161h(i): Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
02.2.2	Fat spreads, dairy fat spreads and blended spreads	100 mg/kg	XS253	DRAFT, Step 4

NOTES

XS253 **Excluding products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006).**

A253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006) at 20 mg/kg.**

B253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), only intended for cooking purposes: propyl gallate (INS 310) at 200 mg/kg, butylated hydroxyanisole (INS 320) at 200 mg/kg or butylated hydroxytoluene (INS 321) at 75 mg/kg, singly or in combination at 200 mg/kg.**

D253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006) at 5 mg/kg.**

E253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006): 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 (INS343(iii)), Disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium phosphate (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 stabilizers and/or thickeners only, singly or in combination for dairy fat spreads with less than 70% milk fat content only, at 880 mg/kg.**

F253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006): 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 (INS343(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 phosphate (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)), for use as acidity regulators only, singly or in combination at 880 mg/kg.

G253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), at 2000 mg/kg for fat contents <59%, and at 1000 mg/kg for fat contents ≥59%.**

H253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), as an emulsifier only.**

I253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), only in dairy fat spreads as an antifoaming agent.**

B256 **For use in products conforming to the Standard for Fat Spreads and Blended Spreads (CXS 256-2007): propyl gallate (INS 310), tertiary butylhydroquinone (INS 319), butylated hydroxyanisole (INS 320) and butylated hydroxytoluene (INS 321), singly or in combination at 200 mg/kg.**

for information:

529 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.

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.6.1

Amendments related to the *Standard for Mozzarella* (CXS 262-2006)

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	**XS262**	DRAFT, 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, 485, XS273**,** **XS262**	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~~	~~191, 201, 478, XS221, XS262, XS273, XS275~~	Entry already made, due to CCFA52

Azorubine (Carmoisine) **INS 122: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened cheese	GMP	3**, XS262**	DRAFT, 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**, XS262**	DRAFT, 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**, XS262**	DRAFT, 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	488, **D262**, 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, **XS262**	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	**XS262**	DRAFT, 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, **XS262**	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, **XS262**	Adopt

Carotenes, beta-, vegetable **INS 160a(ii): Functional class: Colour**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.6.1	Unripened cheese	600 mg/kg	**XS262**	Adopt

Beta-**Carotene-rich extract from Dunaliella Salina** **INS 160a(iv): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened cheese	100 mg/kg	XS221, XS262, XS273, XS275, XS283	DRAFT, Step 2

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	489, 490, XS273, **XS262**	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, 484, XS273, XS275, **A262**	Adopt Note that GSFA EWG also proposing different ML and notes, so coordination needed

Curcumin **INS 100(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened cheese	500 mg/kg	3**, XS262**	DRAFT, Step 4

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, **XS262**	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, **XS262**	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	**XS262**	DRAFT, 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	488, **D262**, XS273, XS275	Adopt

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, 486, XS273, XS275, **B262**	Adopt

Nisin **INS 234: Functional class: Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened cheese	12.5 mg/kg	233, **B262**	Adopt

Nitrates INS 251, 252: Functional class: Preservative				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened cheese	40 mg/kg	30**, XS262**	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**, XS262**	DRAFT, 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**
01.6.1	Unripened cheese	4400 mg/kg	33, 487, 495, 496, **C262, E262**	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, **XS262**	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, **XS262**	Adopt

Quinoline yellow **INS 104: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened cheese	GMP	3**, XS262**	DRAFT, 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	491, XS273, XS275, **XS262**	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, 488, **D262**, 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, 492, 494, **B262**	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, **XS262**	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, 488, **D262**, XS273, XS275	Adopt

Tartrates **INS 334, 335(ii), 337: Functional class: Acidity regulator, Antioxidant, Emulsifying salt, Flavour enhancer, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	Unripened cheese	1500 mg/kg	45, 351, **XS262**	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**, XS262**	DRAFT, 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, **XS262**	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	**XS262**	DRAFT, Step 4

NOTES

XS262 **Excluding products conforming to the Standard for Mozzarella (CXS 262-2006).**

A262 **Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006) at 5 mg/kg, in cheese mass only, to obtain the colour characteristics of the product.**

B262 **Includes use in products conforming to the Standard for Mozzarella (CXS 262-2006) except for the surface treatment of high moisture products packaged in liquid, noting the functional class table in CXS 262-2006.**

C262 **Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006): 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 phosphate (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 stabilizers at 4400 mg/kg as phosphorus, singly or in combination, in cheese mass only.

D262 **Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006): calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and silicon dioxide, amorphous (INS 551), for the surface treatment of sliced, cut, shredded or grated low moisture Mozzarella or for the surface treatment of shredded and/or diced high moisture Mozzarella, as anticaking agents only at 10,000 mg/kg, singly or in combination, as silicon dioxide.**

E262 **Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006): 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 (INS343(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 at 880 mg/kg as phosphorus, singly or in combination, in cheese mass only.**

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.3.1

Amendments related to the *Standard for Evaporated Milks* (CXS 281-1971)

and

Amendments related to the *Standard for Sweetened Condensed Milks* (CXS 282-1971)

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**
01.3.1	Condensed milk (plain)	880 mg/kg	33, **A281282**	Adopt

Note

A281282:Except for use in products conforming to the Standards for Evaporated Milks (CXS 281-1971) and Sweetened Condensed Milks (CXS 282-1971): 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 (INS343(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 1000 mg/kg as phosphorous, singly or in combination.

PROPOSED AMENDMENTS TO FOOD CATEGORIES 01.4, 01.4.1, 01.4.2, 01.4.3

Amendments related to the *Standard for Cream and Prepared Creams* (CXS 288-1976)

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.4

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**
01.4	Cream (plain) and the like	2200 mg/kg	33**, D288**	Adopt

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.4.1

Beet Red **INS 162: Functional Class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	GMP	**XS288**	DRAFT, Step 7

Caramel I – plain caramel **INS 150a: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	GMP	**XS288**	DRAFT, Step 7

Chlorophylls **INS 140: Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	GMP	**XS288**	DRAFT, Step 7

Erythritol **INS 968: Functional class: Sweetener, Humectant, Flavour enhancer**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.4.1	Pasteurised cream (plain)	600000 mg/kg	XS288	DRAFT, Step 4

Lactitol INS 966: Functional class: Emulsifier, Humectant, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	30000 mg/kg	XS288	DRAFT, Step 4

Maltitol INS 965(i): Functional class: Emulsifier, Humectant, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	300000 mg/kg	XS288	DRAFT, Step 4

Maltitol syrup INS 965(ii): Functional class: Emulsifier, Humectant, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	300000 mg/kg	XS288	DRAFT, Step 4

Sorbitol AINS 420(i): Functional class: Bulking agent, Humectant, Sequestrant, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	200000 mg/kg	XS288	DRAFT, Step 4

Sorbitol syrup INS 420(ii): Functional class: Bulking agent, Humectant, Sequestrant, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	200000 mg/kg	XS288	DRAFT, Step 4

~~Tamarind seed polysaccharide~~ ~~INS 437: Functional class: Emulsifier, Gelling agent, Stabilizer, Thickener~~				
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Recommendations~~
~~01.4.1~~	~~Pasteurised cream (plain)~~	~~GMP~~	~~236~~	Entry already made, due to CCFA52

Titanium dioxide INS 171: Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	GMP	XS288	DRAFT, Step 7

Xylitol INS 967: Functional class: Emulsifier, Humectant, Stabilizer, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.1	Pasteurised cream (plain)	30000 mg/kg	**XS288**	DRAFT, Step 4

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.4.2

Beet Red INS 162: Functional Class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	GMP	**XS288**	DRAFT, Step 7

Caramel I – plain caramel INS 150a: Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	GMP	**XS288**	DRAFT, Step 7

Chlorophylls INS 140: Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	GMP	**XS288**	DRAFT, Step 7

Diacetyltartaric and fatty acid esters of glycerol **INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	6000 mg/kg	**C288**	Adopt

Erythritol

INS 968: Functional class: Sweetener, Humectant, Flavour enhancer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	600000 mg/kg	**XS288**	DRAFT, Step 4

Lactitol INS 966: Functional class: Emulsifier, Humectant, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	30000 mg/kg	**XS288**	DRAFT, Step 4

Lycopene, tomato INS 160d(i): Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	5000 mg/kg	**XS288**	DRAFT, Step 3

Maltitol INS 965(i): Functional class: Emulsifier, Humectant, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	300000 mg/kg	**XS288**	DRAFT, Step 4

Maltitol syrup INS 965(ii): Functional class: Emulsifier, Humectant, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	300000 mg/kg	**XS288**	DRAFT, Step 4

Nitrous oxide **INS 942: Functional class: Antioxidant, Foaming agent, Packaging gas, Propellant**

Food Category No.	Food Category	Max Level	Notes	Recommendations
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	GMP	~~59 &~~ 278	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**	**Recommendations**
01.4.2	**Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)**	**5000 mg/kg**	**E288**	Adopt

Sorbitan esters of fatty acids **INS 491-495: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	**Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)**	**5000 mg/kg**	**F288**	Adopt

Sorbitol **INS 420(i): Functional class: Bulking agent, Humectant, Sequestrant, Sweetener, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	200000 mg/kg	**XS288**	DRAFT, Step 4

Sorbitol syrup **INS 420(ii): Functional class: Bulking agent, Humectant, Sequestrant, Sweetener, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	200000 mg/kg	**XS288**	DRAFT, Step 4

Sucrose esters

INS 473, 473a, 474: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	5000 mg/kg	**H288**	Adopt

~~Tamarind seed 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 creams, and reduced fat creams (plain)**~~	~~**GMP**~~		Entry already made, due to CCFA52

Titanium dioxide INS 171: Functional class: Colour				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	GMP	**XS288**	DRAFT, Step 7

Xylitol INS 967: Functional class: Emulsifier, Humectant, Stabilizer, Sweetener, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	30000 mg/kg	**XS288**	DRAFT, Step 4

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.4.3

Diacetyltartaric and fatty acid esters of glycerol INS 472e: Functional class: Emulsifier, Sequestrant, Stabilizer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.3	Clotted cream (plain)	5000 mg/kg	**G288**	Adopt

Nisin

INS 234: Functional class: Preservative				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.3	Clotted cream (plain)	10 mg/kg	**XS288**	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**	**Recommendations**
01.4.3	Clotted cream (plain)	5000 mg/kg	**G288**	Adopt

Sorbitan esters of fatty acids **INS 491-495: Functional class: Emulsifier, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.3	**Clotted cream (plain)**	**5000 mg/kg**	**F288**	Adopt

Sucrose esters **INS 473, 473a, 474: Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.4.3	**Clotted cream (plain)**	**5000 mg/kg**	**F288**	Adopt

NOTES

XS288 **Excluding products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976).**

B288 **For use in reconstituted cream, recombined cream, prepackaged liquid cream, whipping cream, cream packed under pressure and whipped cream products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as an emulsifier, stabilizer and thickener only.**

C288: **Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as a stabilizer and thickener, at 5000 mg/kg.**

D288 **Except for use in products conforming to the Standard for Creams and Prepared Creams (CXS 288-1976): 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 (INS343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium phosphate (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)) and bone phosphate (INS 542), singly or in combination as stabilizers and thickeners only, at 1,100 mg/kg.

E288 **For use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only, as a stabilizer and thickener.**

F288 **For use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only, as an emulsifier.**

G288 **Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as a stabilizer and thickener.**

H288 **Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as an emulsifier.**

236 Excluding **reconstituted cream, recombined cream, prepackaged liquid cream** products conforming to the Standard for Cream and Prepared Creams ~~(reconstituted cream, recombined cream, prepackaged liquid cream)~~ (~~CODEX STAN~~ **CXS** 288-1976).

PROPOSED AMENDMENTS TO FOOD CATEGORIES 01.8 and 01.8.2

Amendments related to the *Standard for Dairy Permeate Powders* (CXS 331-2017)

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.8

Tocopherols **INS 307a, b, c: Functional class: Antioxidant**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8	Whey and whey products, excluding whey cheeses	200 mg/kg	**XS331**	Adopt

PROPOSED AMENDMENTS TO FOOD CATEGORY 01.8.2

Annatto extracts, bixin-based **INS 160b(i): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	20 mg/kg	8**, XS331**	DRAFT, Step 4

Annatto extracts, norbixin-based **INS 160b(ii): Functional class: Colour**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	20 mg/kg	185**, XS331**	DRAFT, Step 4

Benzoyl peroxide **INS 928: Functional class: Bleaching agent, Flour treatment agent, Preservative**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	100 mg/kg	147, **XS331**	Adopt

Calcium carbonate **INS 170(i): Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Calcium chloride **INS 509: Functional class: Firming agent, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Calcium hydroxide **INS 526: Functional class: Acidity regulator, Firming agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Calcium silicate **INS 552: Functional class: Anticaking agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Hydroxypropyl distarch phosphate **INS 1442: Functional class: Anticaking agent, Emulsifier, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Lecithin

INS 322(i): Functional class: Antioxidant, Emulsifier				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Magnesium carbonate INS 504(i): Functional class: Acidity regulator, Anticaking agent, Colour retention agent				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Magnesium oxide INS 530: Functional class: Acidity regulator, Anticaking agent				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Magnesium silicate, synthetic INS 553(i): Functional class: Anticaking agent				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Microcrystalline cellulose (Cellulose gel) INS 460(i): Functional class: Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	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**
01.8.2	Dried whey and whey products, excluding whey cheeses	4400 mg/kg	33, **XS331**	Adopt

Potassium carbonate **INS 501(i): Functional class: Acidity regulator, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Potassium chloride **INS 508: Functional class: Firming agent, Flavour enhancer, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Potassium dihydrogen citrate **INS 332(i): Functional class: Acidity Regulator, Emulsifying salt, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Potassium hydrogen carbonate **INS 501(ii): Functional class: Acidity regulator, Raising agent, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Potassium hydroxide **INS 525: Functional class: Acidity regulator**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Powdered cellulose **INS 460(ii): Functional class: Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Silicon dioxide, amorphous

INS 551: Functional class: Anticaking agent, Antifoaming agent, Carrier,				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Sodium aluminium silicate INS 554: Functional class: Anticaking agent				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	1140 mg/kg	6, **XS331**	Adopt

Sodium carbonate INS 500(i): Functional class: Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Sodium dihydrogen citrate INS 331(i): Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Sodium hydrogen carbonate INS 500(ii): Functional class: Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Sodium hydroxide INS 524: Functional class: Acidity regulator				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Sodium sesquicarbonate **INS 500(iii): Functional class: Acidity regulator, Anticaking agent, Raising agent**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Talc **INS 553(iii): Functional class: Anticaking agent, Glazing agent, Thickener**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	**XS331**	Adopt

Tripotassium citrate **INS 332(ii): Functional class: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

Trisodium citrate **INS 331(iii): Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer**				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.8.2	Dried whey and whey products, excluding whey cheeses	GMP	**XS331**	Adopt

NOTE

XS331 Excluding products conforming to the Standard for Dairy Permeate Powders (CXS 331-2017).

B PROPOSED AMENDMENTS TO TABLE 2

FOOD CATEGORY 01.5.1

Standard for Milk Products and Cream Powder (CXS 207-1999)
and
Standard for Edible Casein Products (CXS 290-1995)

Food category 01.5.1: Milk powder and cream powder (plain)				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Ascorbic acid, L-	**300**	**GMP**	**D207, XS290**	Adopt
Ascorbyl esters	304, 305	500 mg/kg	10, **D207, XS290**	Adopt

Butylated hydroxyanisole	320	100 mg/kg	~~15,~~ 196, **E207, XS290**	Adopt
Butylated hydroxytoluene	321	200 mg/kg	15, 196, **XS207, XS290**	Adopt
Calcium carbonate	**170(i)**	**GMP**	**C207, D290, E290**	Adopt
Calcium silicate	**552**	**GMP**	**C207, D290**	Adopt
Diacetyltartaric and fatty esters of glycerol	472e	10000 mg/kg	**XS207, XS290**	Adopt
Hydroxypropyldistarch phosphate	**1442**	**GMP**	**D290, XS207**	Adopt
Magnesium carbonate	**504(i)**	**GMP**	**C207, D290, E290**	Adopt
Magnesium hydroxide carbonate	**504(ii)**	**GMP**	**E290**	Adopt
Magnesium oxide	**530**	**GMP**	**C207, D290**	Adopt
Magnesium silicate, synthetic	**553(i)**	**GMP**	**C207, D290**	Adopt
Microcrystalline cellulose (Cellulose gel)	**460(i)**	**GMP**	**D290, XS207**	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, **B207 B290, C207, A290, C290**	Adopt
Polydimethylsiloxane	900a	10 mg/kg	**XS207, XS290**	Adopt
Powdered cellulose	**460(ii)**	**GMP**	**D290, XS207**	Adopt
Propyl gallate	310	200 mg/kg	15, 75, 196, **XS207, XS290**	Adopt
Silicon dioxide, amorphous	**551**	**GMP**	**C207, D290**	Adopt
Sodium ascorbate	**301**	**GMP**	**317, D207, XS290**	Adopt
Sucrose esters	473, 473a, 474	10000mg/kg	536, XS207, XS290	Already adopted in 2021, FYI
Talc	**553(iii)**	**GMP**	**C207, D290**	Adopt

NOTES

XS207 Excluding products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999).

XS290 Excluding products conforming to the Standard for Edible Casein Products (CXS 290-1995).

B207: For use in products conforming to the Standards for Milk Powders and Cream Powder (CXS 207-1999) and Edible Casein Products (CXS 290-1995): 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 (INS343(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, singly or in combination at 4,400 mg/kg.

C207 **Except for use in products conforming to the Standard for Milk Products and Cream Powder (CXS 207-1999): bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)), trimagnesium phosphate (INS 343(iii)) and bone phosphate (INS 542) as anticaking agents only, singly or in combination at 10,000 mg/kg.**

D207 **Except for use in products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999): ascorbic acid, L- (INS 300), ascorbyl palmitate (INS 304), ascorbyl stearate (INS 305) and sodium ascorbate (INS 301), as antioxidants only, singly or in combination at 500 mg/kg, expressed as ascorbic acid.**

E207 **On the fat or oil basis except for use in products conforming to the Standard for Milk Powders and Cream Powder (CXS 207-1999).**

A290 **Except for use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): 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, singly or in combination at 2,200 mg/kg.**

B290: **For use in products conforming to the Edible Casein Products (CXS 290-1995): 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 (INS343(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)), as acidity regulators only, singly or in combination at 4,400 mg/kg.**

C290 **For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): bone phosphate (INS 542), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)) and trimagnesium phosphate (INS 343(iii)), as anticaking agents only, singly or in combination at 4,400 mg/kg,**

D290 **Except for use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium silicate (INS 552), hydroxypropyldistarch phosphate (INS 1442), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), microcrystalline cellulose**

(cellulose gel) (INS 460(i)), powdered cellulose (INS 460(ii)), silicon dioxide, amorphous (INS 551),), talc (INS 553(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)) magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)) and trimagnesium phosphate (INS 343(iii)), as anticaking agents only, singly or in combination at 4,400 mg/kg, noting the total amount of phosphorus shall not exceed 4,400 mg/kg.

E290: For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995) as an acidity regulator.

Standard for Fermented Milks (CXS 243-2003)

FOOD CATEGORY 01.1.4

Food category 01.1.4: Flavoured fluid milk drinks				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Acesulfame potassium	**950**	350 mg/kg	478,188, **Q243**	Adopt
~~Adipates~~ Adipic acid	**355**	**1500 mg/kg**	**1**	Adopt
Advantame	**969**	**6 mg/kg**	**XS243**	**DRAFT, Step 2**
~~Alitame~~	~~956~~	~~100 mg/kg~~	~~161~~	Provision was revoked in REP21/FA due to EWG GSFA. Not appropriate to re-add via alignment.
Amaranth	123	50 mg/kg	52, **XS243**	Adopt
Annatto extracts – norbixin-based	160b(ii)	10 mg/kg	52, 185, **A243**	Adopt
Aspartame	951	600 mg/kg	478,191,405, **Q243**	Adopt
Aspartame-acesulfame salt	962	350 mg/kg	113, 477, **Q243**	Adopt
~~Benzoates~~	**~~210-213~~**	**~~300 mg/kg~~**	**~~13, 220~~**	~~Adopt~~
Canthaxanthin	161g	15 mg/kg	52, ~~170,~~ **XS243**	Adopt
beta-Carotene-rich extract from Dunaliella salina	160a(iv)	150 mg/kg	52, XS243	DRAFT, Step 2
Cyclamates	952(i),(ii),(iv)	250 mg/kg	17, 477**, Q243**	Adopt
Cyclodextrin, beta	**459**	**5 mg/kg**	**G243**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	5000 mg/kg	399, **L243**	Adopt
Ethyl maltol	**637**	**GMP**	**R243**	Adopt
Grape skin extract	163(ii)	100 mg/kg	52, 181 ~~&~~ ~~402~~	Adopt
Lycopene, *Blakeslea trispora*	**160d(iii)**	**GMP**	**N243**	Adopt
Lycopene, synthetic	**160d(i)**	**GMP**	**N243**	Adopt
Lycopene, tomato	**160d(ii)**	**GMP**	**N243**	Adopt
Maltol	**636**	**GMP**	**R243**	Adopt
Neotame	961	20 mg/kg	478, **406, Q243**	Adopt
Nisin	234	12.5 mg/kg	233, 403 **~~220~~**	Unchanged, but provided for information as initially proposed to add note 220
Paprika extract	**160c(ii)**	**10 mg/kg**	**39, XS243**	DRAFT, Step 2
Phosphates	338, 339(i)-(iii), 340(i)-(iii), 341(i)-(iii),	1500 mg/kg	33,~~ 364,~~ ~~398~~ **B243**	Adopt

	342(i)-(ii), 343(i)-(iii), 450(i)-(iii), (v)-(vii), (ix), 451(i),(ii), 452(i)-(v), 542			
Polydimethylsiloxane	**900a**	**50 mg/kg**	**S243**	Adopt
Polyglycerol esters of fatty acids	475	2000 mg/kg	**L243**	Adopt
Polysorbates	432-436	3000 mg/kg	**L243**	Adopt
Propylene glycol alginate	405	1300 mg/kg	~~XS243~~**D243, G243**	Adopt
Quinoline yellow	104	10 mg/kg	52, **400**	Adopt
Sorbates	200, 202, 203	1000 mg/kg	42, ~~220,~~ **403**	Adopt
Sorbitan esters of fatty acids	491-495	5000 mg/kg	**L243**	Adopt
Stearoyl lactylates	481(i), 482(i)	1000 mg/kg	**355, L243**	Adopt
Sucrose esters	473, 473a, 474	5000 mg/kg	**L243**	Adopt
Tartrates	**334, 335(ii), 337**	**2000 mg/kg**	**45, M243**	Adopt
Tocopherols	307a, b, c	200 mg/kg	15, **XS243**	Adopt

FOOD CATEGORY 01.2

Food category 01.2: Fermented and renneted milk products				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
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	1000 mg/kg	33**, B243, P243**	Adopt

FOOD CATEGORY 01.2.1

Food category 01.2.1: Fermented milks (plain)				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
~~Caramel IV – sulfite ammonia caramel~~	~~150d~~	~~150 mg/kg~~	~~12~~**, XS243**	~~Adopt~~

FOOD CATEGORY 01.2.1.1

Food category 01.2.1.1: Fermented milks (Plain), not heat treated after fermentation				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Acetic and fatty acid esters of glycerol	**472a**	**GMP**	**234, 235**	Adopt
Acetylated oxidised starch	**1451**	**GMP**	**234, 235**	Adopt
Alginic acid	**400**	**GMP**	**234, 235**	Adopt
Ammonium alginate	**403**	**GMP**	**234, 235**	Adopt
Calcium alginate	**404**	**GMP**	**234, 235**	Adopt
Calcium carbonate	**170(i)**	**GMP**	**234, 235**	Adopt
Calcium chloride	**509**	**GMP**	**234, 235**	Adopt

Carbon dioxide	**290**	**GMP**	**J243**	Adopt
Citric and fatty acid esters of glycerol	**472c**	**GMP**	**234, 235**	Adopt
Cross-linked carboxymethylcellulose (Cross-linked cellulose gum)	**468**	**GMP**	**235**	Adopt
Cyclodextrin, -*beta*	**459**	**5 mg/kg**	**234, 235**	Adopt
Ethyl hydroxyethyl cellulose	**467**	**GMP**	**234, 235**	Adopt
Hydroxypropyl cellulose	**463**	**GMP**	**234, 235**	Adopt
Hydroxypropyl methyl cellulose	**464**	**GMP**	**234, 235**	Adopt
Karaya gum	416	200 mg/kg	234, 235, **D243**	Adopt
Lactic and fatty acid esters of glycerol	**472b**	**GMP**	**234, 235**	Adopt
Magnesium chloride	**511**	**GMP**	**234, 235**	Adopt
Methyl cellulose	**461**	**GMP**	**234, 235**	Adopt
Methyl ethyl cellulose	**465**	**GMP**	**234, 235**	Adopt
Potassium alginate	**402**	**GMP**	**234, 235**	Adopt
Potassium chloride	**508**	**GMP**	**234, 235**	Adopt
Propylene glycol alginate	405	5000 mg/kg	234, 235, **D243**	Adopt
Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium	**470(i)**	**GMP**	**234, 235**	Adopt
Salts of oleic acid with calcium, potassium and sodium	**470(ii)**	**GMP**	**234, 235**	Adopt
Sodium carboxymethyl cellulose, enzymatically hydrolyzed (Cellulose gum, enzymatically hydrolyzed)	**469**	**GMP**	**234, 235**	Adopt
~~Tamarind seed polysaccharide~~	~~437~~	~~GMP~~	~~234, 235~~	Entry already made, due to CCFA52
Tragacanth gum	**413**	**GMP**	**234, 235**	Adopt
Trisodium citrate	**331(iii)**	**GMP**	**234, 235**	Adopt

FOOD CATEGORY 01.2.1.2

Food category 01.2.1.2: Fermented milks (Plain), heat treated after fermentation				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Carbon dioxide	290	GMP	59, **J243,**	Adopt
Cyclodextrin, -*beta*	**459**	**5 mg/kg**	**234, R243**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	5000 mg/kg	**XS243**	Adopt
Isomalt (Hydrogenated isomaltulose)	**953**	**GMP**		DRAFT, Step 7 Table 3 additive, if approved add ref of CS 243
Propylene glycol alginate	405	5000 mg/kg	234, **D243**	Adopt
Sorbitol	420(i)	GMP		DRAFT, Step 7,

				Table 3 additive, if approved add ref of CS 243
Sorbitol syrup	420(ii)	GMP		DRAFT, Step 7 Table 3 additive, if approved add ref of CS 243
~~**Tamarind seed polysaccharide**~~	~~437~~	~~GMP~~	~~234,~~ **~~R243~~**	Entry already made, due to CCFA52 Add to Table 3, CS 243
Xylitol	967	GMP		DRAFT, Step 7 Table 3 additive, if approved add ref of CS 243

FOOD CATEGORY 01.7

Food category 01.7: Dairy based dairy desserts (e.g. pudding, fruit or flavoured yogurt)				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Acesulfame potassium	950	350 mg/kg	478, 188, **Q243**	
~~**Adipates**~~ **Adipic acid**	**355**	**1500 mg/kg**	**1**	Adopt
~~**Adipates**~~ **Adipic acid**	355	6000 mg/kg	1**,E243**	DRAFT, Step 7
Advantame	969	10 mg/kg	**XS243**	DRAFT, Step 2
~~Alitame~~	~~956~~	~~100 mg/kg~~	~~161,~~ **~~145~~**	Provision was revoked in REP21/FA due to EWG GSFA. Not appropriate to re-add via alignment.
Amaranth	123	300 mg	**XS243**	DRAFT, Step 7
Ammonium salts of phosphatidic acid	442	5000 mg/kg	231, **XS243**	Adopt
Annatto extracts – bixin-based	160b(i)	500 mg/kg	8, **A243**	DRAFT, Step 4
Annatto extracts – norbixin-based	160b(ii)	10 mg/kg	185, **A243**	DRAFT, Step 4
Ascorbyl esters	304, 305	500 mg/kg	2, 10, **XS243**	Adopt
Aspartame	951	1000 mg/kg	478, 191, **Q243**	Adopt
Aspartame-acesulfame salt	962	350 mg/kg	113, 477, **Q243**	Adopt
Azorubine (carmoisine)	**122**	**150 mg/kg**		Adopt (noting consistent with GSFA EWG)
Azorubine (carmoisine)	122	150 mg/kg		DRAFT, Step 7 Being discussed at GSFA EWG, same ML
Benzoates	210-213	300 mg/kg	13, ~~**220**~~ **T243**	Adopt
Brilliant black (Black PN)	**151**	**150 mg/kg**		Adopt
Brilliant black	151	150 mg/kg		DRAFT, Step 7 Being discussed at GSFA EWG, same ML
Brown HT	**155**	**150 mg/kg**		Adopt
Brown HT	155	150 mg/kg		DRAFT, Step 7
Canthaxanthin	161g	15 mg/kg	~~170,~~ **XS243**	Adopt

Caramel II, sulfite caramel	150b	50000 mg/kg	**400**	DRAFT, Step 4
Carotenes, beta-, vegetable	160a(ii)	1000 mg/kg	**401**	Adopt
Curcumin	**100(i)**	**100 mg/kg**		Adopt
Curcumin	100(i)	150 mg/kg		DRAFT, Step 7
Cyclamates	952(i), (ii), (iv)	250 mg/kg	17, 477, **Q243**	Adopt
Cyclodextrin, -*beta*	**459**	**5 mg/kg**	**G243**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	10000 mg/kg	**L243**	Adopt
Ethyl maltol	637	200 mg/kg	**D243**	Adopt
Grape skin extract	163(ii)	200 mg/kg	181**, 402**	Adopt
Hydroxybenzoates, para	214, 218	120 mg/kg	27, **XS243**	Adopt
Indigotine (Indigo carmine)	132	150 mg/kg	**402**	Adopt
Lauric arginate ethyl ester	243	200 mg/kg	~~170,~~ **XS243**	Adopt
Lutein from *Tagetes erecta*	**161b(i)**	**150 mg/kg**		Adopt Noting REP21/FA para 155, has been added to Table 3, candidate for future T3 notes?
Lutein from *Tagetes erecta*	161b(i)	150 mg/kg		DRAFT, Step 4
Lycopene, *Blakeslea trispora*	**160d(iii)**	**GMP**	**N243**	Adopt
Lycopene, synthetic	**160d(i)**	**GMP**	**N243**	Adopt
Lycopene, tomato	160d(ii)	5000 mg/kg	**N243**	DRAFT, Step 3
Lycopene, tomato	**160d(ii)**	**GMP**	**N243**	Adopt
Maltol	636	200 mg/kg	**D243**	Adopt
Neotame	961	100 mg/kg	478, **Q243**	Adopt
Nisin	234	12.5 mg/kg	233, ~~362,~~ ~~**220**~~ **T243**	Adopt
Paprika extract	160c(ii)	50 mg/kg	39, **XS243**	DRAFT, 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	1500 mg/kg	33, **B243**	Adopt
Polydimethylsiloxane	**900a**	**50 mg/kg**	**S243**	Adopt
Polyglycerol esters of fatty acids	475	5000 mg/kg	354 ~~& XS243~~**,** **L243**	Adopt
Polysorbates	432-436	3000 mg/kg	**L243**	Adopt
Propyl gallate	310	90 mg/kg	2, 15, **XS243**	Adopt
Propylene glycol alginate	405	6000 mg/kg	**D243, G243**	Adopt
Quinoline yellow	**104**	**150 mg/kg**		Adopt
Quinoline yellow	104	150 mg/kg		DRAFT, Step 7
Sorbates	200, 202, 203	1000 mg/kg	42**,** ~~**220**~~ **T243**	Adopt
Sorbitan esters of fatty acids	491-495	5000 mg/kg	~~362,~~ **S243**	Adopt
Stearoyl lactylates	481(i), 482(i)	5000 mg/kg	355, **L243**	Adopt
Steviol glycosides	960a, 960b, 960c, 960d	330 mg/kg	26, **XS243**	Adopt
Sucrose esters	473, 473a, 474	5000 mg/kg	**S243**	Adopt
Tartrates	334, 335(ii), 337	2000 mg/kg	45, ~~449~~ **U243**	Adopt

Tartrazine	**102**	**300 mg/kg**		Adopt
Tartrazine	102	300 mg/kg		DRAFT, Step 7
Zeaxanthin, synthetic	**161h(i)**	**150 mg/kg**		Adopt Noting REP21/FA para 155, has been added to Table 3, candidate for future T3 notes?
Zeaxanthin, synthetic	161h(i)	150 mg/kg		DRAFT, Step 4

NOTES

XS243 **Excluding products conforming to the Standard for Fermented Milks (CXS 243-2003).**

A243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003), at 20 mg/kg.**

B243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003): 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 phosphate (INS 450(vi), calcium dihydrogen phosphate (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)) and bone phosphate (INS 542), as stabilizers and/or thickeners only, singly or in combination, at 1,000 mg/kg.**

D243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003) at GMP.**

E243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003), at 1,500 mg/kg.**

G243 **For use in flavoured products conforming to the Standard for Fermented Milks (CXS 243-2003) only, as a stabilizer and/or thickener.**

J243 **For use in products conforming to the Standard for Fermented Milks (CXS 243-2003) only, as a carbonating agent in drinks based on fermented milks.**

L243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003) only, as an emulsifier in flavoured fermented milks and flavoured drinks based on fermented milks, heat treated or not after fermentation.**

M243 **For use in products conforming to the Standard for fermented Milks (CXS 243-2003) only, as an acidity regulator in flavoured fermented milks and flavoured drinks based on fermented milks~~, not heat treated after fermentation and plain and flavoured milks and drinks based on fermented milks, heat treated after fermentation~~.**

N243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003): lycopene, synethic (INS 160d(i), lycopene, tomato (INS 160d(ii) and lycopene, *Blakeslea trispora* (INS 260d(iii)), singly or in combination at 30 mg/kg, expressed as pure lycopene.**

P243 **Except for use in products conforming to the Standard for Fermented Milks (CXS 243-2003): for use only in reconstituted and recombined fermented milks (plain), not heat-treated after fermentation.**

Q243 **Except for products conforming to the Standard for Fermented Milks (CXS243-2003): limited to milk- and milk derivative-based products energy reduced or with no added sugar.**

R243 **For use in products conforming to the Standard for Fermented Milks (CXS243-2003) only.**

S243 **For use in products conforming to the Standard for Fermented Milks (CXS 243-2003) only, as an emulsifier in flavoured fermented milks and flavoured drinks based on fermented milks, heat treated or not after fermentation.**

T243: **Except for products conforming to the Standard for Fermented Milks (CXS243-2003), only for use in flavoured fermented products.**

U243 **Except for use in products conforming to the Standard for fermented Milks (CXS 243-2003) as an acidity regulator, only in flavoured milks and drinks based on fermented milks, heat treated after fermentation.**

355 **Except f**or use at 10,000 mg/kg in flavoured products conforming to the Standard for Fermented Milks (~~CODEX STAN~~ **CXS** 243-2003) ~~only~~.

235 For use **only** in reconstituted and recombined products **conforming to the Standard for Fermented Milks (CXS 243-2003)**. ~~only~~

FOOD CATEGORY 02.2.2

Standard for Dairy Fat Spreads – CXS 253-2006

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, **A253**	Adopt GSFA EWG proposing consistent provisions and notes
Benzoates	210-213	1000 mg/kg	13, 529, **XS253**	Adopt
Butylated hydroxyanisole	320	200 mg/kg	15, ~~130,~~ **B253, B256**	Adopt
Butylated hydroxytoluene	321	200 mg/kg	15, ~~130,~~ **B253, B256**	Adopt
Canthaxanthin	161g	15 mg/kg	~~214, 215~~ **XS256**, **XS253**	Adopt
Caramel II, sulfite caramel	150b	500 mg/kg	528, **XS253**	Adopt
Caramel III, ammonia caramel	150c	500 mg/kg	**XS253**	Adopt
Caramel IV, sulfite ammonia caramel	150d	500 mg/kg	~~214,~~ **XS253**	Adopt
Carmines	120	500 mg/kg	161, 178, **XS253**	Adopt
Carotenes, *beta*-, vegetable	160a(ii)	1000 mg/kg	**XS253**	Adopt
Carotenoids	160a(i), (iii), e, f	35 mg/kg		Already aligned, with both CXS 253 & CXS 256, for information only

Beta-Carotene-rich extract from Dunaliella Salina	160(a)(iv)	35 mg/kg	XS253, XS256	DRAFT, Step 2
Curcumin	100(i)	10 mg/kg	528, **D253**	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	10000 mg/kg	**359, H253**	Adopt
Ethylene diamine tetra acetates	385, 386	100 mg/kg	21, **XS253**	Adopt
Hydroxybenzoates, Para-	214, 218	300 mg/kg	27, XS256, **XS253**	Adopt
Isopropyl citrates	384	100 mg/kg	**XS253**	Adopt
Lauric arginate ethyl ester	243	200 mg/kg	~~214, 215~~, **XS256**, **XS253**	Adopt
Lycopene, tomato	160d(ii)	10000 mg/kg	**XS253**	DRAFT, Step 3
Paprika extract	160c(ii)	40 mg/kg	39**, XS253**	DRAFT, 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, 530, **E253, F253**	Adopt
Polydimethylsiloxane	900a	10 mg/kg	152**, I253**	Adopt
Polyglycerol esters of fatty acids	475	5000 mg/kg	359**, H253**	Adopt
Polysorbates	432-436	10000 mg/kg	360, ~~364~~**, H253**	Adopt
Propyl gallate	310	200 mg/kg	15, ~~130~~**, B253, B256**	Adopt
Propylene glycol esters of fatty acids	477	20000 mg/kg	**XS253**	Adopt
Riboflavins	101(i), (ii), (iii)	300 mg/kg	**XS253**	Adopt
Sorbates	200, 202, 203	2000 mg/kg	42, 529, **G253**	Adopt
Sorbitan esters of fatty acids	491-495	10000 mg/kg	359**, H253**	Adopt
Stearoyl lactylates	481(i), 482(i)	10000 mg/kg	**359, H253**	Adopt
Stearyl citrate	484	100 mg/kg	15, **XS253**	Adopt
Sucrose esters	473, 473a, 474	10000 mg/kg	360**, H253**	Adopt
Tertiary butylhydroquinone	319	200 mg/kg	15, ~~130~~, **XS253, B256**	Adopt
Thermally oxidized soya bean oil interacted with mono- and diglycerides of fatty acids	479	5000 mg/kg	531, **XS253**	Adopt
Thiodipropionates	388, 389	200 mg/kg	46, **XS253**	Adopt
Zeaxanthin, synthetic	161h(i)	100 mg/kg	XS253	DRAFT, Step 4

NOTES

XS253 **Excluding products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006).**

A253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006) at 20 mg/kg.**

B253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), only intended for cooking purposes: propyl gallate (INS 310) at 200 mg/kg, butylated hydroxyanisole (INS 320) at 200 mg/kg or butylated hydroxytoluene (INS 321) at 75 mg/kg, singly or in combination at 200 mg/kg.**

D253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), at 5 mg/kg.**

E253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006): 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 (INS343(iii)), Disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium phosphate (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 stabilizers and/or thickeners only, singly or in combination for dairy fat spreads with less than 70% milk fat content only, at 880 mg/kg.**

F253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006): 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 (INS343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium phosphate (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)), for use as acidity regulators only, singly or in combination at 880 mg/kg.**

G253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), at 2000 mg/kg for fat contents <59%, and at 1000 mg/kg for fat contents ≥59%.**

H253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), as an emulsifier only.**

I253 **Except for use in products conforming to the Standard for Dairy Fat Spreads (CXS 253-2006), only in dairy fat spreads as an antifoaming agent.**

B256 **For use in products conforming to the Standard for Fat Spreads and Blended Spreads (CXS 256-2007): propyl gallate (INS 310), tertiary butylhydroquinone (INS 319), butylated hydroxyanisole (INS 320) and butylated hydroxytoluene (INS 321), singly or in combination at 200 mg/kg.**

for information:

529 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.

FOOD CATEGORY 01.6.1

Standard for Mozzarella (CXS 262-2006)

Food category 01.6.1 Unripened cheese				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Advantame	969	10 mg/kg	**XS262**	DRAFT, Step 2
Annatto extracts – norbixin-based	160b(ii)	25 mg/kg	185, 485, XS273**, XS262**	Adopt
~~Aspartame~~	~~951~~	~~1000 mg/kg~~	~~191, 201, 478, XS221, XS273, XS275, XS262~~	Entry already made, due to CCFA52
Azorubine (Carmoisine)	122	GMP	3**, XS262**	DRAFT, Step 7
Brilliant Black (Black PN)	151	GMP	3**, XS262**	DRAFT, Step 7
Brown HT	155	GMP	3**, XS262**	DRAFT, Step 7
Calcium silicate	552	GMP	488, **D262,** XS273, XS275	Adopt
Canthaxanthin	161g	15 mg/kg	201, XS221, XS273, XS275, **XS262**	Adopt
Caramel II, sulfite caramel	150b	50000 mg/kg	**XS262**	DRAFT, Step 4
Caramel III, ammonia caramel	150c	15000 mg/kg	201, XS221, XS273, XS275, **XS262**	Adopt
Caramel IV, sulfite ammonia caramel	150d	50000 mg/kg	201, XS221, XS273, XS275, **XS262**	Adopt
Carotenes, beta-, vegetable	160a(ii)	600 mg/kg	**XS262**	Adopt
Beta-Carotene-rich extract from Dunaliella Salina	160a(iv)	100 mg/kg	XS221, XS262, XS273, XS275, XS283	DRAFT, Step 2
Carotenoids	160a(i),a(iii),e,f	100 mg/kg	489, 490, XS273, **XS262**	Adopt
Chlorophylls and chlorophyllins, copper complexes	141(i), (ii)	50 mg/kg	161, 484, XS273, XS275, **A262**	Adopt Note that GSFA EWG also proposing different ML and notes, so coordination needed
Curcumin	100(i)	500 mg/kg	3**, XS262**	DRAFT, Step 4
Indigotine (Indigo carmine)	132	200 mg/kg	3, XS221, XS273, XS275, **XS262**	Adopt
Lauric arginate ethyl ester	243	200 mg/kg	XS221, XS273, XS275, **XS262**	Adopt
Lutein from *Tagetes erecta*	160b(i)	GMP	**XS262**	DRAFT, Step 4
Magnesium silicate, synthetic	553(i)	GMP	488, **D262**, XS273, XS275	Adopt
Natamycin (Pimaricin)	235	40 mg/kg	3, 80, 486, XS273, XS275, **B262**	Adopt
Nisin	234	12.5 mg/kg	233, **B262**	Adopt

Nitrates	251, 252	40 mg/kg	30**, XS262**	Maintain at Step 7 CCFA EWG investigating nitrates and nitrites, on hold
Paprika extract	160c(ii)	15 mg/kg	39**, XS262**	DRAFT, 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	4400 mg/kg	33, 487, 495, 496, **C262, E262**	Adopt
Polysorbates	432-436	80 mg/kg	38, XS221, XS273, XS275, **XS262**	Adopt
Ponceau 4R (Cochineal red A)	124	100 mg/kg	3, 161, XS221, XS273, XS275, **XS262**	Adopt
Quinoline yellow	104	GMP	3**, XS262**	DRAFT, Step 7
Riboflavins	101(i), (ii), (iii)	300 mg/kg	491, XS273, XS275, **XS262**	Adopt
Silicon dioxide, amorphous	551	GMP	3, 488, **D262**, XS273, XS275	Adopt
Sorbates	200, 202, 203	1000 mg/kg	42, 223, 492, 494, **B262**	Adopt
Sunset yellow FCF	110	300 mg/kg	3, XS221, XS273, XS275, **XS262**	Adopt
Talc	553(iii)	GMP	3, 488, **D262**, XS273, XS275	Adopt
Tartrates	334, 335(ii), 337	1500 mg/kg	45, 351, **XS262**	Adopt
Tartrazine	102	300 mg/kg	3**, XS262**	DRAFT, Step 7
Tocopherols	307a, b, c	200 mg/kg	168, 351, XS221, XS273, **XS262**	Adopt
Zeaxanthin, synthetic	161h(i)	100 mg/kg	**XS262**	DRAFT, Step 4

NOTES

XS262 **Excluding products conforming to the Standard for Mozzarella (CXS 262-2006).**

A262 **Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006) at 5 mg/kg, in cheese mass only, to obtain the colour characteristics of the product.**

B262: **Includes use in products conforming to the Standard for Mozzarella (CXS 262-2006) except for the surface treatment of high moisture products packaged in liquid, noting the functional class table in CXS 262-2006.**

C262 **Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006): 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 phosphate (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 stabilizers at 4400 mg/kg as phosphorus, singly or in combination, in cheese mass only.

D262 **Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006): calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and silicon dioxide, amorphous (INS 551) for the surface treatment of sliced, cut, shredded or grated low moisture Mozzarella or for the surface treatment of shredded and/or diced high moisture Mozzarella, as anticaking agents only at 10,000 mg/kg, singly or in combination, as silicon dioxide.**

E262 **Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006): 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 (INS343(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 at 880 mg/kg as phosphorus, singly or in combination, in cheese mass only.**

FOOD CATEGORY 01.3.1

Standard for Evaporated Milks – CXS 281-1971
and
Standard for Sweetened Condensed Milks – CXS 282-1971

Food category 01.3.1: Condensed milk (plain)				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
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	880 mg/kg	33, **A281282**	Adopt

”

NOTE

A281282 **Except for use in products conforming to the Standards for Evaporated Milks (CXS 281-1971) and Sweetened Condensed Milks (CXS 282-1971): 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 (INS343(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 1000 mg/kg as phosphorous, singly or in combination.

Standard for Cream and Prepared Creams – CXS 288-1976

FOOD CATEGORY 01.4

Food category 01.4 cream (plain) and the like				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
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**, D288**	Adopt

FOOD CATEGORY 01.4.1

Food category 01.4.1 Pasteurised cream (plain)				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Beet red	162	GMP	**XS288**	DRAFT, Step 7
Caramel I – plain caramel	150a	GMP	**XS288**	DRAFT, Step 7
Chlorophylls	140	GMP	**XS288**	DRAFT, Step 7
Erythritol	968	600000 mg/kg	**XS288**	DRAFT, Step 4
Lactitol	966	30000 mg/kg	**XS288**	DRAFT, Step 4
Maltitol	965(i)	300000 mg/kg	**XS288**	DRAFT, Step 4
Maltitol syrup	965(ii)	300000 mg/kg	**XS288**	DRAFT, Step 4
Sorbitol	420(i)	200000 mg/kg	**XS288**	DRAFT, Step 4
Sorbitol syrup	420(ii)	200000 mg/kg	**XS288**	DRAFT, Step 4
~~Tamarind seed polysaccharide~~	~~437~~	~~GMP~~	~~236~~	Entry already made, due to CCFA52
Titanium dioxide	171	GMP	**XS288**	DRAFT, Step 7
Xylitol	967	30000 mg/kg	**XS288**	DRAFT, Step 4

FOOD CATEGORY 01.4.2

Food category 01.4.2 Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Beet red	162	GMP	**XS288**	DRAFT, Step 7
Caramel I – plain caramel	150a	GMP	**XS288**	DRAFT, Step 7
Chlorophylls	140	GMP	**XS288**	DRAFT, Step 7
Diacetyltartaric and fatty acid esters of glycerol	472e	6000 mg/kg	**C288**	Adopt
Erythritol	968	600000 mg/kg	**XS288**	DRAFT, Step 4
Lactitol	966	30000 mg/kg	**XS288**	DRAFT, Step 4

Lycopene, tomato	160d(i)	5000 mg/kg	**XS288**	DRAFT, Step 3
Maltitol	965(i)	300000 mg/kg	**XS288**	DRAFT, Step 4
Maltitol syrup	965(ii)	300000 mg/kg	**XS288**	DRAFT, Step 4
Nitrous oxide	942	GMP	~~59 &~~ 278	Adopt
Propylene glycol alginate	**405**	**5000 mg/kg**	**E288**	Adopt
Sorbitan esters of fatty acids	**491-495**	**5000 mg/kg**	**F288**	Adopt
Sorbitol	420(i)	200000 mg/kg	**XS288**	DRAFT, Step 4
Sorbitol syrup	420(ii)	200000 mg/kg	**XS288**	DRAFT, Step 4
Sucrose esters	473, 473a, 474	5000 mg/kg	**H288**	Adopt
~~Tamarind seed polysaccharide~~	~~437~~	~~GMP~~		Entry already made, due to CCFA52
Titanium dioxide	171	GMP	**XS288**	DRAFT, Step 7
Xylitol	967	30000 mg/kg	**XS288**	DRAFT, Step 4

FOOD CATEGORY 01.4.3

Food category 01.4.3 Clotted cream (plain)				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Diacetyltartaric and fatty acid esters of glycerol	472e	5000 mg/kg	**G288**	Adopt
Nisin	234	10 mg/kg	**XS288**	Adopt
Propylene glycol alginate	405	5000 mg/kg	**G288**	Adopt
Sorbitan esters of fatty acids	**491-495**	**5000 mg/kg**	**F288**	Adopt
Sucrose esters	**473, 473a, 474**	**5000 mg/kg**	**F288**	Adopt

NOTES

XS288 **Excluding products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976).**

B288 **For use in reconstituted cream, recombined cream, prepackaged liquid cream, whipping cream, cream packed under pressure and whipped cream products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as an emulsifier, stabilizer and thickener only.**

C288: **Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as a stabilizer and thickener, at 5,000 mg/kg.**

D288 **Except for use in products conforming to the Standard for Creams and Prepared Creams (CXS 288-1976): 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 (INS343(iii)), disodium diphosphate (INS 450(i)), trisodium diphosphate (INS 450(ii)), tetrasodium diphosphate (INS 450(iii)), tetrapotassium diphosphate (INS 450(v)), dicalcium phosphate (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)) and bone phosphate (INS 542), singly or in combination as stabilizers and thickeners only, at 1,100 mg/kg.

E288 **For use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only, as a stabilizer and thickener.**

F288 **For use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) only, as an emulsifier.**

G288 **Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as a stabilizer and thickener.**

H288 **Except for use in products conforming to the Standard for Cream and Prepared Creams (CXS 288-1976) as an emulsifier.**

236 Excluding **reconstituted cream, recombined cream, prepackaged liquid cream** products conforming to the Standard for Cream and Prepared Creams (reconstituted cream, recombined cream, prepackaged liquid cream) (CODEX STAN **CXS** 288-1976).

Standard for Dairy Permeate Powders (CXS 331 – 2017)

FOOD CATEGORY 01.8

Food category 01.8: Whey and whey products, excluding whey cheeses				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Tocopherols	307a, b, c	200 mg/kg	**XS331**	Adopt

FOOD CATEGORY 01.8.2

Food category 01.8.2: Dried whey and whey products, excluding whey cheeses				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Annatto extracts, bixin-based	160b(i)	20 mg/kg	8**, XS331**	DRAFT, Step 4
Annatto extracts, norbixin-based	160b(ii)	20 mg/kg	185**, XS331**	DRAFT, Step 4
Benzoyl peroxide	928	100 mg/kg	147, **XS331**	Adopt
Calcium carbonate	170(i)	10000 mg/kg	**XS331**	Adopt
Calcium chloride	509	GMP	**XS331**	Adopt
Calcium hydroxide	526	GMP	**XS331**	Adopt
Calcium silicate	552	10000 mg/kg	**XS331**	Adopt
Hydroxypropyl distarch phosphate	1442	10000 mg/kg	**XS331**	Adopt
Lecithin	322(i)	GMP	**XS331**	Adopt
Magnesium carbonate	504(i)	10000 mg/kg	**XS331**	Adopt
Magnesium oxide	530	10000 mg/kg	**XS331**	Adopt
Magnesium silicate, synthetic	553(i)	10000 mg/kg	**XS331**	Adopt
Microcrystalline cellulose (Cellulose gel)	460(i)	10000 mg/kg	**XS331**	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, **XS331**	Adopt

Potassium carbonate	501(i)	GMP	**XS331**	Adopt
Potassium chloride	508	GMP	**XS331**	Adopt
Potassium dihydrogen citrate	332(i)	GMP	**XS331**	Adopt
Potassium hydrogen carbonate	501(ii)	GMP	**XS331**	Adopt
Potassium hydroxide	525	GMP	**XS331**	Adopt
Powdered cellulose	460(ii)	10000 mg/kg	**XS331**	Adopt
Silicon dioxide, amorphous	551	10000 mg/kg	**XS331**	Adopt
Sodium aluminium silicate	554	1140 mg/kg	6, **XS331**	Adopt
Sodium carbonate	500(i)	GMP	**XS331**	Adopt
Sodium dihydrogen citrate	331(i)	GMP	**XS331**	Adopt
Sodium hydrogen carbonate	500(ii)	GMP	**XS331**	Adopt
Sodium hydroxide	524	GMP	**XS331**	Adopt
Sodium sesquicarbonate	500(iii)	GMP	**XS331**	Adopt
Talc	553(iii)	10000 mg/kg	**XS331**	Adopt
Tripotassium citrate	332(ii)	GMP	**XS331**	Adopt
Trisodium citrate	331(iii)	GMP	**XS331**	Adopt

NOTE

XS331 Excluding products conforming to the Standard for Dairy Permeate Powders (CXS 331-2017).

C PROPOSED AMENDMENTS TO TABLE 3

Standard for Milk Powders and Cream Powder (CXS 207-1999)
and
Standard for Edible Casein Products (CXS 290-1995)

Section 2 of Table 3

In the case of the *Standard for Milk powders and cream powder* (CXS 207-1999) the intention of the commodity committee has been to allow only certain Table 3 additives

In the case of the *Standard for Edible Casein Products* (CXS 290-1995) 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

01.5.1	Milk powder and cream powder (plain)
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards
Codex standards	Milk powders and cream powder (CXS 207-1999) Edible Casein Products (CXS 290-1995)

AMENDMENTS TO TABLE 3

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Specific allowance in the following commodity standards[1]**
503(i)	Ammonium carbonate	Acidity regulator, Raising agent	1999	**CS 290-1995**

503(ii)	Ammonium hydrogen carbonate	Acidity regulator, Raising agent	1999	**CS 290-1995**
527	Ammonium hydroxide	Acidity regulator	1999	**CS 290-1995**
263	Calcium acetate	Acidity regulator, Preservative, Stabilizer	1999	**CS 290-1995**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	**CS 290-1995**
509	Calcium chloride	Firming agent, Stabilizer, Thickener	1999	**CS 207-1999**
526	Calcium hydroxide	Acidity regulator, Firming agent	1999	**CS 290-1995**
327	Calcium lactate	Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener	1999	**CS 290-1995**
322(i)	Lecithin	Antioxidant, Emulsifier, Flour treatment agent	1999	**CS 207-1999, CS 290-1995**
322(ii)	**Lecithin, partially hydrolysed**	**Antioxidant, Emulsifier**		**CS 207-1999, CS 290-1995**
504(i)	Magnesium carbonate	Acidity regulator, Anticaking agent, Colour retention agent, Flour treatment agent	1999	**CS 290-1995**
528	Magnesium hydroxide	Acidity regulator, Colour retention agent	1999	**CS 290-1995**
504(ii)	Magnesium hydroxide carbonate	Acidity regulator, Anticaking agent, Carrier, Colour retention agent	1999	**CS 290-1995**
329	Magnesium lactate, DL-	Acidity regulator, Flour treatment agent	1999	**CS 290-1995**
471	Mono- and di-glycerides of fatty acids	Antifoaming agent, Emulsifier, Glazing agent, Stabilizer	1999	**CS 207-1999, CS 290-1995**
261(i)	Potassium acetate	Acidity regulator, Preservative	1999	**CS 290-1995**
501(i)	Potassium carbonate	Acidity regulator, Stabilizer	1999	**CS 207-1999, CS 290-1995**
508	Potassium chloride	Firming agent, Flavour enhancer, Stabilizer, Thickener	1999	**CS 207-1999**
332(i)	Potassium dihydrogen citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 207-1999, CS 290-1995**
501(ii)	Potassium hydrogen carbonate	Acidity regulator, Raising agent, Stabilizer	1999	**CS 207-1999, CS 290-1995**
525	Potassium hydroxide	Acidity regulator	1999	**CS 290-1995**
326	Potassium lactate	Acidity regulator, Antioxidant, Emulsifier, Humectant	1999	**CS 290-1995**
262(i)	Sodium acetate	Acidity regulator, Preservative, Sequestrant	1999	**CS 290-1995**
500(i)	Sodium carbonate	Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener	1999	**CS 207-1999, CS 290-1995**

331(i)	Sodium dihydrogen citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS207-1999, CS 290-1995**
500(ii)	Sodium hydrogen carbonate	Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener	1999	**CS 207-1999, CS 290-1995**
524	Sodium hydroxide	Acidity regulator	1999	**CS 290-1995**
325	Sodium lactate	Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying salt, Humectant, Thickener	1999	**CS 290-1995**
500(iii)	Sodium sesquicarbonate	Acidity regulator, Anticaking agent, Raising Agent	1999	**CS 207-1999, CS 290-1995**
380	Triammonium citrate	Acidity regulator	1999	**CS 290-1995**
333(iii)	Tricalcium citrate	Acidity regulator, Antioxidant, Emulsifying salt, Firming agent, Sequestrant, Stabilizer	1999	**CS 290-1995**
332(ii)	Tripotassium citrate	Acidity regulator, Antioxidant, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 207-1999, CS 290-1995**
331(iii)	Trisodium citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS207-1999, CS 290-1995**

Standard for Fermented Milks (CXS 243-2003)

Section 2 of Table 3

In the case of the *Standard for Fermented Milks* (CXS 243-2003) the intention of the commodity committee has been to allow only certain Table 3 additives, as detailed in the Standard, taking precedence over the footnote to the annex to Table 3, linked to food category 01.2.

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

Additional entries are also required to Table 3, as noted below.

01.1.4	Flavoured fluid milk drinks
	Acidity regulators, colours, emulsifiers~~,~~ **and** packaging gases ~~and preservatives (only for fermentation products)~~ listed in Table 3 are acceptable for use in foods conforming to this food category in this standard, as further detailed in the functional class table in the standard. Certain carbonating agents, flavour enhancers, stabilisers, sweeteners and thickeners as listed in Table 3 are also acceptable for use in ~~flavoured~~ products ~~only~~ conforming to this standard.
Codex standards	Fermented Milks (CXS 243-2003)

01.2.1.2	Fermented milks (plain), heat treated after fermentation
	Acidity regulators and packaging gases, listed in Table 3 are acceptable for use in foods conforming to this food category in this standard, as further detailed in the functional class table in the standard. Certain carbonating agents, stabilizers and thickeners as listed in Table 3 are also acceptable for use in foods conforming to this food category in this standard.

Codex standards	Fermented Milks (CXS 243-2003)

01.7	Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt)
	Acidity regulators, colours, emulsifiers, packaging gases and preservatives (only for heat treated after fermentation products) listed in Table 3 are acceptable for use in foods conforming to this food category in this standard, as further detailed in the functional class table in the standard. Certain carbonating agents, flavour enhancers, stabilisers, sweeteners and thickener as listed in Table 3 are also acceptable for use in flavoured products only conforming to this standard.
Codex standards	Fermented Milks (CXS 243-2003)

AMENDMENTS TO TABLE 3

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Specific allowance in the following commodity standards[1]**
472a	Acetic and fatty acid esters of glycerol	Emulsifier, Sequestrant, Stabilizer	1999	**CS 243-2003 (see functional class table and footnotes)**
1422	Acetylated distarch adipate	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1414	Acetylated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1451	Acetylated oxidised starch	Emulsifier, Stabilizer, Thickener	2005	**CS 243-2003 (see functional class table and footnotes)**
1401	Acid-treated starch	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
406	Agar	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
400	Alginic acid	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1402	Alkaline treated starch	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
403	Ammonium alginate	Bulking agent, Carrier, Emulsifier,	1999	**CS 243-2003 (see functional**

		Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener		**class table and footnotes)**
1403	Bleached starch	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
629	Calcium 5'-guanylate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
633	Calcium 5'-inosinate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
634	Calcium 5'-ribonucleotides	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
404	Calcium alginate	Antifoaming agent, Bulking agent, Carrier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	**CS 243-2003 (see functional class table and footnotes)**
509	Calcium chloride	Firming agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
623	Calcium di-L-glutamate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
290	Carbon dioxide	Carbonating agent, Foaming agent, Packaging gas, Preservative, Propellant	1999	**CS 243-2003 (see functional class table and footnotes)**
410	Carob bean gum	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
407	Carrageenan	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
472c	Citric and fatty esters of glycerol	Antioxidant, Emulsifier, Flour treatment agent,	1999	**CS 243-2003 (see functional**

		Sequestrant, Stabilizer		**class table and footnotes)**
468	Cross-linked sodium carboxymethyl cellulose (Cross-linked cellulose gum)	Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1400	Dextrins, roasted starch	Carrier, Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
628	Dipotassium 5'-guanylate-	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
627	Disodium 5'-guanylate-	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
631	Disodium 5'-inosinate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
635	Disodium 5'-ribonucleotides	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
1412	Distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
968	Erythritol	Flavour enhancer, Humectant, Sweetener	2001	**CS 243-2003 (see functional class table and footnotes)**
467	Ethyl hydroxyethyl cellulose	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
418	Gellan gum	Gelling agent, Stabilizer, Thickener		**CS 243-2003 (see functional class table and footnotes)**
620	Glutamic acid, L(+)-	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
626	Guanylic acid, 5'-	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
412	Guar gum	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
414	Gum Arabic (Acacia gum)	Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
463	Hydroxypropyl cellulose	Emulsifier, Foaming Agent, Glazing agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**

1442	Hydroxypropyl distarch phosphate	Anticaking agent, Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
464	Hydroxypropyl methyl cellulose	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1440	Hydroxypropyl starch	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
630	Inosinic acid, 5'-	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
953	Isomalt (Hydrogenated isomaltulose)	Anticaking agent, Bulking agent, Flavour enhancer, Glazing agent, Stabilizer, Sweetener, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
416	Karaya gum	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
425	Konjac flour	Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
472b	Lactic and fatty acid esters of glycerol	Emulsifier, Sequestrant, Stabilizer	1999	**CS 243-2003 (see functional class table and footnotes)**
966	Lactitol	Emulsifier, Sweetener, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
511	Magnesium chloride	Colour retention agent, Firming agent, Stabilizer	1999	**CS 243-2003 (see functional class table and footnotes)**
625	Magnesium di-L-glutamate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
580	Magnesium gluconate	Acidity regulator, Firming agent, Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
965(i)	Maltitol	Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
965(ii)	Maltitol syrup	Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**

421	Mannitol	Anticaking agent, Bulking agent, Humectant, Stabilizer, Sweetener, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
461	Methyl cellulose	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
465	Methyl ethyl cellulose	Emulsifier, Foaming agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
460(i)	Microcrystalline cellulose (Cellulose gel)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
471	Mono- and di-glycerides of fatty acids	Antifoaming agent, Emulsifier, Glazing agent, Stabilizer	1999	**CS 243-2003 (see functional class table and footnotes)**
624	Monoammonium L-glutamate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
622	Monopotassium L-glutamate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
621	Monosodium L-glutamate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
1410	Monostarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1404	Oxidized starch	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
440	Pectins	Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1413	Phosphated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1200	Polydextroses	Bulking agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
964	Polyglycitol syrup	Sweetener	2001	**CS 243-2003 (see functional class table and footnotes)**
1200	Polydextroses	Bulking agent, Glazing agent,	1999	**CS 243-2003 (see functional**

		Humectant, Stabilizer, Thickener		**class table and footnotes)**
632	Potassium 5'-inosinate	Flavour enhancer	1999	**CS 243-2003 (see functional class table and footnotes)**
402	Potassium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
508	Potassium chloride	Firming agent, Flavour enhancer, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
460(ii)	Powdered cellulose	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
407a	Processed euchema seaweed (PES)	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	2001	**CS 243-2003 (see functional class table and footnotes)**
470(i)	Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium	Anticaking agent, Emulsifier, Stabilizer	1999	**CS 243-2003 (see functional class table and footnotes)**
470(ii)	Salts of oleic acid with calcium, potassium and sodium	Anticaking agent, Emulsifier, Stabilizer	1999	**CS 243-2003 (see functional class table and footnotes)**
401	Sodium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
466	Sodium carboxymethyl cellulose (Cellulose gum)	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
469	Sodium carboxymethyl cellulose, enzymatically hydrolyzed (Cellulose gum, enzymatically hydrolyzed)	Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
420(i)	Sorbitol	Bulking agent, Humectant, Sequestrant,	1999	**CS 243-2003 (see functional class table and footnotes)**

		Stabilizer, Sweetener, Thickener		
420(ii)	Sorbitol syrup	Bulking agent, Humectant, Sequestrant, Stabilizer, Sweetener, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1420	Starch acetate	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1405	Starches, enzyme treated	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
1450	Starch sodium octenyl succinate	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
437	Tamarind seed polysaccharide	Emulsifying salt, Gelling agent, Stabilizer, Thickener	2019	**CS 243-2003 (see functional class table and footnotes)**
417	Tara gum	Gelling agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
413	Tragacanth gum	Emulsifier, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
331(iii)	Trisodium citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 243-2003 (see functional class table and footnotes)**
415	Xanthan gum	Emulsifier, Foaming agent, Stabilizer, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**
967	Xylitol	Emulsifier, Humectant, Stabilizer, Sweetener, Thickener	1999	**CS 243-2003 (see functional class table and footnotes)**

Standard for Dairy Fat Spreads (CXS 253-2006)

Section 2 of Table 3

In the case of the *Standard for Dairy Fat Spreads* (CXS 253-2006) 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

02.2.2	Fat spreads, dairy fat spreads and blended spreads
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to this standard.
Codex standards	Dairy Fat Spreads (CXS 253-2006)

AMENDMENTS TO TABLE 3

INS No.	Additive	Functional Class	Year Adopted	Specific allowance in the following commodity standards[1]
472a	Acetic and fatty acid esters of glycerol	Emulsifier, Sequestrant, Stabilizer	1999	**CS 253-2006 (see functional class table and footnote)**
1422	Acetylated distarch adipate	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1414	Acetylated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1401	Acid-treated starch	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
406	Agar	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
400	Alginic acid	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1402	Alkaline treated starch	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
403	Ammonium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1403	Bleached starch	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
404	Calcium alginate	Antifoaming agent, Bulking agent, Carrier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
526	Calcium hydroxide	Acidity regulator, Firming agent	1999	**CS 253-2006**
327	Calcium lactate	Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener	1999	**CS253-2006**

410	Carob bean gum	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
407	Carrageenan	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
472c	Citric and fatty acid esters of glycerol	Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer	1999	**CS 253-2006 (see functional class table and footnote)**
1400	Dextrins, roasted starch	Carrier, Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
628	Dipotassium 5'-guanylate	Flavour enhancer	1999	**CS 253-2006 (see functional class table and footnote)**
627	Disodium 5'-guanylate	Flavour enhancer	1999	**CS 253-2006 (see functional class table and footnote)**
1412	Distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
418	Gellan gum	Gelling agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
422	Glycerol	Humectant, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
412	Guar gum	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
414	Gum arabic (Acacia gum)	Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
463	Hydroxypropyl cellulose	Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1442	Hydroxypropyl distarch phosphate	Anticaking agent, Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
464	Hydroxypropyl methyl cellulose	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1440	Hydroxypropyl starch	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**

472b	Lactic and fatty acid esters of glycerol	Emulsifier, Sequestrant, Stabilizer	1999	**CS 253-2006 (see functional class table and footnote)**
329	Magnesium lactate, DL-	Acidity regulator, Flour treatment agent	1999	**CS253-2006**
461	Methyl cellulose	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
465	Methyl ethyl cellulose	Emulsifier, Foaming agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
460(i)	Microcrystalline cellulose (Cellulose gel)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
471	Mono and di-glycerides of fatty acids	Antifoaming agent, Emulsifier, Glazing agent, Stabilizer	1999	**CS 253-2006 (see functional class table and footnote)**
1410	Monostarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1404	Oxidized starch	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
440	Pectins	Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1413	Phosphated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
402	Potassium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
326	Potassium lactate	Acidity regulator, Antioxidant, Emulsifier, Humectant	1999	**CS253-2006**
460(ii)	Powdered cellulose	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
407a	Processed euchema seaweed (PES)	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
401	Sodium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent,	1999	**CS 253-2006 (see functional class table and footnote)**

		Humectant, Sequestrant, Stabilizer, Thickener		
500(i)	Sodium carbonate	Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
466	Sodium carboxymethyl cellulose (Cellulose gel)	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
331(i)	Sodium dihydrogen citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS253-2006**
500(ii)	Sodium hydrogen carbonate	Acidity regulator, Anticaking agent, Raising Agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
524	Sodium hydroxide	Acidity regulator	1999	**CS 253-2006**
325	Sodium lactate	Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying salt, Humectant, Thickener	1999	**CS253-2006**
500(iii)	Sodium sesquicarbonate	Acidity regulator, Anticaking agent, Raising agent	1999	**CS 253-2006 (see functional class table and footnote)**
1420	Starch acetate	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
1405	Starches, enzyme treated	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
413	Tragacanth gum	Emulsifier, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**
415	Xanthan gum	Emulsifier, Foaming agent, Stabilizer, Thickener	1999	**CS 253-2006 (see functional class table and footnote)**

Standard for Mozzarella (CXS 262-2006)

Section 2 of Table 3

In the case of the *Standard for Mozzarella* (CXS 262-2006) 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

01.6.1	Unripened cheese
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to this standard.
Codex standards	Mozzarella (CXS 262-2006)

AMENDMENTS TO TABLE 3

INS No.	Additive	Functional Class	Year Adopted	Specific allowance in the following commodity standards[1]
260	Acetic acid, glacial	Acidity regulator, Preservative	1999	**CS 262-2006 (for use in cheese mass only)**
406	Agar	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
263	Calcium acetate	Acidity regulator, Preservative, Stabilizer	1999	**CS 262-2006 (for use in cheese mass only)**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	**CS 262-2006 (for use in cheese mass only)**
578	Calcium gluconate	Acidity regulator, Firming agent, Sequestrant	1999	**CS 262-2006 (for use in cheese mass only)**
327	Calcium lactate	Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
352(ii)	Calcium malate, D, L-	Acidity regulator	1999	**CS 262-2006 (for use in cheese mass only)**
282	Calcium propionate	Preservative	1999	**CS 262-2006 (see functional class table in CXS 262-2006)**
410	Carob bean gum	Emulsifier, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
407	Carrageenan	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
140	Chlorophylls	Colour	1999	**CS 262-2006 (for use in cheese mass only, see functional class table in CXS 262-2006)**
330	Citric acid	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	1999	**CS 262-2006 (for use in cheese mass only)**
575	Glucono delta-lactone	Acidity regulator, Raising agent, Sequestrant	1999	**CS 262-2006 (for use in cheese mass only)**

412	Guar gum	Emulsifier, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
507	Hydrochloric acid	Acidity regulator	1999	**CS 262-2006 (for use in cheese mass only)**
416	Karaya gum	Emulsifier, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
270	Lactic acid, L-, D- and DL-	Acidity regulator	1999	**CS 262-2006 (for use in cheese mass only)**
504(i)	Magnesium carbonate	Acidity regulator, Anticaking agent, Colour retention agent, Flour treatment agent	1999	**CS 262-2006 (for use in cheese mass only)**
504(ii)	Magnesium hydroxide carbonate	Acidity regulator, Anticaking agent, Carrier, Colour retention agent	1999	**CS 262-2006 (for use in cheese mass only)**
296	Malic acid	Acidity regulator, Sequestrant	1999	**CS 262-2006 (for use in cheese mass only)**
460(i)	Microcrystalline cellulose (Cellulose gel)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	**CS 262-2006 (as anticaking agent only, see functional class table in CXS 262-2006)**
440	Pectins	Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
261(i)	Potassium acetate	Acidity regulator, Preservative	1999	**CS 262-2006 (for use in cheese mass only)**
501(i)	Potassium carbonate	Acidity regulator, Stabilizer	1999	**CS 262-2006 (for use in cheese mass only)**
332(i)	Potassium dihydrogen citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 262-2006 (for use in cheese mass only)**
577	Potassium gluconate	Acidity regulator, Sequestrant	1999	**CS 262-2006 (for use in cheese mass only)**
501(ii)	Potassium hydrogen carbonate	Acidity regulator, Raising agent, Stabilizer	1999	**CS 262-2006 (for use in cheese mass only)**
326	Potassium lactate	Acidity regulator, Antioxidant, Emulsifier, Humectant	1999	**CS 262-2006 (for use in cheese mass only)**
283	Potassium propionate	Preservative	1999	**CS 262-2006 (see functional class table in CXS 262-2006)**
460(ii)	Powdered cellulose	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 262-2006 (as anticaking agent only, see functional class table in CXS 262-2006)**
407a	Processed euchema seaweed	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent,	2001	**CS 262-2006 (for use in cheese mass only)**

		Humectant, Stabilizer, Thickener		
280	Propionic acid	Preservative	1999	**CS 262-2006 (see functional class table in CXS 262-2006)**
262(i)	Sodium acetate	Acidity regulator, Preservative, Sequestrant	1999	**CS 262-2006 (for use in cheese mass only)**
500(i)	Sodium carbonate	Acidity regulator, Anticaking agent, Emulsifying salt, Raising Agent, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
466	Sodium carboxymethyl cellulose (Cellulose gum)	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
331(i)	Sodium dihydrogen citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 262-2006 (for use in cheese mass only)**
500(ii)	Sodium hydrogen carbonate	Acidity regulator, Anticaking agent, Raising Agent, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
350(i)	Sodium hydrogen DL-malate	Acidity regulator, Humectant	1999	**CS 262-2006 (for use in cheese mass only)**
325	Sodium lactate	Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying salt, Humectant, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
350(ii)	Sodium DL-malate	Acidity regulator, Humectant	1999	**CS 262-2006 (for use in cheese mass only)**
281	Sodium propionate	Preservative	1999	**CS 262-2006 (see functional class table in CXS 262-2006)**
500(iii)	Sodium sesquicarbonate	Acidity regulator, Anticaking agent, Raising Agent	1999	**CS 262-2006 (for use in cheese mass only)**
417	Tara gum	Gelling agent, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
171	Titanium dioxide	Colour	1999	**CS 262-2006 (for use in cheese mass only, see functional class table in CXS 262-2006)**
413	Tragacanth gum	Emulsifier, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**
333(iii)	Tricalcium citrate	Acidity regulator, Antioxidant, Emulsifying salt, Firming agent, Sequestrant, Stabilizer	1999	**CS 262-2006 (for use in cheese mass only)**

415	Xanthan gum	Emulsifier, Foaming agent, Stabilizer, Thickener	1999	**CS 262-2006 (for use in cheese mass only)**

Standard for Evaporated Milks (CXS 281-1971)
and
Standard for Sweetened Condensed Milks (CXS 282-1971)

Section 2 of Table 3

In the case of the *Standard for Evaporated Milks* (CXS 281-1971) the intention of the commodity committee has been to allow only certain Table 3 additives.

In the case of the *Standard for Sweetened Condensed Milks* (CXS 282-1971) 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

01.3.1	Condensed milk (plain)
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards.
Codex standards	Evaporated milks (CXS 281-1971) Sweetened Condensed Milks (CXS 282-1971)

AMENDMENTS TO TABLE 3

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Specific allowance in the following commodity standards[1]**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	**CS 281-1971, CS 282-1971**
509	Calcium chloride	Firming agent, Stabilizer, Thickener	1999	**CS 281-1971, CS 282-1971**
407	Carrageenan	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 281-1971, CS 282-1971**
322(i)	Lecithin	Antioxidant, Emulsifier, Flour treatment agent	1999	**CS 281-1971, CS 282-1971**
322(ii)	**Lecithin, partially hydrolyzed**	**Antioxidant, Emulsifier**		**CS 281-1971, CS 282-1971**
501(i)	Potassium carbonate	Acidity regulator, Stabilizer	1999	**CS 281-1971, CS 282-1971**
508	Potassium chloride	Firming agent, Flavour enhancer, Stabilizer, Thickener	1999	**CS 281-1971, CS 282-1971**
332(i)	Potassium dihydrogen citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 281-1971, CS 282-1971**
501(ii)	Potassium hydrogen carbonate	Acidity regulator, Raising agent, Stabilizer	1999	**CS 281-1971, CS 282-1971**
500(i)	Sodium carbonate	Acidity regulator, Anticaking agent,	1999	**CS 281-1971, CS 282-1971**

		Emulsifying salt, Raising agent, Stabilizer, Thickener		
331(i)	Sodium dihydrogen citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 281-1971, CS 282-1971**
500(ii)	Sodium hydrogen carbonate	Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener	1999	**CS 281-1971, CS 282-1971**
500(iii)	Sodium sesquicarbonate	Acidity regulator, Anticaking agent, Raising Agent	1999	**CS 281-1971, CS 282-1971**
333(iii)	Tricalcium citrate	Acidity regulator, Antioxidant, Emulsifying salt, Firming agent, Sequestrant, Stabilizer	1999	**CS 281-1971, CS 282-1971**
332(ii)	Tripotassium citrate	Acidity regulator, Antioxidant, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 281-1971, CS 282-1971**
331(iii)	Trisodium citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 281-1971, CS 282-1971**

Standard for Cream and Prepared Creams (CXS 288-1976)

Section 2 of Table 3

In the case of the *Standard for Cream and Prepared Creams* (CXS 288-1976) the intention of the commodity committee has been to allow only certain Table 3 additives for food category 01.4.3 only (since food categories 01.4.1 and 01.4.2 are listed in the annex to Table 3).

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

01.4.3	Clotted cream (plain)
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to this standard.
Codex standards	Cream and Prepared Creams (CXS 288-1976)

AMENDMENTS TO TABLE 3

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Specific allowance in the following commodity standards[1]**
472a	Acetic and fatty acid esters of glycerol	Emulsifier, Sequestrant, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
1422	Acetylated distarch adipate	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**

1414	Acetylated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
406	Agar	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
400	Alginic acid	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
403	Ammonium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
404	Calcium alginate	Antifoaming agent, Bulking agent, Carrier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
509	Calcium chloride	Firming agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
327	Calcium lactate	Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
516	Calcium sulfate	Acidity regulator, Firming agent, Flour treatment agent, Sequestrant, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
410	Carob bean gum	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
407	Carrageenan	Bulking agent, Carrier, Emulsifier, Gelling agent,	1999	**CS 288-1976**

		Glazing agent, Humectant, Stabilizer, Thickener		**In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
330	Citric acid	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
472c	Citric and fatty acid esters of glycerol	Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
1412	Distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
418	Gellan gum	Gelling agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
412	Guar gum	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
414	Gum arabic (Acacia gum)	Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
463	Hydroxypropyl cellulose	Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
1442	Hydroxypropyl distarch phosphate	Anticaking agent, Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
464	Hydroxypropyl methyl cellulose	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
1440	Hydroxypropyl starch	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5)**

				and Acidified creams (2.4.6) only
270	Lactic acid, L-, D- and DL-	Acidity regulator	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
472b	Lactic and fatty acid esters of glycerol	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
322(i)	Lecithin	Antioxidant, emulsifier, Flour treatment agent	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
332(ii)	**Lecithin, partially hydrolyzed**	**Antioxidant, emulsifier**		**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
461	Methyl cellulose	Bulking agent, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
465	Methyl ethyl cellulose	Emulsifier, Foaming agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
460(i)	Microcrystalline cellulose (Cellulose gel)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
471	Mono- and di-glycerides of fatty acids	Antifoaming agent, Emulsifier, Glazing agent, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
1410	Monostarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
440	Pectins	Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified**

				creams (2.4.6) only
1413	Phosphated distarch phosphate	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
402	Potassium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
501(i)	Potassium carbonate	Acidity regulator, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
508	Potassium chloride	Firming agent, Flavour enhancer, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
332(i)	Potassium dihydrogen citrate	Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
501(ii)	Potassium hydrogen carbonate	Acidity regulator, Raising agent, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
326	Potassium lactate	Acidity regulator, Antioxidant, Emulsifier, Humectant	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
460(ii)	Powdered cellulose	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
407a	Processed euchema seaweed	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	2001	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
401	Sodium alginate	Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**

500(i)	Sodium carbonate	Acidity regulator, Anticaking agent, Emulsifying salt, Raising Agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
466	Sodium carboxymethyl cellulose (Cellulose gum)	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
331(i)	Sodium dihydrogen citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
500(ii)	Sodium hydrogen carbonate	Acidity regulator, Anticaking agent, Raising Agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
325	Sodium lactate	Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying salt, Humectant, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
500(iii)	Sodium sesquicarbonate	Acidity regulator, Anticaking agent, Raising Agent	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
1420	Starch acetate	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
1450	Starch sodium octenyl succinate	Emulsifier, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
437	Tamarind seed polysaccharide	Emulsifying salt, Gelling agent, Stabilizer, Thickener	2019	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
333(iii)	Tricalcium citrate	Acidity regulator, Antioxidant, Emulsifying salt, Firming agent, Sequestrant, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
332(ii)	Tripotassium citrate	Acidity regulator, Antioxidant, Emulsifying	1999	**CS 288-1976**

		salt, Sequestrant, Stabilizer		**In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
331(iii)	Trisodium citrate	Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**
415	Xanthan gum	Emulsifier, Foaming agent, Stabilizer, Thickener	1999	**CS 288-1976 In Fermented creams (2.4.5) and Acidified creams (2.4.6) only**

Appendix 4

CONSIDERATION OF THE DEVELOPMENT AND IMPLEMENTATION ISSUES ASSOCIATED WITH ESTABLISHING TABLE 3 NOTES IN THE GSFA

Recommendation

The Chair recommends that the EWG for Alignment supports the development of Table 3 (T3) notes to the GSFA.

Such T3 notes could be developed and have the following features:

- **Relevant current Table 1 & 2 notes could be used as the basis for future T3 notes.**
- **Current condition statements already in the 5th column in Table 3 could be used and converted into T3 notes.**
- **The T3 notes could be listed as T3-1, T3-2, etc to differentiate them from Table 1 & 2 notes.**
- **A 6th column is proposed to be created to add such T3 notes. A footnote is proposed to be added to the title explaining that the notes only apply to standardized foods. The short title could be 'Notes[2]', with footnote 2 stating 'Notes relevant to the commodity standards in column 5 of this table only'. This proposal is designed to keep the width of the column narrow.**
- **The 5th and 6th column could be split into sub rows, with each row dealing only with one commodity standard and linked note, to ensure full clarity on which notes apply to which standards.**
- **Reference to the commodity standard is not required in notes since they are linked directly to the commodity standard in column 5.**
- **A question that has not been resolved is whether T3 notes can be used just to identify the function class the food additive is performing in the products conforming to the standard. Some members supported this to ensure full alignment of the standard. Others considered it was not warranted, further noting that it would increase the number of notes needed and make Table 3 larger and more cumbersome.**
- **The chair recommends the former (i.e. not use T3 notes for this purpose) but suggests further EWG and PWG discussion is required to hopefully reach consensus.**

Background

The 52nd Session of the Codex Committee on Food Additives (CCFA52) held virtually on 1 – 10 September 2021, agreed to convene an EWG on Alignment chaired by Australian and co-chaired by the United States of America and Japan with part of the Terms of Reference[7] to consider:

b) Investigating the development and implementation issues associated with establishing Table 3 notes in the GSFA, in consultation with the Codex Secretariat.

This part of the Terms of Reference came from Recommendation 6 of CCFA52/CRD03[8]:

Recommendation 6 - Development of Table 3 notes

CCFA52 endorsed the recommendation to in-principle introduce Notes in Table 3 similar to those in Tables 1 and 2 in the GSFA, as this new approach would ensure clarity in the use of food additives with numeric use levels; and thus, avoid potentially complicated requirements that could arise once a commodity standard has been aligned with the GSFA.

CCFA52 further tasked the Alignment EWG established by CCFA52 to identify and consider the implementation issues around Table 3 notes; and to consult the Codex Secretariat to identify any issues associated with the inclusion of the new notes in the GSFA database.

The discussion document has been written for that purpose.

During the alignment work for various CCMMP Commodity Standards for CCFA51, CCFA52 and preliminary work for CCFA53 (during 2020 and 2021 that was not presented at CCFA52 but carried over to CCFA53) some decisions were made at the time which in retrospect have been considered to be inappropriate or need to be changed and addressed by another approach.

[7] REP21/FA, para 107(iii)
[8] REP21/FA, para 88-89

The committee agreed a number of cases where provisions for Table 3 additives were added to Tables 1 and 2 of the GSFA in food categories that are not in the Annex to Table 3 when a corresponding commodity standard has specific restrictions on the use of a Table 3 additive. This was done to ensure that the GSFA included any restrictions (such as a numerical use level, or use singly or in combination with other additives) on the use of the Table 3 additives listed in a commodity standard corresponding to a specific food category that is not in the Annex to Table 3. These restrictions would otherwise have been lost.

Using the alignment decision tree[9] it is appropriate that these food additives fit into Box I. However, the reason these provisions were not added into Table 3 was to ensure the conditions listed in the standards are captured by use of notes. The decision had been to propose adding them into Tables 1 and 2 at GMP, but with a note restricting their use to the ML and conditions in the Commodity Standard.

This new approach has led to a problem in that it is not now consistent with the preamble text relating to Table 3. It could be interpreted that Table 3 additives without provisions in those food categories in Tables 1 and 2 cannot be used in other foods that fall within the scope of the food category but are not within the scope of the commodity standard. Consistent with the preamble of the GSFA, CCFA has hisToRically not included provisions for the use of Table 3 additives in Tables 1 and 2 of the GSFA for food categories that are not listed in the Annex to Table 3, as the general use of Table 3 additives in those food categories is already allowed by the listing of the additive in Table 3.

This issue was noted and then considered during 2020 and 2021, specifically in submissions, in particular from the USA. The USA submissions noted it 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 related to the 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. It is noted that this has already occurred as outcomes of the alignment work for CCFA51 and CCFA52.

The USA comments proposed an alternative strategy 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. This proposal received support and was therefore proposed for consideration at CCFA52 and supported.

It was noted that these types of notes might be different compared to the existing CS notes contained in Table 3, though these could be absorbed into new Table 3 notes. The USA proposal is an approach to help simplify entries in Table 3, to comply with the GSFA preamble and limit potential confusion in future understanding on how Table 3 operates. The proposal also helps 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.

Since the use of Table 3 notes has not been discussed or agreed by CCFA, it has not been done as part of the recent alignment work. From recent checking as part of this exercise, it was noted that there were examples in the CCFA52 alignment work (see examples and explanations below). There also were earlier examples 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 was detailed in item 20 of Appendix 1 of the alignment document, CX/FA 19/51/6.

It is noted with the CCFA agreeing in principle to using Table 3 notes then changes to the earlier CCFA51 and CCFA52 (and future CCFA53) alignment work will be required.

In summary, the proposal is to develop a separate list of notes for Table 3 of the GFSA, similar to the existing list of notes for Tables 1 and 2. This document is to consider the options of how best to do that, as well as provide some detail on the relevant provisions already made that will be impacted.

Examples are provided below from the alignment of various CCMMP commodity standards at CCFA51 (2019) and CCFA52 (2021), and proposed for CCFA53 (2023).

Alignments from CCFA51 (2019) approved amendments for Tables 1 & 2

This issue was considered within item 20 of Appendix 1 of CX/FA 19/51/6 (pages 15-16) for CCFA51 (2019). The final amendments made to the GSFA were slightly different to those initially proposed in CX/FA 19/51/6. It was noted that a number of food additives, specifically calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), calcium propionate (INS 282), propionic acid (INS 280), silicon dioxide, amorphous (INS 551), sodium propionate (INS 281) and talc (INS 553(iii)) are Table 3 food additives. However, the MLs for them in the various CCMMP commodity cheese standards were not listed as GMP but had numerical MLs,

[9] The Alignment Decision Tree is located as Attachment 2 within the Codex *Guidance to Commodity Committees on the Alignment of Food Additive Provisions*, https://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CCFA_e_01.pdf

along with quite complicated and detailed condition notes which it was considered needed to be maintained once alignment occurred in the GSFA otherwise they would be lost.

At the time, it was recognized that the alignment process has required the entries to be made to Tables 1 and 2 of the GSFA due to the numerical maximum levels in the standards for these food additives. However, it is also noted that food category number 01.6.2.1 is not listed in the annex to Table 3 and these food additives are listed in Table 3. So, there could well be confusion with users of the GSFA: whether these food additives can be used at GMP (since they are listed in Table 3 and 01.6.2.1 is not listed to the annex to table 3); or they have numerical provisions as listed in the condition notes added to their provisions in Tables 1 and 2. This in essence was the justification for why the alignment work added provisions into Tables 1 and 2 with the complicated and detailed notes, rather than adding them to Table 3 (since Table 3 notes was not considered a possibility at the time). It is noted there was EWG discussion of this issue at the time but unfortunately the ramifications and consequences were not fully understood or realised then, in amongst all the issues considered by the Alignment EWG and the committee.

It was also recognised, as the consideration occurred of removing provisions to these food additives from Tables 1 & 2 and adding them into Table 3, with new Table 3 notes, that amendments (and maybe new entries) are also required to the Tables within *References to Commodity Standards for GSFA Table 3 Additives* (below the Annex to Table 3). Consideration of what these changes would be have also been considered and provided below. This is an additional complication that needs to be addressed.

Examples of how alignment of these food additives were addressed at CCFA51 and then amendments made to the GSFA are provided below using an example of one food additive, calcium silicate (INS 552), but a similar situation exists for the other food additives noted above. That is, the provisions and notes for calcium silicate (INS 552) also apply for magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii).

Example: calcium silicate (INS 552).

Table 1

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	Adopt

Table 2

Food category 01.6.2.1 Ripened cheese, includes rind				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Calcium silicate	552	GMP	459, 461, XS274, XS276, XS277	Adopt

459 Except for use at 10,000 mg/kg, singly or in combination: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)) in 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) and Provolone (CXS 272-1968), as anticaking agents only: silicates calculated as silicon dioxide.

461 For the surface treatment of sliced, cut, shredded or grated cheese 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) and Provolone (CXS 272-1968), only as anticaking agents.

Alternative Table 3 entry with new Table 3 notes

There is already an existing entry in the 5th column of the entry for calcium citrate in Table 3, being CS 105-1981. The proposed new entries as notes to Table 3 entries are provided in **bold** and underlined. It is noted that the new notes are intended to apply to all the specific cheese commodity standards, CS 263, 264, etc, but making that clear in the column is not simple or straight forward, even with providing a line break between the groups. The Japanese Alignment co-chair provided an alternative option of using a 6th column where the specific notes are situated directly next to the commodity standards it relates to. This is also deemed important as there are already condition statements in some of the Table 3 entries that could be converted into their own Table 3 notes, so the single column 5 can become quite confusing. The two options are provided below:

Option 1: adding the Table 3 notes within column 5, and separating the relevant lists of standards by line breaks within the cell.

Option 2 (preferred): adding a 6th column to ensure the relevant note is next to the appropriate standards, requiring additional sub-rows in the row.

Canada made the useful comment which was accepted and therefore part of the proposal, that the notes must only apply to standardized foods, in a similar way to the heading for column 5. This picks up the issue raised by the USA several years earlier when incorporating the additive provisions into Tables 1 & 2. It suggested that the column title could be "Notes relevant to commodity standards". Since this is a bit long to fit into the title, the Chair suggests that maybe the relevant point identified by Canada can be addressed via a footnote, similar to what has been used by the USA for column 5 when it improved Table 3 recently.

Option 1

INS No.	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards[1]
552	Calcium silicate	Anticaking agent	1999	CS 105-1981, **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 (note T3-1)** **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 (note T3-2)**

Option 2

INS No.	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards[1]	Notes[2]
552	Calcium silicate	Anticaking agent	1999	CS 105-1981	
				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	**T3-1, T3-2**

1 This column only lists commodity standards that allow specific Table 3 additives. If a commodity standard allows Table 3 additives on a general basis or based on functional class, that information is contained in the "References to Commodity Standards for GSFA Table 3 Additives".

2 Notes relevant to commodity standards only

As noted in Appendix 5 - that provides a full list of proposed amendments to the GSFA due to the use of Table 3 notes - some of the new entries in Table 3 are even more complicated than the above example and may require 3 or 4 sub-rows for the preferred option 2.

It is understood this would require quite a change to the structure of Table 3, but that is a given if Table 3 notes are supported and agreed to be adopted. Strikethrough has been added to remove reference to the commodity standards, picking up the suggestion by Chile in response to questions at the back of the document. It made the valuable comment that there was no need to list the names of commodity standards in the notes when the notes were listed next to the commodity standards in column 5 of Table 3. This suggestion has been supported and is proposed, unless differing views and justifications are provided.

Notes

T3-1 For use at 10,000 mg/kg, singly or in combination: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)) ~~in 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) and Provolone (CXS 272-1968),~~ as anticaking agents only: silicates calculated as silicon dioxide.

T3-2 For the surface treatment of sliced, cut, shredded or grated cheese ~~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) and Provolone (CXS 272-1968),~~ only as anticaking agents.

The reworded proposed T3 notes to make them more consistent with how Tables 1 & 2 notes are written once reference to the commodity standards are removed is provided below.

T3-1 For use as anticaking agents only: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)), at 10,000 mg/kg, singly or in combination, silicates calculated as silicon dioxide.

T3-2 For use as anticaking agents for the surface treatment of sliced, cut, shredded or grated cheese only.

Another example of how the alignment occurred is provided below using an example of one food additive, calcium propionate (INS 282), but a similar situation exists for the other food additives noted above. That is, the provisions and notes also apply to propionic acid (INS 280) and sodium propionate (INS 281).

Example: calcium propionate (INS 282)

Table 1

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	Adopt

Table 2

Food category 01.6.2.1 Ripened cheese, includes rind				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Calcium propionate	282	GMP	3, 460, XS269, XS274, XS276, XS277	Adopt

Notes

460: Except for use at 3,000 mg/kg, singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) in 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), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968).

3: For use in surface treatment only

Alternative Table 3 entry with new Table 3 notes

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Acceptable in foods conforming to the following commodity standards[1]**	**Notes[2]**
282	Calcium propionate	preservative	1999	**CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968**	**T3-3**

T3-3: For use at 3,000 mg/kg, singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) ~~in 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), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968),~~ for surface treatment only.

It is proposed to take the opportunity update the notes that would become T3 notes. In particular, it is noted there is no need to use the term 'singly or in combination' for additives within the same food additive group. It also noted that the reporting term for propionates is propionic acid as used in some notes. Therefore, these changes should be made in proposed new T3 notes. The reworded T3-3 after removal of reference to commodity standards, restructured and some consistency tweaks is provided below.

T3-3: For use for surface treatment only: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282), 3,000 mg/kg **as propionic acid**.

Consideration of changes required to the relevant Table within the *References to Commodity Standards for GSFA Table 3 Additives* and the food additives paragraph added to Commodity Standards post alignment

The relevant food category within the GSFA is 01.6.2.1 Ripened Cheese, includes rind. There is a current Table for this Food category, which needs amending. Proposed amendments are provided below using

strikethrough (for removal) and bold, underlined (for addition). The amendments relate to the additional functional class of preservative. Below is a suggestion of what changes could look like.

01.6.2.1	**Ripened Cheese, includes rind**
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards. Acidity regulators are only acceptable for use in the cheese mass. Colours are only for use in the cheese mass to obtain the colour characteristics as described in Section 2 of the commodity standard. Anticaking agents are only justified for the surface treatment of sliced, cut, shredded or grated cheese. Where acceptable **preservatives are acceptable for surface treatment only.**
Codex standards	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)

The paragraphs added to the Food Additives section in the Commodity Standards post alignment also need to be considered and amended as required.

An example of one of them is CXS 263-1966 *Standard for Cheddar* is provided below which was amended post alignment. Proposed amendments are provided below using strikethrough (for removal) and bold, underlined (for addition).

Standard for Cheddar (CXS 263-1966)

4. FOOD ADDITIVES

4.1 Only those additives classes indicated as justified in the table below may be used for the product categories specified. ~~Anticaking agents,~~ **C**olours 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, ~~and~~ colours **and preservatives** in Table 3 are acceptable for use in foods conforming to this standard.

Summary from CCFA51 (2019)

The summary of the provisions impacted by changing Tables 1 & 2 entries and notes to implementing amendments to Table 3 and the introduction of new Table 3 notes relating to alignment amendments from CCFA51 is provided in the table below.

Food additive (INS)	**Functional class/technological purpose**	**Food category (Table 2)**	**Commodity standard**	**GSFA Notes Tables 1&2**	**Proposed Table 3 notes**
Calcium silicate (552)	Anticaking agent	01.6.2.1 Ripened cheese, includes rind	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)	459	T3-1
Magnesium silicate, synthetic (553(ii)					
Silicon dioxide, amorphous (551)				461	T3-2
Talc (553(iii)					

Calcium propionate (282) Propionic acid (280) Sodium propionate (281)	Preservative	01.6.2.1 Ripened cheese, includes rind	Cheddar (CXS 263-1966), Danbo (CXS 264-1966) Edam (CXS 265-1966), Gouda (CXS 266-1966), Havarti (CXS 267-1966), Samsø (CXS 268-1966), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968), Provolone (CXS 272-1968)	460	T3-3

Consequential changes are also required for the Table for Food Category 01.6.2.1 in the *References to Commodity Standards for GSFA Table 3 Additives.* Likewise changes are required to be made to the food additives section within each of the aligned Commodity Standards, being:

> Cheddar (CXS 263-1966); Danbo (CXS 264-1966); Edam (CXS 265-1966); Gouda (CXS 266-1966); Havarti (CXS 267-1966); Samsø (CXS 268-1966); Tilsiter (CXS 270-1968); Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968)

Alignments from CCFA52 (2021) approved amendments for Tables 1 & 2

Similar changes proposed from the alignment work for CCFA51 detailed above are also required for CCFA52.

It was noted that a number of food additives with the functional purpose of anticaking agents, specifically calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)) were determined to have an ML of GMP for the various ripened cheeses when they were aligned at CCFA51. The comparable situation was also determined for potassium silicate (INS 560) at CCFA52, noting it is not a Table 3 food additive (was not at CCFA52 meeting). A similar situation occurred for the preservative food additives, calcium propionate (INS 282), propionic acid (INS 280) and sodium propionate (INS 281) at CCFA51. This same situation applies for the alignment of cheese products aligned for CCFA52. The alignment of a number of these food additives, which are Table 3 food additives were aligned in Tables 1 & 2 using detailed notes. As noted above, it is proposed that these can be and should be addressed by amendments to Table 3 and the use of new Table 3 notes. All of the food additives listed above are Table 3 additives (with the exception of potassium silicate (INS 560)) and the food categories are not listed in the annex to Table 3.

It has been pointed out by the Japanese Alignment EWG co-chair that potassium silicate does NOT have a JECFA specification so it should NOT be added to the GSFA as part of the Alignment work. To rectify this, it is proposed to remove entry of potassium silicate from the proposed amendments relating to Table 3 notes. This situation was also identified when the GSFA was updated as an outcome of the REP21/FA from the CCFA52 meeting. This has required changes, noted via the use of ~~strikethrough~~ in relevant sections of the document in the 1st circular but references have been removed completely in this 3rd circular.

Examples of how alignment of these food additives were addressed at CCFA52 and then amendments made to the GSFA following the CAC44 meeting are provided below using an example of one food additive, calcium silicate (INS 552), but a similar situation exists for the other food additives.

Example: calcium silicate (INS 552)

Table 1

Calcium silicate INS 552: Functional class: Anticaking agent				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.6.1	**Unripened Cheese**	**GMP**	488, XS273, XS275	Adopt

01.6.2.1	Ripened Cheese includes rind	GMP	459, 461, 502, XS274, XS276, XS277, XS208, **XS278**	Adopt

Table 2

Food category 01.6.1 Unripened cheese				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Calcium silicate	**552**	**GMP**	488, XS273, XS275	Adopt

Food category 01.6.2.1 Ripened cheese, includes rind				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Calcium silicate	552	GMP	459, 461, 502, XS274, XS276, XS277, XS208, **XS278**	Adopt

488: 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)) and talc (INS 553(iii)), 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.

502: 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)) and talc (INS 553(iii)) as anticaking agents at 10,000 mg/kg, as silicon dioxide, singly or in combination.

XS278 This has been highlighted because it is considered to be an error, that XS278 should be added to the entries for calcium silicate due to alignment conducted at CCFA52 (2021)[10].

Alternative Table 3 entry with new Table 3 notes

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Acceptable in foods conforming to the following commodity standards**	**Notes**
552	Calcium silicate	Anticaking agent	1999	CS 105-1981	
				CS 221-2001, CS 283-1978	**T3-4**

Notes

T3-4: ~~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)) and talc (INS 553(iii)), 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.

T3-5: 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)) and talc (INS 553(iii)) as anticaking agents at 10,000 mg/kg, as silicon dioxide, singly or in combination.

It is further noted that the two new T3 notes should be rewritten to be more comparable to each other and how Table 1 and 2 notes are written once reference to the commodity standards are removed. It is noted that they are now identical so only T3-4 is needed (that is the reworded T3-5 is identical to T3-4).

T3-4: For use as anticaking agents for the surface treatment of sliced, cut, shredded or grated cheese only: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)), singly or in combination, at 10,000 mg/kg as silicon dioxide.

A similar situation occurred for the food additives, calcium propionate (INS 282), propionic acid (INS 280) and sodium propionate (INS 281). The alignment of a number of these food additives, which are Table 3 food additives were aligned in Tables 1 & 2 using detailed notes.

The example for these preservatives is the food additive propionic acid (INS 280).

[10] REP21/FA, Appendix VI, pages 88 and 97

Example: Propionic acid (INS 280)

Table 1

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, 503, XS269, XS274, XS276, XS277, XS208, XS278,	Adopt

Table 2

Food category 01.6.2.1 Ripened cheese, includes rind				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**
Propionic acid	280	GMP	3, 460, 503, XS269, XS274, XS276, XS277, XS208, XS278	Adopt

3: For use in surface treatment only.

503: 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.

Alternative Table 3 entry with new Table 3 notes

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Acceptable in foods conforming to the following commodity standards**	**Notes**
280	Propionic acid	Preservative	1999	**CS 283-1978**	**T3-6**

It was also considered important that note 3 (surface treatment only) needs to also be captured in the new T3 note as written below. This was initially overlooked but it is an important reminder to consider all relevant condition requirements so they are not lost when T3 notes are written from Table 1 & 2 notes.

Further it is considered useful to make the different new T3 notes to be self consistent, with those proposed from the alignment of CCFA51 (2019), ie T3-4 provided above.

Notes

T3-6: ~~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, for surface treatment only.

Restructured T3-6 once the commodity standards are removed is provided below.

T3-6: For surface treatment only: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282), at 3000 mg/kg as propionic acid.

Consideration of changes required to the relevant Table within the *References to Commodity Standards for GSFA Table 3 Additives* and the food additives paragraph added to Commodity Standards post alignment

The relevant food categories within the GSFA are 01.6.1 *Unripened cheese* (linked to *Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001)), and 01.6.2.1 *Ripened cheese, includes rind* (linked to *General Standard for Cheese* (CXS 283-1978)). There is a current Table for food category 01.6.2.1 (noting the proposed amendments already noted from CCFA51 above). CCFA52 also proposed changes to 01.6.2.1 and the creation of a table for food category 01.6.1, which have both been checked and no amendments are required. The Tables from REP21/FA are copied below for information.

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)

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)

The paragraphs added to the Food Additives section of the two Commodity Standards post alignment also need to be considered and amended as required.

These Commodity Standards are *Group Standard for Unripened Cheese including Fresh Cheese* (CXS 221-2001) and *General Standard for Cheese* (CXS 283-1978). The paragraphs are provided below which were amended post alignment. Proposed amendments are provided below using strikethrough (for removal) and bold, underlined (for addition).

Group Standard for Unripened Cheese including Fresh Cheese (CXS 221-2001)

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.

General Standard for Cheese (CXS 283-1978)

4. FOOD ADDITIVES

~~Acidity regulators,~~ **C**olours 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.

Summary from CCFA52 (2021)

The summary of the provisions impacted by changing Table 1 & 2 entries and notes to implementing amendments to Table 3 and the introduction of new Table 3 notes relating to alignment amendments from CCFA52 is provided in the table below.

Food additive (INS)	Functional class/technological purpose	Food category (Table 2)	Commodity standard	GSFA Notes Tables 1&2	Proposed Table 3 notes
Calcium silicate (552)	Anticaking agent	01.6.1 Unripened Cheese	Group Standard for Unripened Cheese including Fresh Cheese (CXS 221-2001)	488	T3-4
Magnesium silicate, synthetic (553(ii)					
Silicon dioxide, amorphous (551)					
Talc (553(iii)					
Calcium silicate (552)	Anticaking agent	01.6.2.1 Ripened cheese, includes rind	General Standard for Cheese (CXS 283-1978)	502	T3-4
Magnesium silicate, synthetic (553(ii)					
Silicon dioxide, amorphous (551)					
Talc (553(iii)					

Calcium propionate (282) Propionic acid (280) Sodium propionate (281)	preservative	01.6.2.1 Ripened cheese, includes rind	General Standard for Cheese (CXS 283-1978)	503	T3-6

Checks were made but no consequential changes are required for the Table for Food Categories 01.6.1 and 01.6.2.1 in the *References to Commodity Standards for GSFA Table 3 Additives.* However, some minor changes are required to be made to the food additives section within each of the aligned Commodity Standards, being:

Group Standard for Unripened Cheese including Fresh Cheese (CXS 221-2001)

General Standard for Cheese (CXS 283-1978)

CCFA53 (2023) alignment (Appendix 1, issue 2), proposed alignment

The alignment of the following anticaking agents: calcium carbonate (INS 170(i)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)) for a number of the commodity standards (CXS 207, CXS 262 and CXS 290) has been made consistent with the decisions adopted at CCFA51 and CCFA52. This was alignment work considered during 2020 and 2021 but not reported at the CCFA52 (2021) meeting, so carried over for CCFA53.

The same explanations and arguments were made for the alignment consideration so they are not repeated here.

However, it was during the EWG for Alignment consideration of the alignment of the next lot of CCMMP commodity standards that the USA submission of using Table 3 notes that changed the approach that had occurred till then. This is explained earlier in the background. The USA submission, along with the explanation of why it proposed Table 3 notes to what has been provided also added a worked example of what Table 3 notes could look like which is provided below (but has been altered to be consistent with the Tables 1 & 2 notes proposed).

Example of the use of "Table 3 Notes" to address the use of Table 3 additives for which the capture of numerical limits is warranted

INS	**Additive**	**Functional Class**	**Year Adopted**	**Acceptable, including foods conforming to the following commodity standards**	**Notes**
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	CS 207-1999	**T3-7**
				CS 290-1995	**T3-8, T3-10**

T3-7: ~~For use in products conforming to the Standard for Milk Products and Cream Powder (CXS 207-1999):~~ Bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), singly or in combination for use as anticaking agents only at 10,000 mg/kg.

T3-8: ~~For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995):~~ Bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium silicate (INS 552), hydroxypropyldistarch phosphate (INS 1442), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), microcrystalline cellulose (cellulose gel) (INS 460(i)), powdered cellulose (INS 460(ii)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)) tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), as anticaking agents only, singly or in combination at 4,400 mg/kg, noting the total amount of phosphorus shall not exceed 4,400 mg/kg.

T3-10: ~~For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995)~~ as an acidity regulator only.

The Table 3 note T3-7 (which has been edited since proposed in the USA submission to be consistent with proposed notes for Tables 1 & 2) is as an alternative to the individual entries in both Table 1 and 2 for the six food additives (INS 170(i), 552, 504(i), 530, 553(i), 551, 341(iii) and 343(iii)) for food category 01.5.1 (CXS 207-1999 and CXS 290-1995). The same note is required for CXS 290-1995 (i.e., CS 290 (Note T3-1)). Additionally, a new note is CS 262 (Note T3-9) is needed for CXS 262-2006 (food category 01.6.1) for four of the food additives (INS 552, 553(i), 551 and 553(iii)) with similar wording.

T3-9: ~~For use in products conforming to the Standard for Mozzarella (CXS 262-2006):~~ Calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)), for the surface treatment of sliced, cut, shredded or grated low moisture Mozzarella or for the surface treatment of shredded and/or diced high moisture Mozzarella, as anticaking agents only at 10,000 mg/kg, singly or in combination, as silicon dioxide.

The above four notes could be rearranged similar to the earlier T3 notes, to make them more consistent with the way Table 1 & 2 notes are generally written, as provided below. It is questioned whether T3-10 is needed to be added to Table 3, since it now refers only to the functional class. This is a question considered at the background of the document, in question 6, where different views have been expressed by the EWG.

T3-7 For use as anticaking agents only: bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), singly or in combination, at 10,000 mg/kg.

T3-8: For use as anticaking agents only: bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium silicate (INS 552), hydroxypropyldistarch phosphate (INS 1442), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), microcrystalline cellulose (cellulose gel) (INS 460(i)), powdered cellulose (INS 460(ii)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), singly or in combination at 4,400 mg/kg, noting the total amount of phosphorus shall not exceed 4,400 mg/kg.

T3-9: For use as anticaking agents for the surface treatment of sliced, cut, shredded or grated low moisture Mozzarella or for the surface treatment of shredded and/or diced high moisture Mozzarella only: calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)), at 10,000 mg/kg, singly or in combination, as silicon dioxide.

T3-10: For use as an acidity regulatory ~~only~~.

Fuller explanations for one example are provided for calcium carbonate (INS 170(i)) taken from Tables 1 & 2 alignment proposed amendments for CCFA53 compared to the Table 3 note T3-7 provided above.

Current alignment proposed for CCFA53 (amendments to Table 1 & 2)

Example: Calcium carbonate (INS 170(i)

Table 1

Calcium carbonate INS 170(i): Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer				
Food Category No.	**Food Category**	**Max Level**	**Notes**	**Recommendations**
01.5.1	**Milk powder and cream powder (plain)**	**GMP**	**C207, D290, E290**	Adopt

Table 2

Food category 01.5.1: Milk powder and cream powder (plain)				
Additive	**INS**	**Max level**	**Notes**	**Recommendation**
Calcium carbonate	**170(i)**	**GMP**	**C207, D290, E290**	Adopt

C207 Except for use in products conforming to the Standard for Milk Products and Cream Powder (CXS 207-1999): bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), singly or in combination for use as anticaking agents only at 10,000 mg/kg.

D290 Except for use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium silicate (INS 552), hydroxypropyldistarch phosphate (INS 1442), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), microcrystalline cellulose (cellulose gel) (INS 460(i)), powdered cellulose (INS 460(ii)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), as anticaking agents only, singly or in combination at 4,400 mg/kg, noting the total amount of phosphorus shall not exceed 4,400 mg/kg.

E290 For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995) as an acidity regulator.

Consideration of changes required to the relevant Table within the *References to Commodity Standards for GSFA Table 3 Additives* and the food additives paragraph added to Commodity Standards post alignment

The relevant food categories within the GSFA are 01.5.1 *Milk powder and cream powder (plain)* (linked to the Standards for *Milk powders and cream powder* (CXS 207-1999) and *Edible Casein Products* (CXS 290-1995)), and 01.6. 1 *Unripened cheese* (linked to *Standard for Mozzarella* (CXS 262-2006)). It is noted that CCFA52 proposed the creation of a table for food category 01.6.1. The Tables from the CCFA53 alignment are copied below for information. No changes are required for these two tables.

01.5.1	Milk powder and cream powder (plain)
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to these standard
Codex standards	Milk powders and cream powder (CXS 207-1999) Edible Casein Products (CXS 290-1995)

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	Mozzarella (CXS 262-2006)

The paragraphs added to the Food Additives section of the three Commodity Standards post alignment also need to be considered and amended as required.

These Commodity Standards are *Standard for Milk Powders and Cream Powder* (CXS 207-1999), *Standard for Edible Casein Products* (CXS 290-1995) and *Standard for Mozzarella* (CXS 262-2006). The paragraphs provided below are proposed as part of alignment. Proposed amendments are provided below using strikethrough (for removal) and bold, underlined (for addition). Only one minor amendment is proposed for the entry to CXS 262-2006 (as noted below).

Standard for Milk Powders and Cream Powder (CXS 207-1999)

4. FOOD ADDITIVES

Acidity regulators, anticaking agents and antioxidants used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CODEX STAN 192-1995) in food category 01.5.1 (Milk powder and cream powder (plain)) and only certain acidity regulators, anticaking agents, antioxidants, emulsifiers, firming agents and stabilizers in Table 3 are acceptable for use in foods conforming to this standard.

Standard for Edible Casein Products (CXS 290-1995)

4. FOOD ADDITIVES

Acidity regulators and anticaking agents used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 01.5.1 (Milk powder and cream powder (plain)) and only certain acidity regulators, anticaking agents, bulking agents and emulsifiers in Table 3 are acceptable for

use in foods conforming to this standard.

Standard for Mozzarella (CXS 262-2006)

4. FOOD ADDITIVES

Acidity regulators, ~~anticaking agents,~~ colours, 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, anticaking agents, colours, preservatives and stabilizers in Table 3 are acceptable for use in foods conforming to this standard.

Summary for CCFA53 (2023)

The summary of the provisions impacted by changing Table 1 & 2 entries and notes to implementing amendments to Table 3 and the introduction of new Table 3 notes relating to alignment amendments for CCFA53 are provided in the table below.

Food additive (INS)	Functional class/technological purpose	Food category (Table 2)	Commodity standard	GSFA Notes Tables 1&2	Proposed Table 3 notes
Calcium carbonate (170(i))	Anticaking agent	01.5.1 Milk powder and cream powder (plain)	Standard for Milk Products and Cream Powder (CXS 207-1999)	C207	T3-7
Calcium silicate (552)					
Magnesium carbonate (504(i))					
Magnesium oxide (530)					
Magnesium silicate, synthetic (553(ii))					
Silicon dioxide, amorphous (551)					
Talc (553(iii))					
Calcium carbonate (170(i))	Anticaking agent	01.5.1 Milk powder and cream powder (plain)	Standard for Edible Casein Products (CXS 290-1995)	D290	T3-8
Calcium silicate (552)					
Hydroxypropyl distarch phosphate (1442)					
Magnesium carbonate (504(i))					
Magnesium oxide (530)					
Magnesium silicate, synthetic (553(ii))					
Microcrystalline cellulose (cellulose gel) (460(i))					
Powdered cellulose (460(ii))					
Silicon dioxide, amorphous (551)					
Talc (553(iii))					

Calcium carbonate (170(i))	Acidity regulator	01.5.1 Milk powder and cream powder (plain)	Standard for Edible Casein Products (CXS 290-1995)	E290	T3-10 (?)
Magnesium carbonate (504(i)					
Magnesium hydroxide carbonate (504(ii))					
Calcium silicate (552)	Anticaking agent	01.6.1 Unripened Cheese	Standard for Mozzarella (CXS 262-2006)	D262	T3-9
Magnesium silicate, synthetic (553(ii)					
Silicon dioxide, amorphous (551)					
Talc (553(iii)					

D262 Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006): calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)) for the surface treatment of sliced, cut, shredded or grated low moisture Mozzarella or for the surface treatment of shredded and/or diced high moisture Mozzarella, as anticaking agents only at 10,000 mg/kg, singly or in combination, as silicon dioxide.

Checks were made but no consequential changes are required for the Table for Food Categories 01.5.1 and 01.6.1 in the *References to Commodity Standards for GSFA Table 3 Additives.* The food additives section was also checked whether consequential changes were required within each of the aligned Commodity Standards, being:

Standard for Milk Products and Cream Powder (CXS 207-1999)

Standard for Edible Casein Products (CXS 290-1995)

Standard for Mozzarella (CXS 262-2006)

Only one minor change is required to be made for CXS 262-2006, and the other two entries do not need any changes.

Potential Table 3 notes due to current condition statements

As noted earlier it is suggested that the current condition statements already located within entries in column 5 of Table 3 could be converted also to Table 3 notes. Such current notes could form the initial basis for a list of Table 3 notes. From an investigation of the current (2021 version) of Table 3 an initial list of potential Table 3 notes is provided in the Annex of this document.

Options

What is being proposed as the preferred option has been highlighted by the worked examples above taken from the completed alignment work for CCFA51 and CCFA52, and what is proposed for CCFA53.

That is to replace provisions and notes in Tables 1 & 2 that were aligned from CCMMP Commodity Standards for Table 3 food additives, where the relevant food category is not listed in the annex to Table 3, and add them into Table 3. The addition of these provisions for the Table 3 food additives is proposed to also include adding new Table 3 notes, which will be essentially the same Tables 1 & 2 notes that were created for alignment into Tables 1 and 2. This is a new concept, but the option and appearance should be relatively straight forward, with the new notes being numbered (e.g. T3-1, T3-2, etc.) and added to the fifth column (Specific allowance in the following commodity standards[1]) where existing condition statements (notes) currently are listed. Examples of current condition statements in the 5th column for agar (INS 406) are:

CS 70-1981 (for use in packing media only)

CS 94-1981 (for use in packing media only)

CS 119-1981 (for use in packing media only).

The condition note could be easily expressed e.g.:

T3-1 For use in packing media only

in a new list of Table 3 notes, in a similar way to the Tables 1 & 2 notes are listed.

Also the commodity standards could be batched to consolidate and tidy them up slightly, e.g.:

{CS 70-1981, CS 94-1981, CS 119-1981: T3-1}

As part of ensuring the appropriate new Table 3 notes are linked to the appropriate commodity standards, a proposed preferred alternative is to include a 6th column which is specifically a note column and include sub-rows within the current list of commodity standards for a particular food additive to apply to a particular note, to limit potential confusion. Examples have been provided in the preceding pages, to indicate how they would look and operate.

What is being proposed is that the existing condition statements, notes already in the 5th column are converted into Table 3 notes. The new Table 3 notes proposed to be created from the recent alignment work would be added to these in a sequential numerical order, noting that the order of the numbers is not important.

There has already been suggestions that new notes could be developed to provide additional information to Table 3 provisions for food additives, including noting the specific functional class that the additive has related to the commodity standard, if that is considered important. It is understood that there are different views on whether this sort of information is critical for GMP Table 3 food additives.

At this initial stage of consideration there does not appear to be many options to consider but the EWG is asked to comment further and offer alternatives or additional comments to what is being proposed.

It is important to note that the committee provided in principle support for adding Table 3 notes to the GSFA. The EWG is therefore asked to consider and provide responses to the following questions. Any additional comments, suggestions or proposed amendments are also appreciated.

Annex 1: EWG questions and summary of responses

Annex 2: Initial list of Table 3 notes taken from column 5 of the current version, before consideration of alignment

Annex 1

EWG questions and summary of responses

1. Can the current Tables 1 & 2 notes already in the GSFA due to earlier alignment be used as the basis for Table 3 notes? Do any changes need to be made?

YES

IDF: for dairy standards, at least be the basis of T3 notes

Chile

Japan: the current notes in Table 3 were made to capture specific conditions of the food additive provisions in the relevant commodity standards, so new Table 3 notes should be based on these.

Canada: agrees that it is appropriate to base the development of new Table 3 notes, specific to commodity standards, on existing notes that were initially placed in Tables 1 and 2 for Table 3 additives in those food categories which are not included the Annex to Table 3.

USA: The existing Tables 1 & 2 notes already included in the GSFA can be used as the basis for the Table 3 notes. It would be a case by case basis as to whether any changes would be need to be made to the existing notes.

2. Is it appropriate to convert current condition statements (notes) already in the 5th column of Table 3 into Table 3 notes?

YES

IDF: comments comparable to response to Q1

Japan: comments comparable to response to Q1. Doing this ensures the notes are consistent to prevent user confusion.

Canada: believes it is appropriate to convert current stipulations in column 5, where present, for individual commodity standards into Table 3 notes to appear under column 6.

USA: It would be appropriate to convert current condition statements in the 5th column of Table 3 into Table 3 notes.

COMMENT

Chile: suggests it is more appropriate to include a sixth column for the notes [Chair comment: understands the comment supports the proposal to include current condition statements already in the 5th column to 6th column, noting response to Q1].

3. Is the suggestion to number Table 3 notes as T3-1, T3-2, etc clear and appropriate so they are not confused with the already numbered Tables 1 & 2 notes? If not, what is an alternative suggestion?

YES

IDF: can support proposed numbering system. It also supports Chile's comment below that there is not a need to include the product standard in the note as that is already listed in column 5.

Chile: clearer with T3-1 nomenclature etc. In addition Chile suggests that the definition of the note not name the product standard again, since column 5 already names the product standards [Chair's comment: good suggestion to be accepted when relevant].

Japan: it clearly distinguishes Table 3 notes from Table 1 & 2 notes.

Canada: agrees with this approach

USA: supports the current proposal to label the Table 3 notes (e.g. T3-1, T3-2, etc)

4. Is there support for creating a 6th column, titled 'Notes', to add these new Table 3 notes? This option is proposed as a preferred one to assist in ensuring new Table 3 notes are directly listed next to the relevant commodity standards. This also would require adding additional sub-rows within the entry to ensure clarity.

YES

IDF: this would help to significantly clarify the document. But caution is noted to ensure there is no confusion. It notes the example of the online version of CXG 36-1989 where the addition of sub-rows to differentiate function is confusing.

Chile: supports the option of a sixth column and adding additional sub-rows within the entry to ensure clarity.

Japan: supports the Chair's proposal (option 2 in page 4) as it is easier to see the notes linked to the relevant commodity standard. Option 1 may become redundant if one commodity standard refers to several notes.

USA: supports the proposal to add a 6th column to Table 3 in which to add the notes, with support also for the inclusion of additional sub-rows to ensure clarity.

Canada: supports the inclusion of a 6th column. However, we strongly recommend that the 6th column title indicate that the notes relate to standardized foods, so that non-standardized foods are not inadvertently affected by alignment of commodity standard provisions, which was one of the concerns the U.S. had identified when incorporating these additive provisions into Tables 1 and 2. The column title could be "Notes relevant to commodity standards".

Chair's comment: Canada's proposal is supported to ensure certainty. Since the proposed title would make the column quite wide it is suggested that the title be added as a footnote (#2) similar to the existing footnote #1 already used for column 5. This is provided as option 2 on page 5 (with yellow highlight).

Chair's additional comment: Chile made comments in its submission to the 1st circular within Appendix 5 where it sought clarification for a number of entries in separate sub-rows where it is proposed that some of the commodity standards do not have Table 3 notes. This is correct, these do not require any Table 3 notes as there are none currently listed for them in column 5 of Table 3 of the GSFA and nothing required due to recent alignment work. This is the justification for why adding sub-rows is important, to ensure clarity of which commodity standards the Table 3 notes apply to.

5. **If the proposed option of using a 6th column is not supported, what alternative is proposed to ensure clarity around which commodity standards are linked to which Table 3 notes, as some food additive entries already are quite long and will get more complicated as the alignment work is finalised?**

YES

IDF: see above comment to Q4

Chile: supports a 6th column as it is the clearest option

6. **What other purposes could Table 3 notes be used for, that up until now it was considered too cumbersome to write very long detailed noted into column 5? Or should the development of Table 3 notes be kept very limited since they are for GMP food additives? One example flagged early was maybe to use them to identify the relevant functional class for the food additive specific to the commodity standard. Is that required, needed or important?**

SUPPORT REFERENCE TO FUNCTIONAL CLASS

YES

IDF: strongly supportive of T3 notes, as it allows alignment to more accurately reflect the conditions in the commodity standards. It notes that T3 notes should be used to identify the relevant functional class of a food additive with multiple function classes appropriate and for which it was mandated in the original commodity standard. This has been especially the situation for dairy standards where the standards development paid particular attention to the food additive functional class, more so than the GSFA, even for GMP food additives. It believes this would more accurately reflect the conditions of the commodity standard, which is a key principle of Alignment.

Japan: supports using Table 3 notes to identify the relevant functional class since commodity standards list food additives and their maximum levels groups by functional class. If Table 3 notes do not capture the relevant functional class, such information would be lost.

Canada: agrees with IDF and Japan, that the relevant functional class should be maintained for all food additives as per conditions in the commodity standards. It further provided support for its position in comments submitted to the 3rd circular documents.

Canada strongly believes the functional classes indicated in Commodity Standards prior to Alignment should be maintained in Table 3 listings through the use of the proposed Table 3 Notes. We believe they are required to relate the new text in Section 4 of the Commodity standards (after Alignment), which includes an identification of the specific functional classes and refers the reader to Tables 1, 2 and Table 3 of the GSFA for additional details on food additive allowances. If this information on functional class is not also included Table 3 (or also Tables 1 and 2), then the information on functional classes in the Aligned Commodity Standards cannot be related to information in the GSFA and this linkage to the reference of the functional class in the commodity standard is lost. This approach also follows the principles of Alignment in that the GSFA be

the single reference point for food additives. If the functional class is not included in the GSFA, the Commodity Standard must be referred to, resulting in the GSFA not being the single reference point.

Canada also makes the important point that the use of the term 'only' in such T3 notes needs to be considered carefully. It is noted, however, using the examples of Notes T3-8 and T3-10 above that we must be careful with the use of the term "only" in Notes after the functional class is listed. For example, magnesium carbonate can be used as both an anticaking agent (T3-8) and an acidity regulator (T3-10) in products conforming to the *Standard for Edible Casein Products* (CXS 290-1995). Including "only" in Note T3-10 would suggest that its use for any other technological function is not permitted, contradicting information contained in Note T3-8.

Chair's response to use of the term 'only' in T3 notes: Canada makes a good point. Is the term 'only' required for any T3 notes? Is it only needed if it is considered important to be explicit about the functional class the food additive is being used along with the specific condition statement from the commodity standard? It is suggested that T3-10 (if there is support for its use) does not need the term 'only'. Seeking further PWG comments on this important point, which is an outcome of whether function classes are required for T3 notes.

NO

Chile: suggests the notes in the 6th column should only refer to the maximum limit and according to the product standard [original commodity standard].

USA: in general it only supports the inclusion of Table 3 notes where it is necessary. It worries that the inclusion of additional non-essential notes could make Table 3 too cumbersome. Under most circumstances, the USA does not support the inclusion of Table 3 notes that only indicate the functional class specific for use in the particular commodity standard.

Chair's comment and proposal: EWG member's views are mixed on whether it is appropriate or supported to only reference the functional class in Table 3 notes consistent with the original provisions in the commodity standard.

The Chair understands the reasons and justification for adding such notes due to alignment but is not convinced that this is a strong enough reason for expanding Table 3. The draft proposal is NOT to propose adding Table 3 notes that only refer to functional class. Further consideration of this proposal is expected at the PWG of the CCFA53 meeting.

It is noted that the entries to the *References to Commodity Standards for GSFA Table Additives* and the food additive sections referring to the GSFA added to the commodity standards as part of alignment work will need to be checked and consequential changes made as appropriate.

Annex II

Initial list of Table 3 notes taken from column 5 of the current version (2021), before consideration of alignment

It is understood that there is obvious duplication of the numbering of Table 3 notes listed below to those proposed in the main part of the document. However, these are used just as a reference; i.e. if they are supported any new notes due to alignment would continue in consecutive numbering from the end of these, i.e., starting from T3-10.

Table 3 note #	Note	Linked to food additive (commodity standard)
T3-1	For use in packing media only	Agar (CS 70, CS 94, CS 119) Alginic acid (CS 70, CS 94, CS 119) Calcium alginate CS 70, CS 94, CS 119) Carob bean gum (CS 70, CS 94, CS 119) Carrageenan (CS 70, CS 94, CS 119) Guar gum (CS 70, CS 94, CS 119) Pectins (CS 70, CS 94, CS 119) Potassium alginate (CS 70, CS 94, CS 119) Processed eucheuma seaweed (PES) (CS 70, CS 94, CS 119) Sodium alginate (CS 70, CS 94, CS 119) Sodium carboxymethyl cellulose (Cellulose gum) (CS 70, CS 94, CS 119) Tragacanth gum (CS 70, CS 94, CS 119) Xanthan gum (CS 70, CS 94, CS 119)
T3-2	As antioxidant in canned pineapple	Ascorbic acid, L- (CS 319)
T3-3	In cheese mass only	Calcium carbonate (CS 263, CS 264, CS 265, CS 266, CS 267, CS 268, CS 269, CS 270, CS 271, CS 272) Chlorophylls (CS 263, CS 264) Glucono delta-lactone (CS 263, CS 264, CS 265, CS 266, CS 267, CS 268, CS 269, CS 270, CS 271, CS 272, CS 274, CS 276, CS 277) Magnesium carbonate (CS 263, CS 264, CS 265, CS 266, CS 267, CS 268, CS 269, CS 270, CS 271, CS 272) Tamarind seed polysaccharide (CS 273, CS 275) Titanium dioxide (CS 221, CS 275, CS 283)
T3-4	For use in surface decoration only	Lutein esters from Tagetes erecta (CS 87)
T3-5	For surface treatment only, of sliced, cut, shredded or grated cheese	Microcrystalline cellulose (cellulose gel) (CS 263, CS 264, CS 265, CS 266, CS 267, CS 268, CS 269, CS 270, CS 271, CS 272) Powdered cellulose (CS 263, CS 264, CS 265, CS 266, CS 267, CS 268, CS 269, CS 270, CS 271, CS 272)

T3-6	For whipped products only	Carbon dioxide (CS 221) Nitrogen (CS 221)
T3-7	For green marbled cheeses only	Chlorophylls (CS 221, CS 283)
T3-8	For use in sliced, cut, shredded or grated cheese only	Microcrystalline cellulose (Cellulose gel) (CS 221, CS 283) Powdered cellulose (CS 221, CS 283)

Appendix 5

FULL LIST OF AMENDMENTS TO GSFA DUE TO INTRODUCTION OF TABLE 3 NOTES ARISING FROM CCFA51, CCFA52 AND PROPOSED CCFA53 CCMMP ALIGNMENT

CCFA51

Table 1

~~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~~	~~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~~	~~Adopt~~

~~Magnesium silicates, 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~~	~~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~~	~~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~~	~~Adopt EWG comments sought~~

~~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~~	~~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~~	~~Adopt EWG comments sought~~

Table 2

Food category 01.6.2.1 Ripened cheese, includes rind				
Additive	**INS**	**Max Level**	**Notes**	**Recommendations**

~~Calcium propionate~~	~~282~~	~~GMP~~	~~3, 460 XS269, XS274, XS276, XS277~~	~~Adopt~~
~~Calcium silicate~~	~~552~~	~~GMP~~	~~459, 461,XS274, XS276, XS277~~	~~Adopt~~
~~Magnesium silicates, synthetic~~	~~553(i)~~	~~GMP~~	~~459, 461,XS274, XS276, XS277~~	~~Adopt~~
~~Propionic acid~~	~~280~~	~~GMP~~	~~3, 460, XS269, XS274, XS276, XS277~~	~~Adopt~~
~~Silicon dioxide, amorphous~~	~~551~~	~~GMP~~	~~459, 461,XS274, XS276, XS277~~	~~Adopt~~
~~Sodium propionate~~	~~281~~	~~GMP~~	~~3, 460, XS269, XS274, XS276, XS277~~	~~Adopt~~
~~Talc~~	~~553(iii)~~	~~GMP~~	~~459, 461,XS274, XS276, XS277~~	~~Adopt~~

Notes

~~459~~ ~~Except for use at 10,000 mg/kg singly or in combination: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)) in 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) and Provolone (CXS 272-1968), as anticaking agents only: silicates calculated as silicon dioxide.~~

~~460~~ ~~Except for use at 3,000 mg/kg singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) in 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), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968).~~

~~461~~ ~~For the surface treatment of sliced, cut, shredded or grated cheese 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), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968).~~

Table 3

Section 2 of the Annex to Table 3 of the GSFA

01.6.2.1	**Ripened Cheese, includes rind**
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards. Acidity regulators are only acceptable for use in the cheese mass. Colours are only for use in the cheese mass to obtain the colour characteristics as described in Section 2 of the commodity standard. Anticaking agents are only justified for the surface treatment of sliced, cut, shredded or grated cheese. Where acceptable **preservatives are acceptable for surface treatment only.**
Codex standards	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)

INS No.	**Additive**	**Functional Class**	**Year Adopted**	**Acceptable in foods conforming to the following commodity standards[1]**	**Notes**
282	Calcium propionate	Preservative	1999	**CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968**	**T3-3**
552		Anticaking agent	1999	CS 105-1981	

	Calcium silicate			**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**	**T3-1, T3-2**
553(i)	Magnesium silicates, synthetic	Anticaking agent	1999	CS 105-1981	
				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	**T3-1, T3-2**
280	Propionic acid	Preservative	1999	**CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968**	**T3-3**
551	Silicon dioxide, amorphous	Anticaking agent, Antifoaming agent, Carrier	1999	CS 105-1981	
				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	**T3-1, T3-2**
281	Sodium propionate	Preservative	1999	**CS 263-1966, CS 264-1966, CS 265-1966, CS 266-1966, CS 267-1966, CS 268-1966, CS 270-1968, CS 271-1968, CS 272-1968**	**T3-3**
553(iii)	Talc	Anticaking agent, Glazing agent, Thickener	1999	CS 105-1981	
				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	**T3-1, T3-2**

Table 3 notes

T3-1: For use as anticaking agents only: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)), at 10,000 mg/kg, singly or in combination, silicates calculated as silicon dioxide.

T3-2: For use as anticaking agents for the surface treatment of sliced, cut, shredded or grated cheese only.

T3-3: For use for surface treatment only: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282), at 3,000 mg/kg as propionic acid.

Amendments to the food additives section in the commodity standards

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)

4. FOOD ADDITIVES

4.1 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. ~~Anticaking agents,~~ **C**olours 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, ~~and~~ colours **and preservatives** in Table 3 are acceptable for use in foods conforming to this standard.

CCFA52

Table 1

~~Calcium propionate~~ ~~INS 282: Functional class: Preservative~~					
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Year adopted~~	~~Recommendations~~
~~01.6.2.1~~	~~Ripened Cheese includes rind~~	~~GMP~~	~~3, 460, XS269, XS274, XS276, XS277, XS208, XS278, 503~~	~~2019~~	~~Endorse~~

~~Calcium silicate~~ ~~INS 552: Functional class: Anticaking agent~~					
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Year adopted~~	~~Recommendations~~
~~01.6.1~~	~~Unripened Cheese~~	~~GMP~~	~~488, XS273, XS275~~	~~2021~~	~~Endorse~~
~~01.6.2.1~~	~~Ripened Cheese includes rind~~	~~GMP~~	~~459, 461, XS274, XS276, XS277, 502, XS208, XS278~~	~~2019~~	~~Endorse~~

~~Magnesium silicate, synthetic~~ ~~INS 553(i): Functional class: Anticaking agent~~					
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Year adopted~~	~~Recommendations~~
~~01.6.1~~	~~Unripened Cheese~~	~~GMP~~	~~488, XS273, XS275~~	~~2021~~	~~Endorse~~
~~01.6.2.1~~	~~Ripened Cheese includes rind~~	~~GMP~~	~~459, 461, XS274, XS276, XS277, XS208, XS278, 502~~	~~2019~~	~~Endorse~~

~~Propionic acid~~ ~~INS 280: Functional class: Preservative~~					
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Year adopted~~	~~Recommendations~~
~~01.6.2.1~~	~~Ripened Cheese includes rind~~	~~GMP~~	~~3, 460, XS269, XS274, XS276, XS277, XS208, XS278, 503~~	~~2019~~	~~Endorse~~

~~Silicon dioxide, amorphous~~

~~INS 551: Functional class: Anticaking agent, Antifoaming agent, Carrier~~					
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Year adopted~~	~~Recommendations~~
~~01.6.1~~	~~Unripened Cheese~~	~~GMP~~	~~3, 488, XS273, XS275~~	~~2021~~	~~Endorse~~
~~01.6.2.1~~	~~Ripened Cheese includes rind~~	~~GMP~~	~~459, 461, XS274, XS276, XS277, XS208, XS278, 502~~	~~2019~~	~~Endorse~~

~~Sodium propionate~~ ~~INS 281: Functional class: Preservative~~					
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Year adopted~~	~~Recommendations~~
~~01.6.2.1~~	~~Ripened Cheese includes rind~~	~~GMP~~	~~3, 460, XS269, XS274, XS276, XS277, XS208, XS278, 503~~	~~2019~~	~~Endorse~~

~~Talc~~ ~~INS 553(iii): Functional class: Anticaking agent, Glazing agent, Thickener~~					
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Year adopted~~	~~Recommendations~~
~~01.6.1~~	~~Unripened Cheese~~	~~GMP~~	~~3, 488, XS273, XS275~~	~~2021~~	~~Endorse~~
~~01.6.2.1~~	~~Ripened Cheese includes rind~~	~~GMP~~	~~459, 461, XS274, XS276, XS277, XS208, XS278, 502~~	~~2019~~	~~Endorse~~

Table 2

Food category 01.6.1 Unripened cheese					
Additive	INS	Year adopted	Max Level	Notes	Recommendations
~~Calcium silicate~~	~~552~~	~~2021~~	~~GMP~~	~~488, XS273, XS275~~	~~Endorse~~
~~Magnesium silicate, synthetic~~	~~553(i)~~	~~2021~~	~~GMP~~	~~488, XS273, XS275~~	~~Endorse~~
~~Silicon dioxide, amorphous~~	~~551~~	~~2021~~	~~GMP~~	~~3, 488, XS273, XS275~~	~~Endorse~~
~~Talc~~	~~553(iii)~~	~~2021~~	~~GMP~~	~~3, 488, XS273, XS275~~	~~Endorse~~

Food category 01.6.2.1 Ripened cheese, includes rind					
Additive	INS	Year adopted	Max Level	Notes	Recommendations
~~Calcium propionate~~	~~282~~	~~2019~~	~~GMP~~	~~3, 460, XS269, XS274, XS276, XS277, XS208, XS278, 503~~	~~Endorse~~

Calcium silicate	552	2019	GMP	459, 461, XS274, XS276, XS277, 502, XS208, XS278	Endorse
Magnesium silicate, synthetic	553(i)	2019	GMP	459, 461, XS274, XS276, XS277, XS208, XS278, 502	Endorse
Propionic acid	280	2019	GMP	3, 460, XS269, XS274, XS276, XS277, XS208, XS278, 503	Endorse
Silicon dioxide, amorphous	551	2019	GMP	459, 461, XS274, XS276, XS277, XS208, XS278, 502	Endorse
Sodium propionate	281	2019	GMP	3, 460, XS269, XS274, XS276, XS277, XS208, XS278, 503	Endorse
Talc	553(iii)	2019	GMP	459, 461, XS274, XS276, XS277, XS208, XS278, 502	Endorse

Notes

488 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.

502 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.

503 Except for use in 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.

(The notes below, i.e. 459. 460 & 461, already removed due to CCFA51 Table 3 work detailed above, but provided here for completeness)

459 Except for use at 10,000 mg/kg singly or in combination: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)) in 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) and Provolone (CXS 272-1968), as anticaking agents only: silicates calculated as silicon dioxide.

460 Except for use at 3,000 mg/kg singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) in 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), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968).

461 For the surface treatment of sliced, cut, shredded or grated cheese 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), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968).

Table 3

Section 2 of the Annex to Table 3 of the GSFA

No changes are required for the Tables for FC 01.6.1 and 01.6.2.1.

INS No.	Additive	Functional Class	Year Adopted	Acceptable in foods conforming to the following commodity standards	Notes
282	Calcium propionate	Preservative	1999	CS 221-2001, CS 273-1968, CS 275-1973	
				CS 283-1978	**T3-6**
552	Calcium silicate	Anticaking agent	1999	CS 105-1981, CS 251-2006,	
				CS 221-2001, CS 283-1978	**T3-4**
553(i)	Magnesium silicate, synthetic	Anticaking agent	1999	CS 105-1981, CS 251-2006,	
				CS 221-2001, CS 283-1978	**T3-4**
283	Potassium propionate	Preservative	1999	CS 221-2001, CS 273-1968, CS 275-1973	
				CS 283-1978	**T3-6**
280	Propionic acid	Preservative	1999	CS 221-2001, CS 273-1968, CS 275-1973	
				CS 283-1978	**T3-6**
551	Silicon dioxide, amorphous	Anticaking agent, Antifoaming agent, Carrier	1999	CS 105-1981, CS 251-2006,	
				CS 221-2001, CS 283-1978	**T3-4**
281	Sodium propionate	Preservative	1999	CS 221-2001, CS 273-1968, CS 275-1973	
				CS 283-1978	**T3-6**
553(iii)	Talc	Anticaking agent, Glazing agent, Thickener	1999	CS 105-1981, CS 251-2006,	
				CS 221-2001, CS 283-1978	**T3-4**

Table 3 notes

T3-4: For use as anticaking agents for the surface treatment of sliced, cut, shredded or grated cheese only: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)), singly or in combination, at 10,000 mg/kg as silicon dioxide.

T3-6: For surface treatment only: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282), at 3000 mg/kg as propionic acid.

Amendments to the food additives section in the commodity standards

Group Standard for Unripened Cheese including Fresh Cheese (CXS 221-2001)

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.

General Standard for Cheese (CXS 283-1978)

4. FOOD ADDITIVES

~~Acidity regulators,~~ **C**olours 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.

CCFA53

Table 1

~~Calcium carbonate~~ ~~INS 170(i): Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer~~				
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Recommendations~~
~~01.5.1~~	~~Milk powder and cream powder (plain)~~	~~GMP~~	~~C207, D290, E290~~	~~Adopt~~

~~Calcium silicate~~ ~~INS 552: Functional class: Anticaking agent~~				
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Recommendations~~
~~01.5.1~~	~~Milk powder and cream powder (plain)~~	~~GMP~~	~~C207, D290~~	~~Adopt~~
~~01.6.1~~	~~Unripened cheese~~	~~GMP~~	~~D262~~	~~Adopt~~

~~Hydroxypropyl distarch phosphate~~ ~~INS 1442: Functional class: Anticaking agent, Emulsifier, Stabilizer, Thickener~~				
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Recommendations~~
~~01.5.1~~	~~Milk powder and cream powder (plain)~~	~~GMP~~	~~D290, XS207~~	~~Adopt~~

~~Magnesium carbonate~~ ~~INS 504(i): Functional class: Acidity regulator, Anticaking agent, Colour retention agent~~				
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Recommendations~~
~~01.5.1~~	~~Milk powder and cream powder (plain)~~	~~GMP~~	~~C207, D290, E290~~	~~Adopt~~

~~Magnesium oxide~~ ~~INS 530: Functional class: Acidity regulator, Anticaking agent~~				
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Recommendations~~
~~01.5.1~~	~~Milk powder and cream powder (plain)~~	~~GMP~~	~~C207, D290~~	~~Adopt~~

~~Magnesium silicate, synthetic~~ ~~INS 553(i): Functional class: Anticaking agent~~				
~~Food Category No.~~	~~Food Category~~	~~Max Level~~	~~Notes~~	~~Recommendations~~
~~01.5.1~~	~~Milk powder and cream powder (plain)~~	~~GMP~~	~~C207, D290~~	~~Adopt~~
~~01.6.1~~	~~Unripened cheese~~	~~GMP~~	~~D262~~	~~Adopt~~

Microcrystalline cellulose (Cellulose gel) INS 460(i): Functional class: Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabilizer, Thickener				
Food Category No.	Food Category	Max Level	Notes	Recommendations
01.5.1	Milk powder and cream powder (plain)	GMP	D290, XS207	Adopt

Powdered cellulose INS 460(ii): Functional class: Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabilizer, Thickener				
Food Category No.	Food Category	Max Level	Notes	Recommendations
01.5.1	Milk powder and cream powder (plain)	GMP	D290, XS207	Adopt

Silicon dioxide, amorphous INS 551: Functional class: Anticaking agent, Antifoaming agent, Carrier,				
Food Category No.	Food Category	Max Level	Notes	Recommendations
01.5.1	Milk powder and cream powder (plain)	GMP	C207, D290	Adopt
01.6.1	Unripened cheese	GMP	D262	Adopt

Talc INS 553(iii): Functional class: Anticaking agent, Glazing agent				
Food Category No.	Food Category	Max Level	Notes	Recommendations
01.5.1	Milk powder and cream powder (plain)	GMP	C207, D290	Adopt
01.6.1	Unripened cheese	GMP	D262	Adopt

Table 2

Food category 01.5.1: Milk powder and cream powder (plain)				
Additive	INS	Max Level	Notes	Recommendations
Calcium carbonate	170(i)	GMP	C207, D290, E290	Adopt
Calcium silicate	552	GMP	C207, D290,	Adopt
Hydroxypropyldistarch phosphate	1442	GMP	D290, XS207	Adopt
Magnesium carbonate	504(i)	GMP	C207, D290, E290	Adopt
Magnesium oxide	530	GMP	C207, D290	Adopt
Magnesium silicate, synthetic	553(i)	GMP	C207, D290,	Adopt
Microcrystalline cellulose (Cellulose gel)	460(i)	GMP	D290, XS207	Adopt
Powdered cellulose	460(ii)	GMP	D290, XS207	Adopt
Silicon dioxide, amorphous	551	GMP	C207, D290,	Adopt
Talc	553(iii)	GMP	C207, D290,	Adopt

Food category 01.6.1: Unripened cheese				
Additive	INS	Max Level	Notes	Recommendations
~~Calcium silicate~~	~~552~~	~~GMP~~	~~D262~~	~~Adopt~~
~~Magnesium silicate, synthetic~~	~~553(i)~~	~~GMP~~	~~D262~~	~~Adopt~~
~~Silicon dioxide, amorphous~~	~~551~~	~~GMP~~	~~D262~~	~~Adopt~~
~~Talc~~	~~553(iii)~~	~~GMP~~	~~D262~~	~~Adopt~~

Notes

~~C207~~ ~~Except for use in products conforming to the Standard for Milk Products and Cream Powder (CXS 207-1999): bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii), trimagnesium phosphate (INS 343(iii)) singly or in combination for use as anticaking agents only at 10,000 mg/kg.~~

~~D290~~ ~~Except for use in products conforming to the Standard for Edible Casein Products (CXS 290-1995): bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium silicate (INS 552), hydroxypropyldistarch phosphate (INS 1442), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), microcrystalline cellulose (cellulose gel) (INS 460(i)), powdered cellulose (INS 460(ii)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)), and trimagnesium phosphate (INS 343(iii))as anticaking agents only, singly or in combination at 4,400 mg/kg, noting the total amount of phosphorus shall not exceed 4,400 mg/kg.~~

~~E290~~ ~~For use in products conforming to the Standard for Edible Casein Products (CXS 290-1995) as an acidity regulator.~~

~~D262~~ ~~Except for use in products conforming to the Standard for Mozzarella (CXS 262-2006): calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)), for the surface treatment of sliced, cut, shredded or grated low moisture Mozzarella or for the surface treatment of shredded and/or diced high moisture Mozzarella, as anticaking agents only at 10,000 mg/kg, singly or in combination, as silicon dioxide.~~

Table 3

Section 2 of the Annex to Table 3 of the GSFA

No changes are required for the Tables for FC 01.5.1 and 01.6.1.

INS	Additive	Functional Class	Year Adopted	Acceptable, including foods conforming to the following commodity standards	Notes
170(i)	Calcium carbonate	Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer	1999	CS 87-1981, CS 105-1981, CS 141-1983, CS 249-2006	
				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	**T3-11**
				CS 207	**T3-7**
				CS 290	**T3-8, T3-10?**

INS	Additive	Functional Class	Year Adopted	Acceptable, including foods conforming to the following commodity standards	Notes
552	Calcium silicate	Anticaking agent	1999	CS 105-1981	
				CS 207-1999	**T3-7**
				CS 290-1995	**T3-8**
				CS 262-2006	**T3-9**
1442	Hydroxypropyl distarch phosphate	Anticaking agent, Emulsifier, Stabiliser, Thickener	1999	CS 70-1981, CS 94-1981, CS 119-1981, CS 249-2006	
				CS 290-1995	**T3-8**
504(i)	Magnesium carbonate	Acidity regulator, Anticaking agent, Colour, Colour retention agent	1999	CS 87-1981, CS 105-1981, CS 141-1983, CS 249-2006	
				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	**T3-11**
				CS 207	**T3-7**
				CS 290	**T3-8, T3-10?**
504(ii)	Magnesium hydroxide carbonate	Acidity regulator, Anticaking agent, Carrier, Colour retention agent	1999	CS 275-1973, CS 283-1978, CS 273-1968	
				CS 290	**T3-10?**
530	Magnesium oxide	Acidity regulator, Anticaking agent	1999	CS 87-1981, CS 105-1981, CS 141-1983,	
				CS 207	**T3-7**
				CS 290	**T3-8**
553(i)	Magnesium silicate, synthetic	Anticaking agent	1999	CS 105-1981	
				CS 207-1999	**T3-7**
				CS 290-1995	**T3-8**
				CS 262-2006	**T3-9**
460(i)	Microcrystalline cellulose (Cellulose gel)	Anticaking agent, Bulking agent, Carrier, Emulsifier, Foaming agent, Glazing agent, Stabiliser, Thickener	1999	CS 105-1981	
				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	**T3-12**
				CS 290	**T3-8**
460(ii)	Powdered cellulose	Anticaking agent, Bulking agent, Emulsifier, Glazing agent, Humectant, Stabiliser, Thickener	1999	CS 105-1981	
				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	**T3-12**
				CS 290	**T3-8**
551	Silicon dioxide, amorphous	Anticaking agent, Antifoaming agent, Carrier	1999	CS 105-1981	
				CS 207-1999	**T3-7**

INS	Additive	Functional Class	Year Adopted	Acceptable, including foods conforming to the following commodity standards	Notes
				CS 290-1995	**T3-8**
				CS 262-2006	**T3-9**
553(iii)	Talc	Anticaking agent, Glazing agent, Thickener	1999	CS 105-1981	
				CS 207-1999	**T3-7**
				CS 290-1995	**T3-8**
				CS 262-2006	**T3-9**

Table 3 notes

T3-7: For use as anticaking agents only: bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), calcium silicate (INS 552), magnesium carbonate (INS 504(i)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), singly or in combination, at 10,000 mg/kg.

T3-8: For use as anticaking agents only: bone phosphate (INS 542), calcium carbonate (INS 170(i)), calcium silicate (INS 552), hydroxypropyldistarch phosphate (INS 1442), magnesium carbonate (INS 504(i)), magnesium oxide (INS 530), magnesium silicate, synthetic (INS 553(i)), microcrystalline cellulose (cellulose gel) (INS 460(i)), powdered cellulose (INS 460(ii)), silicon dioxide, amorphous (INS 551), talc (INS 553(iii)), tricalcium phosphate (INS 341(iii)) and trimagnesium phosphate (INS 343(iii)), singly or in combination at 4,400 mg/kg, noting the total amount of phosphorus shall not exceed 4,400 mg/kg.

T3-9: For use as anticaking agents for the surface treatment of sliced, cut, shredded or grated low moisture Mozzarella or for the surface treatment of shredded and/or diced high moisture Mozzarella only: calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)), silicon dioxide, amorphous (INS 551) and talc (INS 553(iii)), at 10,000 mg/kg, singly or in combination, as silicon dioxide.

T3-10: For use as an acidity regulatory ~~only~~.

T3-11: For use in cheese mass only.

T3-12: For use in the surface treatment of sliced, cut, shredded or grated cheese only.

Amendments to the food additives section in the commodity standards

No changes are required to the food additives sections of the commodity standards *Standard for Milk Powders and Cream Powder* (CXS 207-1999) and *Standard for Edible Casein Products* (CXS 290-1995), while only a minor amendment was required for the *Standard for Mozzarella* (CXS 262-2006) as noted below.

Standard for Mozzarella (CXS 262-2006)

4. FOOD ADDITIVES

Acidity regulators, ~~anticaking agents,~~ colours, 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, anticaking agents, colours, preservatives and stabilizers in Table 3 are acceptable for use in foods conforming to this standard.

Appendix 6

EVALUATION OF WHETHER THE INFORMATION IN THE PROCEDURAL MANUAL IS SUFFICIENT OR IF AMENDMENTS ARE REQUIRED TO ENSURE FUTURE DIVERGENCE DOES NOT OCCUR.

Background

CCFA has worked since its 42nd session[11] in 2010 (CCFA42) to achieve full alignment between the *General Standard for Food Additives* (GSFA; CXS 192-1995) and the food additive provisions contained in the Codex Commodity Standards.

The aim of the alignment work is to systematically align the food additive provisions of the Commodity Standards with those of the GSFA, with the overarching principle that the GSFA be the single reference point for food additives in the Codex Alimentarius and should therefore take account of any food additive provisions in the Commodity Standards.

CCFA50 agreed to the development of a "*Guideline to Commodity Committees on the Alignment of Food Additive Provisions*[12]" to assist Commodity Committees in considering their Commodity Standards for which alignment had not yet been undertaken.

Once that alignment work on Commodity Standards have been completed, further food additive provisions should only be considered by the CCFA, based on advice by the Commodity Committee on the technological justification for the proposed new or amended food additive use(s).

To ensure that new diverge on food additive provisions between the GFSA and Commodity Standards do not arise, CCFA52 agreed to a "*Guideline on avoiding future divergence of food additive provisions in the GSFA*[13]**".** However, the concern remained that this Guideline by itself might be insufficient to ensure further divergence does not occur. The view was expressed by some delegations that changes to the Procedural Manual may be required to reflect this concern.

Accordingly, CCFA52 endorsed the recommendation[14], arising from the Virtual Working Group (VWG) on Alignment, that there should be "An evaluation of the information in the Procedural Manual on the alignment of standards".

In endorsing the recommendation, CCFA52 underscored the need to evaluate whether the information in the Procedural Manual was sufficient to avoid future divergence; and if not, then the Alignment EWG should consider appropriate additions to the Procedural Manual.

CCFA52 also agreed to establish an EWG on Alignment[15], chaired by Australia and co-chaired by the United States of America and Japan, and working in English only. The EWG ToR included the consideration of:

- whether the information in the Procedural Manual is sufficient or if amendments are required to ensure future divergence does not occur, taking into account the *Guideline Document on Avoiding Future Divergence of Food Additive Provisions in the GSFA with Commodity Standard*s, (ref. CRD03 recommendation 10)

Discussion

The ultimate aim of the alignment work is to complete the alignment of ***all*** the Commodity Standards such that no further alignment work is required. For the work to be completed, it is imperative that no further misalignment of food additive provisions is introduced in Commodity Standards.

Once the work on alignment is complete and with no further misalignment introduced by Commodity Committees, the consideration by CCFA of Endorsement of food additive provisions developed by Commodity Committees would no longer be needed.

[11] CX/FA 10/42/17 and ALINORM 10/33/12, paras. 151-164
[12] REP 18/FA Appendix XI, INF_CCFA_DIVe,pdf (https://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CCFA_e_01.pdf)
[13] REP 21/FA 107(i) and App. XII , INF_CCFA_DIVe,pdf (https://www.fao.org/fileadmin/user_upload/codexalimentarius/committee/docs/INF_CCFA_DIVe.pdf)
[14] REP21/FA. Para 94
[15] REP21/FA. Para 107

The Procedural Manual, Twenty-seventh edition[16] includes the consideration of "Procedures for consideration of the entry and review of food additive provisions in the GFSA". This includes the specific text relating to food additives that is reproduced in Annex 1.

The Procedural Manual makes no distinction in the outlined procedure for developing food additive provisions by active Commodity Committees between the following two scenarios:

a) where full alignment of the food additive provisions between the Commodity Standards and the GSFA has been completed.

b) where the alignment of the food additive provisions between the Commodity Standards and the GSFA has not been completed.

The Procedural Manual is therefore inconsistent with the "*Guideline Document on Avoiding Future Divergence of Food Additive Provisions in the GSFA with Commodity Standard*s". Furthermore, the Procedural Manual text does not make it clear that once the alignment between the Commodity Standards and the GSFA has been achieved, that further food additive provisions should only be considered by the CCFA, based on advice by the Commodity Committee on the technological justification.

Consultation with the EWG on Alignment

The EWG on Alignment were asked to comment on the background discussion, and draft recommendations as part of the 2nd Circular. This included a recommendation that the Procedural Manual text relating to food additives (page 49-50 of the 27th edition) be replaced. A proposed new text for the Procedural Manual was included in 2nd Circular.

The second circular was sent for EWG comments between 29 August and 30 September 2022. Comments on Appendix 6 were received from Canada, International Dairy Federation (IDF), Japan, and the USA.

Changes to the proposed new Procedural Manual text were made to reflect the 2nd circular comments received. The revised text was circulated on 16 November 2022 as part of the 3rd circular. In response to the 3rd circular comments on the revised Procedural Manual text were received from Canada, Chile, IDF and the UK. Canada requested some additional changes to the text, while Chile, IDF and the UK outlined their support for the 3rd circular recommendations. The additional changes requested by Canada offered helpful clarity and are reflected in the text at Annex 2.

Recommendations

1. That the Procedural Manual text is amended to ensure that further misalignment of food additive provisions does not occur once the full alignment of the food additive provisions between the Commodity Standards and the GSFA have been completed.
2. That the Procedural Manual text relating to food additives (page 49-50 of the 27th edition) is replaced with the text outlined in Annex 2.
3. That the new text outlined in Annex 2 under the header "*Alignment has not been completed for the relevant Commodity Standard*" be removed from the Procedural Manual once the CCFA has completed the Alignment of all Commodity Standards.

[16] PM27_2019e.pdf; Section II: Elaboration of Codex texts (https://www.fao.org/3/ca2329en/CA2329EN.pdf)

Annex 1

Extract from the 27th Edition of the Procedural Manual (P49-50)

Food Additives

Commodity committees shall examine the *General Standard for Food Additives* (*CODEX STAN 192-1995*) with a view toward incorporating a reference to the General Standard in the relevant Commodity Standards.

All proposals for additions or amendments to the *General Standard for Food Additives* in order to establish a reference to the *General Standard for Food Additives* shall be referred to the Committee on Food Additives. The Committee on Food Additives shall consider such proposals for endorsement. Revisions of a substantive nature that are endorsed by the Committee on Food Additives will be referred back to the commodity committee in order to achieve consensus between both committees at an early stage of the step procedure.

Should the commodity committee consider that a general reference to the *General Standard for Food Additives* does not serve its purpose, a proposal should be prepared and forwarded to the Committee on Food Additives for consideration and endorsement. The commodity committee shall provide a justification for why a general reference to the *General Standard for Food Additives* would not be appropriate in light of the criteria for the use of food additives established in the Preamble of the *General Standard for Food Additives*, in particular Section 3.

All provisions in respect of food additives (including processing aids) contained in commodity standards should be referred to the Committee on Food Additives, preferably before the Standards have been advanced to Step 5 of the *Procedure for the Elaboration of Codex Standards* or before they are considered by the commodity committee concerned at Step 7, though such referral should not be allowed to delay the progress of the Standard to the subsequent Steps of the Procedure.

All provisions in respect of food additives contained in commodity standards will require endorsement by the Committee on Food Additives, on the basis of technological justification submitted by the commodity committees and on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives concerning the safety-in-use (acceptable daily intake (ADI) and other restrictions) and an estimate of the potential and, where possible, the actual intake of the food additives, ensuring conformity with the Preamble of the *General Standard for Food Additives*.

When forwarding a food additive section of a commodity standard for endorsement by the Committee on Food Additives, the Secretariat should prepare a report to the Committee that includes the International System (INS) number, the Acceptable Daily Intake (ADI) assigned by the Joint FAO/WHO Expert Committee on Food Additives, technological justification, proposed level, and whether the additive was previously endorsed by the Codex Committee on Food Additives.

When an active commodity committee exists, proposals for the use of additives in any commodity standard under consideration should be prepared by the committee concerned and forwarded to the Committee on Food Additives for endorsement and inclusion in the *General Standard for Food Additives*. When the Committee on Food Additives decides not to endorse specific additives provisions, the reason should be clearly stated. The section under consideration should be referred back to the commodity committee concerned if further information is needed, or for information if the Committee on Food Additives decides to amend the provision.

When no active commodity committee exists, proposals for new additive provisions or amendment of existing provisions for inclusion in the *General Standard for Food Additives* should be forwarded directly by Codex members to the Committee on Food Additives.

Annex 2

Extract from the 27th Edition of the Procedural Manual (P49-50).

Proposed new Procedural Manual text

Food Additives

The General Standard for Food Additives (*CODEX STAN 192-1995*) (GSFA) is to be the single reference point for food additives in the Codex Alimentarius. Therefore, Commodity Committees shall examine the GSFA with a view towards ensuring that relevant commodity standards are aligned with respect to the use of food additives described in the GSFA by incorporating a reference to the GSFA.

Those cases where Alignment has not been completed for the relevant Commodity Standard

Where the alignment of the food additive provisions between the Commodity Standards and the GSFA has not been completed**,** additions or amendments for food additive provisions may be considered by the Commodity Committee but must then be referred to the Committee on Food Additives. Referral to the Committee on Food Additives should preferably be prior to Step 5 of the *Procedure for the Elaboration of Codex Standards* or before they are considered by the commodity committee concerned at Step 7, though such referral should not be allowed to delay the progress of the Standard to the subsequent Steps of the Procedure.

The Committee on Food Additives shall consider such proposals, relating to Commodity Standards for which full alignment has not been completed, for endorsement. This will be on the basis of technological justification submitted by the commodity committees and on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives concerning the safety-in-use (acceptable daily intake (ADI) and other restrictions) and an estimate of the potential and, where possible, the actual intake of the food additives, ensuring conformity with the Preamble of the GSFA. When the Committee on Food Additives decides not to endorse specific additives provisions, the reason should be clearly stated. The section under consideration should be referred back to the commodity committee concerned if further information is needed, or for information if the Committee on Food Additives decides to amend the provision.

In those cases where there is no active commodity committee with physical meetings or working by correspondence, proposals for new additive provisions or amendment of existing provisions, should be forwarded directly by Codex members to the Committee on Food Additives, irrespective of whether the Commodity Standards are fully aligned.

Those cases where Alignment has been completed for the relevant Commodity Standard

Once the alignment of the food additives permitted for use in a commodity standard with the GSFA has been completed and the commodity standard contains a general reference to the GSFA, any request for the addition, removal or change to a food additive provision applicable to the commodity standard, should be made directly to CCFA. CCFA will make a determination based on an evaluation of the technological justification and safety-in-use in conformity with the Preamble of the GSFA. Where there is an active Commodity Committee with physical meetings or working by correspondence, they should always be consulted, in particular with regard to technological function. The procedure outlined in the "*Guideline on avoiding future divergence of food additive provisions in the GSFA with Commodity Standards*[17]" should be referred to and utilised.

[17] INF_CCFA_DIVe

Appendix 7

DISCUSSION AND COMMENTS

PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE CODEX COMMODITY STANDARDS FOR PROCESSED FRUITS AND VEGETABLES (CCPFV) AND TABLES 1, 2 AND 3 OF THE GSFA RELATING TO CCPFV

Comments by EWG members were not included in the 2nd Circular, rather updates were made as necessary to address the comment provided. However, comments requiring discussion by the EWG and further explanation from the Chair are included in this cover page.

1. Use of Tartrates (INS 334, 335(ii), 337) in Food Category 04.1.2.6

In the GSFA EWG, the use of Tartrates (INS 334, 335(ii), 337) in Food Category 04.1.2.6 are being discussed as a result of the comments received from the Codex Committee on Processed Fruits and Vegetables (CCPFV). CCFA48 agreed to hold the provisions for the use of Tartrates in food categories 04.1.2.2 and 04.1.2.6 in the GSFA and request guidance from CCPFV on the use of acidity regulators in general and Tartrates specifically in foods FC 04.1.2.6 and corresponding *Standard for Mango Chutney* (CSX 160-1987).

CCPFV29 agreed with the inclusion of tartrates as acidity regulators in FC 04.1.2.6 with the technological justifications that (i) Mango is generally rich in vitamins & minerals like calcium, iron, vitamin C, vitamin B complex. These nutrients are highly susceptible to temperature and oxidation. Tartrates, as acidity regulators, can protect against this; (ii) the use of tartrates in fruit-based spreads, e.g., mango chutney, can help improve product shelf life by helping ensure that the pH of the product does not exceed 4.6; product is not spoiled by bacteria (spoilage bacteria cannot grow at low pH); and potential for lesser amounts of preservatives to be used due to the maintenance of a low pH.

As such, the GSFA EWG has recommended that the provision for Tartrates be adopted for use in standardized and non-standardized products covered under FC 04.1.2.6 and to request the revision of CXS 160-1987 to include provision for tartrates.

Chair's Proposal: Since the work of the GSFA EWG indicates that Tartrates be adopted for use in standardized and non-standardized products covered under FC 04.1.2.6 and the alignment of CXS 160-1987 is currently being undertaken by the Alignment EWG, the proposal is to accept the recommendation and align the provision in the commodity standard.

2. Use of Curcumin INS 100(i) in Food category 12.6.2

Curcumin INS 100(i) in listed in CXS 306-2011 (corresponding to food category 12.6.2) for use at a level of GMP. However, JECFA has assigned it a Numeric ADI, so GMP is not appropriate.

Chair's Proposal: Since the use of curcumin in food category 12.6.2 is currently under review by the GSFA EWG, the current level of GMP will serve as a place holder in the Alignment work until a recommendation is made by the GSFA EWG on the appropriate use level.

3. Preservatives in CXS 306-2011

A comment by one EWG member notes that INS 539 (currently included in CXS 306-2011) does not have the preservative function, and so its use in FC 12.6 would not be appropriate. A proposal could be forwarded to the working group on the INS to endorse the use of preservative for this additive, in which case the proposal for FC 12.6 can be maintained as shown. However, if the functions for INS 539 are not expanded to include preservative functions, then it is suggested that a new note would be needed to the effect of, "Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): potassium metabisulfite (INS 224), potassium sulfite (INS 225), sodium hydrogen sulfite (INS 222), sodium metabisulfite (INS 223) and sulfur dioxide (INS 220), singly or in combination".

Chair's Proposal: This comment correctly notes that INS 539 does not have the preservative function even though it is listed in CXS 306-2011 for use in standardized products. This EWG is not mandated to determine whether INS 539 is appropriate for use in non- standardized products. Therefore, applying the general practice of the Alignment exercise, the Chair has two proposals:

1. ***Apply a new note excluding the use of INS 539***
2. ***Forward a recommendation to the working group on the INS to endorse the use of preservative for INS 539.***

4. Allowance of Additives with the same Functional Action

Comments by one EWG member referred to the *Guidance to Commodity Committees on the Alignment of Food Additive Provisions* citing the general principle that "if a commodity standard lists an individual additive that is included under a "group" additive in the GSFA (e.g., sulfites, ascorbyl esters), and the individual additives in the group that have the same functional class(es) as the additive listed in the relevant commodity standard are expected to be appropriate for the use specified in the relevant commodity standard, then the alignment should include all the individual additives with the appropriate functional class(es) in the group."

Chair's Proposal: We appreciate the general comment about including all the individual additives with the appropriate functional class(es) in the group. This activity has not been practiced consistently in the Alignment exercise but should be considered by the EWG. As such, it is proposed to include the group of additives with the same functional class thereby modifying the new notes (e.g., A-160, B-294 and E-306) and also combining notes that link additive groups and their respective use levels (e.g., B-160 and D-160).

5. Use of Chlorophylls and Chlorophylls, Cooper Complexes

A comment by one EWG member indicated that for Note G-306, the use of INS 141(i) could be expanded to the group of Chlorophylls and Chlorophylls, Cooper Complexes because Chlorophylls and Chlorophylls, Cooper Complexes are already in the parent food category 12.6. However, Note 62 does not appear for the provision in the parent food category. As such, all provisions for the use of Chlorophylls and Chlorophylls, Cooper Complexes regardless of their reporting basis should be included in the subcategories since they are not all calculated on an equivalent reporting basis.

Chair's Proposal: We consider this comment introduces a point for consideration, but not for the Alignment EWG rather for the GSFA EWG. It is therefore proposed to retain the Note G-306 based on the alignment of CXS 306-2011 and refer the issue to the GSFA EWG to consider moving the provision for Chlorophylls and Chlorophylls, Cooper Complexes to the subcategories so that the appropriate reporting basis can be applied accordingly.

6. Comment on the Note 144

Comments by one EWG member indicated Note 144 ("For use in sweet and sour products only") listed for Aspartame (INS 951), Neotame (INS 621), Saccharins (INS 954(i-iv), and Sucralose (trichlorogalactosucrose) (INS 955) in FC 04.2.2.7 should be note 161 instead.

Chair's Comment: These provisions were discussed by the VWG on Note 161 and the recommendation to CCFA52 were provided in FA52/CRD4. CCFA52 endorsed recommendation to adopt the revised provisions for sweeteners in different food categories (see REP21_FA, para. 173). Therefore, Note 144 is correct as listed (see CXS 192-1995 (2021)).

7. Comment on Section 2 of the Annex to Table 3

A comment by one EWG member asks if the text proposed for food category 04.1.2.6 in the Section 2 of the Annex to Table 3 should be specific to "Certain acidity regulators", rather than general to Table 3 food additives.

Chair's Comment: While this is correct for the use of acidity regulators in CXS 160-1987, this section of CXS 192-1995 (Section 2 of the Annex to Table 3) only pertains to use of additives listed in Table 3. Such language is consistent with the reference to other commodity standards in this section.

It is noted that CAC43 adopted the conversion of the regional standards for Gochujang (CXS 294R-2009) and Chili sauce (CXS 306R-2011) at step 5/8 as noted in REP20/PFV, App II and III respectively. CCFA52 were subsequently tasked to endorse the food additive provisions, via agenda paper 4a (CX/FA 21/52/5) with the decision in the REP21/FA for the Alignment EWG to undertake the alignment work on these food additives (see Terms of Reference for the EWG, REP21/FA para 107(iii)).

Therefore, the alignment work has been conducted with the removal of the Regional term and (R) suffix to address the CAC43 decision.

The relevant Codex Standards for processed fruits and vegetables 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
160-1987	Mango Chutney	04.1.2.6
294-2009	Gochujang	04.2.2.7
306-2011	Chili Sauce	12.6.2

ALIGNMENT WORKING DOCUMENT CONVENTIONS:

Alignment of the CODEX Standards 160-1987, 294-2009 and 306-2011 were done using the following Codex documents:

1. The most recent applicable CODEX Standards located at https://www.fao.org/fao-who-codexalimentarius/codex-texts/list-standards/en/.
2. The most recent version of CODEX Standard 192-1995 (2021)
3. Decision on the use of Table 3 notes as a result of the CCFA51

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 processed fruits and vegetables

A. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR MANGO CHUTNEY* (CXS 160-1987)

3. FOOD ADDITIVES

Acidity regulators and preservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 04.1.2.6 (Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5) are acceptable for use in foods conforming to this standard and only certain acidity regulators in Table 3 are acceptable for use in foods conforming to this standard.

		~~Maximum level in the finished product~~
~~3.1~~	~~Acidifying Agents~~	
~~3.1.1~~	~~Citric acid~~	~~To maintain the pH at a level not above4.6 if the product is heat pasteurized or limited by GMP if the product is heat sterilized.~~
~~3.1.2~~	~~Acetic acid~~	
~~3.2~~	~~Preservatives~~	
~~3.2.1~~	~~Sodium metabisulphite~~	~~100 mg/kg singly or in any combination expressed as SO_2.~~
~~3.2.2~~	~~Potassium metabisulphite~~	
~~3.2.3~~	~~Sodium and potassium benzoates~~	~~250 mg/kg singly or in any combination expressed as the acid. parahydroxy~~
~~3.2.4~~	~~Methyl, ethyl and propyl benzoates~~	

~~3.2.5~~	~~Sorbic acid~~	~~1000 mg/kg~~

B. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR GOCHUJANG* (CXS 294-2009)

4. FOOD ADDITIVES

Acidity regulators, antioxidants, flavour enhancers, preservatives, and stabilizers used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 04.2.2.7 (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3) are acceptable for use in foods conforming to this standard.

~~**4.1 PRESERVATIVES**~~

~~INS No.~~	~~Name of food additives~~	~~Maximum level~~
~~200~~	~~Sorbic acid~~	~~1000 mg/kg as sorbic acid, singly or in combination~~
~~202~~	~~Potassium sorbate~~	
~~203~~	~~Calcium sorbate~~	

~~**4.2 FLAVOUR ENHANCERS**~~

~~INS No.~~	~~Name of food additives~~	~~Maximum level~~
~~621~~	~~Monosodium L-glutamate~~	~~Limited by GMP~~
~~508~~	~~Potassium chloride~~	~~Limited by GMP~~

~~**4.3 ANTIOXIDANT**~~

~~INS No.~~	~~Name of food additives~~	~~Maximum level~~
~~325~~	~~Sodium lactate~~	~~Limited by GMP~~

~~**4.4 ACIDITY REGULATORS**~~

~~INS No.~~	~~Name of food additives~~	~~Maximum level~~
~~296~~	~~Malic acid (DL-)~~	~~Limited by GMP~~
~~339(i)~~	~~Sodium dihydrogen phosphate~~	~~5000 mg/kg as phosphorus, singly or in combination~~
~~339(ii)~~	~~Disodium hydrogen phosphate~~	
~~340(i)~~	~~Potassium dihydrogen phosphate~~	
~~340(ii)~~	~~Dipotassium hydrogen phosphate~~	
~~452(i)~~	~~Sodium polyphosphate~~	
~~452(ii)~~	~~Potassium polyphosphate~~	

~~**4.5 STABILIZERS**~~

~~INS No.~~	~~Name of food additives~~	~~Maximum level~~
~~412~~	~~Guar gum~~	~~Limited by GMP~~
~~414~~	~~Gum Arabic (acacia gum)~~	~~Limited by GMP~~
~~415~~	~~Xanthan gum~~	~~Limited by GMP~~

C. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE *STANDARD FOR CHILI SAUCE* (CXS 306-2011)

4. FOOD ADDITIVES

Acidity regulators, antioxidants, colours, emulsifiers, preservatives, stabilizers, sweeteners, and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 12.6.2 (Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy) are acceptable for use in foods conforming to this standard. Additionally, acidity

regulators, colours, flavour enhancers, preservatives, sweeteners and thickeners listed in Table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in food 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 limits, specified.~~

~~**4.1** Acidity regulators, antioxidants, colours, flavour enhancers, preservatives, sweeteners and thickeners listed in Table 3 of the *Codex General Standard for Food Additives* (CODEX STAN 192-1995) are acceptable for use in food conforming to this standard.~~

~~**4.2 ACIDITY REGULATORS**~~

~~**INS No.**~~	~~**Food Additive**~~	~~**Maximum level**~~
~~334~~	~~Tartaric acid~~	~~5000 mg/kg (as tartrate) (singly or in combination)~~
~~335(ii)~~	~~Sodium L (+) tartrate~~	
~~337~~	~~Potassium sodium L (+)-tartrate~~	
~~452(i)~~	~~Sodium polyphosphate~~	~~1000 mg/kg (as phosphorus)~~

~~**4.3 ANTIOXIDANTS**~~

~~**INS No.**~~	~~**Food Additive**~~	~~**Maximum level**~~
~~307a~~	~~Tocopherol, d-alpha-~~	~~600 mg/kg (Singly or in combination)~~
~~307b~~	~~Tocopherol concentrate, mixed~~	
~~307c~~	~~Tocopherol, dl-alpha-~~	
~~320~~	~~Butylated hydroxyanisole~~	~~100 mg/kg~~
~~321~~	~~Butylated hydroxytoluene~~	~~100 mg/kg~~
~~386~~	~~Disodium ethylene diamine tetra acetate~~	~~75 mg/kg~~

~~**4.4 COLOURS**~~

~~**INS No.**~~	~~**Food Additive**~~	~~**Maximum level**~~
~~100(i)~~	~~Curcumin~~	~~GMP~~
~~101(i)~~	~~Riboflavin, synthetic~~	~~350 mg/kg (Singly or in combination)~~
~~101(ii)~~	~~Riboflavin, 5'-phosphate sodium~~	
~~102~~	~~Tartrazine~~	~~100 mg/kg~~
~~110~~	~~Sunset yellow FCF~~	~~300 mg/kg~~
~~120~~	~~Carmines~~	~~50 mg/kg~~
~~124~~	~~Ponceau (4R) (cochineal red A)~~	~~50 mg/kg~~
~~127~~	~~Erythrosine~~	~~50 mg/kg~~
~~129~~	~~Allura Red AC~~	~~300 mg/kg~~
~~133~~	~~Brilliant blue, FCF~~	~~100 mg/kg~~
~~141(i)~~	~~Chlorophylls, copper complexes~~	~~30 mg/kg (as Cu)~~
~~150c~~	~~Caramel III – ammonia process~~	~~1500 mg/kg~~
~~150d~~	~~Caramel IV – sulphite ammonia process~~	~~1500 mg/kg~~
~~155~~	~~Brown HT~~	~~50 mg/kg~~
~~160a (ii)~~	~~Carotenes, beta (vegetable)~~	~~2000 mg/kg~~

160b(i)	Annatto extracts, bixin based	10 mg/kg
160d(i)	Lycopene (synthetic)	390 mg/kg

4.5 PRESERVATIVES

INS No.	Food Additive	Maximum level
210	Benzoic acid	1000 mg/kg (as benzoic acid) (singly or in combination)
211	Sodium benzoate	
212	Potassium benzoate	
213	Calcium benzoate	
200	Sorbic acid	1000 mg/kg (as sorbic acid) (singly or in combination)
201	Sodium sorbate	
202	Potassium sorbate	
203	Calcium sorbate	
220	Sulfur dioxide	300 mg/kg (as residual SO_2) (singly or in combination)
221	Sodium sulfite	
222	Sodium hydrogen sulfite	
223	Sodium metabisulfite	
224	Potassium metabisulfite	
225	Potassium sulfite	
539	Sodium thiosulfate	
214	Ethyl parahydroxybenzoates	1000 mg/kg
218	Methyl para-hydroxybenzoate	

4.6 EMULSIFIERS

INS No.	Food Additive	Maximum level
432	Polyoxyethylene (20) sorbitan monolaurate	5 000 mg/kg (singly or in combination)
433	Polyoxyethylene (20) sorbitan monooleate	
434	Polyoxyethylene (20) sorbitan monopalmitate	
435	Polyoxyethylene (20) sorbitan monoesterate	
473	Sucrose esters of fatty acids	5 000 mg/kg
475	Polyglycerol esters of fatty acids	10 000 mg/kg
477	Propylene glycol esters of fatty acids	20 000 mg/kg

4.7 SWEETNERS

INS No.	Name of food additives	Maximum level
951	Aspartame	350 mg/kg
950	Acesulfame potassium	1000 mg/kg
955	Sucralose	450 mg/kg
952(i)	Saccharin	150 mg/kg (singly or in combination)
952(ii)	Calcium Saccharin	
952(iii)	Potassium Saccharin	
952(iv)	Sodium saccharin	

4.8 STABILIZERS

INS No.	Name of food additives	Maximum level

~~472e~~	~~Diacetyctartaric and fatty acid esters of glycerol~~	~~10 000 mg/kg~~

~~4.9 THICKENERS~~

~~INS No.~~	**~~Name of food additives~~**	**~~Maximum level~~**
~~405~~	~~Propylene glycol alginate~~	~~8 000 mg/kg~~

4.10 FLAVOURINGS

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

2. <u>Proposed amendments to Tables 1, 2 and 3 of the GSFA for processed fruits and vegetables</u>

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

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

A. PROPOSED AMENDMENTS TO TABLE 1

<u>Acesulfame Potassium:</u>

<u>INS: 950</u> **<u>Functional class: Flavour enhancer, Sweetener</u>**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	1000 mg/kg	478, 188, **<u>XS160</u>**	2005	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	1000 mg/kg	188, **<u>XS294</u>**	2008	Adopt
12.6	Sauces and like products	1000 mg/kg	188	2007	Maintain

<u>Acetic Acid, Glacial:</u>

<u>INS: 260</u> **<u>Functional class: Acidity regulator, Preservative</u>**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Advantame:					
INS: 969		**Functional class: Flavour enhancer, Sweetener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	10 mg/kg	478, **XS160**	2021	Adopt

Alginic Acid:					
INS: 400		**Functional class: Bulking agent, Carrier, Emulsifier, Foaming agent, Gelling agent, Glazing agent, Humectant, Sequestrant, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7,	GMP	**XS294**	2013	Adopt

	12.9.1, 12.9.2.1 and 12.9.2.3				

Allura Red:					
INS: 129		**Functional class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6	Sauces and like products	300 mg/kg	XS302	2018	Maintain

Annatto extracts, bixin based:					
INS: 160b(i)		**Functional class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	**Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)**	**10 mg/kg**	**8, D-306**		**Adopt** **Also under consideration in GSFA EWG**

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**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Maintain

Ascorbyl esters:					
INS: 304, 305		**Functional class: Antioxidant**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	Non-emulsified sauces (e.g.	500 mg/kg	10, **XS306**	2005	Adopt

	ketchup, cheese sauce, cream sauce, brown gravy)				

Aspartame:

INS: 951 **Functional class: Flavour enhancer, Sweetener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	1000 mg/kg	478, 191, **XS160**	2019	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	2500 mg/kg	144, 191, **XS294**	2021	Adopt
12.6	Sauces and like products	350 mg/kg	191	2005	Maintain

Aspartame-Acesulfame Salt:

INS: 962 **Functional class: Sweetener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	1000 mg/kg	119, 477 & XS160	2021	Maintain

Benzoates:

INS: 210 **Functional class: Preservative**
INS: 211 **Functional class: Preservative**
INS: 212 **Functional class: Preservative**
INS: 213 **Functional class: Preservative**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	1000 mg/kg	13, B-160	2001	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	1000	13, **XS294**	2001	Adopt
12.6	Sauces and like products	1000 mg/kg	13	2003	Maintain

Brilliant Blue FCF:

INS: 133 **Functional class: Colour**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	100 mg/kg	161, **XS160**	2009	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products	100 mg/kg	92, 161, **XS294**	2009	Adopt

	of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				
12.6	Sauces and like products	100 mg/kg	XS302	2018	Maintain

Brown HT:

INS: 155 **Functional class: Colour**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
12.6.2	**Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)**	**50 mg/kg**	**D-306**		**Adopt**

Butylated hydroxyanisole:

INS: 320 **Functional class: Antioxidant**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
12.6	Sauces and like products	200 mg/kg	15, 130, XS302, **B-306**	2018	Adopt

Butylated hydroxytoluene:

INS: 321 Functional class: Antioxidant

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
12.6	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	100 mg/kg	15, 130, XS302	2018	Maintain

Calcium 5'-Ribonucleotides:

INS: 634 **Functional class: Flavour enhancer**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented	GMP	279, **XS294**	2014	Adopt

	soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Calcium Carbonate:					
INS: 170(i)		**Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Calcium Chloride:					
INS: 509		**Functional class: Firming agent, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7,	GMP	**XS294**	2013	Adopt

	12.9.1, 12.9.2.1 and 12.9.2.3				

Calcium lactate:					
INS: 509		**Functional class: Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	10000	58, **XS294**	2013	Adopt

Canthaxanthin:					
INS: 161g		**Functional class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	15 mg/kg	**XS160**	2011	Adopt
12.6	Sauces and like products	30 mg/kg	XS302, **XS306**	2018	Adopt

Caramel III – Ammonia Caramel:					
INS: 150c		**Functional class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	500 mg/kg	**XS160**	1999	Adopt

04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	50000	161, **XS294**	2010	Adopt
12.6	Sauces and like products	50000 mg/kg	**H-306**	2010	Adopt

Caramel IV – Sulfite Ammonia Caramel:					
INS: 150d		**Functional class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	500 mg/kg	**XS160**	1999	Adopt
04.2.2	Processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	50000	92, 161 & **XS294**	2009	Adopt
12.6	Sauces and like products	30000 mg/kg	XS302, **H-306**	2018	Adopt

Carmines:					
INS: 120		**Functional class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of	500 mg/kg	178, **XS160**	2005	Adopt

	food category 04.1.2.5				
12.6	Sauces and like products	500 mg/kg	178, XS302, **F-306**	2018	Adopt

Carnauba wax:					
INS: 903		**Functional class: Acidity regulator, Anticaking agent, Bulking agent, Carrier, Glazing agent**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2	Processed fruit	400 mg/kg	**XS160**	2004	Adopt

Carotenes, Beta-,Vegetable:					
INS: 160a(ii)		**Functional class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	500 mg/kg	**XS160**	2005	Adopt **Also under consideration in GSFA EWG**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	1000	**XS294**	2005	Adopt **Also under consideration in GSFA EWG**
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	2000 mg/kg		2005	Maintain **Also under consideration in GSFA EWG**

Carotenoids:	
INS 160a(i)	**Functional Class: Colour**
INS 160a(iii)	**Functional Class: Colour**
INS 160e	**Functional Class: Colour**

INS 160f		**Functional Class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	500 mg/kg	**XS160**	2009	Adopt **Also under consideration in GSFA EWG**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	50	**XS294**	2009	Adopt **Also under consideration in GSFA EWG**
12.6	Sauces and like products	500 mg/kg	XS302, **XS306**	2018	Maintain **Also under consideration in GSFA EWG**

Carrageenan:					
INS 407		**Functional Class: Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7,	GMP	**XS294**	2013	Adopt

	12.9.1, 12.9.2.1 and 12.9.2.3				

Chlorophylls and chlorophyllins, Copper Complexes:					
INS 141(i) **INS 141(ii)**		**Functional Class: Colour** **Functional Class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	150 mg/kg	**XS160**	2009	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	100	62, **XS294**	2005	Adopt
12.6	Sauces and like products	100 mg/kg	XS302, **G-306**	2018	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**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products	GMP	**XS294**	2013	Adopt

	of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

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**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Curcumin:					
INS 100(i)		**Functional Class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	**Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)**	**GMP**	**D-306**		**Adopt** **Also under consideration in GSFA EWG;** **Chair's Note: Curcumin has a numerical JECFA ADI**

Cyclamates:					
INS 952(i) **INS 952(ii)** **INS 952(iv)**		**Functional Class: Sweetener** **Functional Class: Sweetener** **Functional Class: Sweetener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney)	2000 mg/kg	17, 477, **XS160**	2019	Adopt

	excluding products of food category 04.1.2.5				

Dextrins, Roasted Starch:					
INS 1400		**Functional Class:** Carrier, Emulsifier, Stabilizer, Thickener			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

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**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	5000 mg/kg	**XS160**	2005	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products	2500	**XS294**	2005	Adopt

	of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				
12.6	Sauces and like products	10000 mg/kg	XS302	2018	Maintain

Disodium 5'-Guanylate:					
INS 627		**Functional Class: Flavour enhancer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	279, **XS294**	2014	Adopt

Disodium 5'-Inosinate:					
INS 631		**Functional Class: Flavour enhancer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7,	GMP	279, **XS294**	2014	Adopt

	12.9.1, 12.9.2.1 and 12.9.2.3				

Disodium 5'-Ribonucleotides:					
INS 635		**Functional Class: Flavour enhancer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	279, **XS294**	2014	Adopt

Erythrosine:					
INS 127		**Functional Class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	30 mg/kg	**XS294**	2011	Adopt
12.6.2	**Non-emulsified sauces (e.g. ketchup, cheese sauce, cream**	**50 mg/kg**	**D-306**		**Adopt**

	sauce, brown gravy)				

Ethylene diamine tetra acetates:					
INS 385		**Functional Class: Antioxidant, Colour retention agent, Preservative, Sequestrant**			
INS 386		**Functional Class: Antioxidant, Colour retention agent, Preservative, Sequestrant, Stabilizer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	100 mg/kg	21, **XS160**	2001	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	250	21, **XS294**	2001	Adopt
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	75 mg/kg	21, **C-306**	2001	Adopt

Fast Green FCF:					
INS 143		**Functional Class: Antioxidant, Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	100 mg/kg	161, **XS160**	2009	Adopt
04.2.2.7	Fermented vegetable	100	161, **XS294**	2009	Adopt

	(including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Fumaric acid:					
INS 297		**Functional Class: Acidity regulator**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Glycerol:					
INS 422		**Functional Class: Humectant, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and	GMP	**XS294**	2014	Adopt

	legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Grape Skin Extract:					
INS 163(ii)		**Functional Class: Antioxidant, Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	500 mg/kg	161, 181, **XS160**	2009	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	100	161, 181, **XS294**	2009	Adopt
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	300 mg/kg	181, **XS306**	2009	Adopt

Guaiac resin:					
INS 314		**Functional Class: Antioxidant**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**

12.6	Sauces and like products	600 mg/kg	15, XS302, **XS306**	2009	Adopt

Guar gum:					
INS 412		**Functional Class: Emulsifier, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP		2013	Maintain

Gum Arabic (Acacia gum):					
INS 414		**Functional Class: Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	**Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3**	**GMP**	**A-294**		**Adopt**

Hydroxybenzoates, para:

INS 214		**Functional Class: Preservative**			
INS 218		**Functional Class: Preservative**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	1000 mg/kg	27, **D-160**	2012	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	300	27, **XS294**	2012	Adopt
12.6	Sauces and like products	1000 mg/kg	27, XS302	2018	Maintain

Indigotine (Indigo Carmine):					
INS 132		**Functional Class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	300 mg/kg	161, **XS160**	2009	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented	300	161, **XS294**	2009	Adopt

	soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				
12.6	Sauces and like products	300 mg/kg	XS302, **XS306**	2018	Adopt

Iron Oxides:					
INS 172(i) **INS 172(ii)** **INS 172(iii)**		**Functional Class: Colour** **Functional Class: Colour** **Functional Class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	500 mg/kg	**XS160**	2005	Adopt
12.6	Sauces and like products	75 mg/kg	XS302, **XS306**	2018	Adopt

Lactic acid, L-, D- and DL-:					
INS 270		**Functional Class: Acidity regulator**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Lauric arginate ethyl ester:					
INS 243		**Functional Class: Preservative**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**

12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	200 mg/kg	**XS306**	2011	Adopt

Lecithin:					
INS 322(i)		**Functional Class: Antioxidant, Emulsifier**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Magnesium Carbonate:					
INS 504(i)		**Functional Class: Acidity regulator, Anticaking agent, Colour retention agent**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	5000 mg/kg	36, **XS294**	2013	Adopt

Malic acid, DL-:

INS 296 **Functional Class: Acidity regulator, Sequestrant**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP		2013	Maintain

Monosodium L-glutamate:

INS 621 **Functional Class: Flavour enhancer**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	279	2014	Maintain

Neotame:

INS 621 **Functional Class: Flavour enhancer, Sweetener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation

04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	70 mg/kg	478, **XS160**	2019	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	33 mg/kg	144, **XS294**	2021	Adopt
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	70 mg/kg	**XS306**	2007	Adopt

Nisin:

INS 234 **Functional Class: Preservative**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	5 mg/kg	233, ~~**XS306R**~~, **XS306**, B5	2021	Adopt

Pectins:

INS 440 **Functional Class: Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and	GMP	**XS294**	2013	Adopt

	legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Phosphates:	
INS 338	**Functional Class: Acidity regulator, Antioxidant, Sequestrant**
INS 339(i)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 339(ii)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener**
INS 339(iii)	**Functional Class: Acidity regulator, Emulsifier, Humectant, Preservative, Sequestrant, Stabilizer, Thickener**
INS 340(i)	**Functional Class: Acidity regulator, Emulsifier, Humectant, Sequestrant, Stabilizer, Thickener**
INS 340(ii)	**Functional Class: Acidity regulator, Emulsifier, Humectant, Sequestrant, Stabilizer, Thickener**
INS 340(iii)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener**
INS 341(i)	**Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 341(ii)	**Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Raising agent, Stabilizer, Thickener**
INS 341(iii)	**Functional Class: Acidity regulator, Anticaking agent, Emulsifier, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Raising agent, Stabilizer, Thickener**
INS 342(i)	**Functional Class: Acidity regulator, Flour treatment agent, Raising agent, Stabilizer, Thickener**
INS 342(ii)	**Functional Class: Acidity regulator, Flour treatment agent, Raising agent, Stabilizer, Thickener**
INS 343(i)	**Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Stabilizer, Thickener**
INS 343(ii)	**Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener**
INS 343(iii)	**Functional Class: Acidity regulator, Anticaking agent, Stabilizer, Thickener**
INS 450(i)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 450(ii)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 450(iii)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 450(ix)	**Functional Class: Acidity regulator, Raising agent, Stabilizer**
INS 450(v)	

INS 450(vi)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 450(vii)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Firming agent, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 451(i)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer**
INS 451(ii)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener**
INS 452(i)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener**
INS 452(ii)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 452(iii)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 452(iv)	**Functional Class: Acidity regulator, Emulsifier, Humectant, Raising agent, Sequestrant, Stabilizer**
INS 452(v)	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener**
INS 542	**Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener**
	Functional Class: Anticaking agent, Emulsifier, Humectant

Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	1100 mg/kg	33, **XS160**	2009	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	2200	33, **B-294**	2010	Adopt
12.6	Sauces and like products	2200 mg/kg	33, XS302, **A-306**	2018	Adopt

Polydimethylsiloxane:

INS 900a		**Functional Class: Anticaking agent, Antifoaming agent, Emulsifier**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	10 mg/kg	**XS160**	1999	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	10 mg/kg	**XS294**	2008	Adopt

Polyglycerol esters of fatty acids:					
INS 475		**Functional Class: Emulsifier, Stabilizer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	5000 mg/kg	**~~XS306R~~ L-306**	2018	Adopt

Polysorbates:					
INS 432		**Functional Class: Emulsifier, Stabilizer**			
INS 433		**Functional Class: Emulsifier, Stabilizer**			
INS 434		**Functional Class: Emulsifier**			
INS 435		**Functional Class: Emulsifier, Stabilizer**			
INS 436		**Functional Class: Emulsifier, Stabilizer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream	5000 mg/kg	**J-306**	2007	Adopt

	sauce, brown gravy)				

Ponceau 4R (Cochineal Red A):					
INS 124		**Functional Class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	500 mg/kg	161, **XS160**	2008	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	500 mg/kg	161, **XS294**	2008	Adopt
12.6	Sauces and like products	50 mg/kg	XS302	2018	Maintain

Potassium Carbonate:					
INS 501(i)		**Functional Class: Acidity regulator, Stabilizer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products	GMP	**XS294**	2013	Adopt

	of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Potassium Chloride:					
INS 508		**Functional Class: Firming agent, Flavour enhancer, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP		2013	Maintain

Processed eucheuma seaweed (PES):					
INS 407a		**Functional Class: Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Propyl gallate:					
INS 310		**Functional Class: Antioxidant**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6	Sauces and like products	200 mg/kg	15, 130, XS302, **XS306**	2018	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**
12.6.2	**Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)**	**8000 mg/kg**	**D-306**		**Adopt**

Propylene glycol esters of fatty acids:					
INS 477		**Functional Class: Emulsifier**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	**Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)**	**20000 mg/kg**	**D-306**		**Adopt**

Pullulan:					
INS 1204		**Functional Class: Glazing agent, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories	GMP	**XS294**	2014	Adopt

	06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Riboflavins:

INS 101(i) **Functional Class: Colour**
INS 101(ii) **Functional Class: Colour**
INS 101(iii) **Functional Class: Colour**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	500 mg/kg	**XS160**	2005	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	500 mg/kg	**XS294**	2008	Adopt
12.6	Sauces and like products	350 mg/kg	XS302, **E-306**	2018	Adopt

Saccharins:

INS 954(i) **Functional Class: Sweetener**
INS 954(ii) **Functional Class: Sweetener**
INS 954(iii) **Functional Class: Sweetener**
INS 954(iv) **Functional Class: Sweetener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	200 mg/kg	477, **XS160**	2019	Adopt
04.2.2.7	Fermented vegetable (including	200 mg/kg	144, **XS294**	2021	Adopt

	mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				
12.6	Sauces and like products	160 mg/kg	XS302, **M-306**	2018	Adopt

Sodium acetate:

INS 262(i) **Functional Class: Acidity regulator, Preservative, Sequestrant**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Sodium ascorbate:

INS 301 **Functional Class: Antioxidant**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and	GMP	**XS294**	2014	Adopt

	legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Sodium carbonate:					
INS 500(i)		**Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Sodium diacetate:					
INS 262(ii)		**Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	2500 mg/kg	~~**XS306R**~~ **XS306**		Adopt

Sodium DL-malate:	
INS 350(ii)	**Functional Class: Acidity regulator, Humectant**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Sodium erythorbate (sodium isoascorbate):

INS 350(ii) **Functional Class: Acidity regulator, Humectant**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	280, **XS294**	2014	Adopt

Sodium fumarates:

INS 365 **Functional Class: Acidity regulator**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.2.2.7	Fermented vegetable (including	GMP	**XS294**	2013	Adopt

	mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Sodium gluconate:					
INS 365		**Functional Class: Acidity regulator**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Sodium lactate:					
INS 325		**Functional Class: Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying salt, Humectant, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and	GMP		2013	Maintain

	seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3				

Sorbates:

INS 200 **Functional Class: Preservative**
INS 202 **Functional Class: Preservative**
INS 203 **Functional Class: Preservative**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	1000 mg/kg	42, **C-160**	2009	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	1000 mg/kg	42	2012	Maintain
12.6	Sauces and like products	1000 mg/kg	42, 127	2012	Maintain

Stearoyl lactylates:

INS 481(i) **Functional Class: Emulsifier, Flour treatment agent, Foaming agent, Stabilizer**
INS 482(i) **Functional Class: Emulsifier, Flour treatment agent, Foaming agent, Stabilizer**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
12.6.2	Non-emulsified sauces (e.g. ketchup,	2500 mg/kg	~~XS306R~~ **XS306**	2018	Adopt

	cheese sauce, cream sauce, brown gravy)				

Steviol glycosides:					
INS 960a		**Functional Class: Sweetener**			
INS 960b		**Functional Class: Sweetener**			
INS 960c		**Functional Class: Sweetener**			
INS 960d		**Functional Class: Sweetener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	330 mg/kg	26, **XS160**	2011	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	200 mg/kg	26, **XS294**	2011	Adopt
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	350 mg/kg	26, **XS306**	2011	Adopt

Sucralose (trichlorogalactosucrose):					
INS 955		**Functional Class: Flavour enhancer, Sweetener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	400 mg/kg	478, **XS160**	2019	Adopt

04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	580 mg/kg	144, **XS294**	2021	Adopt
12.6	Sauces and like products	450 mg/kg	127	2007	Maintain

Sucrose esters:					
INS 473		**Functional Class: Emulsifier, Foaming agent, Glazing agent, Stabilizer**			
INS 473a		**Functional Class: Emulsifier, Glazing agent, Stabilizer**			
INS 474		**Functional Class: Emulsifier**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	10000 mg/kg	~~B4~~ **K-306**	2021	Adopt

Sulfites:					
INS 220		**Functional Class: Antioxidant, Bleaching agent, Flour treatment agent, Preservative**			
INS 221		**Functional Class: Antioxidant, Bleaching agent, Flour treatment agent, Preservative**			
INS 222		**Functional Class: Antioxidant, Preservative**			
INS 223		**Functional Class: Antioxidant, Bleaching agent, Flour treatment agent, Preservative**			
INS 224		**Functional Class: Antioxidant, Bleaching agent, Flour treatment agent, Preservative**			
INS 225		**Functional Class: Antioxidant, Preservative**			
INS 539		**Functional Class: Antioxidant, Sequestrant**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	**Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5**	**100 mg/kg**	**44, A-160**		**Adopt**

04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	500 mg/kg	44, **XS294**	2006	Adopt
12.6	Sauces and like products	300 mg/kg	44, XS302, N-306	2018	Maintain

Sunset yellow FCF:

INS 110 **Functional Class: Colour**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	300 mg/kg	161, **XS160**	2008	Adopt
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	200 mg/kg	92, **XS294**	2008	Adopt
12.6	Sauces and like products	300 mg/kg	XS302	2018	Maintain

Tamarind seed polysaccharide:

INS 437		**Functional Class: Emulsifier, Gelling agent, Stabilizer, Thickener**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	XS38	2021	Adopt

Tartrates:					
INS 334		**Functional Class: Acidity regulator, Antioxidant, Flavour enhancer, Sequestrant**			
INS 335(ii)		**Functional Class: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer**			
INS 337		**Functional Class: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	**Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5**	**3000**	**45**		**Adopt** **Chair's Note:** Since the work of the GSFA EWG provides to adopt the provision for Tartrates be adopted for use in standardized and non-standardized products covered under FC 04.1.2.6 and the alignment of CODEX STAN 160-1987 is currently being undertaken by the Alignment EWG, the proposal is to accept the recommendation and align the provision in the

					commodity standard.
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	5000 mg/kg	45, ~~XS306R~~	2018	Adopt

Tartrazine:					
INS 102		**Functional Class: Colour**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6.2	**Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)**	**100 mg/kg**	**D-306**		Adopt

Tertiary butylhydroquinone:					
INS 319		**Functional Class: Antioxidant**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
12.6	Sauces and like products	200 mg/kg	15, 130, XS302, **XS306**	2018	Adopt

Tocopherols:					
INS 307a **INS 307b** **INS 307c**		**Functional class: Antioxidant** **Functional class: Antioxidant** **Functional class: Antioxidant**			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.1.2.6	Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5	200 mg/kg	XS160	2018	Maintain
12.6.2	Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)	600 mg/kg		2018	Maintain

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**

04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP	**XS294**	2013	Adopt

Xanthan gum:					
INS 415		**Functional class:** Emulsifier, Foaming agent, Stabilizer, Thickener			
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	GMP		2013	Maintain

Notes

8	As bixin.
10	As ascorbyl stearate.
13	As benzoic acid.
15	On the fat or oil basis.
17	As cyclamic acid.
21	As anhydrous calcium disodium ethylenediaminetetraacetate.
26	As steviol equivalents.

27	As para-hydroxybenzoic acid.
33	As phosphorus.
36	On the residual level basis.
42	As sorbic acid.
44	As residual SO2.
45	As tartaric acid.
58	As calcium.
62	As copper.
92	Excluding tomato-based sauces.
127	On the served to the consumer basis.
130	Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylated hydroquinone (INS 319), and propyl gallate (INS 310).
161	Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
178	As carminic acid.
181	As anthocyanin.
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.
191	If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as aspartame, should not exceed this level.
279	Except for products conforming to the standard for Edible Fungi and Fungus Products (CXS 38-1981).
280	For use in pickled radish only.
477	Some Codex Members allow use of additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars.
478	Some Codex Members allow use of additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars. This limitation may not apply to the appropriate use as a flavour enhancer.
XS160	Excluding products conforming to the Standard for Mango Chutney (CXS 160-1987).
XS294	Excluding products conforming to the Standard for Gochujang (CXS 294-2009).
XS302	Excluding products conforming to the Standard for Fish Sauce (CXS 302-2011).
XS306	Excluding products conforming to the Standard for Chili Sauce (CXS 306-2011).

B5	For use in low oil content or refrigerated products only.
A-160	For use only in products conforming to the Standard for Mango Chutney (CXS 160-1987): Sodium metabisulfite (INS 223) and Potassium metabisulfite (INS 224), singly or in combination.
B-160	Except for use in products conforming to the Standard for Mango Chutney (CXS 160-1987): Sodium benzoate (INS 211) and Potassium benzoate (INS 212) only at 250 mg/kg, singly or in combination.
C-160	Except for use in products conforming to the Standard for Mango Chutney (CXS 160-1987): Sorbic acid (INS 200) only.
D-160	Except for use at 250 mg/kg in products conforming to the Standard for Mango Chutney (CXS 160-1987)
A-294	For use only in products conforming to the Standard for Gochujang (CXS 294-2009).
B-294	Except for use in products conforming to the Standard for Gochujang (CXS 294-2009): Sodium dihydrogen phosphate (INS 339(i)), Disodium hydrogen phosphate (INS 339(ii)), Potassium dihydrogen phosphate (INS 340(i)), Dipotassium hydrogen phosphate (340(ii)), Sodium polyphosphate (INS 452(i)), and Potassium polyphosphate (INS 453(ii)) only at 5000 mg/kg, singly or in combination.
A-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Sodium polyphosphate (INS 452(i)) only at 1000 mg/kg.
B-306	Except for use at 100 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
C-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Disodium ethylenediaminetetraacetate (INS 386) only.
D-306	For use only in products conforming to the Standard for Chili Sauce (CXS 306-2011).
E-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Riboflavin, synthetic (INS 101(i)) and Riboflavin, 5'-phosphate sodium (INS 101(ii)) only, singly or in combination.
F-306	Except for use at 50 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
G-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Chlorophylls, copper complexes (INS 141(i)) only at 30 mg/kg as copper.
H-306	Except for use at 1500 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
J-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Polyoxyethylene (20) sorbitan monolaurate (INS 432), Polyoxyethylene (20) sorbitan monooleate (INS 433), Polyoxyethylene (20) sorbitan monopalmitate (INS 434) and Polyoxyethylene (20) sorbitan monostearate (INS 435) only, singly or in combination.
K-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Sucrose esters of fatty acids only at 5000 mg/kg.
L-306	Except for use at 10000 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
M-306	Except for use at 150 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
N-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): sulfur dioxide (INS 220), sodium sulfite (INS 221), sodium hydrogen sulfite (INS 222), sodium metabisulfite (INS 223), potassium metabisulfite (INS 224), and potassium sulfite (INS 225) only, singly or in combination.

B. PROPOSED AMENDMENTS TO TABLE 2

Food category 04.1.2 Processed fruit

Additive	INS	Step/Year Adopted	Max Level	Notes	Recommendation
ACESULFAME POTASSIUM	950	2019	1000 mg/kg	478, 188 & **XS160**	Adopt

Food category 04.1.2.6 Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5

Additive	INS	Step/Year Adopted	Max Level	Notes	Recommendation
ACESULFAME POTASSIUM	950	2019	1000 mg/kg	478, 188 & **XS160**	Adopt
ADVANTAME	969	2021	10 mg/kg	**XS160**	Adopt
ASPARTAME	951	2019	1000 mg/kg	478, 191 & **XS160**	Adopt
ASPARTAME-ACESULFAME SALT	962	2021	1000 mg/kg	119, 477 & XS160	Maintain
BENZOATES	210-213	2001	1000 mg/kg	13 & **B-160**	Adopt
BRILLIANT BLUE FCF	133	2009	100 mg/kg	161 & **XS160**	Adopt
CANTHAXANTHIN	161g	2011	15 mg/kg	**XS160**	Adopt
CARAMEL III - AMMONIA CARAMEL	150c	1999	500 mg/kg	**XS160**	Adopt
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	1999	500 mg/kg	**XS160**	Adopt
CARMINES	120	2005	500 mg/kg	178 & **XS160**	Adopt
CAROTENES, BETA-, VEGETABLE	160a(ii)	2005	500 mg/kg	**XS160**	Adopt **Also under consideration in GSFA EWG**
CAROTENOIDS	160a(i),a(iii),e,f	2009	500 mg/kg	**XS160**	Adopt **Also under consideration in GSFA EWG**

CHLOROPHYLLS AND CHLOROPHYLLINS, COPPER COMPLEXES	141(i),(ii)	2009	150 mg/kg	**XS160**	Adopt
CYCLAMATES	952(i), (ii), (iv)	2019	2000 mg/kg	17, 477 & **XS160**	Adopt
DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL	472e	2005	5000 mg/kg	**XS160**	Adopt
ETHYLENE DIAMINE TETRA ACETATES	385, 386	2001	100 mg/kg	21 & **XS160**	Adopt
FAST GREEN FCF	143	2009	100 mg/kg	161 & **XS160**	Adopt
GRAPE SKIN EXTRACT	163(ii)	2009	500 mg/kg	161, 181 & **XS160**	Adopt
HYDROXYBENZOATES, PARA-	214, 218	2012	1000 mg/kg	27 & **D-160**	Adopt
INDIGOTINE (INDIGO CARMINE)	132	2009	300 mg/kg	161 & **XS160**	Adopt
IRON OXIDES	172(i)-(iii)	2005	500 mg/kg	**XS160**	Adopt
NEOTAME	961	2019	70 mg/kg	478 & **XS160**	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	2009	1100 mg/kg	33 & **XS160**	Adopt
POLYDIMETHYLSILOXANE	900a	1999	10 mg/kg	**XS160**	Adopt
PONCEAU 4R (COCHINEAL RED A)	124	2008	500 mg/kg	161 & **XS160**	Adopt
RIBOFLAVINS	101(i),(ii), (iii)	2005	500 mg/kg	**XS160**	Adopt
SACCHARINS	954(i)-(iv)	2019	200 mg/kg	477 & **XS160**	Adopt
SORBATES	200, 202, 203	2009	1000 mg/kg	42 & **C-160**	Adopt
STEVIOL GLYCOSIDES	960a, 960b, 960c, 960d	2011	330 mg/kg	26 & **XS160**	Adopt
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	2019	400 mg/kg	478, **XS160**	Adopt

SULFITES	**220-225, 539**		**100 mg/kg**	**44, A-160**	Adopt
SUNSET YELLOW FCF	110	2008	300 mg/kg	161, **XS160**	Adopt
TARTRATES	**334, 335(ii), 337**		**3000**	**45**	**Adopt**
TOCOPHEROLS	307a, b, c	2018	200 mg/kg	XS160	Maintain

Food category 04.2.2 **Processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds**

Additive	INS	Step/Year Adopted	Max Level	Notes	Recommendation
CARAMEL IV – SULFITE AMMONIA CARAMEL	150d	2009	50000	92, 161 & **XS294**	Adopt

Food category 04.2.2.7 **Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3**

Additive	INS	Step/Year Adopted	Max Level	Notes	Recommendation
ACESULFAME POTASSIUM	950	2008	1000 mg/kg	188, **XS294**	Adopt
ACETIC ACID, GLACIAL	260	2013	GMP	**XS294**	Adopt
ALGINIC ACID	400	2013	GMP	**XS294**	Adopt
ASCORBIC ACID, L-	300	2013	GMP	**XS294**	Maintain
ASPARTAME	951	2008	2500 mg/kg	144, 191 & **XS294**	Adopt
BENZOATES	210-213	2001	1000 mg/kg	13, **XS294**	Adopt
BRILLIANT BLUE FCF	133	2009	100 mg/kg	92, 161 & **XS294**	Adopt
CALCIUM 5'-RIBONUCLEOTIDES	634	2014	GMP	279 & **XS294**	Adopt

CALCIUM CARBONATE	170(i)	2013	GMP	**XS294**	Adopt
CALCIUM CHLORIDE	509	2013	GMP	**XS294**	Adopt
CALCIUM LACTATE	327	2013	10000 mg/kg	58, **XS294**	Adopt
CARAMEL III - AMMONIA CARAMEL	150c	2010	50000 mg/kg	161, **XS294**	Adopt
CAROTENES, BETA-, VEGETABLE	160a(ii)	2005	1000 mg/kg	**XS294**	Adopt **Also under consideration in GSFA EWG**
CAROTENOIDS	160a(i),a(iii),e,f	2009	50 mg/kg	**XS294**	Adopt **Also under consideration in GSFA EWG**
CARRAGEENAN	407	2013	GMP	**XS294**	Adopt
CHLOROPHYLLS AND CHLOROPHYLLINS, COPPER COMPLEXES	141(i),(ii)	2005	100 mg/kg	62 & **XS294**	Adopt
CITRIC ACID	330	2013	GMP	**XS294**	Adopt
CITRIC AND FATTY ACID ESTERS OF GLYCEROL	472c	2013	GMP	**XS294**	Adopt
DEXTRINS, ROASTED STARCH	1400	2013	GMP	**XS294**	Adopt
DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL	472e	2005	2500 mg/kg	**XS294**	Adopt
DISODIUM 5'-GUANYLATE	627	2014	GMP	279 & **XS294**	Adopt
DISODIUM 5'-INOSINATE	631	2014	GMP	279 & **XS294**	Adopt
DISODIUM 5'-RIBONUCLEOTIDES	635	2014	GMP	279 & **XS294**	Adopt
ERYTHROSINE	127	2011	30 mg/kg	**XS294**	Adopt
ETHYLENE DIAMINE TETRA ACETATES	385, 386	2001	250 mg/kg	21 & **XS294**	Adopt
FAST GREEN FCF	143	2009	100 mg/kg	161 & **XS294**	Adopt
FUMARIC ACID	297	2013	GMP	**XS294**	Adopt

GLYCEROL	422	2014	GMP	**XS294**	Adopt
GRAPE SKIN EXTRACT	163(ii)	2009	100 mg/kg	161, 181 & **XS294**	Adopt
GUAR GUM	412	2013	GMP		Maintain
GUM ARABIC (ACACIA GUM)	**414**		**GMP**	**A-294**	Adopt
HYDROXYBENZOATES, PARA-	214, 218	2012	300 mg/kg	27 & **XS294**	Adopt
INDIGOTINE (INDIGO CARMINE)	132	2009	300 mg/kg	161 & **XS294**	Adopt
LACTIC ACID, L-, D- and DL-	270	2013	GMP	**XS294**	Adopt
LECITHIN	322(i)	2013	GMP	**XS294**	Adopt
MAGNESIUM CARBONATE	504(i)	2013	5000 mg/kg	36 & **XS294**	Adopt
MALIC ACID, DL-	296	2013	GMP		Maintain
MONOSODIUM L-GLUTAMATE	621	2014	GMP	279	Maintain
NEOTAME	961	2007	33 mg/kg	144 & **XS294**	Adopt
PECTINS	440	2013	GMP	**XS294**	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	2010	2200 mg/kg	33, **B-294**	Adopt
POLYDIMETHYLSILOXANE	900a	2008	10 mg/kg	**XS294**	Adopt
PONCEAU 4R (COCHINEAL RED A)	124	2008	500 mg/kg	161 & **XS294**	Adopt
POTASSIUM CARBONATE	501(i)	2013	GMP	**XS294**	Adopt
POTASSIUM CHLORIDE	508	2013	GMP		Maintain

PROCESSED EUCHEUMA SEAWEED (PES)	407a	2013	GMP	**XS294**	Adopt
PULLULAN	1204	2014	GMP	**XS294**	Adopt
RIBOFLAVINS	101(i),(ii), (iii)	2008	500 mg/kg	**XS294**	Adopt
SACCHARINS	954(i)-(iv)	2008	200 mg/kg	144 & **XS294**	Adopt
SODIUM ACETATE	262(i)	2013	GMP	**XS294**	Adopt
SODIUM ASCORBATE	301	2014	GMP	**XS294**	Adopt
SODIUM CARBONATE	500(i)	2013	GMP	**XS294**	Adopt
SODIUM DL-MALATE	350(ii)	2013	GMP	**XS294**	Adopt
SODIUM ERYTHORBATE (SODIUM ISOASCORBATE)	316	2014	GMP	280 & **XS294**	Adopt
SODIUM FUMARATES	365	2013	GMP	**XS294**	Adopt
SODIUM GLUCONATE	576	2013	GMP	**XS294**	Adopt
SODIUM LACTATE	325	2013	GMP		Maintain
SORBATES	200, 202, 203	2012	1000 mg/kg	42	Maintain
STEVIOL GLYCOSIDES	960a, 960b, 960c, 960d	2011	200 mg/kg	26 & **XS294**	Adopt
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	2008	580 mg/kg	144 & **XS294**	Adopt
SULFITES	220-225, 539	2006	500 mg/kg	44 & **XS294**	Adopt
SUNSET YELLOW FCF	110	2008	200 mg/kg	92 & **XS294**	Adopt
TAMARIND SEED POLYSACCHARIDE	437	2021	GMP	XS38	Adopt
TRISODIUM CITRATE	331(iii)	2013	GMP	**XS294**	Adopt

XANTHAN GUM	415	2013	GMP		Maintain

Food category 12.6 **Sauces and like products**

Additive	INS	Step/Year Adopted	Max Level	Notes	Recommendation
ACESULFAME POTASSIUM	950	2007	1000 mg/kg	188	Adopt
ALLURA RED AC	129	2018	300 mg/kg	XS302	Maintain
ASPARTAME	951	2005	350 mg/kg	191	Adopt
BENZOATES	210-213	2003	1000 mg/kg	13	Maintain
BRILLIANT BLUE FCF	133	2018	100 mg/kg	XS302	Maintain
BUTYLATED HYDROXYANISOLE	320	2018	200 mg/kg	15, 130, XS302 & **B-306**	Adopt
BUTYLATED HYDROXYTOLUENE	321	2018	100 mg/kg	15, 130 & XS302	Maintain
CANTHAXANTHIN	161g	2018	30 mg/kg	XS302 & **XS306**	Adopt
CARAMEL III - AMMONIA CARAMEL	150c	2010	50000 mg/kg	**H-306**	Adopt
CARAMEL IV - SULFITE AMMONIA CARAMEL	150d	2018	30000 mg/kg	XS302 & **H-306**	Adopt
CARMINES	120	2018	500 mg/kg	178, XS302 & **F-306**	Adopt
CAROTENOIDS	160a(i),a(iii),e,f	2018	500 mg/kg	XS302, **XS306**	Maintain **Also under consideration in GSFA EWG**
CHLOROPHYLLS AND CHLOROPHYLLINS, COPPER COMPLEXES	141(i),(ii)	2018	100 mg/kg	XS302 & **G-306**	Adopt
DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL	472e	2018	10000 mg/kg	XS302	Adopt
GUAIAC RESIN	314	2018	600 mg/kg	15, XS302 & **XS306**	Adopt
HYDROXYBENZOATES, PARA-	214, 218	2018	1000 mg/kg	27 & XS302	Maintain

INDIGOTINE (INDIGO CARMINE)	132	2018	300 mg/kg	XS302 & **XS306**	Adopt
IRON OXIDES	172(i)-(iii)	2018	75 mg/kg	XS302 & **XS306**	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	2018	2200 mg/kg	33, XS302 & **A-306**	Adopt
PONCEAU 4R (COCHINEAL RED A)	124	2018	50 mg/kg	XS302	Maintain
PROPYL GALLATE	310	2018	200 mg/kg	15, 130, XS302 & **XS306**	Adopt
RIBOFLAVINS	101(i),(ii), (iii)	2018	350 mg/kg	XS302 & **E-306**	Adopt
SACCHARINS	954(i)-(iv)	2018	160 mg/kg	XS302 & **M-306**	Adopt
SORBATES	200, 202, 203	2012	1000 mg/kg	42, 127	Maintain
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	2007	450 mg/kg	127	Adopt
SULFITES	220-225, 539	2018	300 mg/kg	44, XS302	Maintain
SUNSET YELLOW FCF	110	2018	300 mg/kg	XS302	Maintain
TERTIARY BUTYLHYDROQUINONE	319	2018	200 mg/kg	15, 130, XS302 & **XS306**	Adopt

Food category 12.6.2 **Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)**

Additive	**INS**	**Step/Year Adopted**	**Max Level**	**Notes**	**Recommendation**
ANNATTO EXTRACTS, BIXIN BASED	**160b(i)**		**10 mg/kg**	**8, D-306**	**Adopt**
ASCORBYL ESTERS	304, 305	2005	500 mg/kg	10 & **XS306**	Adopt
BROWN HT	**155**		**50 mg/kg**	**D-306**	**Adopt**
CAROTENES, BETA-, VEGETABLE	160a(ii)	2005	2000 mg/kg		Maintain **Also under consideration in**

					GSFA EWG
CURCUMIN	100(i)		**GMP**	**D-306**	Adopt
ERYTHROSINE	**127**		**50 mg/kg**	**D-306**	**Adopt**
ETHYLENE DIAMINE TETRA ACETATES	385, 386	2001	75 mg/kg	21, **C-306**	Adopt
GRAPE SKIN EXTRACT	163(ii)	2009	300 mg/kg	181 & **XS306**	Adopt
LAURIC ARGINATE ETHYL ESTER	243	2011	200 mg/kg	**XS306**	Adopt
NEOTAME	961	2007	70 mg/kg	**XS306**	Adopt
NISIN	234	2021	5 mg/kg	233, ~~**XS306R**~~, **XS306**, B5	Adopt
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	2018	5000 mg/kg	~~XS306**R**~~ **L-306**	Adopt
PROPYLENE GLYCOL ALGINATE	**405**		**8000 mg/kg**	**D-306**	**Adopt**
PROPYLENE GLYCOL ESTERS OF FATTY ACIDS	**477**		**20000 mg/kg**	**D-306**	**Adopt**
POLYSORBATES	432-436	2007	5000 mg/kg	**J-306**	Adopt
SODIUM DIACETATE	262(ii)	2018	2500 mg/kg	~~**XS306R**~~ **XS306**	Adopt
STEAROYL LACTYLATES	481(i), 482(i)	2018	2500 mg/kg	~~**XS306R**~~ **XS306**	Adopt
STEVIOL GLYCOSIDES	960a, 960b, 960c, 960d	2011	350 mg/kg	26 & **XS306**	Adopt
SUCROSE ESTERS	473, 473a, 474	1000 mg/kg		**K-306**	Adopt
TARTRATES	334, 335(ii), 337	2018	5000 mg/kg	45, ~~**XS306R**~~	Adopt
TARTRAZINE	**102**		**100 mg/kg**	**D-306**	**Adopt**

TOCOPHEROLS	307a, b, c	2018	600 mg/kg		Maintain

Notes

8	As bixin.
10	As ascorbyl stearate.
13	As benzoic acid.
15	On the fat or oil basis.
17	As cyclamic acid.
21	As anhydrous calcium disodium ethylenediaminetetraacetate.
26	As steviol equivalents.
27	As para-hydroxybenzoic acid.
33	As phosphorus.
36	On the residual level basis.
42	As sorbic acid.
44	As residual SO2.
45	As tartaric acid.
58	As calcium.
62	As copper.
92	Excluding tomato-based sauces.
127	On the served to the consumer basis.
130	Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylated hydroquinone (INS 319), and propyl gallate (INS 310).
161	Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
178	As carminic acid.
181	As anthocyanin.
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.
191	If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as aspartame, should not exceed this level.
279	Except for products conforming to the standard for Edible Fungi and Fungus Products (CXS 38-1981).
280	For use in pickled radish only.
477	Some Codex Members allow use of additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars.
478	Some Codex Members allow use of additives with sweetener function in all foods

	within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars. This limitation may not apply to the appropriate use as a flavour enhancer.
XS160	Excluding products conforming to the Standard for Mango Chutney (CXS 160-1987).
XS294	Excluding products conforming to the Standard for Gochujang (CXS 294-2009).
XS302	Excluding products conforming to the Standard for Fish Sauce (CXS 302-2011).
XS306	Excluding products conforming to the Standard for Chili Sauce (CXS 306-2011).
B5	For use in low oil content or refrigerated products only.
A-160	For use only in products conforming to the Standard for Mango Chutney (CXS 160-1987): Sodium metabisulfite (INS 223) and Potassium metabisulfite (INS 224), singly or in combination.
B-160	Except for use in products conforming to the Standard for Mango Chutney (CXS 160-1987): Sodium benzoate (INS 211) and Potassium benzoate (INS 212) only at 250 mg/kg, singly or in combination.
C-160	Except for use in products conforming to the Standard for Mango Chutney (CXS 160-1987): Sorbic acid (INS 200) only.
D-160	Except for use at 250 mg/kg in products conforming to the Standard for Mango Chutney (CXS 160-1987)
A-294	For use only in products conforming to the Standard for Gochujang (CXS 294-2009).
B-294	Except for use in products conforming to the Standard for Gochujang (CXS 294-2009): Sodium dihydrogen phosphate (INS 339(i)), Disodium hydrogen phosphate (INS 339(ii)), Potassium dihydrogen phosphate (INS 340(i)), Dipotassium hydrogen phosphate (340(ii)), Sodium polyphosphate (INS 452(i)), and Potassium polyphosphate (INS 453(ii)) only at 5000 mg/kg, singly or in combination.
A-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Sodium polyphosphate (INS 452(i)) only at 1000 mg/kg.
B-306	Except for use at 100 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
C-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Disodium ethylenediaminetetraacetate (INS 386) only.
D-306	For use only in products conforming to the Standard for Chili Sauce (CXS 306-2011).
E-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Riboflavin, synthetic (INS 101(i)) and Riboflavin, 5'-phosphate sodium (INS 101(ii)) only, singly or in combination.
F-306	Except for use at 50 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
G-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Chlorophylls, copper complexes (INS 141(i)) only at 30 mg/kg as copper.
H-306	Except for use at 1500 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
J-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Polyoxyethylene (20) sorbitan monolaurate (INS 432), Polyoxyethylene (20) sorbitan

	monooleate (INS 433), Polyoxyethylene (20) sorbitan monopalmitate (INS 434) and Polyoxyethylene (20) sorbitan monostearate (INS 435) only, singly or in combination.
K-306	Except for use in products conforming to the Standard for Chili Sauce (CXS 306-2011): Sucrose esters of fatty acids only at 5000 mg/kg.
L-306	Except for use at 10000 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).
M-306	Except for use at 150 mg/kg in products conforming to the Standard for Chili Sauce (CXS 306-2011).

C. PROPOSED AMENDMENTS TO TABLE 3

INS No	**Additive**	**Functional Class**	**Year Adopted**	**Specific allowance in the following commodity standards**
260	Acetic acid, glacial	Acidity regulator, Preservative	1999	CS 70-1981, CS 94-1981, CS 119-1981, **CS 160-1987 (only for use in heat pasteurized products to maintain the pH at less than or equal to 4.6, and in heat sterilized products)**, CS 302-2011, CS 249-2006
330	Citric acid	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	1999	CS 87-1981, CS 105-1981, CS 141-1983, CS 13-1981, CS 57-1981, CS 37-1991, CS 70-1981, CS 90-1981, CS 94-1981, CS 119-1981, **CS 160-1987 (only for use in heat pasteurized products to maintain the pH at less than or equal to 4.6, and in heat sterilized products)**, CS 302-2011, CS 249-2006
160d(i)	Lycopene, synthetic	Colour	2012	**CS 306-2011 (at 390 mg/kg)**

Section 2 of the Annex to Table 3

04.1.2.6	**Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5**
	Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to this Standard.
Codex standards	**Mango chutney (CXS 160-1987)**

12.6.2	**Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy)**
	Acidity regulators, antioxidants, colours, flavour enhancers, preservatives, sweeteners and thickeners listed in Table 3 are acceptable for use in foods conforming to this standard.
Codex standards	**Chili sauce (CXS 306-2011)**

Appendix 8

EXPLANATORY DOCUMENT – ISSUES AND CHAIR'S PROPOSALS

RELATED TO ALIGNMENT OF CCNFSDU STANDARDS WITH THE GSFA

CCNFSDU discussed the alignment of food additive provisions in CCNFSDU commodity standards with the GSFA. Reports of the CCNFSDU42 and CCNFSDU41 and CX/NFSDU 19/41/9 were referred to consider proposed amendments to the CCNFSDU commodity standards and the GSFA.

This document provides issues which arose during the alignment work. It also provides the proposed approach as outlined by the chair and the reasons for the decisions taken.

The chair wishes to highlight a specific question (see context and discussion for issue V) upfront so it is not lost.

The Chair requests comments on the suggestion to change the units of MLs from mg/kg, as is usual in the GSFA, to mg/L to be consistent with the original commodity standards of the CCNFSDU that are being aligned. Support or opposition to this suggestion is requested, with justifications required.

Comments received from the EWG on 2nd circular

Support: ISDI

New Zealand and Japan express their support.

ISDI: All commodity standards corresponding to FC 13.1.1, 13.1.2 and 13.1.3 express their food additive provisions "as-fed" with units of g/100mL. Updating the units in the GSFA to g/L [mg/L] would allow for the best alignment between the commodity standards with the GSFA.

Comments received from the EWG on 3rd circular

Support: Chile, UK, ISDI

Chair's proposal: To replace the ML units of mg/kg to mg/L for FC 13.1 and subcategories in the GSFA to better align with the relevant commodity standards.

Part A: General Issues

Issue I - Advisory lists of nutrient compounds for use in foods for special dietary uses intended for infants and young children (CXG 10-1979)

Food additive section of the commodity standards

1. Some commodity standards established by CCNFSDU contain the reference to the *Advisory lists of nutrient compounds for use in foods for special dietary uses intended for infants and young children* (CXG 10-1979) in the food additive section. Commodity standards and guidelines containing the reference to CXG 10-1979 are as follows;

- ✓ *Standard for Infant Formula and Formula for Special Medical Purposes Intended for Infant*s (CXS 72-1981)
- ✓ *Standard for Processed Cereal Based Foods for Infants and Young Children* (CXS 74-1981)
- ✓ *Guidelines for Ready-to-Use Therapeutic Foods* (RUTF)

Food additives listed in CXG 10-1979 as nutrient carriers may be present as a result of carry-over from a raw material or other ingredient (including food additive) used to produce foods conforming to the above commodity standards and guidelines.

Preamble of the GSFA

2. Section 4.3 "Foods for Which the Carry-over of Food Additives is Unacceptable" of the Preamble of the GSFA states as follows;

"Carry-over of a food additive from a raw material or ingredient is unacceptable for foods belonging to the following food categories, unless a food additive provision in the specified category is listed in Tables 1 and 2 of this standard.

a) 13.1 - Infant formulae, follow-up formulae, and formulae for special medical purposes for infants.

b) 13.2 - Complementary foods for infants and young children."

CXS 72-1981 corresponds to FC 13.1.1 (Infant formulae) and FC 13.1.3 (Formulae for special medical purposes intended for infants) and CXS 74-1981 corresponds to FC 13.2 (Complementary foods for infants and young children). Therefore, food additive provisions listed in CXG 10-1979 should be included in FC 13.1.1, FC 13.1.3 and FC 13.2 of the GSFA and the specific conditions for each food additive stated in CXG 10-1979 be captured by use of notes. The chair seeks comments on the above issue.

Comments received from the EWG on 1st circular

Agree: Chile, US, ISDI

Chile, US and ISDI propose that the additives listed in Part D of CXG 10-1979 be included in FC 13.1.2 of the GSFA. ISDI recommends the provisions listed in CXG 10-1979 be extended to FC 13.1.2 to ensure that all Commodity Standards that reference the Carry-Over of the GSFA are also covered by the scope of CXG 10-1979 (which covers foods for infants and young children). It also notes that Carry-Over Principle has been reflected in the proposed revision to the Standard for Follow-Up Formula (REP22/NFSDU p.27-28).

Response

The chair has checked REP22/NFSDU para. 27-28 and found that CCNFSDU42 had endorsed the carry-over of food additives and nutrient carriers and text was consistent with the text in both CXS 72-1981 and CXS 74-1981. Therefore, the chair proposes that FC 13.1.2 be included in the proposal.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair's proposal: unchanged, food additive provisions listed in CXG 10-1979 be included in FC 13.1.1, 13.1.2, 13.1.3 and 13.2 of the GSFA with the specific conditions captured using notes.

Technological function of the food additives listed in CXG 10-1979

3. CXG 10-1979 permits Gum arabic (INS 414), Silicon dioxide, amorphous (INS 551), Mannitol (INS 421), Starch sodium octenyl succinate (INS1450) and Sodium ascorbate (INS 301) as nutrient carriers. However, INS 421, 1450 and 301 do not have carrier function in *Class names and the international numbering system for food additives* (CXG 36-1989). It is suggested that technological function of INS 301 in nutrient preparation is as an antioxidant. The other two food additive include the functional classes of stabilizer and thickener (INS 421) and emulsifier, stabilizer and thickener (INS 1450). Therefore, the chair seeks advice on the technological function of the three food additives (INS 421, 1450 and 301) in foods conforming to CXS 72-1981 or CXS 74-1981.

Comments received from the EWG on 1st circular

US would support a recommendation to the INS EWG that the functional class of Carrier be added to these additives if technological justification is provided to indicate that these additives act as Carriers (specifically nutrient carriers).

ISDI provides information that the technological justification of the food additives listed in CXG 10-1979 relate to their function in the nutrient preparations (i.e. as a nutrient carrier), rather than their function in the final food commodities (CXS 72-1981, CXS 73-1981, CXS 74-1981, and CXS 156-1987). These substances are justified with the technological function of Carrier in the context of the nutrient preparation itself. ISDI further notes that the lack of a listed Carrier function in the INS list does not mean that these substances cannot perform a Carrier function in nutrient preparations because the section 1 of the CXG 36-1989 states:

"The various technological purposes of the food additives are included in the INS in a fourth column. The purposes listed are indicative rather than exhaustive".

Response

Based on the comments provided by ISDI, the chair notes that the food additives listed in CXG 10-1979 are used as a nutrient carrier in the nutrient preparation. The page 63 "Procedures for consideration of the entry and review of food additive provisions in the General Standard for Food Additives" of the 27th Procedural Manual states:

"Functional effect of the food additive

- The functional class list used in *Class names and the International numbering system* (CAC/GL 36-1989) should be used."

Therefore, as noted by the US, the chair proposes that CCFA53 task the next INS WG to consider the addition of functional class of carrier to the food additives INS 421, 1450 and 301.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: Chile, UK, ISDI

Chair's proposal: INS 421, 1450 and 301 are used as a nutrient carrier in the nutrient preparations. The chair proposes that CCFA53 task the next INS EWG to consider the addition of functional class of Carrier to the food additives INS 421, 1450 and 301.

Additional comments by a CCFA observer

ISDI does not support deletion of the reference to CXG 10-1979 and suggests maintaining the reference to CXG 10-1979 would be better for clarity and maintaining the reference to CXG 10-1979 could help reduce confusion as to whether these provisions are still endorsed by Codex.

Section 1.2 of the preamble of the GSFA clearly states that "The *General Standard for Food Additives* (GSFA) should be the single authoritative reference point for food additives". Therefore, the chair recommends that food additive provisions listed in CXG 10-1979 be listed in the corresponding food categories of the GSFA. The chair does NOT recommend maintaining the reference to CXG 10-1979.

Comments received from the EWG on 2nd circular

Support (not maintaining the reference to CXG 10-1979): US

Not support: ISDI

ISDI: Support maintaining the reference to CXG 10-1979 for clarity across standards. As Codex Members may reference some, but not all Codex texts, it suggests that maintaining the reference to the substances in CXG 10-1979 could help reduce confusion as to whether these provisions are still being endorsed by Codex.

Response

If Codex members do not reference all Codex texts, the establishment of the single authoritative reference point for food additives (GSFA) has a great advantage since the users only check the GSFA to understand the current standard for food additives.

Plus, no changes are proposed for food additive provisions for CXG 10-1979. If users check the food additive provisions listed in CXG 10-1979, they can confirm that these food additive provisions are endorsed by Codex.

Therefore, the Chair considers it is unnecessary to change the Chair's proposal. It is important that condition notes have been added to make it clear the provisions are only for use in nutrient preparations added to the product which is the important point.

Comments received from the EWG on 3rd circular

Support: ISDI

Chair's proposal: unchanged, include food additive provisions listed in CXG 10-1979 in the corresponding food categories of the GSFA and delete the reference to CXG 10-1979. It is important that condition notes have been added to make it clear that the food additives are allowed in nutrient preparations only.

Issue II - Carry-over principle stipulated in the commodity standards

Situation in CCNFSDU commodity standards

Standard for Infant Formula and Formula for Special Medical Purposes Intended for Infants (CXS 72-1981), *Standard for Canned Baby Foods* (CXS 73-1981), *Processed Cereal-Based Foods for Infants and Young Children* (CXS 74-1981) and *Standard for Follow-up Formula* (CXS 156-1987) stipulate carry-over principle in the standards. Those four commodity standards correspond to either subcategories of FC 13.1 or FC 13.2. According to the Section 4.3 of the preamble of the GSFA, carry-over of a food additive from a raw material or ingredient is unacceptable for foods belonging to FC 13.1 and FC 13.2. Therefore, to reflect the intent of the commodity standards correctly, it is important to state carry-over principle in food additive section of the above Commodity standards.

CCNFSDU42 considered the revision of Carry-over principle in CXS 156-1987 and adopted the text from the CXS 72-1981 and CXS 74-1981 for the carry-over of food additives and nutrient carriers (see para.27 of

REP22/NFSDU). Therefore, the revision of Section 4.6 of CXS 156-1987 are proposed based on the text in CXS 72-1981 and CXS 74-1981.

Comments received from the EWG on 1st circular

Chile, US, ISDI: Agree

ISDI suggests that since the list of additives will now be located in the GSFA and not the infant formula standard, there is no reason to repeat the preamble of the GSFA within this document. Therefore, it recommends eliminating this section and replacing it with a reference to the preamble of the GSFA.

The chair reiterates that the Carry-over of food additives are **unacceptable** in food category 13.1 and 13.2 (see page.5 of section 4.3 of the preamble of the GSFA). Therefore, the carry-over principle should be clearly stated in the commodity standards corresponding to food category 13.1 and 13.2 if CCNFSDU considers it necessary.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: Chile, UK, ISDI

Chair's proposal: Unchanged, add the carry-over principle statements in the commodity standards corresponding to food category 13.1 and 13.2 (i.e. CXS 72-1981, CXS 73-1981, CXS 74-1981 and CXS 156-1987). This recommendation should be referred to CCNFSDU as it is reviewing CXS 156-1987.

Issue III – Consideration of the food category to which the Guidelines for Ready-to-Use Therapeutic Foods (RUTF) relates

Background

The report of CCFA52 (para.72) states as follows;

> "Based on the above considerations, CCFA52 agreed to the recommendation to endorse the food additive provisions in the guidelines for RUTF; and to include the guidelines for RUTF to the future Alignment work with the other CCNFSDU standards; and that the alignment working group would also consider the appropriate GSFA food category."

Based on the above decision, the EWG needs to consider the appropriate GSFA food category to which the guidelines for RUTF relates.

Scope and description of the guidelines for RUTF

The 42nd session of the CCNFSDU agreed to forward the guidelines for RUTF to CAC45 which was held in November 2022. Scope of the guidelines and definition of RUTF are as follows;

3. SCOPE

The provisions of these guidelines apply to RUTF for children aged 6 to 59 months with severe acute malnutrition. Ready-to-Use Supplementary Foods (RUSF), micronutrient supplements[2], processed cereal based foods[3], formulated complementary foods for older infants and young children[4], canned baby foods[5] are not covered by these guidelines.

2*Guidelines for Vitamin and Mineral Food Supplements* (CXG 55-2005)

3*Standard for Processed Cereal-Based Foods for Infants and Young Children* (CXS 74-1981)

4*Guidelines on Formulated Complementary Foods for Older Infants and Young Children* (CXG 8-1991)

5*Standard for Canned Baby Foods* (CXS 73-1981)

4. DESCRIPTION

4.1 Ready-to-Use Therapeutic Foods (RUTF) are foods for special medical purposes and are high-energy and contain adequate protein and other essential nutrients for the dietary management of children from 6 to 59 months with severe acute malnutrition without medical complications with appetite. These foods should be soft or crushable and should be easy for children to eat without any prior preparation.

Consideration of appropriate GSFA food category

According to the scope and description of the guidelines, foods covered by the guidelines are categorized in food category 13.0. Taken the scope of the guidelines into consideration, foods covered by the guidelines are

covered by food category 13.3 - Dietetic foods intended for special medical purposes (excluding products of food category 13.1), or food category 13.5 - Dietetic foods (e.g. supplementary foods for dietary use) excluding products of food categories 13.1- 13.4 and 13.6. Descriptors of food categories 13.3 and 13.5 are as follows;

13.3 Dietetic foods intended for special medical purposes (excluding products of food category 13.1):

Foods for special dietary use that are specially processed or formulated and presented for the dietary management of patients and may be used only under medical supervision. They are intended for the exclusive or partial feeding of patients with limited or impaired capacity to take, digest, absorb or metabolize ordinary foods or certain nutrients contained therein, or who have other special medically-determined nutrient requirement, whose dietary management cannot be achieved only by modification of the normal diet, by other foods for special dietary uses, or by a combination of the two. ref 76 *Standard for the Labelling of and Claims for Foods for Special Medical Purposes* (CODEX STAN 180-1991).

13.5 Dietetic foods (e.g. supplementary foods for dietary use) excluding products of food categories 13.1 -13.4 and 13.6:

Products of high nutritional content, in liquid or solid form (e.g. protein bars), to be used by individuals as part of a balanced diet to provide supplemental nutrition. Products are not intended to be used for purposes of weight loss or as part of a medical regimen.

Description of the “Ready-to-Use Therapeutic Foods (RUTF)” clearly states that RUTF are foods for special medical purposes. Food category 13.3 covers foods for special medial purposes. Food category 13.5 does not cover products intended to be used as part of a medical regimen. Therefore, foods covered by RUTF may be categorized into food category 13.3.

Comments received from the EWG on 1st circular

Chile, US, ISDI; Support

ISDI agrees with the proposed approach in Appendix 9 in relation to adding notes in the fifth column of Table 3 in relation to these products.

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair’s proposal: unchanged, to capture RUTF within food category 13.3 (Dietetic foods intended for special medical purposes (excluding products of food category 13.1)) for alignment work.

Issue IV – Provisions for packaging in commodity standards

CCNFSDU proposed revision of provision for packaging in commodity standards. It was described in CX/NFSDU 19/41/9 page. 5 (CXS 72-1981), 7 (CXS 73-1981) and 14 (CXS 156-1987). Therefore, revision of provision for packaging in commodity standards are proposed based on the proposal made by CCNFSDU. For ensuring consistency, same revisions are proposed for CXS 181-1991 and CXS 203-1995.

Comments received from the EWG on 1st circular

Chile, US, ISDI; Agree

Issue V – Expression of provisions in units that align to the commodity standards

ISDI proposes an additional edit to all of the provisions in Food Categories 13.1.1, 13.1.2, and 13.1.3 in the GSFA to ensure complete alignment between the commodity standards and the GSFA. The commodity standards that correspond with Food Categories 13.1.1, 13.1.2, and 13.1.3 all express their additive provisions “as-fed” with units of **g/100 mL**.

While the GSFA currently expresses all provisions in the unit “mg/kg”, ISDI believe that for these Food Categories, it would be more harmonized to express the maximum use levels with the unit “mg/L”. This is harmonized with the current provisions, since they all have a Note defining the maximum use levels on the “as-consumed” or “ready-to-eat” basis. ISDI believes this change in unit would be highly beneficial in ensuring aligned interpretations of the provisions.

According to the Definitions of the Preamble of the GSFA, maximum use level is defined as follows;

> d) ***Maximum Use Level*** of an additive is the highest concentration of the additive determined to be functionally effective in a food or food category and agreed to be safe by the Codex Alimentarius Commission. It is generally expressed as mg additive/kg of food.

As stated in ISDI’s submission, the chair notes that CXS 72-1981 and CXS 156-1981 stipulate maximum use level in 100 mL of the product ready for consumption. The chair does not see any food additive provisions in

the GSFA whose maximum use level are established other than “mg additive/kg of food”. If CCFA53 agrees, it might be possible to establish maximum use level other than “mg additive/kg of food” in FC 13.1 of the GSFA since CXS 72-1981 and CXS 156-1981 correspond to FC 13.1. The chair seeks comments on the above issue. If EWG members support the replacement of the ML units of mg/kg to mg/L for FC 13.1 and subcategories, the ML units in appendix 9 will be changed in the subsequent circular.

Comments received from the EWG on 2nd circular

Support: NZ, Japan, ISDI

NZ: Revise the units in the GSFA to mg/L for the additive provisions in FC 13.1 avoids a slight change in permitted levels that would occur if the mg/kg were to be used as occurs in the GSFA. The commodity standards that correspond with FC 13.1 and subcategories all express their additive provisions “as-fed” with units of g/100 mL. Therefore, updating the units in the GSFA to mg/L would allow for the best alignment between the provisions in the commodity standards with the GSFA. This could be achieved by the use of a note that says the unit of the ML is mg/L.

Japan: Although ML is “generally” expressed as mg additive/kg, it seems to be appropriate to set the ML on mg additive/L of food for FC13.1 and subcategories because it enables to precisely reflect the commodity standards to the GSFA.

ISDI: All commodity standards corresponding to FC 13.1.1, 13.1.2 and 13.1.3 express their food additive provisions “as-fed” with units of g/100mL. Updating the units in the GSFA to g/L would allow for the best alignment between the commodity standards with the GSFA.

Comments received from the EWG on 3rd circular

Support: Chile, UK, ISDI

Chair’s proposal: Unchanged, to replace the ML units of mg/kg to mg/L for FC 13.1 and subcategories to better align with the relevant commodity. This will be done by inserting a new Note as it is not possible to make such specific changes to the GSFA database. Such a new note needs to be added within Appendix 9 for the relevant provisions.

Issue VI – Elimination of redundant footnotes related to existing nutrient limits

ISDI has proposed elimination of a series of footnotes for provisions in these food categories that refer to ensuring that the use of calcium-, sodium-, or potassium-containing food additives must be used within the limitations of these nutrients in these standards. ISDI believes these footnotes (55, 240, 316, 319, and 320) do not provide clarity, the requirements they describe are already clearly stated within the sections of the corresponding commodity standards in the sections related to nutrient composition, and adding additional footnotes only increases the complexity of using the GSFA. Eliminating footnotes can aid in the ease of use of the GSFA and reduce potential confusion of interpreting notes.

Notes pointed out by ISDI are as follows;

Note 55: Within the limits for sodium, calcium, and potassium specified in the Standard for Infant Formula and Formula for Special Dietary Purposes Intended for Infants (CODEX STAN 72-1981): singly or in combination with other sodium, calcium, and/or potassium salts.

Note 240: The use level is within the limit for sodium listed in the Standard for Canned Baby Foods (CODEX STAN 73-1981).

Note 316: Within the limit for sodium specified in the Codex Standard for Follow-up Formulae (CODEX STAN 156-1987): singly or in combination with other sodium containing additives.

Note 319: Within the limit for sodium listed in the Codex Standard for Canned Baby Food (CODEX STAN 73-1981) for foods corresponding to that standard: singly or in combination with other sodium containing additives.

Note 320: Within the limit for sodium listed in the Codex Standard for Processed Cereal-based Foods for Infants and Young Children (CODEX STAN 74-1981) for foods corresponding to that standard: singly or in combination with other sodium containing additives.

The commodity standards corresponding to FC 13.1 or 13.2 permits some food additives within the limit for sodium, potassium and calcium and it is clearly described in Section 4 Food additives of the commodity standards. For example, Sodium hydroxide (INS 524) is permitted in CXS 72-1981 as an acidity regulator at 0.2 g/100ml within the limits for sodium, potassium and calcium in section 3.1.3(e) in all types of infant formula. Therefore, notes pointed out by ISDI are attached to the relevant food additives to capture the intent of the

commodity standards correctly. The chair recommends that these notes be maintained to capture the intent of the commodity standards. However, the chair seeks comments on above issue.

Comments received from the EWG on 2nd circular

Support: US

Not support: ISDI

Those footnotes are not necessary as they are redundant with the compositional requirements in the commodity standards and add to the complexity of interpreting additive provisions in the GSFA.

These footnotes direct GSFA users back to the commodity standards where the limits for the nutrients are captured since any components of a product that impact composition must be considered. This would include not only food additives but also any other ingredients.

There are other conditions stated in these standards that are not captured using footnotes, and therefore it is atypical for this information to be addressed with a footnote.

Eliminating footnotes could greatly aid in ensuring consistent application of the provisions, as referencing multiple footnotes for an additive provision is a potential way that error could be introduced.

However, if the committee agrees to retain these footnotes, it notes that this approach should be applied consistently across all additives that would provide calcium, sodium, or potassium in all FC 13.1 and FC 13.2 provisions.

Response

The chair has checked the food additive section of the relevant commodity standards and found that

I. CXS 72-1981; the limitation for sodium, potassium, calcium and phosphorus are attached to some food additive provisions

II. CXS 73-1981; the limitation for sodium is attached to some food additive provisions

III. CXS 74-1981; no limitation for nutrients is attached to food additive provisions

IV. CXS156-1987; the limitation for sodium is attached to some food additive provisions

The approach of Alignment is to ensure any relevant and important condition statements that are connected to food additive provisions with the commodity standards are not lost when the standards are aligned in the GSFA. This is the same for these condition statements.

If the limitation for nutrients is attached to some food additive provisions in commodity standards, the intention of CCNFSDU is to adopt food additive provisions with the limitation for nutrients. If the limitation notes are removed from food additive provisions in the GSFA, it becomes more difficult for GSFA users to obtain information on the limitation for nutrients stipulated in CXS 72-1981. Therefore, chair's proposal is maintained.

It seems to be reasonable that any components that impact nutrient amount in the products should be considered if Notes which limit for nutrients have already been included in the food additive sections of the commodity standards. For example, CXS 73-1981 has already had the limitation notes for sodium. Therefore, the chair proposes that Notes which limits the amount for sodium be added to the provisions for food additives containing sodium. Alignment is only considering relevant notes to the commodity standards it is aligning, not to make additional changes outside of alignment to the GSFA.

The chair notes that Note 55 does not capture the title of CXS 72 correctly. Therefore, the chair proposes that Note 55 be slightly amended as follows (proposed additions are shown in bold underlined font; proposed deletions are shown in ~~strikethrough font~~);

Note 55: Within the limits for sodium, calcium, and potassium specified in the Standard for Infant Formula and Formula**s** for Special **Medical** ~~Dietary~~ Purposes Intended for Infants (**CXS**~~CODEX STAN~~ 72-1981): singly or in combination with other sodium, calcium, and/or potassium salts.

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

ISDI: It has included some suggested additional notes in its comments on Appendix 9.

It suggests that the limitation notes for potassium should be applied to FC 13.1.2 for ensuring consistency.

It suggests that the limitation notes for nutrients should not be applied to FC 13.1.3 since section B 3.1.3 of CXS 72-1981 states as follows;

"The energy content and nutrient composition of Formula for Special Medical Purposes intended for infants shall be based on the requirements for infant formula as given in sections A 3.1.2 and A 3.1.3, except for the compositional provisions which must be modified to meet the special nutritional requirements arising from the disease(s), disorder(s) or medical condition(s) for whose dietary management the product is specifically formulated, labelled and presented."

It specifically requested clarification relating to the use of the current note 55 and new note D72 (due to alignment). It suggests the situation could be simplified by using a single note (either 55 or D72).

Response

Food category 13.1.2 corresponds to CXS 156-1987. The chair notes that food additive section of CXS 156-1987 does not stipulate the limitation for potassium. Therefore, no changes are proposed.

The chair notes that section B of CXS 72-1981 is stated as mentioned by ISDI. However, for a number of food additive provisions within the food additive provision table in section 4 (Food additives) within CXS 72-1981 the condition statements relating to limits for sodium, potassium and calcium (i.e. note 55), as well as another condition for sodium, potassium and phosphorus (i.e. note D72) applies to all types of infant formula. Therefore, these condition notes should still apply for FC 13.1.3.

The chair notes that note 55 and D72 are not identical and so at this stage, it is proposed to stay with their use for the relevant specific condition statements due to alignment from the commodity standards.

Chair's proposal: Unchanged: (1) Maintain Notes 55, 240, 316, 319 and 320 to capture the intent of the commodity standards (same as 2nd circular proposal); (2) If a commodity standard has already had the limitation notes for a nutrient in food additive section, notes which limit the amount for the nutrient are added to food additives containing the nutrient including for FC 13.1.3 (3) Amend Note 55 as proposed above.

Issue VII – Food additive provisions adopted in 2021

Chile does not agree with the food additive provisions (those are INS 440 and INS 415 in FC 13.1.3, INS 473, 473a and 474 in FC 13.3) that were adopted in 2021 as the year of revision of the CXS 192-1995, available on the codex website is 2019 and those provisions are not possible to revise.

The chair confirms that CXS 192-1995 downloaded from the codex website was revised in 2019. However, the Annex of the report of 52nd session of the CCFA clearly states how those food additive provisions are revised. For example, food additive provisions for INS 440 and INS 415 are described in Appendix VI of REP21/FA. Therefore, the chair does not propose to change the initial proposal rather than having to amend it later once the GSFA has been formally updated. The GSFA has been updated as the 2021 update, post the CCFA52 meeting, now on the Codex website.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Issue VIII – Justification for the use of Stabilizers in foods conforming to CXS 72-1981, CXS 73-1981, CXS 74-1981 and CXS 156-1987

ISDI notes that the functional classes captured in 1st circular reflects those that are currently listed in CXS 72-1981, CXS 73-1981, CXS 74-1981 and CXS 156-1987. However, it comments that this list does not completely reflect the functional classes identified in the 1971 JECFA report on the use of additives in infant foods as being justified for use in these products to increase shelf life, to ensure adequate sterilization by promoting homogenization, or to maintain consistency and texture in order to ensure safe and acceptable use. It recommends the addition of the functional class of "stabilizer" to this list to both accurately reflect the recommendation from the report, and to be consistent with current authorizations of additives, many of which have dual function that includes "stabilizer".

The chair reconfirms that CXS 72-1981, CXS 73-1981, CXS 74-1981 and CXS 156-1987 do not permit any food additives as "stabilizer" and it is stated in CX/NFSDU 19/41/19 that stabilizers are not authorized by CCNFSDU. Therefore, the chair does NOT recommend that functional class of stabilizer be added to the general reference of above four commodity standards since the relevant Commodity Committee (i.e. CCNFSDU) considers the functional classes of additives if the additive is used in standardized food (see page.64 of 27th Procedural Manual). This is NOT an appropriate decision for Alignment nor for CCFA.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: UK, ISDI

Chair's proposal: unchanged, not to add functional class of "stabilizer" in the food additive section of CXS 72-1981, CXS 73-1981, CXS 74-1981 and CXS 156-1987, as this is not appropriate as part of Alignment nor even for CCFA.

Part B: Specific Issues

I. *Standard for Canned baby food* (CXS 73-1981)

Issue – Food additive provision for Distarch glycerol (INS 1411), Acetylated distarch glycerol (no INS number) and Potassium ascorbate (INS 303)

Distarch glycerol (INS 1411), Acetylated distarch glycerol (no INS number) and Potassium ascorbate (INS 303) do not have JECFA specifications. Therefore, food additive provisions for the above three additives are removed from the amendments to the GSFA.

Comments received from the EWG on 1st circular

Chile, US, ISDI; Agree

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair's proposal: unchanged, remove food additive provisions for Distarch glycerol (INS 1411), Acetylated distarch glycerol (no INS number) and Potassium ascorbate (INS 303) from the alignment proposed amendments.

II. Food category 13.1

Issue 1 – Food additive provision for Citric and fatty acid esters of glycerol (INS 472c)

There is one food additive provision for INS 472c in FC 13.1. CX/NFSDU 19/41/9 page 15 indicates that INS 472c is not technologically justified in foods conforming to CXS 156-1987. CCFAC38 decided that CXS 156-1987 had one-to-one correspondence with FC 13.1.2 (ref. Appendix IX of ALINORM 06/29/12). Therefore, it is not appropriate to maintain its food additive provision in FC 13.1. The chair proposes the food additive provision for INS 472c in FC 13.1 be revoked and be established in subcategories FC 13.1.1 and FC 13.1.3.

Comments received from the EWG on 1st circular

Chile; Agree

US comments that the chair's proposal seems appropriate given the explanation provided here and in CX/NFSDU 19/41/9.

ISDI requests maintaining the provision for INS 472c in FC 13.1.2 through inclusion in the parent category (FC 13.1). It recognizes that no technological need was justified in CCNFSDU held in 2019. However, prior to discontinuation of this provision, it would appreciate time to evaluate whether since CCNFSDU 2019 there have been any products placed on the market that require INS 472c.

The chair notes that it is clearly stated in para. 3 of page 15 of CX/NFSDU 19/41/9;

> "The provision for Citric and fatty acid esters of glycerol (INS 472c) in food category 13.1 is not listed in the commodity standard. It shall not be applicable to the subcategory 13.1.2, but only to the subcategories 13.1.1 and 13.1.3. Therefore this provision should be removed in food category 13.1 and introduced in the subcategories 13.1.1 and 13.1.3."

The paragraph 5 of "Guidance to commodity committees on the alignment of food additive provisions" states;

> "Whilst the provision of guidance to the Commodity Committees would assist, it may be unrealistic to expect the Commodity Committees to undertake all of the alignment work for the commodity standards for which they have responsibility. On the other hand, it is the Commodity Committees that understand the technological function of additives needed for standardized products, and whether it is appropriate to list specific food additives or allow all additives of a relevant functional class in these products."

Taking the above information into consideration, it is CCNFSDU to consider whether there have been any products placed on the market that require INS 472c since CCNFSDU41. However, CCNFSDU has already concluded that INS 472c shall not be applicable to FC 13.1.2. CCNFSDU has been reviewing the standard for follow-up formula but INS 472c is not listed in the food additive section of Appendix IV of REP22/NFSDU.

Therefore, the chair does not consider it appropriate for CCFA to evaluate that there are any products on the market that require INS 472c. The chair therefore does not propose to change the 1st circular proposal.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: Chile, UK, ISDI

Chair's proposal: unchanged, revoke food additive provision for INS 472c in FC 13.1 and establish food additive provisions in FC 13.1.1 and FC 13.1.3.

Issue 2 – Replacement of Note 72 with Note 381

Paragraph 26 of the report of the CCFA52 states as follows:

> "On the proposal to add Note 72 reading "On the ready-to-eat basis" to the provision for xanthan gum, CCFA52 noted that Note 381 reading "As consumed" would be more appropriate. It was further noted that these relevant notes would be revised for consistency when aligning CCNFSDU standards and the GSFA."

Therefore, Note 72 is proposed to be replaced with Note 381 in FC 13.1.1 and 13.1.3.

Comments received from the EWG on 1st circular

Chile, Japan, US: Support

Japan notes that the replacement of Note 72 with Note 381 is also appropriate to FC 13.1.2. The provisions in FC 13.1.2 have already been revised in the 1st circular of Appendix 9.

ISDI recommends that all footnotes relating to application of the provisions "as consumed", including both footnote 72 and 381, be eliminated from the provisions in FC 13.1.1, FC 13.1.2, FC 13.1.3, and FC 13.2, as per Section 6 of the GSFA Preamble that all additive provisions are applied "as consumed" unless otherwise indicated. ISDI notes that Section 6 of the preamble of the GSFA (CXS 192-1995) reads "*Unless otherwise specified, maximum use levels for additives in Tables 1 and 2 are set on the final product as consumed".* Thus, both note 72 and note 381 are unnecessary considering this principle embedded in the GSFA preamble. The inclusion of these footnotes for the provisions in these Food Categories may lead to confusion about the interpretation of the language in Section 6 of the preamble.

The section 6 of the preamble of the GSFA is as stated by ISDI. However, Note 72 or Note 381 is added to food additive provisions in FC13.1.1 and 13.1.3 to capture the intent of the commodity standard properly and to specify that the ML is on a powder basis or the ready for consumption basis. CX/NFSDU 19/41/9 page 5 stated that "For the sake of consistency the footnote 381 "As consumed" when used in the food category 13.1, 13.1.1 and 13.1.3 might be replaced by the footnote 72 "On the ready-to-eat basis". After that CCFA52 decided that Note 381 "As consumed" would be more appropriate than Note 72. For food category other than food category 13.1, the chair notes that Note 127 "On the served to the consumer basis" is added to all provisions in food category 12.6.3 (Mixes for sauces and gravies) and 14.1.4.3 (Concentrates (liquid or solid) for water based flavoured drinks) to specify that the ML is on a concentrated basis or an "as served to the consumer" basis (see CRD 2 of CCFA50). Therefore, the chair recommends that Note 381 be added to food additive provisions in FC 13.1.

Comments received from the EWG on 2nd circular

Support: US, NZ

NZ: It notes ISDI's point that retaining one or both of these notes in FC 13.1 can create confusion around how to apply an ML when other food categories rely on the "unless otherwise specified" clause in the GSFA Preamble.

In the case of FC 13.1, it supports the Chair's proposal to replace note 72 with note 381 so that one note is used. This ensures that it is clear that an ML applies to the powder or ready to drink formula. Other subcategories of 13.0 are more likely to be sold in ready to eat form.

Not support: ISDI

ISDI: There is no need for either Note 72 or Note 381 since the products in FC 13.1.1, 13.1.2, and 13.1.3 are only ever consumed as liquids, and all of the provisions "are set on the final product as consumed", per Section 6 of the GSFA preamble. Products in FC 13.1.1, 13.1.2, and 13.1.3 can be *sold* as either powders, concentrated liquids, or liquids ready for consumption. However, in all cases the provisions apply to the final

product as consumed, ensuring consistency in the application of the provisions in a way that is aligned to the language in Section 6 of the GSFA preamble.

ISDI is of the view that if the committee decides it is important to include these Notes as a redundant mechanism to specify the limits apply to these products as consumed, ISDI is aligned with the recommendation to use Note 381 for all provisions. ISDI would then also recommend that Note 381 be applied to all provisions for FC 13.2, 13.3, 13.4, and 13.5.

Response

The chair notes that Section 6 of the preamble of the GSFA states;

> "Unless otherwise specified, maximum use level for additives in Tables 1 and 2 are set on the final product as consumed."

Products covered by FC 13.1.1, FC 13.1.2 and FC 13.1.3 are sold as either powders, concentrated liquids or liquids ready for consumption. Note 381 is used to ensure that the maximum use level is applied to the ready to drink formula. It is not necessary to use Note 381 since products within FC 13.2, 13.3, 13.4 and 13.5 are sold as ready to eat basis. Plus Alignment is only addressing the alignment of the relevant commodity standards, so it is inappropriate to make other changes outside of alignment. Therefore, the chair maintains the 2nd circular proposal.

Comments received from the EWG on 3rd circular

Support: Chile

Not support: ISDI: It repeats and provides further justification for why it considers that neither note 72 or 381 is required. It further notes inconsistency with how such notes are used within the GSFA.

Response

The chair notes the points made by ISDI but it repeats the reasons noted above. It also notes that it is only dealing with alignment of the relevant CCNFSDU commodity standards, not trying to address all the notes within the GSFA, which is outside the scope of alignment. As ISDI noted this is something that could be investigated in future work (outside Alignment).

Chair's proposal: Unchanged, replace Note 72 with Note 381 in FC 13.1.1, FC 13.1.2 and FC 13.1.3.

Issue 3 – Food additive provisions for INS 322(i) and INS 471

CXS 72-1981 permits Lecithin (INS 322(i)) and Mono- and diglycerides of fatty acids (INS 471) with a following note;

> "If more than one of the substances INS 322, 471 are added the maximum level for each of those substances is lowered with the relative part as present of the other substances"

ISDI proposes the following alternative note to make the proportional approach for these two additives more explicit in order to avoid different interpretation;

> "If Lecithin (INS 322 (i)) is used in combination with Mono- and diglycerides of fatty acids (INS 471) the sum of the proportions of these substances in the food must not be more than 1. The sum of the proportions is calculated as: Sum of proportions = (Concentration of INS 322(i) / Maximum Permitted Level of INS 322(i)) + (Concentration of INS 471 / Maximum Permitted Level of INS 471)"

The chair notes that CCNFSDU proposed a new note in page 4 of CX/NFSDU 19/41/9 as follows:

> "If Lecithin (INS 322 (i)) is used in combination with Mono- and diglycerides of fatty acids (INS 471) the maximum level for each of those substances is lowered with the relative part as present of the other substances."

The note proposed by CCNFSDU is the same as Note B72. Therefore, the chair recommends that Note B72 be maintained. However, the views of the EWG are sought.

Comments received from the EWG on 2nd circular

Support the revised Note proposed by ISDI: US, NZ, ISDI

US: The revised note proposed by ISDI is clear whereas Note B72 still leaves room for confusion and misinterpretation.

NZ: It can support the more explicit and clearer wording proposed by ISDI. However, alignment is achieved with the Chair's proposal to maintain the note as proposed by CCNFSDU.

ISDI: Note B72 proposed by CCNFSDU leaves room for interpretation that could result in confusion or lack of harmonization on how the provision is applied. Including the equation in the footnote significantly reduces the potential for alternative interpretations.

Response

Based on the comments provided by EWG members, the Note proposed by ISDI is clearer than Note B72 as proposed by CCNFSDU. The chair notes that "lowered with the relative part" in Note B72 leaves room for misinterpretation. Therefore, the chair revised Note B72 based on the Codex Observer to make Note B72 more explicit.

Comments received from the EWG on 3rd circular

Support: ISDI

Chair's proposal: Change Note B72 based on the Codex Observer suggestion with slight amendments.

Revised Note B72: "If Lecithin (INS 322 (i)) is used in combination with Mono- and diglycerides of fatty acids (INS 471) the sum of the proportions of these substances in the food should not be more than 1. The sum of the proportions is calculated as: Sum of proportions = (Concentration of INS 322(i) / Maximum Use Level of INS 322(i)) + (Concentration of INS 471 / Maximum Use Level of INS 471)"

Issue 4 – Food additive provisions for potassium phosphates

ISDI comments that Potassium phosphates (INS 340) are listed in the Nutrient Advisory List (CXG 10-1979) as acceptable sources of potassium. It recommends removing the notes 230 and D72.

According to the GSFA (copied from the Procedural Manual), the definition of "Food additive" is as follows:

> ***"Food additive*** means any substance not normally consumed as a food by itself and not normally used as a typical ingredient of the food, whether or not it has nutritive value, the intentional addition of which to food for a technological (including organoleptic) purpose in the manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food results, or may be reasonably expected to result (directly or indirectly), in it or its by-products becoming a component of or otherwise affecting the characteristics of such foods. **The term does not include contaminants or substances added to food for maintaining or improving nutritional qualities."**

Therefore, the chair does not support the proposal.

Issue 5 – Food additive provisions for Sodium ascorbate (INS 301) in food category 13.1.2

ISDI recommends updating maximum level to 75 mg/kg since CXG 10-1979 permits INS 301 at 75 mg/kg in food category 13.1.2 and it also recommends adding Note H72 "For use as a nutrient carrier in a raw material or other ingredient, in coating of nutrient preparations containing polyunsaturated fatty acids".

The chair notes that CXG 10-1979 permits INS 301 at 75 mg/kg. On the other hand, CXS 156-1987 permits L-ascorbic acids and its Na, Ca salts at 50 mg/kg singly or in combination expressed as ascorbic acid. Therefore, maximum use level of L-ascorbic acid, sodium ascorbate and calcium ascorbate in food category 13.1.2 of the GSFA are 50 mg/kg. The chair maintains the maximum use level at 50 mg/kg and propose New Note A156:

> "For use as a nutrient carrier in coating of nutrient preparations containing polyunsaturated fatty acids used to produce the foods conforming to the *Standard for Follow-up formula* (CXS 156-1987) at 75 mg/kg"

instead of proposed Note H72 since maximum use level should be stipulated in the note.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair's proposal: unchanged, to maintain the ML of 50 mg/kg for sodium ascorbate (INS 301) in FC 13.1.2 and add the new note A156 (as listed above).

Issue 6 – Food additive provisions for Carrageenan (INS 407) in food category 13.1.1 and 13.1.3

ISDI suggests new note "For use in liquid products only" be added to this provision since CXS 72-1981 allows soy- and milk-based liquid infant formulas only.

Response

As the Codex observer noted, CXS 72-1981 permits soy- and milk-based liquid infant formulas only. However, Note A72 “For use in liquid infant formula except for use in hydrolysed protein and/or amino acid based liquid infant formula at 1000 mg/kg.” has already captured the specific condition. Therefore, there is no need to add a new note.

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair’s proposal: Not to add the proposed new note.

Issue 7 – Food additive provision for Tocopherols (INS 307a-c) in food category 13.1.2

ISDI suggests Note 168 “Singly or in combination: d- alpha-tocopherol (INS 307a), tocopherol concentrate, mixed (INS 307b) and dl-alpha-tocopherol (INS 307c) be added to food additive provision for Tocopherols (INS 307a-c) in FC 13.1.2.

Response

During the discussion of food additive provisions for Sucrose esters in CCFA52, CCFA has agreed that Note 348 “Singly or in combination: Sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474)” is no longer necessary as the three additives are grouped under one heading. For ensuring consistency, the chair does NOT recommend that Note 168 be added to Tocopherols (INS 307a-c) in FC 13.1.2 since the three additives are grouped under the one food additive heading (i.e., food additive group).

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair’s proposal: Not to add Note 168 to the food additive provision for Tocopherols in FC 13.1.2.

Issue 8 –Note G72 in FC 13.1.1 and 13.1.3 and Note A156 in FC 13.1.2

ISDI suggests modifying Note G72 and Note A156 as follows (proposed additions are shown in bold underlined font):

Proposed Note G72

> “For use as a nutrient carrier in a raw material or other ingredient at 100 mg/kg **in the food as consumed**.”

Proposed Note A156

> “For use as a nutrient carrier in coating of nutrient preparations containing polyunsaturated fatty acids used to produce the foods conforming to the Standard for Follow-up formula (CXS 156-1987) at 75 mg/kg **in the food as consumed**.”

Response

Note 381 “As consumed” has already been attached to all food additive provisions in subcategories of FC 13.1. Therefore, it is not necessary to change both Note G72 and Note A156.

Comments received from the EWG on 3rd circular

Support: Chile

Not support: ISDI: It separately and further argues that these two notes relate to the use of secondary food additives or indirect uses of food additives, i.e. the use of food additives in nutrient preparations that are then added to the final food. This is the first time such notes have been used for this purpose. Therefore to ensure clarity it suggests adding the additional words, and not rely on note 381 (as consumed).

Response

The chair notes the unique situation of these food additive permissions, being secondary and indirect food additives. It therefore agrees that adding the additional wording as suggested ensure clarity and should prevent misinterpretation.

Chair’s proposal: It is changed, to add the additional words as ISDI proposed above for Note G72 and Note A156 for the reasons explained.

III. Food category 13.2

Issue 1 – Food additive provisions for INS 551 (Silicon dioxide, amorphous)

Chile requests that the limit of 2000 mg/kg for INS 551 be reviewed as it is too high for category 13.2.

The chair has confirmed that CXS 73-1981 does not permit INS 551 and CXS 74-1981 permits INS 551 at 2000 mg/kg for dry cereals only. Maximum use level in the GSFA is as same as that in CXS 74-1981. Notes 65 (As a result of carryover from nutrient) and 318 (In dry cereals only) are attached to capture the intent of CXS 74-1981. If member countries want to change maximum use level for CXS 74-1981, the proposal should be submitted to the CCNFSDU since CCNFSDU is an active commodity committee (see Appendix XII "Guideline on avoiding future divergence of food additive provisions in the GSFA" of REP21/FA). The Alignment work is to ensure consistency with the relevant commodity standard.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair's proposal: unchanged, to maintain the ML and notes to ensure alignment of silicon dioxide amorphous (INS 551) in FC 13.2 with CXS 74-1981.

Issue 2 – Food additive provisions for INS 421 (Mannitol)

ISDI suggests Note XS73 and XS74 be deleted since the permission to use INS 421 as a nutrient carrier in CXG 10-1979 also applies to CXS 73 and 74. The preamble of CXG 10-1979 refers to foods for infants and young children, which includes CXS 73 and 74.

The chair confirms that CXS 74-1981 refers to CXG 10-1979. However, CXS 73-1981 does not refer to it. The chair does not see the intention of the CCNFSDU to add the reference of CXG 10-1979 to CXS 73-1981. The chair notes that this matter is not under the purview of the CCFA since CCNFSDU is an active commodity committee.

Comments received from the EWG on 2nd circular

Support maintaining Note XS73: US

Support deleting Note XS73: NZ, ISDI

NZ: It notes that both CXS 73 and CXS 74 allow the carry over clause in the GSFA in different ways. Section 4.6 Carry-Over Principle of CXS 73 states "Section 4.1 of the General Standard for Food Additives (CXS 192-1995) shall apply." This should allow note XS 73 to be also deleted.

NZ also notes that Section 3.1.2.1 of CXS 73 directly refers to CXG 10-1979. If the nutrients in CXG 10-1979 may be used in CXS 73, logically the permitted carriers needed for these nutrients in CXG 10-1979 should be permitted too.

ISDI: It notes that Section 3.1.2.1 of CXS 73-1981 states "Vitamins and/or minerals added in accordance with Section 3.1.2 should be selected from the *Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Children* (CXG 10-1979)". Therefore, ISDI maintains the position that Note XS73 can be deleted from the provisions for the additives used as nutrient carriers, including mannitol but also the other additives in CXG 10-1979 (refer to comments in Appendix 9).

Response

The chair notes that Section 3.1.2.1 under Section 3 "Essential Composition and Quality Factors" of CXS 73-1981 refers to CXG 10-1979 but it is not Section 4 "Food Additives". The chair also confirms that CXG 10-1979 is referred both in Section 3.7.4 under Section 3 "Essential Composition and Quality Factors" and Section 4 "Food Additives" in CXS 74-1981. The reference in Section 3.1.2.1 does not mean that food additives listed in CXG 10-1979 are acceptable in foods covered by CXS 73-1981.

The chair recommends that CCFA53 ask CCNFSDU to consider whether CXS 73-1981 allows food additives listed in CXG 10-1979 Part D as nutrient carriers or not. The chair also recommends that alignment of CXS 73-1981 is held until the response from CCNFSDU is provided.

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair's proposal: It has reconsidered its earlier proposal to maintain Note XS73 due to the differing comments of EWG members and observer. The proposal is now for CCFA53 to request CCNFSDU to

consider whether CXS 73-1981 allows the food additives listed in CXG 10-1979 Part D as nutrient carriers or not. This will delay the alignment of CXS 73-1981.

Issue 3 – Food additive provisions for Phosphates

ISDI comments that as only INS 338, 339(i)-(iii), 340(i)-(iii) and 341(i)-(iii) are allowed in products conforming to CXS 74-1981, it proposes that the relevant note should be revised to capture the exclusion of the other additives from this food category.

CX/NFSDU 19/41/9 page.12 clearly states as follows:

> "The food additive provisions in food category 13.2 for Phosphates go beyond those in CXS 74-1981 and include additionally Phosphates with the INS numbers 342 (i)-(ii), 343 (i)-(iii), 450 (i)-(iii), (v)-(vii), (ix), 451 (i)-(ii), 452 (i)-(v) and 542. Taking into account that (a) the Phosphates listed in food category 13.2 share a group ADI and (b) their use is restricted to that of an acidity regulator by note 230 the provision for Phosphates in food category 13.2 may be considered as conforming to the related provisions in CXS 74-1981."

This same situation has been considered and agreed by the EWG on Alignment a number of times, especially for phosphates. That is, to permit all food additives in a group having the same technological function (e.g. acidity regulator) provided they share an ADI, have a JECFA specification and there are no reasons to prohibit provisions.

Therefore, the chair maintains the 1st circular proposal not to change the relevant note.

Issue 4 – Food additive provisions for some food additive groups

ISDI suggests maintaining Note 364 "Singly or in combination" and adding Note 83 "L(+)-form only" and removing Note 45 "As tartaric acid".

Regarding the comment for Note 364, when the creation of a group header in the GSFA for INS 473, 473a and 474 was discussed in CCFA52, CCFA52 agreed that it was implied that the use level automatically was singly or in combination for all of the additives listed in the group header (see page 7 of CRD2 of CCFA52). Therefore, the chair maintains the 1st circular proposal is appropriate and note 364 is not required.

Regarding the comment for Note 45, page.63 of 27th Procedural manual state as follows:

> "For some food additives, the ADI has been reported on a specific basis (e.g. "as phosphorus" for phosphates; "as benzoic acid" for benzoates). For consistency, the maximum use level for these additives should be reported on the same basis as the ADI."

Therefore, Note 45 should be maintained for ensuring consistency.

Regarding the comment for Note 83, CXS 74-1981 permits L(+)-Tartaric acid only. The only tartrates permitted in the GSFA are all L+ versions, being INS 334, 335(ii) and 337 so note 83 is not required (or maybe no longer required).

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair's proposal: unchanged, to maintain note 45, remove note 364 and not add note 83 for the alignment of tartaric acid.

Issue 5 – Food additive provision for Malic acid, DL- (INS 260)

Chile suggests that the name of the additive be changed to "Malic acid, L-" since only the L form can be included.

The section 1.1 of the preamble of the GSFA states that "an International Numbering System (INS) designation by Codex will be considered for inclusion in this Standard". "Malic acid, DL-" not "Malic acid, L-" is listed in the Class names and the international numbering system for food additives (CXG 36-1989). Therefore "Malic acid, DL-" should be included in the GSFA.

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair's proposal: Maintain food additive provision for Malic acid, DL- (INS 260).

Issue 6 – Food additive provision for Silicon dioxide, amorphous (INS 550)

ISDI suggests that Note XS73 be deleted since Note 318 "In dry cereal only" has already been added and Note 318 prevents the use of the additive in foods covered by CXS 73.

Response

CXS 73-1981 covers canned baby foods and CXS 74 covers cereal based foods for infants and Young Children. Note 318 may prevent the use of food additives in foods covered by CXS 73. However, an XS Note is normally added to all provisions for food additives when a commodity standard does not permit the food additive to ensure clarity. This has been the approach Alignment has taken over a number of years as a policy; sometimes even to replace notes with XS notes if they state the same thing.

Comments received from the EWG on 3rd circular

Support: ISDI

Chair's proposal: Maintain Note XS73

IV. Food category 13.3

Issue 1 – Table 3 notes

The alignment work conducted for the guidelines for RUTF has been performed for food category 13.3. If the guidelines for RUTF corresponds to Food Category 13.3, Table 3 notes are necessary to capture specific statements and conditions since Food Category 13.3 is not listed in the Annex to Table 3. The Chair seeks comments on the issue of Table 3 notes. The proposals in this document will be changed, taken into account the comments provided to the issue of Table 3 notes, to ensure consistency (noting Appendix 4 & 5 are addressing Table 3 notes).

Comments received from the EWG on 1st circular

US supports the use of Table 3 notes as noted in its comments to Appendix 4.

ISDI supports the approach in Appendix 9 in relation to RUTF and Table 3 additives. Noting that FC 13.3 is not in the Annex to Table 3 therefore by default all Table 3 additives would be permitted in RUTF if it is within FC 13.3. The way to avoid this default position is to add FC 13.3 to the second part of the Annex to Table 3 and then add a note in the 5th column of Table 3 for the specific Table 3 additives that are allowed in RUTF.

Comments received from the EWG on 3rd circular

Support: Chile, ISDI

Chair's proposal: Based on the comments provided by US and ISDI, the chair recommends that Table 3 notes be used to capture specific statements and conditions if the guidelines for RUTF are accepted to correspond to Food Category 13.3. This is also dependent on Table 3 notes being accepted at CCFA53 (via consideration of Appendices 4 & 5).

Issue 2 – Food additive provisions for Carotenoids

CCFA52 tasked the EWG on GSFA to revise the list of food additives contained under the group header "CAROTENOIDS" (REP 21/FA para. 60)

- Removal of INS 160e from the group header and duplicate separate provisions for INS 160e.
- Removal of food additive provision for INS 160f from the GSFA
- Add Beta-Carotene-Rich Extract from Dunaliella salina (INS 160a(iv)) to the group header

The above changes are incorporated in the proposed document. Alignment of food additive provisions for Carotenoids should be held until the CCFA makes decision (expected at CCFA53, consideration of the EWG on the GSFA proposals).

Comments received from the EWG on 1st circular

Chile, US: Support

ISDI is not clear on how the alignment of carotenoids is in scope of CCNFSDU alignment. To its understanding, this is only relevant to FC 13.3, FC 13.4 and FC 13.5. However, only FC 13.3 maps to any of the commodities that are within scope (i.e. RUTF) and the carotenoids are not permitted in RUTF.

As noted by ISDI, there are adopted food additive provisions for Carotenoids only in FC 13.3. However, the GSFA EWG is currently reviewing all food additive provisions for Carotenoids based on the comments on actual use and use level to be provided by members of the GSFA EWG. If CCFA decides to change maximum

use level or notes based on the outcome on the GSFA EWG, the changes should be reflected in the relevant provisions for Carotenoids. Therefore, the chair recommends that food additive provisions for Carotenoids be held until the CCFA makes the decision.

Comments received from the EWG on 2nd circular

Support: US, ISDI

Comments received from the EWG on 3rd circular

Support: Chile, UK, ISDI

Chair's proposal: unchanged, to hold the food additive provisions for "Carotenoids" until the CCFA makes its decision on such (expected at CCFA53).

Appendix 9

THE ALIGNMENT OF THE SEVEN CCNFSDU COMMODITY STANDARDS, INCLUDING THE GUIDELINE FOR THE READY TO USE THERAPEUTIC FOODS (RUTF)

This Appendix provides a first assessment of the work as noted in the EWG on Alignment Terms of Reference:

e) the alignment of the following CCNFSDU commodity standards: *CXS 72-1981; CXS73-1981; CXS 74-1981; CXS 156-1987; CXS 181-1991; CXS 203-1995;* and the Guideline for the Ready to Use Therapeutic Foods (RUTF) *(ref. Brought forward from Workplan and CRD3 recommendation 3)*;

1. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE CODEX COMMODITY STANDARDS FOR NUTRITION AND FOODS FOR SPECIAL DIETARY USES, INCLUDING THE GUIDELINES FOR READY TO USE THERAPEUTIC FOODS (RUTF)

The relevant Codex Standards for nutrition and foods for special dietary uses including RUTF 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
72-1981	Infant formula and formulas for special medical purposes intended for infants	13.1.1 13.1.3
73-1981	Canned baby foods	13.2
74-1981	Processed cereal based foods for infants and children	13.2
156-1987	Follow-up formula	13.1.2
181-1991	Formula foods for use in weight control diets	13.4
203-1995	Formula foods for use in very low energy diets for weight reduction	13.4
CXG Number	Codex Guideline Name	GSFA Food category
To be decided by Codex secretariat	Ready to use therapeutic foods	To be discussed in this EWG

The following amendments to the food additive provisions in Codex commodity standards/guidelines 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 INFANT FORMULA AND FORMULAS FOR SPECIAL MEDICAL PURPOSES INTENDED FOR INFANTS (CXS 72-1981)

SECTION A: STANDARD FOR INFANT FORMULA

4. FOOD ADDITIVES

4.1 Acidity regulators, antioxidants, carriers, emulsifiers, packaging gases and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 13.1.1 (Infant formulae) are acceptable for use in foods conforming to this standard.

4.2 Only the food additives listed in **food category 13.1.1 (Infant formulae) of the CXS 192-1995** ~~this Section or in the *Advisory lists of nutrient compounds for use in foods for special dietary uses intended for infants and young children* (CXG 10-1979)~~ may be present in the foods **conforming to**~~described in Section 2.1 of~~ this Standard, as a result of carry-over from a raw material or other ingredient (including food additive) used to produce the food, subject to the following conditions:

a) The amount of the food additive in the raw materials or other ingredients (including food additives) does not exceed the maximum level specified; and

b) The food into which the food additive is carried over does not contain the food additive in greater quantity than would be introduced by the use of the raw materials or ingredients under good manufacturing practice, consistent with the provisions on carry-over in the Preamble of the ~~*General Standard for Food Additives* (~~CXS 192-1995~~)~~.

~~The following food additives are acceptable for use in the preparation of infant formula, as described in Section 2.1 of this Standard (in 100 ml of product, ready for consumption prepared following manufacturer's instructions, unless otherwise indicated):~~

~~**INS**~~	~~**Additive**~~	~~**Maximum level in 100 ml of the product ready for consumption**~~

4.1 Thickeners		
412	Guar gum	0.1 g in liquid formulas containing hydrolysed protein
410	Carob bean gum (Locust bean gum)	0.1 g in all types of infant formula
415	Xanthan gum	0.1g in powdered hydrolysed protein and/or amino acid based infant formula only
440	Pectins	0.2g in liquid hydrolysed protein infant formula only.
1412	Distarch phosphate	0.5 g singly or in combination in soy based infant formula only 2.5 g singly or in combination in hydrolyzed protein and/or amino acid based infant formula only
1414	Acetylated distarch phosphate	
1413	Phosphated distarch phosphate	
1440	Hydroxypropyl starch	
407	Carrageenan	0.03 g in regular milk and soy based liquid infant formula only 0.1 g in hydrolysed protein- and/or amino acid based liquid infant formula only
1450	Starch sodium octenyl succinate	2 g in hydrolyzed protein and/or amino acid based infant formula only
4.2 Emulsifiers		
322	Lecithins	0.5 g in all types of infant formula[18)]
471	Mono- and diglycerides	0.4 g in all types of infant formula[21)]
472c	Citric and fatty acid esters of glycerol	0.9 g in all types of liquid infant formula 0.75 g in all types of powder infant formula
4.3 Acidity Regulators		
524	Sodium hydroxide	0.2 g singly or in combination and within the limits for sodium, potassium and calcium in section 3.1.3 (e) in all types of infant formula
500ii	Sodium hydrogen carbonate	0.2 g singly or in combination and within the limits for sodium, potassium and calcium in section 3.1.3 (e) in all types of infant formula
500i	Sodium carbonate	
525	Potassium hydroxide	
501ii	Potassium hydrogen carbonate	
501i	Potassium carbonate	
526	Calcium hydroxide	
21) If more than one of the substances INS 322, 471 are added the maximum level for each of those substances is lowered with the relative part as present of the other substances		
270	L(+) lactic acid	Limited by GMP in all types of infant formula
330	Citric acid	Limited by GMP in all types of infant formula
331i	Sodium dihydrogen citrate	Limited by GMP in all types of infant formula
331iii	Trisodium citrate	Limited by GMP in all types of infant formula
332	Potassium citrate	Limited by GMP in all types of infant formula
339 i, ii and iii	Sodium dihydrogen phosphate, disodium hydrogen phosphate and trisodium phosphate	45 mg as phosphorus singly or in combination and within the limits for sodium, potassium and phosphorus in section 3.1.3 (e) in all types of infant formula
340 i, ii and iii	Potassium dihydrogen phosphate, dipotassium hydrogen phosphate and tripotassium phosphate	
4.4 Antioxidants		

~~307b~~	~~Mixed tocopherol concentrate~~	~~1 mg in all types of infant formula singly or in combination~~
~~304i~~	~~Ascorbyl palmitate~~	~~1 mg in all types of infant formula singly or in combination~~
~~4.5 Packaging Gases~~		
~~290~~	~~Carbon dioxide~~	~~GMP~~
~~941~~	~~Nitrogen~~	

7. PACKAGING

7.1 The product shall be packed in containers which will safeguard the hygienic and other qualities of the food. When in liquid form, the product shall be packed in hermetically sealed containers~~; nitrogen and carbon dioxide may be used as packing media~~.

SECTION B: FORMULA FOR SPECIAL MEDICAL PURPOSES INTENDED FOR INFANTS

4. FOOD ADDITIVES

4.1 Acidity regulators, antioxidants, carriers, emulsifiers, packaging gases and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 13.1.3 (Formulae for special medical purposes intended for infants) are acceptable for use in foods conforming to this standard.

4.2 Only the food additives listed in food category 13.1.3 (Formulae for special medical purposes intended for infants) of the CXS 192-1995 may be present in the foods conforming to this Standard, as a result of carry-over from a raw material or other ingredient (including food additive) used to produce the food, subject to the following conditions:

a) The amount of the food additive in the raw materials or other ingredients (including food additives) does not exceed the maximum level specified; and

b) The food into which the food additive is carried over does not contain the food additive in greater quantity than would be introduced by the use of the raw materials or ingredients under good manufacturing practice, consistent with the provisions on carry-over in the Preamble of the CXS 192-1995.

~~See Section A4.~~

B. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR CANNED BABY FOODS (CXS 73-1981)

4. FOOD ADDITIVES

4.1 Acidity regulators, antioxidants, emulsifiers, packaging gases and thickeners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 13.2 (Complementary foods for infants and young children) are acceptable for use in foods conforming to this standard.

4.2 Flavourings

Name of flavouring	Maximum use level
Vanilla extract	GMP
Ethyl vanillin	70 mg/kg
Vanillin	70 mg/kg

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

4.3 Carry-Over Principle

Only the food additives listed in food category 13.2 (Complementary foods for infants and young children) of the CXS 192-1995 may be present in the foods conforming to this Standard, as a result of carry-over from a raw material or other ingredient (including food additive) used to produce the food, subject to the following conditions:

a) The amount of the food additive in the raw materials or other ingredients (including food additives) does not exceed the maximum level specified; and

b) The food into which the food additive is carried over does not contain the food additive in greater quantity than would be introduced by the use of the raw materials or ingredients under good manufacturing practice, consistent with the provisions on carry-over in the Preamble of the CXS 192-1995.

~~The following additives are permitted in the preparation of canned baby food with the restrictions stated below:~~

	~~**Maximum level in 100 g of the ready-to-eat product (unless otherwise indicated)**~~
~~**4.1 Thickening Agents**~~	
~~**4.1.1** Locust bean gum [1]~~	~~0.2 g~~
~~**4.1.2** Guar gum~~	~~0.2 g~~
~~**4.1.3** Distarch phosphate~~	~~}~~
~~**4.1.4** Acetylated distarch phosphate~~	~~} 6 g, singly or~~
~~**4.1.5** Phosphated distarch phosphate~~	~~} in combination~~
~~**4.1.6** Hydroxypropyl starch~~	~~}~~
~~**4.1.7** Acetylated distarch adipate~~	~~} 6 g, singly or~~
~~**4.1.8** Distarch glycerol~~	~~} in combination~~
~~**4.1.9** Acetylated distarch glycerol~~	~~}~~
~~**4.1.10** Non-amidated pectin~~	~~1 g in canned fruit-based baby foods only~~
~~**4.2 Emulsifiers**~~	
~~**4.2.1** Lecithin~~	~~0.5 g~~

4.2.2 Mono- and diglycerides 0.15 g

4.3 pH Adjusting Agents

4.3.1 Sodium hydrogen carbonate } Limited by good manufacturing

4.3.2 Sodium carbonate } practice and within the limit for

} sodium in Section 3.1.3

4.3.3 Potassium hydrogen carbonate } Limited by good manufacturing

4.3.4 Calcium carbonate } practice

4.3.5 Citric acid and sodium salt 0.5 g and within the limit for sodium in Section 3.1.3

4.3.6 L(+) Lactic acid 0.2 g

4.3.7 Acetic acid 0.5 g

4.4 Antioxidants

4.4.1 Mixed tocopherols concentrate } 300 mg/kg fat, singly or in

4.4.2 □-Tocopherol } combination

4.4.3 L-Ascorbyl palmitate 200 mg/kg fat

4.4.4 L-Ascorbic acid and its sodium and potassium salts 0.5 g/kg, expressed as ascorbic acid and within the limit for sodium in Section 3.1.3

4.5 Flavourings

4.5.1 Vanilla extract Limited by good manufacturing practice

4.5.2 Ethyl vanillin 7 mg

4.5.3 Vanillin 7 mg

7. PACKAGING

The product shall be packed in containers which will safeguard the hygienic and other qualities of the food. If in ready-to-eat form, it shall be packed in hermetically sealed containers; nitrogen and carbon dioxide may be used as packing media.

C. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR PROCESSED CEREAL BASED FOODS FOR INFANTS AND YOUNG CHILDREN (CXS 74-1981)

~~3.9 Flavourings~~

~~The following flavourings may be used:~~

- ~~Natural fruit extracts and vanilla extract: GMP~~
- ~~Ethyl vanillin and vanillin: 7 mg/100 g RTU~~

4. FOOD ADDITIVES

4.1 Acidity regulators, anticaking agents, antioxidants, carriers, emulsifiers, packaging gases, raising agents and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 13.2 (Complementary foods for infants and young children) are acceptable for use in foods conforming to this standard.

4.2 Only the food additives listed in **food category 13.2 (Complementary foods for infants and young children) of the CXS 192-1995** ~~this Section or in the *Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Children* (CXG 10-1979)~~ may be present in the foods **conforming to** ~~described in Section 2.1 of~~ this Standard, as a result of carry-over from a raw material or other ingredient (including food additive) used to produce the food, subject to the following conditions:

a) The amount of the food additive in the raw materials or other ingredients (including food additives) does not exceed the maximum level specified; and

b) The food into which the food additive is carried over does not contain the food additive in greater quantity than would be introduced by the use of the raw materials or ingredients under good manufacturing practice, consistent with the provisions on carry-over in the Preamble of the ~~*General Standard for Food Additives* (~~CXS 192-1995~~)~~.

4.3 Flavourings

Name of flavouring	**Maximum use level**
Natural fruit extracts and vanilla extract	**GMP**
Ethyl vanillin	**70 mg/kg**
Vanillin	**70 mg/kg**

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

~~The following additives are permitted in the preparation of processed cereal-based foods for infants and young children, as described in Section 2.1 of this Standard (in 100 g of product, ready for consumption prepared following manufacturer's instructions unless otherwise indicated).~~

~~**INS no.**~~		~~**Maximum level**~~
~~**Emulsifiers**~~		
~~322~~	~~Lecithins~~	~~1500 mg~~
~~471~~	~~Mono- and diglycerides~~	~~500 mg Singly or in combination~~
~~472a~~	~~Acetic and fatty acid esters of glycerol~~	
~~472b~~	~~Lactic and fatty acid esters of glycerol~~	
~~472c~~	~~Citric and fatty acid esters of glycerol~~	
~~**Acidity Regulators**~~		
~~500 ii~~	~~Sodium hydrogen carbonate~~	~~GMP~~
~~501 ii~~	~~Potassium hydrogen carbonate~~	~~GMP~~
~~170 i~~	~~Calcium carbonate~~	~~GMP~~
~~270~~	~~L(+) Lactic acid~~	~~GMP~~
~~330~~	~~Citric acid~~	~~GMP~~
~~260~~	~~Acetic acid~~	~~GMP~~
~~261~~	~~Potassium acetates~~	

~~262 i~~	~~Sodium acetate~~	
~~263~~	~~Calcium acetate~~	
~~296~~	~~Malic acid (DL) – L(+)-form only~~	
~~325~~	~~Sodium lactate (solution) – L(+)-form only~~	
~~326~~	~~Potassium lactate (solution) – L(+)form only~~	
~~327~~	~~Calcium lactate – L(+)-form only~~	
~~331 i~~	~~Monosodium citrate~~	
~~331 ii~~	~~Trisodium citrate~~	
~~332 i~~	~~Monopotassium citrate~~	
~~332 ii~~	~~Tripotassium citrate~~	
~~333~~	~~Calcium citrate~~	
~~507~~	~~Hydrochloric acid~~	
~~524~~	~~Sodium hydroxide~~	
~~525~~	~~Potassium hydroxide~~	
~~526~~	~~Calcium hydroxide~~	
~~575~~	~~Glucono delta-lactone~~	~~GMP~~
~~334~~	~~L(+) Tartaric acid – L(+)form only~~	~~500 mg Singly or in combination~~
~~335 ii~~	~~Disodium tartrate~~	
~~337~~	~~Potassium sodium L(+)tartrate L(+)form only~~	~~Tartrates as residue in biscuits and rusks~~
~~338~~	~~Orthophosphoric acid~~	~~Only for pH adjustment 440 mg Singly or in combination as phosphorous~~
~~339 i~~	~~Monosodium orthophosphate~~	
~~339 ii~~	~~Disodium orthophosphate~~	
~~339 iii~~	~~Trisodium orthophosphate~~	
~~340 i~~	~~Monopotassium orthophosphate~~	
~~340 ii~~	~~Dipotassium orthophosphate~~	
~~340 iii~~	~~Tripotassium orthophosphate~~	
~~341 i~~	~~Monocalcium orthophosphate~~	
~~341 ii~~	~~Dicalcium orthophosphate~~	
~~341 iii~~	~~Tricalcium orthophosphate~~	
~~**Antioxidants**~~		
~~306~~	~~Mixed tocopherols concentrate~~	~~300 mg/kg fat or oil basis, Singly or in combination~~
~~307~~	~~Alpha-tocopherol~~	
~~304~~	~~L-Ascorbyl palmitate~~	~~200 mg/kg fat~~
~~300~~	~~L-Ascorbic acid~~	~~50 mg, expressed as ascorbic acid~~
~~301~~	~~Sodium ascorbate~~	
~~303~~	~~Potassium ascorbate~~	
~~302~~	~~Calcium ascorbate~~	~~20 mg, expressed as ascorbic acid~~
~~**Raising Agents**~~		
~~503 i~~	~~Ammonium carbonate~~	~~Limited by GMP~~
~~503 ii~~	~~Ammonium hydrogen carbonate~~	
~~500 i~~	~~Sodium carbonate~~	
~~500 ii~~	~~Sodium hydrogen carbonate~~	
~~**Thickeners**~~		

410	Carob bean gum	1000 mg singly or in combination
412	Guar gum	
414	Gum arabic	
415	Xanthan gum	
440	Pectins (Amidated and NonAmidated)	2000 mg in gluten-free cereal-based foods
1404	Oxidized starch	5000 mg Singly or in combination
1410	Monostarch phosphate	
1412	Distarch phosphate	
1413	Phosphated distarch phosphate	
1414	Acetylated distarch phosphate	
1422	Acetylated distarch adipate	
1420	Starch acetate esterified with acetic anhydride	
1450	Starch sodium octenyl succinate	
1451	Acetylated oxidized starch	
Anticaking Agents		
551	Silicon dioxide (amorphous)	200 mg for dry cereals only
Packaging Gases		
290	Carbon dioxide	GMP
941	Nitrogen	GMP

D. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR FOLLOW-UP FORMULA (CXS 156-1987)

4. FOOD ADDITIVES

4.1 Acidity regulators, antioxidants, emulsifiers, packaging gases and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 13.1.2 (Follow-up formulae) are acceptable for use in foods conforming to this standard.

4.2 Flavourings

Name of flavouring	Maximum use level
Natural Fruit Extracts	GMP
Vanilla extract	GMP
Ethyl vanillin	50 mg/kg
Vanillin	50 mg/kg

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

4.3 Carry-Over Principle

Only the food additives listed in food category 13.1.2 (Follow-up formulae) of the CXS 192-1995 may be present in the foods conforming to this Standard, as a result of carry-over from a raw material or other ingredient (including food additive) used to produce the food, subject to the following conditions:

a) **The amount of the food additive in the raw materials or other ingredients (including food additives) does not exceed the maximum level specified; and**

b) **The food into which the food additive is carried over does not contain the food additive in greater quantity than would be introduced by the use of the raw materials or ingredients under good manufacturing practice, consistent with the provisions on carry-over in the Preamble of the CXS 192-1995.**

~~The following additives are permitted:~~

~~Maximum Level in 100 ml of Product Ready-for-Consumption~~

~~**4.1 Thickening Agents**~~

~~**4.1.1** Guar gum } 0.1 g~~
~~**4.1.2** Locust bean gum }~~
~~**4.1.3** Distarch phosphate } 0.5 g singly or in~~
~~**4.1.4** Acetylated distarch phosphate } combination in soy-based products only~~
~~**4.1.5** Phosphated distarch phosphate }~~
~~**4.1.6** Acetylated distarch adipate } 2.5 g singly or in combination in hydrolyzed protein and/or amino acid-based products only~~
~~**4.1.7** Carrageenan } 0.03 g singly or in combination in milk and soy-based products only~~
~~}~~
~~} 0.1 g singly or in combination in hydrolyzed protein and/or amino acid-based liquid products only~~
~~**4.1.8** Pectins 1 g~~

~~**4.2 Emulsifiers**~~

~~**4.2.1** Lecithin 0.5 g~~

~~**4.2.2** Mono- and Diglycerides 0.4 g~~

~~**4.3 pH-Adjusting Agents**~~

~~**4.3.1** Sodium hydrogen carbonate }~~
~~**4.3.2** Sodium carbonate }~~
~~**4.3.3** Sodium citrate }~~
~~**4.3.4** Potassium hydrogen } carbonate }~~
~~**4.3.5** Potassium carbonate } Limited by Good~~
~~**4.3.6** Potassium citrate } Manufacturing Practice~~
~~**4.3.7** Sodium hydroxide } within the limits for sodium in~~
~~**4.3.8** Potassium hydroxide } Section 3.2.6~~
~~**4.3.9** Calcium hydroxide }~~
~~**4.3.10** L (+) Lactic acid~~
~~**4.3.11** L (+) Lactic acid } producing cultures }~~
~~**4.3.12** Citric acid }~~

~~**4.4 Antioxidants**~~

~~**4.4.1** Mixed tocopherols } 3 mg singly or in~~
~~concentrate } combination~~
~~**4.4.2** α-Tocopherol }~~
~~**4.4.3** L-Ascorbyl palmitate } 5 mg singly or in~~
~~**4.4.4** L-Ascorbic acid and } combination, expressed as its Na, Ca salts~~
~~} ascorbic acid (see Section 3.2.6)~~

~~**4.5 Flavourings**~~

~~**4.5.1** Natural Fruit Extracts GMP~~
~~**4.5.2** Vanilla extract GMP~~
~~**4.5.3** Ethyl vanillin 5 mg~~
~~**4.5.4** Vanillin 5 mg~~

~~4.6 Carry-Over Principle~~

~~Section 4.1 of the *General Standard for Food Additives* (CXS 192-1995) shall apply.~~

7. PACKAGING

7.1 The product shall be packed in containers which will safeguard the hygienic and other qualities of the food. When in liquid form, the product shall be packed in hermetically sealed containers~~; nitrogen and carbon dioxide may be used as packing media~~.

E. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR FORMULA FOODS IN WEIGHT CONTROL DIETS (CXS 181-1991)

4. FOOD ADDITIVES

~~Food additives cleared by the Joint FAO/WHO Expert Committee on Food Additives shall be permitted at levels not exceeding the equivalent of their Acceptable Daily Intake.~~

Food additives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 13.4 (Dietetic formulae for sliming purposes and weight reduction) or listed in Table 3 are acceptable for use in foods conforming to this standard.

7. PACKAGING

7.1 The product shall be packed in containers which will safeguard hygienic and other qualities of the food. When in liquid form, the product shall be thermally processed and packed in hermetically sealed containers to ensure sterility~~; nitrogen and carbon dioxide may be used as packing media~~.

F. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR FORMULA FOR USE IN VERY LOW ENERGY DIETS FOR WEIGHT REDUCTION (CXS 203-1995)

4. FOOD ADDITIVES

~~Food additives cleared by the Joint FAO/WHO Expert Committee on Food Additives shall be permitted at levels endorsed by the Committee on Food Additives and Contaminants.~~

Food additives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 13.4 (Dietetic formulae for sliming purposes and weight reduction) or listed in Table 3 are acceptable for use in foods conforming to this standard.

7. PACKAGING

7.1 The product shall be packed in containers which will safeguard hygienic and other qualities of the foods. When in liquid form, the product shall be thermally processed and packed in hermetically sealed containers to ensure sterility~~; nitrogen and carbon dioxide may be used as packing media~~.

G. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE GUIDELIES FOR READY TO USE THERAPEUTIC FOODS (CXG XXX-XXXX)

The report of the 52nd session of the CCFA (para.72) states as follows;

> "Based on the above considerations, CCFA52 agreed to the recommendation to endorse the food additive provisions in the guidelines for RUTF; and to include the guidelines for RUTF to the future Alignment work with the other CCNFSDU standards; and that the alignment working group would also consider the appropriate GSFA food category."

EWG should consider two issues for the guidelines. Firstly, EWG considers the appropriate GSFA food category, and secondly, EWG considers amendments to the food additive provisions of the guidelines.

i) Consideration of appropriate GSFA food category

Scope and description of the guidelines

The 42nd session of the CCNFSDU agreed to forward the Guidelines for Ready-to-Use Therapeutic Foods to CAC45 for adoption at Step 8. Scope of the guidelines are as follows;

> The provisions of these guidelines apply to RUTF for children aged 6 to 59 months with severe acute malnutrition. Ready-to-Use Supplementary Foods (RUSF), micronutrient supplements[2], processed cereal based foods[3], formulated complementary foods for older infants and young children[4], canned baby foods[5] are not covered by these guidelines.
>
> 2*Guidelines for Vitamin and Mineral Food Supplements* (CXG 55-2005)
>
> 3*Standard for Processed Cereal-Based Foods for Infants and Young Children* (CXS 74-1981)
>
> 4*Guidelines on Formulated Complementary Foods for Older Infants and Young Children* (CXG 8-1991)
>
> 5*Standard for Canned Baby Foods* (CXS 73-1981)

"Ready-to-Use Therapeutic Foods (RUTF)" is described in the guidelines as follows;

> **Ready-to-Use Therapeutic Foods (RUTF)** are foods for special medical purposes and are high-energy and contain adequate protein and other essential nutrients for the dietary management of children from 6 to 59 months with severe acute malnutrition without medical complications with appetite. These foods should be soft or crushable and should be easy for children to eat without any prior preparation.

Description of "Foods for special medical purposes"

"Foods for special medical purposes" are described in the Standard for the labelling of and claims for foods for special medical purposes (CXS 180-1991) as follows;

> ***Foods for special medical purposes*** are a category of foods for special dietary uses which are specially processed or formulated and presented for the dietary management of patients and may be used only under medical supervision. They are intended for the exclusive or partial feeding of patients with limited or impaired capacity to take, digest, absorb or metabolize ordinary foodstuffs or certain nutrients contained therein, or who have other special medically-determined nutrient requirements, whose dietary management cannot be achieved only by modification of the normal diet, by other foods for special dietary uses, or by a combination of the two.

Consideration of appropriate GSFA food category

According to the scope and description of the guidelines, foods covered by the guidelines are categorized in food category 13.0. Taken the scope of the guidelines into consideration, foods covered by the guidelines are covered by food category 13.3 - Dietetic foods intended for special medical purposes (excluding products of food category 13.1), or food category 13.5 - Dietetic foods (e.g. supplementary foods for dietary use) excluding products of food categories 13.1- 13.4 and 13.6. Descriptors of food categories 13.3 and 13.5 are as follows;

13.3 Dietetic foods intended for special medical purposes (excluding products of food category 13.1):

Foods for special dietary use that are specially processed or formulated and presented for the dietary management of patients and may be used only under medical supervision. They are intended for the exclusive or partial feeding of patients with limited or impaired capacity to take, digest, absorb or metabolize ordinary foods or certain nutrients contained therein, or who have other special medically-determined nutrient requirement, whose dietary management cannot be achieved only by modification of the normal diet, by other foods for special dietary uses, or by a combination of the two. ref 76 *Standard for the Labelling of and Claims for Foods for Special Medical Purposes* (CODEX STAN 180-1991).

13.5 Dietetic foods (e.g. supplementary foods for dietary use) excluding products of food categories 13.1 -13.4 and 13.6:

Products of high nutritional content, in liquid or solid form (e.g. protein bars), to be used by individuals as part of a balanced diet to provide supplemental nutrition. Products are not intended to be used for purposes of weight loss or as part of a medical regimen.

Description of the "Ready-to-Use Therapeutic Foods (RUTF)" clearly states that RUTF are foods for special medical purposes. Food category 13.3 covers foods for special medial purposes. Food category 13.5 does not cover products intended to be used as part of a medical regimen. Therefore, foods covered by RUTF may be categorized into food category 13.3.

The chair seeks the views from the EWG about the appropriate food category corresponding to RUTF. For the reasons provided above the Alignment chair proposes the most appropriate food category to be 13.3. The alignment work conducted has been performed for food category 13.3. However, the views of the EWG, with justifications, are sought.

Comments are received from Chile, US and ISDI. They agree that foods covered by RUTF are captured within food category 13.3.

ii) Amendments to the food additive provisions of the guidelines

5.2.2 Food Additives

5.2.2.1 Antioxidants used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 13.3 (Dietetic foods intended for special medical purposes (excluding products of food category 13.1)) and only certain acidity regulators, antioxidants, carriers, emulsifiers and packaging gases in Table 3 are acceptable for use in foods conforming to this standard.

5.2.2.2 Section 4.1 of the CXS 192-1995, referring to the conditions applying to carry-over of food additives from ingredients and raw materials into foods, shall apply.

~~Only the food additives listed in this Section (Table A: Food Additives in RUTF Formulation) or in the *Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses Intended for Infants and Young Children* (CXG 10-1979) may be present in the foods described in Section 4.1 of these Guidelines. Other than by direct addition, an additive may be present in RUTF as a result of carry-over from a raw material or other ingredient (including food additive) used to produce the food, subject to the following conditions:~~

~~a) The additive is acceptable for use in the raw materials or other ingredients (including food additives) according to the *General Standard for Food Additives* (CXS 192-1995);~~

~~b) The amount of the additive in the raw materials or other ingredients (including food additives) does not exceed the maximum use level specified in the *General Standard for Food Additives* (CXS 192-1995);~~

~~and~~

~~c) The food into which the additive is carried over does not contain the additive in greater quantity than would be introduced by the use of the raw materials or ingredients under proper technological conditions or good manufacturing practice, consistent with the provisions on carry-over in the Preamble of the *General Standard for Food Additives* (CXS 192-1995).~~

~~**Table A: Food Additives in RUTF Formulation**~~

~~Functional Class~~	~~Food Additive~~	~~International Numbering System (INS)~~	~~Maximum Use Level~~
~~Emulsifier~~	~~Mono- and di-glycerides of fatty acids~~	~~471~~	~~4000 mg/kg~~
	~~Citric and fatty acid esters of glycerol~~	~~472c~~	~~9000 mg/kg~~
	~~Lecithin~~	~~322(i)~~	~~5000 mg/kg~~
~~Antioxidant~~	~~Ascorbyl palmitate~~	~~304~~	~~10 mg/kg~~
	~~Tocopherol concentrate, mixed~~	~~307b~~	~~10 mg/kg~~
	~~Ascorbic acid, L-~~	~~300~~	~~GMP~~
~~Acidity regulator~~	~~Citric acid~~	~~330~~	~~GMP~~
~~Packaging gas~~	~~Nitrogen~~	~~941~~	~~GMP~~

	~~Carbon dioxide~~	~~290~~	~~GMP~~
~~Carrier~~	~~Silicon dioxide, amorphous~~	~~551~~	~~10 mg/kg~~

2. PROPOSED AMENDMENTS TO TABLES 1, 2 AND 3 OF THE GSFA RELATING TO CCNFSDU COMMODITY STANDARDS

A. PROPOSED AMENDMENTS TO TABLE 1

ACESULFAME POTASSIUM: INS: 950 Functional class: Flavour enhancer, Sweetener					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	500 mg/kg	188**, A**	2007	Endorse

ACETIC ACID, GLACIAL: INS: 260 Functional class: Acidity regulator, Preservative					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	5000 mg/kg	238	2013	For information purposes only

ACETIC AND FATTY ACID ESTERS OF GLYCEROL: INS: 472a Functional class: Emulsifier, Sequestrant, Stabilizer					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	5000 mg/kg	~~239,~~ 268**, XS73**	2014	Endorse

ACETYLATED DISTARCH ADIPATE: INS: 1422 Functional class: Emulsifier, Stabilizer, Thickener					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.2	Follow-up formula	5000 mg/kg	~~72,~~ 150, 285 & 292**, 381, U**	2014	Endorse
13.2	Complementary foods for infants and young children	50000 mg/kg	269, 270	2014	For information purposes only

ACETYLATED DISTARCH PHOSPHATE: INS: 1414 Functional class: Emulsifier, Stabilizer, Thickener					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formula	5000 mg/kg	~~72,~~ 150, 284 & 292**, 381, U, D72**	2014	Endorse
13.1.2	Follow-up formula	5000 mg/kg	~~72,~~ 150, 285 & 292**, 381, U**	2014	Endorse
13.1.3	Formulae for special medical purposes for	5000 mg/kg	~~72,~~ 150**, 284** &	2014	Endorse

	infants		292**, 381, U, D72**		
13.2	Complementary foods for infants and young children	50000 mg/kg	269, 270	2014	For information purposes only

ACETYLATED OXIDIZED STARCH: INS: 1451 Functional class: Emulsifier, Stabilizer, Thickener					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	50000 mg/kg	~~239,~~ 269**, XS73**	2014	Endorse

ADVANTAME: INS: 950 Functional class: Flavour enhancer, Sweetener					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	10 mg/kg	**A**	Step 2	Maintain at Step 2

ALLURA RED AC: INS: 129 Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	2009	Endorse

AMMONIUM CARBONATE: INS: 503(i) Functional class: Acidity regulator, Raising agent					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	~~239,~~ 248**, XS73**	2013	Endorse

AMMONIUM HYDROGEN CARBONATE: INS: 503(ii) Functional class: Acidity regulator, Raising agent					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	~~239,~~ 248**, XS73**	2013	Endorse

ANNATTO EXTRACTS, BIXIN-BASED: INS: 160b(i) Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**

13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20 mg/kg	8**, A**	Step 4	Maintain at Step 4

ANNATTO EXTRACTS, NOR BIXIN-BASED: INS: 160b(ii) Functional class: Acidity regulator, Raising agent					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	10 mg/kg	185**, A**	Step 4	Maintain at Step 4

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**
13.1.2	Follow-up formula	50 mg/kg	~~72,~~ 242 & 315**, 381, U**	2015	Endorse
13.2	Complementary foods for infants and young children	500 mg/kg	242	2013	For information purposes only

ASCORBYL ESTERS: INS: 304 Functional class: Antioxidant INS: 305 Functional class: Antioxidant					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	10 mg/kg	~~72,~~ 187**, 381, U**	2019	Endorse
13.1.2	Follow-up formula	50 mg/kg	~~72,~~ 187, 315**, 381, U**	2019	Endorse
13.1.3	Formulae for special medical purposes for infants	10 mg/kg	~~72,~~ 187**, 381, U**	2019	Endorse
13.2	Complementary foods for infants and young children	200 mg/kg	15, 187	2018	For information purposes only
13.3	**Dietetic foods intended for special medical purposes (excluding products of food category 13.1)**	**10 mg/kg**	**187, B**		**Adopt**

ASPARTAME: INS: 951 Functional class: Flavour enhancer, Sweetener					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category	1000 mg/kg	191**, A**	2007	Endorse

	13.1)				

ASPARTAME-ACESULFAME SALT: **INS: 962 Functional class: Flavour enhancer, Sweetener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	500 mg/kg	113, **A**	2012	Endorse

AZORUBINE (CARMOISINE): **INS: 122 Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	Step 7	Maintain at Step 7

BENZOATES: **INS: 210-213 Functional class: Preservative**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	1500 mg/kg	13, **A**	2003	Endorse

BRILLIANT BLACK (BLACK PN): **INS: 151 Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	Step 7	Maintain at Step 7

BRILLIANT BLUE FCF: **INS: 133 Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	2005	Endorse

BROWN HT: **INS: 155 Functional class: Colour**					
Food	**Food Category**	**Max**	**Notes**	**Step/Year**	**Recommendation**

Category No		level		Adopted	
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	Step 7	Maintain at Step 7

CALCIUM ACETATE: **INS: 263 Functional class: Acidity regulator, Preservative, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	~~239~~**XS73**	2013	Endorse

CALCIUM ASCORBATE: **INS: 302 Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.2	Follow-up formulae	50 mg/kg	~~70, 72,~~ 315**, 317, 381, U**	2015	Endorse
13.2	Complementary foods for infants and young children	200 mg/kg	~~239,~~ 317, **XS73**	2015	Endorse

CALCIUM CARBONATE: **INS:170(i) Functional class: Acidity regulator, Anticaking agent, Colour, Firming agent, Flour treatment agent, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP		2013	For information purposes only

CALCIUM HYDROXIDE: **INS:526 Functional class: Acidity regulator, Firming agent**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.1.2	Follow-up formulae	GMP	~~72~~**381, U**	2013	Endorse
13.1.3	Formulae for special medical purposes for infants	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.2	Complementary foods for infants and young children	GMP	~~239~~**XS73**	2013	Endorse

CALCIUM LACTATE: **INS:327 Functional class: Acidity regulator, Emulsifying salt, Firming agent, Flour treatment agent, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**

13.2	Complementary foods for infants and young children	GMP	83, ~~239~~**XS73**	2013	Endorse

CARAMEL II - SULFITE: INS:150b Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000 mg/kg	**A**	Step 4	Maintain at Step 4

CARAMEL III - AMMONIA CARAMEL: INS:150c Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000 mg/kg	**A**	2010	Endorse

CARAMEL IV - SULFITE AMMONIA CARAMEL: INS:150d Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000 mg/kg	**A**	2009	Endorse

CARMINES: INS:120 Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	178**, A**	2005	Endorse

CAROTENAL, BETA-APO-8'-: INS:160e Functional class: Colour					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	**Dietetic foods intended for special medical purposes (excluding products of food category 13.1)**	**50 mg/kg**	**A**		**Pending until the discussion on this provision is finalize**

CAROTENES, BETA-, VEGETABLE: INS:160a(ii) Functional class: Colour

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	600 mg/kg	**A**	2005	**Pending until the discussion on this provision is finalize**

CAROTENOIDS: **INS:160a(i), a(iii), a(iv)~~e, f~~ Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	2009	**Pending until the discussion on this provision is finalize**

CARBON DIOXIDE: **INS:290 Functional class: Carbonating agent, Foaming agent, Packaging gas, Preservative, Propellant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	GMP	59	2015	For information purposes only
13.1.2	**Follow up formulae**	**GMP**	**59**		**Adopt**
13.1.3	Formulae for special medical purposes for infants	GMP	59	2015	For information purposes only
13.2	Complementary foods for infants and young children	GMP	59	2015	For information purposes only

CAROB BEAN GUM: **INS:410 Functional class: Emulsifier, Stablizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	1000 mg/kg	~~72~~**381, U**	2014	Endorse
13.1.2	Follow up formulae	1000 mg/kg	~~72~~**381, U**	2014	Endorse
13.1.3	Formulae for special medical purposes for infants	1000 mg/kg	~~72~~**381, U**	2014	Endorse
13.2	Complementary foods for infants and young children	2000 mg/kg	271, 272	2014	For information purposes only

CARRAGEENAN: **INS:407 Functional class: Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	300 mg/kg	~~379,~~ 381**, A72, U**	2016	Endorse

13.1.2	Follow up formulae	300 mg/kg	~~72,~~ 151, 328, 329, **381, U**	2015	Endorse
13.1.3	Formulae for special medical purposes for infants	~~1000~~ **300** mg/kg	~~379,~~ 381**, A72, U**	2016	Endorse

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**
13.1.1	Infant formulae	GMP	~~72,~~ **381, U**	2015	Endorse
13.1.2	Follow up formulae	GMP	~~72,~~ **381, U**	2013	Endorse
13.1.3	Formulae for special medical purposes for infants	GMP	~~72,~~ **381, U**	2015	Endorse
13.2	Complementary foods for infants and young children	5000 mg/kg	238	2013	For information purposes only

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**
~~13.1~~	~~Infant formulae, follow-up formulae, and formulae for special medical purposes for infants~~	~~9000 mg/kg~~	~~380, 381~~	~~2016~~	Revoke
13.1.1	**Infant formulae**	**9000 mg/kg**	**380, 381, U**		**Adopt**
13.1.3	**Formulae for special medical purposes for infants**	**9000 mg/kg**	**380, 381, U**		**Adopt**
13.2	Complementary foods for infants and young children	5000 mg/kg	~~239,~~ 268**, XS73**	2014	Endorse

CURCUMIN: **INS:100(i) Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	Step 7	Maintain at Step 7

CYCLAMATES: **INS: 952(i), (ii), (iv) Functional class: Sweetener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding	400 mg/kg	17**, A**	2007	Endorse

	products of food category 13.1)				

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**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	5000 mg/kg	**A**	2005	Endorse

DISTARCH PHOSPHATE: **INS: 1412 Functional class: Emulsifier, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	5000 mg/kg	~~72,~~ 150, 284 & 292, **381, U, D72**	2014	Endorse
13.1.2	Follow up formulae	5000 mg/kg	~~72,~~ 150, 285 & 292, **381, U**	2014	Endorse
13.1.3	Formulae for special medical purposes for infants	5000 mg/kg	~~72,~~ 150, **284** & 292, **381, U, D72**	2014	Endorse
13.2	Complementary foods for infants and young children	50000 mg/kg	269, 270	2014	For information purposes only

GLUCONO DELTA-LACTONE: **INS:** 575 **Functional class: Acidity regulator, Raising agent, Sequestrant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	**XS73**	2013	Endorse

GRAPE SKIN EXTRACT: **INS:** 163(ii) **Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	250 mg/kg	181**, A**	2009	Endorse

GUAR GUM: **INS:** 412 **Functional class: Emulsifier, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	1000 mg/kg	14, ~~72,~~ **381, U**	2014	Endorse

13.1.2	Follow up formulae	1000 mg/kg	~~72,~~ **381, U**	2014	Endorse
13.1.3	Formulae for special medical purposes for infants	1000 mg/kg	14, ~~72,~~ **381, U**	2014	Endorse
13.2	Complementary foods for infants and young children	2000 mg/kg	271, 272	2014	For information purposes only

GUM ARABIC (ACACIA GUM):
INS: 414 **Functional class: Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.1.1	**Infant formulae**	**10 mg/kg**	**381, F72, U**		Adopt
13.1.2	**Follow up formulae**	**10 mg/kg**	**381, F72, U**		Adopt
13.1.3	**Formulae for special medical purposes for infants**	**10 mg/kg**	**381, F72, U**		Adopt
13.2	Complementary foods for infants and young children	10000 mg/kg	~~239,~~ 273**, A74, XS73**	2014	Endorse

HYDROCHLORIC ACID:
INS: 507 **Functional class: Acidity regulator**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.2	Complementary foods for infants and young children	GMP	~~239~~**XS73**	2013	Endorse

HYDROXYPROPYL STARCH:
INS: 1440 **Functional class: Emulsifier, Stabilizer, Thickener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.1.1	Infant formulae	5000 mg/kg	~~72,~~ 150, 284, 292**, 381, U**	2014	Endorse
13.1.3	Formulae for special medical purposes for infants	5000 mg/kg	~~72,~~ 150, **284,** 292**, 381, U**	2014	Endorse
13.2	Complementary foods for infants and young children	60000 mg/kg	~~237,~~ 276**, XS74**	2014	Endorse

INDIGOTINE (INDIGO CARMINE):
INS: 132 **Functional class: Colour**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	2009	Endorse

ISOMALT (HYDROGENATED ISOMALTULOSE): **INS:** 953 **Functional class: Anticaking agent, Bulking agent, Glazing agent, Stabilizer, Sweetener, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	100000 mg/kg	**XS73, XS74**	Step 4	Maintain at Step 4

LACTIC ACID, L-, D- and DL-: **INS:** 270 **Functional class: Acidity regulator**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	GMP	~~72,~~ 83, **381, U**	2015	Endorse
13.1.2	Follow-up formulae	GMP	~~72,~~ 83, **381, U**	2013	Endorse
13.1.3	Formulae for special medical purposes for infants	GMP	~~72,~~ 83, **381, U**	2015	Endorse
13.2	Complementary foods for infants and young children	2000 mg/kg	83, 238	2013	For information purposes only

LACTIC AND FATTY ACID ESTERS OF GLYCEROL: **INS:** 472b **Functional class: Emulsifier, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	5000 mg/kg	~~239,~~ 268, **XS73**	2014	Endorse

LACTITOL: **INS:** 966 **Functional class: Emulsifier, Sweetener, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	**XS73, XS74**	Step 7	Maintain at Step 7

LECITHIN: **INS:** 322(i) **Functional class: Antioxidant, Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	5000 mg/kg	~~72~~**381, B72, U**	2014	Endorse
13.1.2	Follow-up formulae	5000 mg/kg	~~72~~**381, U**	2014	Endorse
13.1.3	Formulae for special medical purposes for infants	5000 mg/kg	~~72~~**381, B72, U**	2014	Endorse
13.2	Complementary foods for infants and young children	5000 mg/kg	271, 274	2014	For information purposes only

LUTEIN FROM TAGETES ERECTA: **INS:** 161b(i) **Functional class: Acidity regulator, Sequestrant**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	Step 4	Maintain at Step 4

MALIC ACID, DL-: **INS:** 296 **Functional class: Acidity regulator, Sequestrant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	~~239~~**83, XS73**	2013	Endorse

MALTITOL: **INS:** 965(i) **Functional class: Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	**XS73, XS74**	Step 7	Maintain at Step 7

MALTITOL SYRUP: **INS:** 965(ii) **Functional class: Bulking agent, Emulsifier, Humectant, Stabilizer, Sweetener, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	**XS73, XS74**	Step 7	Maintain at Step 7

MANNITOL: **INS:** 421 **Functional class: Anticaking agent, Bulking agent, Humectant, Stabilizer, Sweetener, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	**Infant formulae**	**10 mg/kg**	**381, F72, U**		**Adopt**
13.1.2	**Follow-up formula**	**10 mg/kg**	**381, F72, U**		**Adopt**
13.1.3	**Formulae for special medical purposes for infants**	**10 mg/kg**	**381, F72, U**		**Adopt**
13.2	**Complementary foods for infants and young children**	**10 mg/kg**	**XS73, A74**		**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**
13.1.1	Infant formulae	4000 mg/kg	~~72~~**381, B72, U**	2014	Endorse

13.1.2	Follow-up formulae	4000 mg/kg	~~72~~**381, U**	2014	Endorse
13.1.3	Formulae for special medical purposes for infants	4000 mg/kg	~~72~~**381, B72, U**	2014	Endorse
13.2	Complementary foods for infants and young children	5000 mg/kg	268, 275	2014	For information purposes only

MONOSTARCH PHOSPHATE: **INS:** 1410 **Functional class: Emulsifier, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	50000 mg/kg	~~239,~~ 269, **XS73**	2014	Endorse

NEOTAME: **INS:** 961 **Functional class: Flavour enhancer, Sweetener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	33 mg/kg	**A**	2007	Endorse

NITROGEN: **INS:** 941 **Functional class: Foaming agent, Packaging gas, Propellant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	GMP	59	2015	For information purposes only
13.1.2	**Follow-up formulae**	**GMP**	**59**		**Adopt**
13.1.3	Formulae for special medical purposes for infants	GMP	59	2015	For information purposes only
13.2	Complementary foods for infants and young children	GMP	59	2015	For information purposes only

OXIDIZED STARCH: **INS:** 1404 **Functional class: Emulsifier, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	50000 mg/kg	~~239,~~ 269, **XS73**	2014	Endorse

PECTINS: **INS:** 440 **Functional class: Emulsifier, Gelling agent, Glazing agent, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.2	Follow-up formulae	10000 mg/kg	~~72~~**381, U**	2014	Endorse

13.1.3	Formulae for special medical purposes for infants	2000 mg/kg	14, ~~72~~**381, U**	2021	Endorse
13.2	Complementary foods for infants and young children	10000 mg/kg	273, 282, 283	2014	For information purposes only

PHOSPHATED DISTARCH PHOSPHATE: **INS:** 1413 **Functional class: Emulsifier, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	5000 mg/kg	~~72,~~ 150, 284, 292**, 381, U, D72**	2014	Endorse
13.1.2	Follow-up formulae	5000 mg/kg	~~72,~~ 150, 285, 292**, 381, U**	2014	Endorse
13.1.3	Formulae for special medical purposes for infants	5000 mg/kg	~~72,~~ 150, **284,** 292**, 381, U, D72**	2014	Endorse
13.2	Complementary foods for infants and young children	50000 mg/kg	269, 270	2014	For information purposes only

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, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Preservative, Raising agent, Sequestrant, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	**Infant formulae**	**450 mg/kg**	**33, 230, 381, C72, D72, U**		**Adopt**
13.1.3	**Formulae for special medical purposes for infants**	**450 mg/kg**	**33, 230, 381, C72, D72, U**		**Adopt**
13.2	Complementary foods for infants and young children	4400 mg/kg	33, 230**, XS73**	2012	Endorse
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	2200 mg/kg	33**, A**	2009	Endorse

POLYDIMETHYLSILOXANE: **INS:** 900a **Functional class: Anticaking agent, Antifoaming agent, Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	2004	Endorse

POLYGLYCEROL ESTERS OF FATTY ACIDS: **INS:** 475 **Functional class: Emulsifier, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	1000 mg/kg	**A**	2018	Endorse

POLYSORBATES: **INS:** 432-436 **Functional class: Emulsifier, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	1000 mg/kg	**A**	2005	Endorse

PONCEAU 4R (COCHINEAL RED A): **INS:** 124 **Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	2008	Endorse

POTASSIUM ACETATE: **INS:** 261(i) **Functional class: Acidity regulator, Preservative**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	~~239~~**XS73**	2013	Endorse

POTASSIUM CARBONATE: **INS:** 501(i) **Functional class: Acidity regulator, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.1.2	Follow-up formulae	GMP	~~72~~**381, U**	2013	Endorse
13.1.3	Formulae for special medical purposes for infants	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse

POTASSIUM DIHYDROGEN CITRATE: **INS:** 332(i) **Functional class: Acidity regulator, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	GMP	55, ~~72~~**381, U**	2014	Endorse

13.1.2	Follow-up formulae	GMP	~~72~~**381, U**	2013	Endorse
13.1.3	Formulae for special medical purposes for infants	GMP	55, ~~72~~**381, U**	2014	Endorse
13.2	Complementary foods for infants and young children	GMP	~~239~~**XS73**	2013	Endorse

POTASSIUM HYDROGEN CARBONATE: **INS:** 501(ii) **Functional class: Acidity regulator, Raising agent, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.1.2	Follow-up formulae	GMP	~~72~~**381, U**	2013	Endorse
13.1.3	Formulae for special medical purposes for infants	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.2	Complementary foods for infants and young children	GMP		2013	For information purposes only

POTASSIUM HYDROXIDE: **INS:** 525 **Functional class: Acidity regulator**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.1.2	Follow-up formulae	GMP	~~72~~**381, U**	2013	Endorse
13.1.3	Formulae for special medical purposes for infants	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.2	Complementary foods for infants and young children	GMP	~~239~~**XS73**	2013	Endorse

POTASSIUM LACTATE: **INS:** 326 **Functional class: Acidity regulator, Antioxidant, Emulsifier, Humectant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	83, ~~239~~**XS73**	2013	Endorse

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**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	1200 mg/kg	**A**	2018	Endorse

PROPYLENE GLYCOL ESTERS OF FATTY ACIDS: **INS:** 477 **Functional class: Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	5000 mg/kg	**A**	2001	Endorse

QUINOLINE YELLOW: **INS:** 104 **Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	Step 7	Maintain at Step 7

RIBOFLAVINS: **INS:** 101(i),(ii), (iii) **Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	300 mg/kg	**A**	2005	Endorse

SACCHARINS: **INS:** 954(i)-(iv) **Functional class: Sweetener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	200 mg/kg	**A**	2007	Endorse

SILICON DIOXIDE, AMORPHOUS: **INS:** 551 **Functional class: Anticaking agent, Antifoaming agent, Carrier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	**Infant formulae**	**10 mg/kg**	**381, F72, U**		**Adopt**
13.1.2	**Follow-up formulae**	**10 mg/kg**	**381, F72, U**		**Adopt**
13.1.3	**Formulae for special medical purposes for infants**	**10 mg/kg**	**381, F72, U**		**Adopt**
13.2	Complementary foods for infants and young children	2000 mg/kg	~~65,~~ 318, **A74, XS73**	2015	Endorse

SODIUM ACETATE: **INS:** 262(i) **Functional class: Acidity regulator, Preservative, Sequestrant**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.2	Complementary foods for infants and young children	GMP	~~239, 319,~~ 320, **XS73**	2015	Endorse

SODIUM ASCORBATE: **INS:** 301 **Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	**Infant formulae**	**75 mg/kg**	**83, 381, H72, U, D72**		**Adopt**
13.1.2	Follow-up formulae	50 mg/kg	~~70, 72,~~ 315, 316**, 317, 381, A156, U**	2015	Endorse
13.1.3	**Formulae for special medical purposes for infants**	**75 mg/kg**	**83, 381, H72, U, D72**		**Adopt**
13.2	Complementary foods for infants and young children	500 mg/kg	317, 319, 320**, C74**	2015	Endorse

SODIUM CARBONATE: **INS:** 500(i) **Functional class: Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.1.2	Follow-up formulae	GMP	~~72,~~ 316**, 381, U**	2015	Endorse
13.1.3	Formulae for special medical purposes for infants	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.2	Complementary foods for infants and young children	GMP	~~240,~~ 243, 295, 319**, 320**	2015	Endorse

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**
13.1.1	Infant formulae	GMP	55, ~~72~~**381, U**	2014	Endorse
13.1.2	Follow-up formulae	GMP	~~72,~~ 316**, 381, U**	2015	Endorse
13.1.3	Formulae for special medical purposes for infants	GMP	55, ~~72~~**381, U**	2014	Endorse
13.2	Complementary foods for infants and young children	5000 mg/kg	238, ~~240,~~ 319**, 320**	2015	Endorse

SODIUM HYDROGEN CARBONATE:

INS: 500(ii) **Functional class: Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.1.1	Infant formulae	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.1.2	Follow-up formulae	GMP	~~72,~~ 316**,** **381, U**	2015	Endorse
13.1.3	Formulae for special medical purposes for infants	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.2	Complementary foods for infants and young children	GMP	~~240,~~ 319**,** **320**	2015	Endorse

SODIUM HYDROXIDE:
INS: 524 **Functional class: Acidity regulator**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.1.1	Infant formulae	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.1.2	Follow-up formulae	GMP	~~72,~~ 316**,** **381, U**	2015	Endorse
13.1.3	Formulae for special medical purposes for infants	2000 mg/kg	55, ~~72~~**381, U**	2013	Endorse
13.2	Complementary foods for infants and young children	GMP	~~239, 319~~, 320**,** **XS73**	2015	Endorse

SODIUM LACTATE:
INS: 325 **Functional class: Acidity regulator, Antioxidant, Bulking agent, Emulsifier, Emulsifying salt, Humectant, Thickener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.2	Complementary foods for infants and young children	GMP	83, ~~239, 319,~~ 320**,** **XS73**	2015	Endorse

SORBATES:
INS: 200, 202, 203 **Functional class: Preservative**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	1500 mg/kg	42, **A**	2009	Endorse

SORBITAN ESTERS OF FATTY ACIDS:
INS: 491-495 **Functional class: Emulsifier, Stabilizer**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.3	Dietetic foods intended for special medical purposes (excluding products of food category	1000 mg/kg	**A**	2018	Endorse

	13.1)				

SORBITOL: **INS:** 420(i) **Functional class: Bulking agent, Humectant, Sequestrant, Stabilizer, Sweetener, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	**XS73, XS74**	Step 7	Maintain at Step 7

SORBITOL SYRUP: **INS:** 420(ii) **Functional class: Bulking agent, Humectant, Sequestrant, Stabilizer, Sweetener, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	**XS73, XS74**	Step 7	Maintain at Step 7

STARCH ACETATE: **INS:** 1420 **Functional class: Emulsifier, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	50000 mg/kg	~~239,~~ 269**,** **XS73**	2014	Endorse

STARCH SODIUM OCTENYL SUCCINATE: **INS:** 1450 **Functional class: Emulsifier, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	**Infant formulae**	**20000 mg/kg**	**376, 381, G72, U, D72**		**Adopt**
13.1.2	**Follow-up formulae**	**100 mg/kg**	**316, 381, F72, U**		**Adopt**
13.1.3	Formulae for special medical purposes for infants	20000 mg/kg	376, 381**,** **G72, U, D72**	2016	Endorse
13.2	Complementary foods for infants and young children	50000 mg/kg	~~239,~~ 269**,** **XS73, B74**	2014	Endorse

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**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	2000 mg/kg	**A**	2018	Endorse

STEVIOL GLYCOSIDES: **INS:** 960a, b, c, d **Functional class: Sweetener**

Food Category No	Food Category	Max level	Notes	Step/Year Adopted	Recommendation
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	350 mg/kg	26, **A**	2011	Endorse

SUCRALOSE (TRICHLOROGALACTOSUCROSE): **INS:** 955 **Functional class: Sweetener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	400 mg/kg	**A**	2007	Endorse

SUCROSE ESTERS: **INS:** 473, 473a, 474 **Functional class: Emulsifier, Foaming agent, Glazing agent, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	5000 mg/kg	**A**	2021	Endorse

SUNSET YELLOW FCF: **INS:** 110 **Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	2008	Endorse

TARTRATES: **INS:** 334, 335(ii), 337 **Functional class: Acidity regulator, Antioxidant, Flavour enhancer, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	5000 mg/kg	45, ~~364,~~ XS73, 428	2018	Endorse

TARTRAZINE: **INS:**102 **Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	Step 7	Maintain at Step 7

THAUMATIN:

INS: 957 **Functional class: Flavour enhancer, Sweetener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	**XS73, XS74**	Step 4	Maintain at Step 4

TOCOPHEROLS: **INS:** 307a-c **Functional class: Antioxidant**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	10 mg/kg	~~72~~**381**, 416**, U**	2018	Endorse
13.1.2	Follow-up formulae	30 mg/kg	~~72,~~**381, U**	2018	Endorse
13.1.3	Formulae for special medical purposes for infants	10 mg/kg	~~72~~**381**, 416**, U**	2018	Endorse
13.2	Complementary foods for infants and young children	300 mg/kg	15	2018	For information purposes only
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	30 mg/kg	**C**	2018	Endorse

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**
13.2	Complementary foods for infants and young children	GMP	~~239,~~ **XS73**	2015	Endorse

TRIPOTASSIUM CITRATE: **INS:** 332(ii) **Functional class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.1	Infant formulae	GMP	55, ~~72~~**381, U**	2014	Endorse
13.1.2	Follow-up formulae	GMP	~~72,~~**381, U**	2013	Endorse
13.1.3	Formulae for special medical purposes for infants	GMP	55, ~~72~~**381, U**	2014	Endorse
13.2	Complementary foods for infants and young children	GMP	~~239~~**XS73**	2013	Endorse

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**

13.1.1	Infant formulae	GMP	55, ~~72~~**381, U**	2014	Endorse
13.1.2	Follow-up formulae	GMP	~~72,~~ 316, **381, U**	2015	Endorse
13.1.3	Formulae for special medical purposes for infants	GMP	55, ~~72~~**381, U**	2014	Endorse
13.2	Complementary foods for infants and young children	5000 mg/kg	238, ~~240,~~ 319, 320	2015	Endorse

XANTHAN GUM: **INS:415 Functional class: Emulsifier, Foaming agent, Stabilizer, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.1.3	Formulae for special medical purposes for infants	1000 mg/kg	~~72~~**381, E72, U**	2021	Endorse
13.2	Complementary foods for infants and young children	10000 mg/kg	~~239,~~ 273**,** **XS73**	2014	Endorse

Xylitol: **INS:967 Functional class: Emulsifier, Humectant, Stabilizer, Sweetener, Thickener**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.2	Complementary foods for infants and young children	GMP	**XS73, XS74**	Step 7	Maintain at Step 7

ZEAXANTHIN, SYNTHETIC: **INS:**161h(i) **Functional class: Colour**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50 mg/kg	**A**	Step 4	Maintain at Step 4

Proposed notes to the GSFA

XS72: Excluding products conforming to the Standard for Infant Formula and Formula for Special Medical Purposes Intended for Infants (CXS 72-1981).

XS73: Excluding products conforming to the Standard for Canned Baby Foods (CXS 73-1981)

XS74: Excluding products conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981)

XS156: Excluding products conforming to the Standard for Follow-Up Formula (CXS 156-1987).

A72: For use in liquid infant formula except for use in hydrolysed protein and/or amino acid based liquid infant formula at 1000 mg/kg.

B72: If Lecithin (INS 322(i)) is used in combination with Mono-and diglycerides of fatty acids (INS 471) the sum of the proportions of these substances in the food should not be more than 1. The sum of the proportions is calculated as: Sum of proportions = (Concentration of INS 322(i) / Maximum Use Level of INS 322(i)) + (Concentration of INS 471 / Maximum Use Level of INS 471)~~maximum level for each of the substance is lowered with the relative part as present of the other substance~~.

C72: For use in products conforming to the Standard for Infant Formula and Formula for Special Medical Purposes Intended for Infants (CXS 72-1981): 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)), and Tripotassium phosphate (INS 340(iii)) only, singly or in combination.

D72: Within the limits for sodium, potassium and phosphorus specified in the Standard for Infant Formula and Formula for Special Dietary Purposes Intended for Infants (CXS 72-1981)

E72: For use in powdered hydrolysed protein and/or amino acid based infant formula only.

F72: For use as a nutrient carrier in a raw material or other ingredient.

G72: For use as a nutrient carrier in a raw material or other ingredient at 100 mg/kg in the food as consumed.

H72: For use as a nutrient carrier in a raw material or other ingredient, in coating of nutrient preparations containing polyunsaturated fatty acids.

55: Within the limits for sodium, calcium, and potassium specified in the Standard for Infant Formula and Formula**s** for Special **Medical**~~Dietary~~ Purposes Intended for Infants (**CXS**~~CODEX STAN~~ 72-1981): singly or in combination with other sodium, calcium, and/or potassium salts.

269: Singly or in combination**: INS 1404, 1410, 1412, 1413, 1414, 1420, 1422, 1450 and 1451** ~~with other modified starches used as thickeners~~ in products conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981).

270: For use at 60 000 mg/kg, singly or in combination**: INS 1412, 1413, 1414, 1422 and 1440** ~~with other starch thickeners~~ in products conforming to the Standard for Canned Baby Foods (CXS 73-1981).

A74: For use as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) at 10 mg/kg.

B74: For use as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) at 100 mg/kg.

C74: For use as a nutrient carrier in coating of nutrient preparations containing polyunsaturated fatty acids used to produce the foods conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) at 75 mg/kg.

A156: For use as a nutrient carrier in coating of nutrient preparations containing polyunsaturated fatty acids used to produce the foods conforming to the Standard for Follow-up formula (CXS 156-1987) at 75 mg/kg in the food as consumed.

A: Excluding products conforming to the Guidelines for Ready to Use Therapeutic Foods (CXG XX-XXXX).

B: For use in products conforming to the Guidelines for Ready to Use Therapeutic Foods (CXG XX-XXXX).

C: For use of Tocopherol concentrate, mixed (INS 307b) only in products conforming to the Guidelines for Ready to Use Therapeutic Foods (CXG XX-XXXX) at 10 mg/kg.

U: Maximum use level is expressed as mg additive/L of food.

B. PROPOSED AMENDMENTS TO TABLE 2

Food category 13.1 Infant formulae, follow-up formulae, and formulae for special medical purposes for infants:					
Additive	**INS**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
~~Citric and fatty acid esters of glycerol~~	~~472c~~	~~9000 mg/kg~~	~~380, 381~~	~~2016~~	Revoke

Food category 13.1.1 Infant formulae:					
Additive	**INS**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
Acetylated distarch phosphate	1414	5000 mg/kg	~~72,~~150, 284, 292**, 381, U, D72**	2014	Endorse
Ascorbyl esters	304, 305	10 mg/kg	~~72,~~187**, 381, U**	2019	Endorse
Calcium hydroxide	526	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Carbon dioxide	290	GMP	59	2015	For information purposes only
Carob bean gum	410	1000 mg/kg	~~72~~**381, U**	2014	Endorse
Carrageenan	407	300 mg/kg	~~379,~~ 381, **A72, U**	2016	Endorse
Citric acid	330	GMP	~~72~~**381, U**	2015	Endorse
Citric and fatty acid esters of glycerol	**472c**	**9000 mg/kg**	**380, 381, U**		**Adopt**
Distarch phosphate	1412	5000 mg/kg	~~72, 1~~50, 284, 292**, 381, U, D72**	2014	Endorse
Guar gum	412	1000 mg/kg	14, ~~72~~**, 381, U**	2014	Endorse
Gum Arabic (gum acacia)	**414**	**10 mg/kg**	**381, F72, U**		**Adopt**
Hydroxypropyl starch	1440	5000 mg/kg	~~72, 1~~50, 284, 292**, 381, U**	2014	Endorse
Lactic acid, L-, D- and DL-	270	GMP	~~72,~~83, **381, U**	2015	Endorse
Lecithin	322(i)	5000 mg/kg	~~72,~~ **381, B72, U**	2014	Endorse
Mannitol	**421**	**10 mg/kg**	**381, F72, U**		**Adopt**
Mono- and di-glycerides of fatty acids	471	4000 mg/kg	~~72,~~ **381, B72, U**	2014	Endorse
Nitrogen	941	GMP	59	2015	For information purposes only
Phosphated distarch phosphate	1413	5000 mg/kg	~~72, 1~~50, 284, 292**, 381, U, D72**	2014	Endorse
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**	**450 mg/kg**	**33, 230, 381, C72, D72, U**		**Adopt**

Potassium carbonate	501(i)	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Potassium dihydrogen citrate	332(i)	GMP	55~~, 72~~**, 381, U**	2014	Endorse
Potassium hydrogen carbonate	501(ii)	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Potassium hydroxide	525	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Silicon dioxide, amorphous	**551**	**10 mg/kg**	**381, F72, U**		**Adopt**
Sodium ascorbate	**301**	**75 mg/kg**	**83, 381, H72, U**		**Adopt**
Sodium carbonate	500(i)	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Sodium dihydrogen citrate	331(i)	GMP	55~~, 72~~**, 381, U**	2014	Endorse
Sodium hydrogen carbonate	500(ii)	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Sodium hydroxide	524	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Starch sodium octenyl succinate	**1450**	**20000 mg/kg**	**376, 381, G72, U, D72**		**Adopt**
Tocopherols	307a, b, c	10 mg/kg	~~72,~~ **381,** 416**, U**	2018	Endorse
Tripotassium citrate	332(ii)	GMP	55~~, 72~~**, 381, U**	2014	Endorse
Trisodium citrate	331(iii)	GMP	55~~, 72~~**, 381, U**	2014	Endorse

Food category 13.1.2 Follow-up formula:					
Additive	**INS**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
Acetylated distarch adipate	1422	5000 mg/kg	~~72,~~150, 285, 292**, 381, U**	2014	Endorse
Acetylated distarch phosphate	1414	5000 mg/kg	~~72,~~150, 285, 292**, 381, U**	2014	Endorse
Ascorbic acid, L-	300	50 mg/kg	~~72,~~242, 315**, 381, U**	2015	Endorse
Ascorbyl esters	304, 305	50 mg/kg	~~72,~~187, 315**, 381, U**	2019	Endorse
Calcium ascorbate	302	50 mg/kg	~~70, 72,~~315**, 317, 381, U**	2015	Endorse
Calcium hydroxide	526	GMP	~~72~~**, 381, U**	2013	Endorse
Carbon dioxide	**290**	**GMP**	**59**		**Adopt**
Carob bean gum	410	1000 mg/kg	~~72~~**381, U**	2014	Endorse
Carrageenan	407	300 mg/kg	~~72,~~151, 328, 329**, 381, U**	2015	Endorse
Citric acid	330	GMP	~~72~~**381, U**	2013	Endorse
Distarch phosphate	1412	5000 mg/kg	~~72,~~150, 285, 292**, 381, U**	2014	Endorse
Guar gum	412	1000 mg/kg	~~72~~**, 381, U**	2014	Endorse
Gum Arabic (acacia gum)	**414**	**10 mg/kg**	**381, F72, U**		**Adopt**
Lactic acid, L-, D- and DL-	270	GMP	~~72,~~83, **381, U**	2013	Endorse
Lecithin	322(i)	5000 mg/kg	~~72,~~ **381, U**	2014	Endorse
Mannitol	**421**	**10 mg/kg**	**381, F72, U**		**Adopt**
Mono- and di-glycerides of fatty acids	471	4000 mg/kg	~~72,~~ **381, U**	2014	Endorse
Nitrogen	**941**	**GMP**	**59**		**Adopt**
Pectins	440	10000 mg/kg	~~72,~~ **381, U**	2014	Endorse
Phosphated distarch phosphate	1413	5000 mg/kg	~~72,~~150, 285, 292**, 381, U**	2014	Endorse

Potassium carbonate	501(i)	GMP	~~72~~**, 381, U**	2013	Endorse
Potassium dihydrogen citrate	332(i)	GMP	~~72~~**, 381, U**	2013	Endorse
Potassium hydrogen carbonate	501(ii)	GMP	~~72~~**, 381, U**	2013	Endorse
Potassium hydroxide	525	GMP	~~72~~**, 381, U**	2013	Endorse
Silicon dioxide, amorphous	**551**	**10 mg/kg**	**381, F72, U**		**Adopt**
Sodium ascorbate	301	50 mg/kg	~~70, 72,~~ 315, 316, **317, 381, A156, U**	2015	Endorse
Sodium carbonate	500(i)	GMP	~~72~~, 316**, 381, U**	2015	Endorse
Sodium dihydrogen citrate	331(i)	GMP	~~72,~~316**, 381, U**	2015	Endorse
Sodium hydrogen carbonate	500(ii)	GMP	~~72,~~316**, 381, U**	2015	Endorse
Sodium hydroxide	524	GMP	~~72,~~316**, 381, U**	2015	Endorse
Starch sodium octenyl succinate	**1450**	**10 mg/kg**	**316, 381, F72, U**		**Adopt**
Tocopherols	307a, b, c	30 mg/kg	~~72,~~ **381, U**	2018	Endorse
Tripotassium citrate	332(ii)	GMP	~~72~~**, 381, U**	2013	Endorse
Trisodium citrate	331(iii)	GMP	~~72,~~316**, 381, U**	2015	Endorse

Food category 13.1.3 Formulae for special medical purposes for infants:					
Additive	**INS**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
Acetylated distarch phosphate	1414	5000 mg/kg	~~72,~~150, **284,** 292**, 381, U, D72**	2014	Endorse
Ascorbyl esters	304, 305	10 mg/kg	~~72,~~187**, 381, U**	2019	Endorse
Calcium hydroxide	526	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Carbon dioxide	290	GMP	59	2015	For information purposes only
Carob bean gum	410	1000 mg/kg	~~72~~**381, U**	2014	Endorse
Carrageenan	407	~~1000~~**300** mg/kg	~~379,~~ 381, **A72, U**	2016	Endorse
Citric acid	330	GMP	~~72~~**381, U**	2015	Endorse
Citric and fatty acid esters of glycerol	**472c**	**9000 mg/kg**	**380, 381, U**		**Adopted**
Distarch phosphate	1412	5000 mg/kg	~~72, 1~~50, **284,** 292**, 381, U, D72**	2014	Endorse
Guar gum	412	1000 mg/kg	14, ~~72~~**, 381, U**	2014	Endorse
Gum Arabic (gum acacia)	**414**	**10 mg/kg**	**381, F72, U**		**Adopt**
Hydroxypropyl starch	1440	5000 mg/kg	~~72, 1~~50, **284,** 292**, 381, U**	2014	Endorse
Lactic acid, L-, D- and DL-	270	GMP	~~72,~~83, **381, U**	2015	Endorse
Lecithin	322(i)	5000 mg/kg	~~72,~~ **381, B72, U**	2014	Endorse
Mannitol	**421**	**10 mg/kg**	**381, F72, U**		**Adopt**
Mono- and di-glycerides of fatty acids	471	4000 mg/kg	~~72,~~ **381, B72, U**	2014	Endorse
Nitrogen	941	GMP	59	2015	For information purposes only

Pectins	440	2000 mg/kg	14, ~~72~~**381, U**	2021	Endorse
Phosphated distarch phosphate	1413	5000 mg/kg	~~72, 1~~50, **284,** 292**, 381, U, D72**	2014	Endorse
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**	**450 mg/kg**	**33, 230, C72, D72, U**		**Adopt**
Potassium carbonate	501(i)	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Potassium dihydrogen citrate	332(i)	GMP	55~~, 72~~**, 381, U**	2014	Endorse
Potassium hydrogen carbonate	501(ii)	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Potassium hydroxide	525	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Silicon dioxide, amorphous	**551**	**10 mg/kg**	**381, F72, U**		**Adopt**
Sodium ascorbate	**301**	**75 mg/kg**	**83, 381, H72, U**		**Adopt**
Sodium carbonate	500(i)	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Sodium dihydrogen citrate	331(i)	GMP	55~~, 72~~**, 381, U**	2014	Endorse
Sodium hydrogen carbonate	500(ii)	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Sodium hydroxide	524	2000 mg/kg	55~~, 72~~**, 381, U**	2013	Endorse
Starch sodium octenyl succinate	1450	20000 mg/kg	376, 381**, G72, U, D72**	2016	Endorse
Tocopherols	307a, b, c	10 mg/kg	~~72,~~ **381,** 416**, U**	2018	Endorse
Tripotassium citrate	332(ii)	GMP	55~~, 72~~**, 381, U**	2014	Endorse
Trisodium citrate	331(iii)	GMP	55~~, 72~~**, 381, U**	2014	Endorse
Xanthan gum	415	1000 mg/kg	~~72~~**381, E72, U**	2021	Endorse

Proposed notes to the GSFA

XS72: Excluding products conforming to the Standard for Infant Formula and Formula for Special Medical Purposes Intended for Infants (CXS 72-1981).

XS156: Excluding products conforming to the Standard for Follow-Up Formula (CXS 156-1987).

55: Within the limits for sodium, calcium, and potassium specified in the Standard for Infant Formula and Formula**s** for Special **Medical**~~Dietary~~ Purposes Intended for Infants (**CXS**~~CODEX STAN~~ 72-1981): singly or in combination with other sodium, calcium, and/or potassium salts.

A72: For use in liquid infant formula except for use in hydrolysed protein and/or amino acid based liquid infant formula at 1000 mg/kg.

B72: If Lecithin (INS 322(i)) is used in combination with Mono-and diglycerides of fatty acids (INS 471) the sum of the proportions of these substances in the food should not be more than 1. The sum of the proportions is calculated as: Sum of proportions = (Concentration of INS 322(i) / Maximum Use Level of INS 322(i)) + (Concentration of INS 471 / Maximum Use Level of INS 471) ~~maximum level for each of the substance is lowered with the relative part as present of the other substance~~.

C72: For use in products conforming to the Standard for Infant Formula and Formula for Special Medical Purposes Intended for Infants (CXS 72-1981): 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)), and Tripotassium phosphate (INS 340(ii)) only.

D72: Within the limits for sodium, potassium and phosphorus specified in the Standard for Infant Formula and Formula for Special Dietary Purposes Intended for Infants (CXS 72-1981)

E72: For use in powdered hydrolysed protein and/or amino acid based infant formula only.

F72: For use as a nutrient carrier in a raw material or other ingredient.

G72: For use as a nutrient carrier in a raw material or other ingredient at 100 mg/kg in the food as consumed.

H72: For use as a nutrient carrier in a raw material or other ingredient, in coating of nutrient preparations containing polyunsaturated fatty acids.

A156: For use as a nutrient carrier in coating of nutrient preparations containing polyunsaturated fatty acids used to produce foods conforming to the Standard for Follow-up formula (CXS 156-1987) at 75 mg/kg in the food as consumed.

U: Maximum use level is expressed as mg additive/L of food.

Food category 13.2 Complementary foods for infants and young children:					
Additive	**INS**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
Acetic acid, glacial	260	5000 mg/kg	238	2013	For information purposes only
Acetic and fatty acid esters of glycerol	472a	5000 mg/kg	~~239,~~ 268**, XS73**	2014	Endorse
Acetylated distarch adipate	1422	50000 mg/kg	269, 270	2014	For information purposes only
Acetylated distarch phosphate	1414	50000 mg/kg	269, 270	2014	For information purposes only
Acetylated oxidized starch	1451	50000 mg/kg	~~239,~~ 269**, XS73**	2014	Endorse
Ammonium carbonate	503(i)	GMP	~~239,~~ 248**, XS73**	2013	Endorse
Ammonium hydrogen carbonate	503(ii)	GMP	~~239,~~ 248**, XS73**	2013	Endorse
Ascorbic acid, L-	300	500 mg/kg	242	2013	For information purposes only
Ascorbyl esters	304, 305	200 mg/kg	15, 187	2018	For information purposes only
Calcium acetate	263	GMP	~~239~~**XS73**	2013	Endorse
Calcium ascorbate	302	200 mg/kg	~~239,~~ 317**, XS73**	2015	Endorse
Calcium carbonate	170(i)	GMP		2013	For information purposes only
Calcium hydroxide	526	GMP	~~239~~**XS73**	2013	Endorse
Calcium lactate	327	GMP	83, ~~239~~ **XS73**	2013	Endorse
Carbon dioxide	290	GMP	59	2015	For information purposes only
Carob bean gum	410	2000 mg/kg	271, 272	2014	For information purposes only
Citric acid	330	5000 mg/kg	238	2013	For information purposes only
Citric and fatty acid esters of glycerol	472c	5000 mg/kg	~~239,~~ 268**, XS73**	2014	Endorse
Distarch phosphate	1412	50000 mg/kg	269, 270	2014	For information purposes only
Glucono delta-lactone	575	GMP	~~239~~**XS73**	2013	Endorse
Guar gum	412	2000 mg/kg	271, 272	2014	For information purposes only
Gum arabic (Acacia gum)	414	10000 mg/kg	~~239,~~ 273**, A74, XS73**	2014	Endorse
Hydrochloric acid	507	GMP	~~239~~**XS73**	2013	Endorse
Hydroxypropyl starch	1440	60000 mg/klg	~~237,~~ 276**, XS74**	2014	Endorse
Isomalt (Hydrogenated isomaltulose)	953	100000 mg/kg	**XS73, XS74**	Step 4	Maintain at Step 4
Lactic acid, L-, D- and DL-	270	2000 mg/kg	83, 238	2013	For information purposes only
Lactic and fatty acid esters of glycerol	472b	5000 mg/kg	~~239,~~ 268**, XS73**	2014	Endorse
Lactitol	966	GMP	**XS73, XS74**	Step 7	Maintain at Step 7
Lecithin	322(i)	5000 mg/kg	271, 274	2014	For information purposes only
Malic acid, DL-	296	GMP	~~239~~**83, XS73**	2013	Endorse
Maltitol	965(i)	GMP	**XS73, XS74**	Step 7	Maintain at Step 7

Maltitol syrup	965(ii)	GMP	**XS73, XS74**	Step 7	Maintain at Step 7
Mannitol	**421**	**10 mg/kg**	**XS73, A74**		**Adopt**
Mono- and di-glycerides of fatty acids	471	5000 mg/kg	268, 275	2014	For information purposes only
Monostarch phosphate	1410	50000 mg/kg	~~239,~~ 269**, XS73**	2014	Endorse
Nitrogen	941	GMP	59	2015	For information purposes only
Oxidized starch	1404	50000 mg/kg	~~239,~~ 269**, XS73**	2014	Endorse
Pectins	440	10000 mg/kg	273, 282, 283	2014	For information purposes only
Phosphated distarch phosphate	1413	50000 mg/kg	269, 270	2014	For information purposes only
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, 230**, XS73**	2012	Endorse
Potassium acetate	261(i)	GMP	~~239~~**XS73**	2013	Endorse
Potassium dihydrogen citrate	332(i)	GMP	~~239~~**XS73**	2013	Endorse
Potassium hydrogen carbonate	501(ii)	GMP		2013	For information purposes only
Potassium hydroxide	525	GMP	~~239~~**XS73**	2013	Endorse
Potassium lactate	326	GMP	83, ~~239~~ **XS73**	2013	Endorse
Silicon dioxide, amorphous	551	2000 mg/kg	~~65,~~ 318**, A74, XS73**	2015	Endorse
Sodium acetate	262(i)	GMP	~~239, 319,~~ 320**, XS73**	2015	Endorse
Sodium ascorbate	301	500 mg/kg	317, 319, 320, **C74**	2015	Endorse
Sodium carbonate	500(i)	GMP	~~240,~~ 243, 295, 319**, 320**	2015	Endorse
Sodium dihydrogen citrate	331(i)	5000 mg/kg	238, ~~240,~~ 319, 320	2015	Endorse
Sodium hydrogen carbonate	500(ii)	GMP	~~240,~~ 319, 320	2015	Endorse
Sodium hydroxide	524	GMP	~~239, 319,~~ 320**, XS73**	2015	Endorse
Sodium lactate	325	GMP	83, ~~239, 319~~, 320**, XS73**	2015	Endorse
Sorbitol	420(i)	GMP	**XS73, XS74**	Step 7	Maintain at Step 7
Sorbitol syrup	420(ii)	GMP	**XS73, XS74**	Step 7	Maintain at Step 7
Starch acetate	1420	50000 mg/kg	~~239,~~ 269**, XS73**	2014	Endorse
Starch sodium octenyl succinate	1450	50000 mg/kg	~~239,~~ 269**, XS73, B74**	2014	Endorse
Tartrates	334, 335(ii), 337	5000 mg/kg	45, ~~364,~~ XS73, 428	2018	Endorse
Thaumatin	957	GMP	**XS73, XS74**	Step 4	Maintain at Step 4
Tocopherols	307a, b, c	300 mg/kg	15	2018	For information

					purposes only
Tricalcium citrate	333(iii)	GMP	~~239~~**XS73**	2015	Endorse
Tripotassium citrate	332(ii)	GMP	~~239~~**XS73**	2013	Endorse
Trisodium citrate	331(iii)	5000 mg/kg	238, ~~240,~~ 319, 320	2015	Endorse
Xanthan gum	415	10000 mg/kg	~~239,~~ 273**, XS73**	2014	Endorse
Xylitol	967	GMP	**XS73, XS74**	Step 7	Maintain at Step 7

Proposed notes to the GSFA

XS73: Excluding products conforming to the Standard for Canned Baby Foods (CXS 73-1981).

XS74: Excluding products conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981).

269: Singly or in combination**: INS 1404, 1410, 1412, 1413, 1414, 1420, 1422, 1450 and 1451** ~~with other modified starches used as thickeners~~ in products conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981).

270: For use at 60 000 mg/kg, singly or in combination**: INS 1412, 1413, 1414, 1422 and 1440** ~~with other starch thickeners~~ in products conforming to the Standard for Canned Baby Foods (CXS 73-1981).

A74: For use as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) at 10 mg/kg.

B74: For use as a nutrient carrier in a raw material or other ingredient used to produce the foods conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) at 100 mg/kg.

C74: For use as a nutrient carrier in coating of nutrient preparations containing polyunsaturated fatty acids used to produce the foods conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) at 75 mg/kg.

Food category 13.3 Dietetic foods intended for special medical purposes (excluding products of food category 13.1):					
Additive	**INS**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
Acesulfame potassium	950	500 mg/kg	188**, A**	2007	Endorse
Advantame	969	10 mg/kg	**A**	Step 2	Maintain at Step 2
Allura red ac	129	50 mg/kg	**A**	2009	Endorse
Annatto extracts, bixin-based	160b(i)	20 mg/kg	8**, A**	Step 4	Maintain at Step 4
Annatto extracts, norbixin-based	160b(ii)	10 mg/kg	185**, A**	Step 4	Maintain at Step 4
Ascorbyl esters	**304, 305**	**10 mg/kg**	**187, B**		**Adopt**
Aspartame	951	1000 mg/kg	191**, A**	2007	Endorse
Aspartame-acesulfame salt	962	500 mg/kg	113**, A**	2012	Endorse
Azorubine (carmoisine)	122	50 mg/kg	**A**	Step 7	Maintain at Step 7
Benzoates	210-213	1500 mg/kg	13**, A**	2003	Endorse
Brilliant black (black PN)	151	50 mg/kg	**A**	Step 7	Maintain at Step 7
Brilliant blue FCF	133	50 mg/kg	**A**	2005	Endorse
Brown HT	155	50 mg/kg	**A**	Step 7	Maintain at Step 7
Caramel II – sulfite	150b	20000 mg/kg	**A**	Step 4	Maintain at Step 4
Caramel III - ammonia caramel	150c	20000 mg/kg	**A**	2010	Endorse
Caramel IV - sulfite ammonia caramel	150d	20000 mg/kg	**A**	2009	Endorse
Carmines	120	50 mg/kg	178**, A**	2005	Endorse
Carotenal, beta-apo-8'-	**160e**	**50 mg/kg**	**A**		**Pending until the discussion on this provision is finalize**
Carotenes, beta-, vegetable	160a(ii)	600 mg/kg	**A**	2005	**Pending until the discussion on this provision is finalize**
Carotenoids	160a(i),a(iii),**a(iv)**~~e,f~~	50 mg/kg	**A**	2009	**Pending until the discussion on this provision is finalize**
Curcumin	100(i)	50 mg/kg	**A**	Step 7	Maintain at Step 7
Cyclamates	952(i), (ii), (iv)	400 mg/kg	17**, A**	2007	Endorse
Diacetyltartaric and fatty acid esters of glycerol	472e	5000 mg/kg	**A**	2005	Endorse
Grape skin extract	163(ii)	250 mg/kg	181**, A**	2009	Endorse
Indigotine (Indigo carmine)	132	50 mg/kg	**A**	2009	Endorse
Lutein from tagetes erecta	161b(i)	50 mg/kg	**A**	Step 4	Maintain at Step 4
Neotame	961	33 mg/kg	**A**	2007	Endorse
Phosphates	338; 339(i)-(iii);	2200 mg/kg	33**, A**	2009	Endorse

	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				
Polydimethylsiloxane	900a	50 mg/kg	A	2004	Endorse
Polyglycerol esters of fatty acids	475	1000 mg/kg	A	2018	Endorse
Polysorbates	432-436	1000 mg/kg	A	2005	Endorse
Ponceau 4R (cochineal red a)	124	50 mg/kg	A	2008	Endorse
Propylene glycol alginate	405	1200 mg/kg	A	2018	Endorse
Propylene glycol esters of fatty acids	477	5000 mg/kg	A	2001	Endorse
Quinoline yellow	104	50 mg/kg	A	Step 7	Maintain at Step 7
Riboflavins	101(i),(ii), (iii)	300 mg/kg	A	2005	Endorse
Saccharins	954(i)-(iv)	200 mg/kg	A	2007	Endorse
Sorbates	200, 202, 203	1500 mg/kg	42, A	2009	Endorse
Sorbitan esters of fatty acids	491-495	1000 mg/kg	A	2018	Endorse
Stearoyl lactylates	481(i), 482(i)	2000 mg/kg	A	2018	Endorse
Steviol glycosides	960a, b, c, d	350 mg/kg	26, A	2011	Endorse
Sucralose (trichlorogalactosucrose)	955	400 mg/kg	A	2007	Endorse
Sucrose esters	473, 473a, 474	5000 mg/kg	A	2021	Endorse
Sunset yellow FCF	110	50 mg/kg	A	2008	Endorse
Tartrazine	102	50 mg/kg	A	Step 7	Maintain at Step 7
Tocopherols	307a, b, c	50 mg/kg	C	2018	Endorse
Zeaxanthin, synthetic	161h(i)	50 mg/kg	A	Step 4	Maintain at Step 4

Proposed notes to the GSFA

A: Excluding products conforming to the Guidelines for Ready to Use Therapeutic Foods (CXG XX-XXXX).

B: For use in products conforming to the Guidelines for Ready to Use Therapeutic Foods (CXG XX-XXXX).

C: For use of Tocopherol concentrate, mixed (INS 307b) only in products conforming to the Guidelines for Ready to Use Therapeutic Foods (CXG XX-XXXX) at 10 mg/kg.

Food category 13.4 Dietetic formulae for sliming purposes and weight reduction

No changes to the GSFA Table 2 are proposed.

Both *Standard for Formula Foods for Use in Weight Control Diets* (CXS 181-1991) and *Standard for Formula Foods for Use In Very Low Energy Diets For Weight Reduction* (CXS 203-1995) are corresponds to Food category 13.4 of the GSFA. Both of the standards permit food additives listed in FC 13.4 of the GSFA and those of Table 3.

C. PROPOSED AMENDMENTS TO TABLE 3

INS No	Additive	Functional class	Year Adopted	Specific allowance in the following commodity standards
300	Ascorbic acid, L-	Acidity regulator, Antioxidant, Flour treatment agent, Sequestrant	1999	CS 88-1981, CS 89-1981, CS 96-1981, CS 97-1981, CS 98-1981, CS 13-1981, CS 57-1981, CS 302-2011 CS 249-2006**, CG XX-XXXX** CS 319-2015 ~~(acidity regulator in general and~~ as antioxidant in canned pineapple~~ and canned mangoes)~~, CS 249-2008, CS 251-2006, CS 273-1968
290	Carbon dioxide	Carbonating agent, Foaming agent, Packaging gas, Preservative, Propellant	1999	CS 221-2001(for whipped products only), CS 275-1973), **CG XX-XXXX**
330	Citric acid	Acidity regulator, Antioxidant, Colour retention agent, Sequestrant	1999	CS 87-1981, CS 105-1981, CS 141-1983, CS 13-1981, CS 57-1981, CS 37-1991, CS 70-1981, CS 90-1981, CS 94-1981, CS 119-1981, CS 302-2011, CS 249-2006, CS 221-2001, CS 273-1968, CS 275-1973**, CG XX-XXXX**
472c	Citric and fatty acid esters of glycerol	Antioxidant, Emulsifier, Flour treatment agent, Sequestrant, Stabilizer	1999	CS 275-1973 **CG XX-XXXX (For use at 9000 mg/kg as emulsifier)**
414	Gum Arabic (Acacia gum)	Bulking agent, Carrier, Emulsifier, Glazing agent, Stabilizer, Thickener	1999	CS 87-1981, CS 105-1981, CS 249-2006 **CG XX-XXXX (For use at 10 mg/kg as carrier)**
322(i)	Lecithin	Antioxidant, Emulsifier	1999	CS 87-1981, CS 105-1981, CS 141-1983, CS 249-2006 **CG XX-XXXX (For use at 5000 mg/kg as emulsifier)**
421	Mannitol	Anticaking agent, Bulking agent, Humectant, Stabilizer, Sweetener, Thickener	1999	CS 87-1981, CS 105-1981 **CG XX-XXXX (For use at 10 mg/kg as carrier), (For use in vitamin B_{12} dry rubbing, 0.1% only)**
471	Mono- and di-glycerides of fatty acids	Antifoaming agent, Emulsifier, Glazing agent, Stabilizer	1999	CS 87-1981, CS 105-1981, CS 141-1983, CS 249-2006, CS 251-2006, CS 275-1973, **CG XX-XXXX (For use at 4000 mg/kg as emulsifier)**
941	Nitrogen	Foaming agent, Packaging gas, Propellant	1999	CS 221-2001(for whipped products only), CS 275-1973), **CG XX-XXXX**
551	Silicon dioxide, amorphous	Anticaking agent, Antifoaming agent, Carrier	1999	CS 105-1981, CS 251-2006, **CG XX-XXXX (For use at 10 mg/kg as carrier)**

301	Sodium ascorbate	Antioxidant	1999	CS 88-1981, CS 89-1981, CS 96-1981, CS 97-1981, CS 98-1981, CS 251-206, CS 275-1973, **CG XX-XXXX (For use in coating of nutrient preparations containing polyunsaturated fatty acids at 75 mg/kg)**
1450	Starch sodium octenyl succinate	Emulsifier, Stabilizer, Thickener	1999	CS 249-2006 **CG XX-XXXX (For use at 100 mg/kg as carrier)**

D. PROPOSED AMENDMENTS TO REFERENCES TO COMMODITY STANDARDS FOR GSFA TABLE 3 ADDITIVES

13.3	**Dietetic foods intended for special medical purposes (excluding products of food category 13.1)**
	Only certain Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to these standards.
Codex Guideline	Guidelines for Ready to Use Therapeutic Foods (CXG XX-XXXX)

13.4	**Dietetic formulae for sliming purposes and weight reduction**
	Food additives listed in Table 3 are acceptable for use in foods conforming to the standard.
Codex Standard	Formula foods for use in weight control diets (CXS 181-1991) Formula foods for use in very low energy diets for weight reduction (CXS 203-1995)

Appendix 10

PROPOSED AMENDMENTS TO THE GSFA DUE TO:

CXS 325R-2017 *REGIONAL STANDARD FOR UNREFINED SHEA BUTTER* (FC 02.1.2) CCAFRICA

CXS 40R-1981 *REGIONAL STANDARD FOR CHANTERELLES* (FC 04.2.1.1) CCEURO CXS 325R-2017

Some comments coming out of CCFA52 regarding future work by the EWG on the GSFA are provided, relating to carotenoids and mono- and di-glycerides of fatty acids (INS 471).

CXS 325R-2017

PROPOSED AMENDMENTS TO TABLE 1

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, 508, 509, XS33, XS210, **XS325R**	2021	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, 511, XS33, **XS325R**	2021	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, **XS325R**	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, 511, 515, XS33, **XS325R**	2021	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, 511, 515, XS33, **XS325R**	2021	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, **XS325R**	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	509, 517, XS33, XS210, **XS325R**	2021	**Pending, waiting decision EWG GSFA on carotenoids, post CCFA52[19]**

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	508, 509, XS33, XS210, **XS325R**	2021	**Pending, waiting decision EWG GSFA on carotenoids, post CCFA52[1]**

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, **XS325R**	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, 511, XS33, **XS325R**	2021	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	511, 520, XS33, **XS325R**	2021	Adopt

Curcumin: **INS: 100(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	508, 509, XS33, XS210, **XS325R**	2021	Adopt

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**

[19] REP21/FA, para 60

02.1.2	Vegetable oils and fats	10000 mg/kg	XS19, XS33, XS210, **XS325R**	2021	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, **XS325R**	2021	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	511, 520, XS33, **XS325R**	2021	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	511, 519, XS33, **XS325R**	2021	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, **XS325R**	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**	**511, 524, XS33, ~~XS210~~, XS325R**		**Hold, post CCFA52 discussion CCFO re technological justification and use in CXS210[20]**

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	511, 524, XS33, **XS325R**	2021	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	20000 mg/kg	**XS325R**	Step 7	Maintain at step 7,

[20] REP21/FA, para 134

					Being considered at CCFA53

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[1], **XS325R**	2021	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, 511, 515, X33[1], **XS325R**	2021	Adopt

Propylene glycol esters of fatty acids: **INS: 477 Functional class: Emulsifier**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
02.1.2	Vegetable oils and fats	10000 mg/kg	XS19, XS33, XS210[1], **XS325R**	2021	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	511, XS33[1], **XS325R**	2021	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	10000 mg/kg	**XS325R**	Step 7	Maintain at step 7, Being considered at CCFA53

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	3000 mg/kg	**XS325R**	Step 7	Maintain at step 7, Being considered at CCFA53

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[1], **XS325R**	2021	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, 511, 515, XS33, **XS325R**	2021	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, 511, XS33, **XS325R**	2021	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	357, 511, **XS325R**	2021	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	511, XS33, **XS325R**	2021	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	511, XS33, **XS325R**	2021	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	511, XS33, **XS325R**	2021	Adopt

PROPOSED AMENDMENTS TO TABLE 2

Food category 02.1.2 Vegetable oils and fats					
Additive	**INS**	**Max Level**	**Notes**	**Year Adopted**	**Recommendation**
Annatto extracts, bixin based	160b(i)	10 mg/kg	8, 508, 509, XS33, XS210, **XS325R**	2021	Adopt
Ascorbyl esters	304, 305	500 mg/kg	10, 511, XS33, **XS325R**	2021	Adopt
Beet red	162	GMP	XS19, XS33, XS210, **XS325R**	2021	Maintain at step 7
Butylated hydroxyanisole	320	200 mg/kg	15, 130, 511, 515, XS33, **XS325R**	2021	Adopt

Butylated hydroxytoluene	321	200 mg/kg	15, 130, 511, 515, XS33, **XS325R**	2021	Adopt
Caramel II - sulfite caramel	150b	20000 mg/kg	XS19, XS33, XS210, **XS325R**		Maintain at step 4
Carotenes, beta-, vegetable	160a(ii)	1000 mg/kg	509, 517, XS33, XS210, **XS325R**	2021	**Pending, waiting decision EWG GSFA on carotenoids, post CCFA52[1]**
Carotenoids	160a(i), a(iii), e, f	25 mg/kg	508, 509, XS33, XS210, **XS325R**	2021	**Pending, waiting decision EWG GSFA on carotenoids, post CCFA52[1]**
Chlorophylls	140	GMP	XS19, XS33, XS210, **XS325R**		Maintain at step 7
Citric acid	330	GMP	15, 511, XS33, **XS325R**	2021	Adopt
Citric and fatty acid esters of glycerol	472c	100 mg/kg	511, 520, XS33, **XS325R**	2021	Adopt
Curcumin	100(i)	5 mg/kg	508, 509, XS33, XS210, **XS325R**	2021	Adopt
Diacetyltartaric and fatty acid esters of glycerol	472e	10000 mg/kg	XS19, XS33, XS210, **XS325R**	2021	Adopt
Guaiac resin	314	1000 mg/kg	XS19, XS33, XS210, **XS325R**	2021	Adopt
Isopropyl citrates	384	200 mg/kg	511, 520, XS33, **XS325R**	2021	Adopt
Lecithin	322(i)	GMP	511, 519, XS33, **XS325R**	2021	Adopt
Lycopene, tomato	160d(ii)	50000 mg/kg	XS19, XS33, XS210, **XS325R**	Step 3	Maintain at step 3
Mono- and di-glycerides of fatty acids	**471**	**GMP**	**511, 524, XS33, ~~XS210,~~ XS325R**		**Hold, post CCFA52 discussion CCFO re technological justification and use in CXS210[2]**
Polydimethylsiloxane	900a	10 mg/kg	511, 524, XS33, **XS325R**	2021	Adopt
Polyglycerol esters of fatty acids	475	20000 mg/kg	**XS375R**	Step 7	Maintain at step 7, Being considered at CCFA53
Polysorbates	432-436	5000 mg/kg	102, XS19, XS33, XS210, **XS325R**	2021	Adopt
Propyl gallate	310	200 mg/kg	15, 130, 511, 515, XS33, **XS325R**	2021	Adopt

Propylene glycol esters of fatty acids	477	10000 mg/kg	XS19, XS33, XS210[1], **XS325R**	2021	Adopt
Sodium dihydrogen citrate	331(i)	GMP	511, XS33[1], **XS325R**	2021	Adopt
Sorbitan esters of fatty acids	491-495	10000 mg/kg	**XS375R**	Step 7	Maintain at step 7, Being considered at CCFA53
Stearoyl lactylates	481(i), 482(i)	3000 mg/kg	**XS375R**	Step 7	Maintain at step 7, Being considered at CCFA53
Stearyl citrate	484	GMP	XS19, XS33, XS210[1], **XS325R**	2021	Adopt
Tertiary butylhydroquinone	319	200 mg/kg	15, 130, 511, 515, XS33[1], **XS325R**	2021	Adopt
Thiodipropionates	388, 389	200 mg/kg	46, 511, XS33[1], **XS325R**	2021	Adopt
Tocopherols	307a, b, c	300 mg/kg	357, 511[1], **XS325R**	2021	Adopt
Tricalcium citrate	333(iii)	GMP	511, XS33[1], **XS325R**	2021	Adopt
Tripotassium citrate	332(ii)	GMP	511, XS33[1], **XS325R**	2021	Adopt
Trisodium citrate	331(iii)	GMP	511, XS33[1], **XS325R**	2021	Adopt

Footnotes

1. REP21/FA, para 60
2. REP21/FA, para 134

NOTES

XS325R **Excluding products conforming to the *Regional Standard for Unrefined Shea Butter* (CXS 325R-2017).**

508 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

509 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).

511 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).

515 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.

517 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.

519 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 antioxidant only.

520 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.

524 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.

CXS 40R-1981

PROPOSED AMENDMENTS TO TABLE 1

Food Category No. 04.2.1.1 Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds

Acetic acid, glacial: **INS: 260 Functional class: Acidity regulator, Preservative**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.1.1	Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	GMP	262, 263**, XS40R**	2013	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**
04.2.1.1	Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	500 mg/kg	262**, XS40R**	2013	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**
04.2.1.1	Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	GMP	262, 264**, XS40R**	2013	Adopt

Lactic acid, L-, D- and DL-: **INS: 270 Functional class: Acidity regulator**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.1.1	Untreated fresh vegetables	GMP	262, 264**, XS40R**	2013	Adopt

	(including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds				

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**
04.2.1.1	Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	GMP	262**, XS40R**	2015	Adopt

Trisodium citrate: **INS: 331(iii) Functional class: Acidity regulator, Emulsifying salt, Firming agent, Sequestrant, Stabilizer**					
Food Category No	**Food Category**	**Max level**	**Notes**	**Step/Year Adopted**	**Recommendation**
04.2.1.1	Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	GMP	262**, XS40R**	2015	Adopt

PROPOSED AMENDMENTS TO TABLE 2

Food category 04.2.1.1 Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds					
Additive	**INS**	**Max Level**	**Notes**	**Year Adopted**	**Recommendation**
Acetic acid, glacial	260	GMP	262, 263**, XS40R**	2013	Adopt
Ascorbic acid, L-	300	500 mg/kg	262**, XS40R**	2013	Adopt
Citric acid	330	GMP	262, 264**, XS40R**	2013	Adopt
Lactic acid, L-, D- and DL-	270	GMP	262, 264**, XS40R**	2013	Adopt
Sodium dihydrogen citrate	331(i)	GMP	262**, XS40R**	2015	Adopt
Trisodium citrate	331(iii)	GMP	262**, XS40R**	2015	Adopt

NOTES

XS40R Excluding products conforming to the *Regional Standard for Chanterelles* (CXS 40R-2017).

PROPOSED AMENDMENTS TO TABLE 3

No changes are required to Table 3 due to alignment of the two commodity standards since the relevant food categories (02.1.2 and 04.2.1.1) are captured by 02.1 and 04.2.1, which are both included in the Annex to Table 3. This requires that use of any food additives listed in Table 3 are governed by provisions in Tables 1 & 2.