

codex alimentarius commission E



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 5(c)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-second Session

Beijing, China, 15-19 March 2010

COMMENTS AND INFORMATION ON THE REPORTING BASIS OF THE PROVISIONS FOR ALUMINIUM CONTAINING FOOD ADDITIVES INCLUDED IN THE GSFA (REPLIES TO CL 2009/10-FA)

The following comments have been received from the following Codex members and observers:

Japan, Mexico, CEFS, ICBA, ICGMA, IDF and IFAC

JAPAN

Japan pleased to provide the following information on reporting basis of the provision for aluminium ammonium sulphate (INS 523).

ALUMINIUM AMMONIUM SULFATE

Aluminium ammonium sulfate INS: 523

Function: firming agent, raising agent, stabilizer

Food Cat No	Food Category	Max Level	Unit	Notes	Step / Year of Adoption	Reporting basis (as aluminium)
01.1.2	Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey- based drinks)	350	mg/kg	6	3	
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	150	mg/kg	6	3	
04.1.2.7	Candied fruit	200	mg/kg	6	2001	
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce	500	mg/kg	6	3	
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce	35	mg/kg	6	2003	
04.2.2.6	Vegetable (including mushrooms and fungi, roots and tubers, pulses	200	mg/kg	6	2001	

Food Cat No	Food Category	Max Level	Unit	Notes	Step / Year of Adoption	Reporting basis (as aluminium)
	and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5					
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	6	3	
06.2	Flours and starches (including soybean powder)	500	mg/kg	6	3	
06.2.2	Starches		GMP	6 & 26	6	
06.4.1	Fresh pastas and noodles and like products	470	mg/kg	6	3	Used at 270mg Al/kg in starch noodles (kuzukiri) as firming agent Max Level Unit proposal : 300mg Al/kg
06.4.2	Dried pastas and noodles and like products					Used at 270mg Al/kg in starch noodles (kuzukiri) as firming agent Max Level Unit proposal : 300mg Al/kg
06.6	Batters (e.g., for breading or batters for fish or poultry)					Used at 20mg Al/kg in "tempura" mixes as raising agent Max Level Unit proposal : 100mg Al/kg
07.1.2	Crackers, excluding sweet crackers	10000	mg/kg	29	3	Used at 5mg Al/kg in crackers as raising agent Max Level Unit proposal : 10mg Al/kg
07.1.3	Other ordinary bakery products (e.g., bagels, pita, English muffins)	10000	mg/kg	29	3	Used at 780mg Al/kg in American biscuits as raising agent Max Level Unit proposal : 900mg Al/kg
07.1.5	Steamed breads and buns	10000	mg/kg	29	3	Used at 300mg Al/kg in steamed breads and buns as raising Agent Max Level Unit proposal : 1000mg Al/kg
07.2	Fine bakery wares (sweet, salty, savoury) and mixes	10000	mg/kg	29	3	Used at 600mg Al/kg in scones and pancake mixes, at 1200mg Al/kg in Corn dogs as raising agent Max Level Unit proposal : 1300mg Al/kg
08.3.2	Heat-treated processed comminuted meat, poultry, and game products	5	mg/kg	6	3	

Food Cat No	Food Category	Max Level	Unit	Notes	Step / Year of Adoption	Reporting basis (as aluminium)
09.1.2	Fresh molluscs, crustaceans and echinoderms					Used at 230mg Al/kg in fresh sea urchins as firming agent Max Level Unit proposal : 300mg Al/kg
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	1500	mg/kg	6	3	
09.2.4	Cooked and/or fried fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	6	2001	Used at 40mg Al/kg in boiled octopuses as firming agent Max Level Unit proposal : 50mg Al/kg
09.3	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	1500	mg/kg	6	3	Used at 1200mg Al/kg in salted jelly fishes as firming agent Max Level Unit proposal : 1500mg Al/kg
10.2	Egg products	30	mg/kg	6	2001	
10.4	Egg-based desserts (e.g., custard)	380	mg/kg	6	2003	
12.2	Herbs, spices, seasonings and condiments (e.g., seasoning for instant noodles)	500	mg/kg	6	3	
15.1	Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	500	mg/kg	6	3	

(as aluminium mg/kg)

MEXICO**Aluminium silicate**

Aluminium silicate INS 559

Function: processing aid, anticaking agent

Food cat n.	Food category	Maximum level	Notes	Step/adoption year	Reporting basis
	Decorations (e.g., for fine bakery wares), toppings (non-fruit), and sweet sauces	GMP	3,6 & 174	3	GMP
06.1	Whole, broken, or flaked grain, including rice	GMP		6	GMP
07.1.6	Mixes for bread and bakery wares	10000 mg/kg	6 & 174	3	GMP
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000 mg/kg	6 & 174	3	GMP
12.2.2	Seasonings and condiments	30000 mg/kg	6 & 174	3	GMP

Calcium aluminium silicate

Calcium aluminium silicate INS 556

Function: anticaking agent

Food cat n.	Food category	Maximum level	Notes	Step/adoption year	Reporting basis
06.1	Whole, broken, or flaked grain, including rice	GMP		6	GMP
07.1.6	Mixes for bread and bakery wares	10000 mg/kg	6 & 174	3	GMP
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000 mg/kg	6 & 174	3	GMP
12.1.1	Salt	20000 mg/kg	6	3	20000 mg/kg

12.2.2	Seasonings and condiments	30000 mg/kg	6 & 174	3	GMP
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Sodium aluminium phosphates

Sodium aluminium phosphate INS 541(i) Sodium aluminium phosphate (basic) INS 541(ii)

Functions: acidity regulator, emulsifier, raising agent, stabilizer, thickening agent

Food cat n.	Food category	Maximum level	Notes	Step/adoption year	Reporting basis
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	20000 mg/kg	6	6	10000 mg/kg
07.1	Bread and ordinary bakery wares	20000 mg/kg	6	6	10000 mg/kg
07.2.2	Other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	20000 mg/kg	6 & 174	6	10000 mg/kg
09.2.2	Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	190 mg/kg	6 & 41	6	10000 mg/kg

Sodium aluminosilicate

Sodium aluminosilicate INS 554

Function: anticaking agent

Food cat n.	Food category	Maximum level	Notes	Step/adoption year	Reporting basis
06.1	Whole, broken, or flaked grain, including rice	GMP		6	GMP
06.3	Breakfast cereals, including rolled oats	20000 mg/kg	6	3	GMP
06.4.3	Pre-cooked pastas and noodles and like products	20000 mg/kg	6	3	GMP
06.5	Cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	20000 mg/kg	6	3	GMP
06.6	Batters (e.g., for breading or batters for fish or poultry)	20000 mg/kg	6	3	GMP
07.1.6	Mixes for bread and bakery wares	10000 mg/kg	6 & 174	3	GMP
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000 mg/kg	6	3	GMP
12.1.1	Salt	20000 mg/kg	6	3	20000 mg/kg

CEFS (Comité Européen des Fabricants de Sucre)

In response to Codex' circular letter CL 2009/10-FA, CEFS, on behalf of all European sugar producers, would like to present comments on the reporting basis of the provisions for aluminium-containing food additives permitted for use in category 11.1.2. *Powdered sugar, powdered dextrose.*

The Codex Standard for Sugars 212-1999 (rev. 2001) presently authorizes the use of two aluminium-containing anti-caking agents - namely calcium aluminosilicate (INS 556) and sodium aluminosilicate (INS 554) - in the food category 11.1.2 *Powdered sugar, powdered dextrose* at a maximum level of 15000 mg/kg, singly or in combination, provided that starch is not present. In the EU, the use of these two compounds is permitted at a maximum level of 10000 mg/kg in dried powdered foodstuffs, including sugars (Directive (EC) 95/2).

CEFS generally supports the review of maximum use levels for aluminium-containing food additives as well as CCFA's intention to lower the maximum use level of sodium aluminium silicate (INS 554) and calcium aluminium silicate (INS 556) in category 11.1.2. The **revised maximum use level of both additives - used singly or in combination - in category 11.1.2 Powdered sugar, powdered dextrose should be 10000mg/kg**, which is in line with European law.

Maximum use levels for sodium aluminium silicate (INS 554) and calcium aluminium silicate (INS 556) are calculated on a **molecular weight basis** and not as aluminium. CEFS would recommend maintaining this calculation. Consequently, **note 6: "As aluminium" should be deleted** from all occurrences of category 11.1.2 *Powdered sugar, powdered dextrose*. On the other hand and according to the Codex Standard for Sugars, **note 56: "Provided starch is not present" should be added** to all occurrences of category 11.1.2 *Powdered sugar, powdered dextrose*.

Aluminium ammonium sulfate

Aluminium ammonium sulfate INS: 523

Function: firming agent, raising agent, stabilizer

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.1.2	Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	350	mg/kg	6	3	
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	150	mg/kg	6	3	
04.1.2.7	Candied fruit	200	mg/kg	6	2001	
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce	500	mg/kg	6	3	
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce	35	mg/kg	6	2003	
04.2.2.6	Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg	6	2001	
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	6	3	
06.2	Flours and starches (including soybean powder)	500	mg/kg	6	3	
06.2.2	Starches		GMP	6 & 26	6	
06.4.1	Fresh pastas and noodles and like products	470	mg/kg	6	3	
07.1.2	Crackers, excluding sweet crackers	10000	mg/kg	29	3	
07.1.3	Other ordinary bakery products (e.g., bagels, pita, English muffins)	10000	mg/kg	29	3	
07.1.4	Bread-type products, including bread stuffing and bread crumbs	10000	mg/kg	29	3	
07.1.5	Steamed breads and buns	10000	mg/kg	29	3	
07.1.6	Mixes for bread and ordinary bakery wares	10000	mg/kg	6	3	
07.2	Fine bakery wares (sweet, salty, savoury) and mixes	10000	mg/kg	29	3	
08.3.2	Heat-treated processed comminuted meat, poultry, and game products	5	mg/kg	6	3	
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	1500	mg/kg	6	3	
09.2.4	Cooked and/or fried fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	6	2001	
09.3	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	1500	mg/kg	6	3	
10.2	Egg products	30	mg/kg	6	2001	
10.4	Egg-based desserts (e.g., custard)	380	mg/kg	6	2003	
12.2	Herbs, spices, seasonings and condiments (e.g., seasoning for instant noodles)	500	mg/kg	6	3	
15.1	Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	500	mg/kg	6	3	

Aluminium silicate

Aluminium silicate INS: 559

Function: adjuvant, anticaking agent

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.5	Milk powder and cream powder and powder analogues (plain)	10000	mg/kg	6 & 174	3	
01.6.1	Unripened cheese	10000	mg/kg	6	3	
01.6.2.1	Ripened cheese, includes rind	10000	mg/kg	6, 174 & 177	3	
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000	mg/kg	6 & 174	3	
01.6.4	Processed cheese	10000	mg/kg	6, 174 & 177	3	
01.6.5	Cheese analogues	10000	mg/kg	6, 174 & 177	3	
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	10000	mg/kg	6 & 174	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg	6 & 174	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg		2006	
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4		GMP	3, 6 & 174	3	
05.3	Chewing gum		GMP	3, 6 & 174	3	
05.4	Decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces		GMP	3, 6 & 174	3	
06.1	Whole, broken, or flaked grain, including rice		GMP		6	
07.1.6	Mixes for bread and ordinary bakery wares	10000	mg/kg	6 & 174	3	
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000	mg/kg	6 & 174	3	
08.3	Processed comminuted meat, poultry, and game products		GMP	6, 174 & 179	3	
08.4	Edible casings (e.g., sausage casings)		GMP	3, 6 & 174	3	
12.1.1	Salt	10000	mg/kg	6	3	
12.1.2	Salt Substitutes	10000	mg/kg		6	
12.2.1	Herbs and spices		GMP	51	3	
12.2.2	Seasonings and condiments	30000	mg/kg	6 & 174	3	
12.5.2	Mixes for soups and broths	10000	mg/kg	6 & 174	3	
12.6.3	Mixes for sauces and gravies	10000	mg/kg	6 & 174	3	
13.6	Food supplements		GMP	6 & 174	3	

Calcium aluminium silicate

Calcium aluminium silicate INS: 556

Function: anticaking agent

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.5	Milk powder and cream powder and powder analogues (plain)	10000	mg/kg	6 & 174	3	
01.6.1	Unripened cheese	10000	mg/kg	6 & 174	3	
01.6.2.1	Ripened cheese, includes rind	10000	mg/kg	6, 174 & 177	3	
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000	mg/kg	6 & 174	3	
01.6.4	Processed cheese	10000	mg/kg	6, 174 & 177	3	
01.6.5	Cheese analogues	10000	mg/kg	6, 174 & 177	3	
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	10000	mg/kg	6 & 174	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	265	mg/kg	6 & 174	3	
01.8.2	Dried whey and whey products,	10000	mg/kg		2006	

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
	excluding whey cheeses					
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4		GMP	3, 6 & 174	3	
05.3	Chewing gum		GMP	3, 6 & 174	3	
05.4	Decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces		GMP	3, 6 & 174	3	
06.1	Whole, broken, or flaked grain, including rice		GMP		6	
07.1.6	Mixes for bread and ordinary bakery wares	10000	mg/kg	6 & 174	3	
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000	mg/kg	6 & 174	3	
08.3	Processed comminuted meat, poultry, and game products		GMP	6, 174 & 179	3	
08.4	Edible casings (e.g., sausage casings)		GMP	3, 6 & 174	3	
11.1.2	Powdered sugar, powdered dextrose	10000	mg/kg	56 & 174	3	Molecular weight
12.1.1	Salt	20000	mg/kg	6	3	
12.1.1	Salt		GMP		2006	
12.1.2	Salt Substitutes	10000	mg/kg		6	
12.2.2	Seasonings and condiments	30000	mg/kg	6 & 174	3	
12.5.2	Mixes for soups and broths	10000	mg/kg	6 & 174	3	
12.6.3	Mixes for sauces and gravies	10000	mg/kg	6 & 174	3	
13.6	Food supplements		GMP	6 & 174	3	
14.2.3	Grape wines		GMP		6	

Sodium aluminium phosphates

Sodium aluminium phosphate-acidic INS: 541(i) Sodium aluminium phosphate-basic INS: 541(ii)

Function: acidity regulator, emulsifier, raising agent, stabilizer, thickener

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.6.1	Unripened cheese	670	mg/kg	6	3	
01.6.4	Processed cheese	35000	mg/kg	29	6	
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	2000	mg/kg	6	6	
02.4	Fat-based desserts excluding dairy-based dessert products of food category 01.7	2000	mg/kg	6	6	
04.1.2.9	Fruit-based desserts, including fruit-flavoured water-based desserts	2000	mg/kg	6	6	
05.1.1	Cocoa mixes (powders) and cocoa mass/cake	2000	mg/kg	6 & 72	6	
05.2	Confectionery including hard and soft candy, nougats, etc other than food categories 05.1, 05.3 and 05.4	350	mg/kg	29	3	
06.2	Flours and starches (including soybean powder)	3600	mg/kg	6	3	
06.2.1	Flours	45000	mg/kg	29	6	
06.5	Cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	2000	mg/kg	6	6	
06.6	Batters (e.g., for breading or batters for fish or poultry)	1600	mg/kg	6	6	
07.1	Bread and ordinary bakery wares	2000	mg/kg	6	6	
07.2.1	Cakes, cookies and pies (e.g., fruit-filled or custard types)	2000	mg/kg	6	6	
07.2.2	Other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	2000	mg/kg	6	6	
07.2.3	Mixes for fine bakery wares (e.g.,	15300	mg/kg	29	6	

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
	cakes, pancakes)					
08.3.3	Frozen processed comminuted meat, poultry, and game products	360	mg/kg	6	3	
09.2.2	Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	190	mg/kg	6 & 41	6	
09.2.4.3	Fried fish and fish products, including mollusks, crustaceans, and echinoderms	600	mg/kg	6	3	
10.4	Egg-based desserts (e.g., custard)	2000	mg/kg	6	6	
12.5.2	Mixes for soups and broths	2000	mg/kg	6 & 127	6	
12.6.3	Mixes for sauces and gravies	2000	mg/kg	6 & 127	6	
16.0	Composite foods - foods that could not be placed in categories 01 - 15	190	mg/kg	6	6	

Sodium aluminosilicate

Sodium aluminosilicate

INS: 554

Function: anticaking agent

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.1.2	Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	20000	mg/kg	6	3	
01.3	Condensed milk and analogues (plain)	20000	mg/kg	6	3	
01.4.4	Cream analogues	20000	mg/kg	6	3	
01.5	Milk powder and cream powder and powder analogues (plain)	10000	mg/kg	6 & 174	3	
01.6.2.1	Ripened cheese, includes rind	10000	mg/kg	6, 174 & 177	3	
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000	mg/kg	6 & 174	3	
01.6.4	Processed cheese	10000	mg/kg	6, 174 & 177	3	
01.6.5	Cheese analogues	10000	mg/kg	6, 174 & 177	3	
01.8.1	Liquid whey and whey products, excluding whey cheeses	20000	mg/kg	6	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg	6 & 174	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg		2006	
04.2.2.2	Dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	20000	mg/kg	6	3	
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4		GMP	3, 6 & 174	3	
05.3	Chewing gum		GMP	3, 6 & 174	3	
05.4	Decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces		GMP	3, 6 & 174	3	
06.1	Whole, broken, or flaked grain, including rice		GMP		6	
06.3	Breakfast cereals, including rolled oats	20000	mg/kg	6	3	
06.4.3	Pre-cooked pastas and noodles and like products	20000	mg/kg	6	3	
06.5	Cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	20000	mg/kg	6	3	
06.6	Batters (e.g., for breading or batters for fish or poultry)	20000	mg/kg	6	3	

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
07.1.6	Mixes for bread and ordinary bakery wares	10000	mg/kg	6 & 174	3	
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000	mg/kg	6	3	
08.3	Processed comminuted meat, poultry, and game products		GMP	6, 174 & 179	3	
08.4	Edible casings (e.g., sausage casings)		GMP	3, 6 & 174	3	
11.1.2	Powdered sugar, powdered dextrose	10000	mg/kg	56 & 174	3	Molecular weight
12.1.1	Salt	20000	mg/kg	6	3	
12.1.1	Salt		GMP		2006	
12.1.2	Salt Substitutes	10000	mg/kg		6	
12.2.2	Seasonings and condiments	30000	mg/kg	6 & 174	3	
12.5.2	Mixes for soups and broths	10000	mg/kg	6 & 174	3	
12.6.3	Mixes for sauces and gravies	10000	mg/kg	6 & 174	3	
13.6	Food supplements		GMP	6 & 174	3	
14.1.4.3	Concentrates (liquid or solid) for water-based flavoured drinks	10000	mg/kg	6 & 174	3	
15.1	Snacks- potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	120	mg/kg	6	3	

Notes:

Note 3: Surface treatment.

Note 6: As aluminium.

Note 26: For use in baking powder only.

Note 29: Reporting basis not specified.

Note 41: Use in breading or batter coatings only.

Note 51: For use in herbs only.

Note 56: Provided starch is not present.

Note 72: Ready-to-eat basis.

Note 127: As served to the consumer.

Note 174: Singly or in combination: sodium aluminium silicate (INS 554), calcium aluminium silicate (INS 556), and aluminium silicate (INS 559).

Note 177: For use in sliced, cut, shredded, or grated cheese only.

Note 179: For use in surface treatment of sausages.

ICBA (International Council of Beverages Associations)**Sodium aluminosilicate**

Sodium aluminosilicate

INS: 554

Function: anticaking agent

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
14.1.4.3	Concentrates (liquid or solid) for water-based flavoured drinks	10000	mg/kg	6 & 174	3	This level is not reported as aluminium so Note 6 should be removed. Sodium aluminosilicate is a series of hydrated sodium aluminum silicates having Na ₂ O:Al ₂ O ₃ :SiO ₂ molar ratios of approximately 1:1:13. If calculated as aluminium, 10000 mg/kg would be 572 mg/kg* as aluminium in the powder not including the dilution factor. Thus, the level as consumed would be considerably lower. We also believe that actual use levels in those powdered beverage concentrates in which this additive is being used are

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
						much lower than the proposed maximum level.

*The calculation used above: For 1000 mg/kg sodium aluminosilicate

$(27.0 \text{ g/mol Al}) / (945.3 \text{ g/mol sodium aluminosilicate}) \times (1000 \text{ mg/kg sodium aluminosilicate}) \times 2 \text{ mol Al}] = [0.0286 \times (1,000 \text{ mg/kg sodium aluminosilicate}) \times 2] = 57.2 \text{ mg/kg as Al}$

Notes:

Note 6: As aluminium.

Note 127: As served to the consumer.

Note 174: Singly or in combination: sodium aluminium silicate (INS 554), calcium aluminium silicate (INS 556), and aluminium silicate (INS 559).

ICGMA (the International Council of Grocery Manufacturers Associations)

ICGMA appreciates the opportunity to respond to and is pleased to provide the following comments on the document CL 2009/10-FA.

JECFA recently set a group Provisional Tolerable Weekly Intake (PTWI) of 7 mg/kg,bw for Aluminium-Containing Food Additives. ICGMA elaborates below on the reporting basis for existing provisions that are in the Step process.

(i) Sodium Aluminium Phosphate-acidic (INS 541(i); Function: aciditivy regulator, emulsifier, raising agent, stabilizer, thickener)

Either $\text{NaAl}_3\text{H}_{14}(\text{PO}_4)_8 \cdot 4\text{H}_2\text{O}$ of MW 949.88 OR $\text{Na}_3\text{Al}_2\text{H}_{15}(\text{PO}_4)_8$ of MW 897.82 – each mg of the precipitate so obtained corresponds to either 0.689 mg of $\text{NaAl}_3\text{H}_{14}(\text{PO}_4)_8 \cdot 4\text{H}_2\text{O}$ or 0.977 mg of $\text{Na}_3\text{Al}_2\text{H}_{15}(\text{PO}_4)_8$, respectively.

Food Cat. No.	Food Category Name	Max Level		Comm ents	Step	Comments to CCFA			
						Max Level	Comments	Justification	
07.1	Bread and ordinary bakery wares	2000	mg/kg	Note 6	6	1,000	mg/kg	Note 6	Sodium Aluminium Phosphate (acidic) is used as a leavening/raising agent to help with dough/texture formation. ML of 11,000 mg/kg on the basis of the whole compound is necessary to achieve intended function. ML on the basis of Aluminum would be 937 mg/kg. This is used in baking mixes for bread (FC 7.1.1) and pizza crust (FC 7.1.6), for example.
07.2.1	Cakes, cookies and pies (e.g., fruit-filled or custard types)	2000	mg/kg	Note 6	6	200	mg/kg	Note 6	Sodium Aluminium Phosphate (acidic) is used as a leavening/raising agent to help with dough/texture formation. ML of 2,220 mg/kg on the basis of the whole compound is necessary to achieve intended function. ML on the basis of Aluminum would be 190 mg/kg. This is used in cookies and pop-tarts.
07.2.2	Other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	2000	mg/kg	Note 6	6	1,000	mg/kg	Note 6	Sodium Aluminium Phosphate (acidic) is used as a leavening/raising agent to help with dough/texture formation. ML of 11,000 mg/kg on the basis of the whole compound is necessary to achieve intended function. ML on the basis of Aluminum would be 937 mg/kg. This is used in Muffins, French Toast, Filled Sweet Rolls, Waffles, Cinnabon, Pancakes, and baked wafers.
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	15300	mg/kg	Note 6	6	1,000	mg/kg	Note 6	Sodium Aluminium Phosphate (acidic) is used as a leavening/raising agent to help with dough/texture formation. ML of 11,000 mg/kg on the basis of the whole compound is

Food Cat. No.	Food Category Name	Max Level		Comments	Step	Comments to CCFA		
						Max Level	Comments	Justification
								necessary to achieve intended function. ML on the basis of Aluminum would be 937 mg/kg. This is used in baking mixes for Muffins, Cakes, Pancakes, for example.

Note 6: As aluminium

(ii) Sodium Aluminosilicate (INS 554; Function: anticaking agent)

($AlNa_2SiO_5$ MW 411.1 OR hydrated $Na_2O:Al_2O_3:SiO_2$ at 1:1:13 MW 945.3) To convert first one to Al, multiply by 0.0657; To convert the hydrated form to Al, multiply by 0.0572 – JECFA makes reference to the second in its specifications).

Food Cat. No.	Food Category Name	Max Level		Comments	Step	Comments to CCFA			
						Max Level	Comments	Justification	
01.1.2	Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	20000	mg/kg	Note 6	3	100	mg/kg	Note 6	Sodium aluminosilicate is used in dry mix hot chocolate at levels of 1,000 mg/kg on the basis of the whole compound and 57 mg/kg on the basis of Al.
01.3	Condensed milk and analogues (plain)	20000	mg/kg	Note 6	3	1,000	mg/kg	Note 6	Levels of 10,000 mg/kg on the basis of whole compound (or 570 mg/kg on the basis of Al) are necessary for beverage whiteners (FC 1.3.2) including non-dairy creamer powder, Coffee Whitener powder.
01.5	Milk powder and cream powder and powder analogues (plain)	10000	mg/kg	Notes 6 & 174	3	1,000	mg/kg	Note 6	Levels of 10,000 mg/kg on the basis of the whole compound (or 570 mg/kg on the basis of Al) are necessary for milk/cream powder analogues (e.g., soy oil powder) and levels of 5,000 mg/kg on the basis of the whole compound are necessary for dairy-based creamers (e.g., milk powder and cream powder)
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000	mg/kg	Notes 6 & 174	3	1,500	mg/kg	Note 6	Sodium aluminosilicate is an anti-caking agent that helps prevent components from adhering to each other. To ensure flowability for the cheese powder and to prevent clumping, a max level of 25,000 mg/kg on the basis of whole compound (or 1,425 mg/kg on the basis of Al) is being recommended.
07.1.6	Mixes for bread and ordinary bakery wares	10000	mg/kg	Notes 6 & 174	3	500	mg/kg	Note 6	Levels of use range from 0.1-0.6% (6,000 mg/kg on the basis of whole compound; or, 342 mg/kg on the basis of Al) and are necessary to prevent clumping and ensure flowability.
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000	mg/kg	Note 6	3	1,500	mg/kg	Note 6	To ensure flowability and prevent clumping, levels of 20,000 mg/kg on the basis of whole compound are necessary (or, 1,140 mg/kg on the basis of Al)
12.2.2	Seasonings and condiments	30000	mg/kg	Notes 6 & 174	3	2,000	mg/kg	Note 6	Sodium aluminosilicate is required as an anticaking agent in seasonings to prevent clumping and improving flowability. Levels of 30,000 mg/kg on the basis of whole compound are

Food Cat. No.	Food Category Name	Max Level		Comments	Step	Comments to CCFA			
						Max Level	Comments	Justification	
								necessary (or, 1,710 mg/kg on the basis of Al).	
12.5.2	Mixes for soups and broths	10000	mg/kg	Notes 6 & 174	3	1,000	mg/kg	Note 6	Sodium aluminosilicate is required as an anticaking agent in these mixes to prevent clumping and improving flowability. Levels of 10,000 mg/kg on the basis of whole compound are sufficient to carry out the intended function (or, 570 mg/kg on the basis of Al).
12.6.3	Mixes for sauces and gravies	10000	mg/kg	Notes 6 & 174	3	1,500	mg/kg	Note 6	Sodium aluminosilicate is required as an anticaking agent in these mixes to prevent clumping and improving flowability. Levels of 20,000 mg/kg on the basis of whole compound are sufficient to carry out the intended function (or, 1,140 mg/kg on the basis of Al).
15.1	Snacks- potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	120	mg/kg	Note 6	3	120	mg/kg	Note 6	Snacks frequently have seasoning mixtures applied to them to create new flavors of products. These seasonings must flow to properly adhere to the product. Sodium aluminosilicate is needed as an anticaking agent in these seasonings to prevent components from adhering to each other and then not adhering to the snack product. Necessary levels to achieve this function are at 2,000 mg/kg on the basis of whole compound (or, 114 on the basis of Al).

Note 6: As aluminium.

Note 174: Singly or in combination: sodium aluminium silicate (INS 554), calcium aluminium silicate (INS 556), and aluminium silicate (INS 559).

IDF(International Dairy Federation)

General comment:

We believe that for consistency purposes, and to allow for aluminium compounds that may be added singly or in combination, that the maximum level could be expressed based on aluminium (by the use of Note 6) subject to a review of the maximum levels proposed to reflect the change of the relevant methods of expression.

ALUMINIUM AMMONIUM SULFATE

Aluminium ammonium sulfate INS: 523

Function: firming agent, raising agent, stabilizer

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.1.2	Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	350	mg/kg	6	3	
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	150	mg/kg	6	3	

ALUMINIUM SILICATE

Aluminium silicate INS: 559

Function: adjuvant, anticaking agent

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.5	Milk powder and cream powder and powder analogues (plain)	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Authorized in the Codex Standard 207.
01.6.1	Unripened cheese	10000	mg/kg	6	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Authorized in the Codex Standard 221-2001 for sliced, cut, shredded and grated products only (surface treatment). Use as an anticaking agent in shredded cheese.
01.6.2.1	Ripened cheese, includes rind	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Authorized in the Codex Standard 283. Use as an anticaking agent in shredded cheese.
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Used as anticaking agent in any powdered product.
01.6.4	Processed cheese	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Technological justification as anticaking agent for sliced, cut, shredded and grated cheese.
01.6.5	Cheese analogues	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Technological justification as anticaking agent for sliced, cut, shredded and grated cheese. Should be consistent with other cheese standards.
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	10000	mg/kg	6 & 174	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium.
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg		2006	

CALCIUM ALUMINIUM SILICATE

Calcium aluminium silicate INS: 556

Function: anticaking agent

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.5	Milk powder and cream powder and powder analogues (plain)	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Authorized in the Codex Standard 207.
01.6.1	Unripened cheese	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium.

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
						Authorized in the Codex Standard 221. Technological justification as anticaking agent in any powdered product.
01.6.2.1	Ripened cheese, includes rind	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Authorized in the Codex Standard 283. Technological justification as anticaking agent for sliced, cut, shredded and grated cheese.
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Technological justification as anticaking agent for sliced, cut, shredded and grated cheese.
01.6.4	Processed cheese	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium.
01.6.5	Cheese analogues	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Technological justification as anticaking agent in any powdered product. Use as an anticaking agent in shredded cheese. Should be consistent with other cheese standards.
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	10000	mg/kg	6 & 174	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	265	mg/kg	6 & 174	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg		2006	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium.

SODIUM ALUMINIUM PHOSPHATES

Sodium aluminium phosphate-acidic INS: 541(i) Sodium aluminium phosphate-basic INS: 541(ii)

Function: acidity regulator, emulsifier, raising agent, stabilizer, thickener

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.6.1	Unripened cheese	670	mg/kg	6	3	IDF supports a level of 3500 mg/kg measured as P2O5. Adopted in the Codex Standard 221.
01.6.4	Processed cheese	35000	mg/kg	29	6	IDF understands the level of 35,000 mg/kg is expressed on the basis of the P2O5 content. Used as emulsifying salt
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	2000	mg/kg	6	6	

SODIUM ALUMINOSILICATE

Sodium aluminosilicate INS: 554

Function: anticaking agent

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.1.2	Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	20000	mg/kg	6	3	IDF understands the level of 20000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium.
01.3	Condensed milk and analogues (plain)	20000	mg/kg	6	3	IDF understands the level of 20000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium.
01.4.4	Cream analogues	20000	mg/kg	6	3	IDF understands the level of 20000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium.
01.5	Milk powder and cream powder and powder analogues (plain)	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Authorized in the Codex Standard 207. Used as free flowing agent.
01.6.2.1	Ripened cheese, includes rind	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Authorized in the Codex Standard 283. Used as anticaking agent in shredded cheese.
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Used as an anti-caking agent in any powdered product that helps prevent components from adhesion and enhance flowability.
01.6.4	Processed cheese	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Technological justification as anticaking agent for sliced, cut, shredded and grated cheese
01.6.5	Cheese analogues	10000	mg/kg	6, 174 & 177	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium. Technological justification as anticaking agent for sliced, cut, shredded and grated cheese
01.8.1	Liquid whey and whey products, excluding whey cheeses	20000	mg/kg	6	3	IDF understands the level of 20000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg	6 & 174	3	IDF understands the level of 10000 mg/kg is expressed on the basis of the aluminium compound and not as aluminium
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg		2006	

Notes:

Note 3: Surface treatment.

Note 6: As aluminium.

Note 26: For use in baking powder only.

Note 29: Reporting basis not specified.

Note 41: Use in breadings or batter coatings only.

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting Basis
	meat, poultry, and game products					(480 mg/kg Al)
09.2.2	Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	190	mg/kg	6 & 41	6	10000 mg/kg (800 mg/kg Al)
09.2.4.3	Fried fish and fish products, including mollusks, crustaceans, and echinoderms	600	mg/kg	6	3	10000 mg/kg (800 mg/kg Al)
10.4	Egg-based desserts (e.g., custard)	2000	mg/kg	6	6	
12.5.2	Mixes for soups and broths	2000	mg/kg	6 & 127	6	2000 mg/kg (160 mg/kg Al)
12.6.3	Mixes for sauces and gravies	2000	mg/kg	6 & 127	6	2000 mg/kg (160 mg/kg Al)
16.0	Composite foods - foods that could not be placed in categories 01 - 15	190	mg/kg	6	6	190 mg/kg (15 mg/kg Al)

SODIUM ALUMINOSILICATE

Sodium aluminosilicate INS: 554

Function: anticaking agent

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
01.1.2	Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
01.3	Condensed milk and analogues (plain)	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
01.4.4	Cream analogues	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
01.5	Milk powder and cream powder and powder analogues (plain)	10000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
01.6.2.1	Ripened cheese, includes rind	10000	mg/kg	6, 174 & 177	3	20000 mg/kg (1380 mg/kg Al)
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
01.6.4	Processed cheese	10000	mg/kg	6, 174 & 177	3	20000 mg/kg (1380 mg/kg Al)
01.6.5	Cheese analogues	10000	mg/kg	6, 174 & 177	3	20000 mg/kg (1380 mg/kg Al)
01.8.1	Liquid whey and whey products, excluding whey cheeses	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
01.8.2	Dried whey and whey products, excluding whey cheeses	10000	mg/kg		2006	20000 mg/kg (1380 mg/kg Al)
04.2.2.2	Dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	GMP		3, 6 & 174	3	20000 mg/kg (1380 mg/kg Al)
05.3	Chewing gum	GMP		3, 6 & 174	3	20000 mg/kg (1380 mg/kg Al)
05.4	Decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	GMP		3, 6 & 174	3	20000 mg/kg (1380 mg/kg Al)
06.1	Whole, broken, or flaked grain, including rice	GMP			6	20000 mg/kg (1380 mg/kg Al)
06.3	Breakfast cereals, including rolled oats	20000	mg/kg	6	3	20000 mg/kg

FoodCatNo	FoodCategory	MaxLevel	Unit	Notes	Step / Year of Adoption	Reporting basis
						(1380 mg/kg Al)
06.4.3	Pre-cooked pastas and noodles and like products	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
06.5	Cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
06.6	Batters (e.g., for breading or batters for fish or poultry)	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
07.1.6	Mixes for bread and ordinary bakery wares	10000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
08.3	Processed comminuted meat, poultry, and game products	GMP		6, 174 & 179	3	20000 mg/kg (1380 mg/kg Al)
08.4	Edible casings (e.g., sausage casings)	GMP		3, 6 & 174	3	
11.1.2	Powdered sugar, powdered dextrose	10000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
11.1.2	Powdered sugar, powdered dextrose	15000	mg/kg	56	2006	20000 mg/kg (1380 mg/kg Al)
12.1.1	Salt	20000	mg/kg	6	3	20000 mg/kg (1380 mg/kg Al)
12.1.1	Salt	GMP			2006	20000 mg/kg (1380 mg/kg Al)
12.1.2	Salt Substitutes	10000	mg/kg		6	20000 mg/kg (1380 mg/kg Al)
12.2.2	Seasonings and condiments	30000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
12.5.2	Mixes for soups and broths	10000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
12.6.3	Mixes for sauces and gravies	10000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
13.6	Food supplements	GMP		6 & 174	3	20000 mg/kg (1380 mg/kg Al)
14.1.4.3	Concentrates (liquid or solid) for water-based flavoured drinks	10000	mg/kg	6 & 174	3	20000 mg/kg (1380 mg/kg Al)
15.1	Snacks- potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	120 mg/kg		6	3	20000 mg/kg (1380 mg/kg Al)

Notes:

Note 3: Surface treatment.

Note 6: As aluminium.

Note 26: For use in baking powder only.

Note 29: Reporting basis not specified.

Note 41: Use in breading or batter coatings only.

Note 51: For use in herbs only.

Note 56: Provided starch is not present.

Note 72: Ready-to-eat basis.

Note 127: As served to the consumer.

Note 174: Singly or in combination: sodium aluminium silicate (INS 554), calcium aluminium silicate (INS 556), and aluminium silicate (INS 559).

Note 177: For use in sliced, cut, shredded, or grated cheese only.

Note 179: For use in surface treatment of sausages.