

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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Agenda Item 5(d)

CX/FA 10/42/8 Add.1  
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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 SEVERAL ASPECTS OF THE FOOD CATEGORY SYSTEM OF THE GSFA (REPLIES TO CL 2009/07-FA PART B, POINTS 10-12)

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

Argentina, Brazil, European Union and India

#### **Point 10 Comments on the proposal for the revision of the name and descriptors of food category 16.0 "Composite foods - foods that could not be placed in categories 01-15" and examples of food products in this category**

##### ARGENTINA

Argentina suggests, regarding the name, that the category be named "Industrial culinary preparations", which excludes all those foods described in categories 1 to 15.

Argentina considers it appropriate to open a category to include the products that are similar.

Further, they may be classified into:

1- Lists for consumption (frozen or not)

Ready-to-eat industrial culinary preparations, frozen or not, based on ingredients of animal and/or plant origin, processed or not, not included in other categories.

2 - Dehydrated

Ready-to-eat industrial culinary preparations, frozen or not, based on ingredients of animal and/or plant origin, processed or not, not included in other categories.

##### BRAZIL

16.0 Composite foods: ~~foods that could not be placed in categories 01-15~~

**Composite foods are** ~~includes~~ prepared ~~or composite dishes~~ **meals** in which additives are ~~directly~~ added to achieve a technological effect in the final product ~~composite food~~. Additives ~~may also be~~ present as a results of carry-over from the ingredients **components are covered by the appropriate food category**. ~~For example, an additive that is used as an ingredient in a meat pie, but not in any of its ingredients (e.g., in the crust) is reported in this category.~~

Examples of composite ~~dishes~~ **foods** include: **prepared meals that must be heated prior to consumption (e.g., frozen culinary products consisting of a mixture of components, such as lasagna, casseroles, pizza, risotto), ready-to-eat meals that are thermally-processed, frozen sandwich wraps, and meals to**

**be reconstituted with water or milk (e.g., dehydrated culinary products which may contain processed vegetables or animal ingredients and spices, to be reconstituted with water before cooking), prepared dinners (e.g., frozen entrees), casseroles, mince-meat and snack dips (e.g., onion dip) excluding products under food categories 12.5.2 (mixes for soups and broths) and 12.6.3 (mixes for sauces and gravies), and mixes to prepare other foods (ice creams, beverages, desserts).**

## EUROPEAN UNION

The EU takes note that the document CX/FA 10/42/5 has provided only one example of foodstuff – namely bean-paste – as a proposed candidate to be inserted into the category 16.0. The EU takes note that no technological justification was provided to justify this extra needs in term of food additives. In addition, the EU would very much appreciate receiving some clarification about the rationale to insert bean-paste into category 16.0 and not in 04.2.2.6 where the descriptor refers, *inter alia*, to red bean-paste.

The EU still considers that the discussion paper does not resolve the problem regarding the lack of clarity of products that are covered by this category which is far too broad.

Although the EU generally may support the revision of the section 5 (C) of the preamble to the GSFA, the last sentence should be completed with a specific statement requiring an amendment of the current FCS, e.g. a new category/sub category or specific footnote.

On the grounds that a specific compound food may need additional food additives, the food category 16.0 should not be seen as a way for authorising by default food additives in a wide range of non identified compound foods.

If it can be demonstrated, on a case by case basis, that an identified compound food requires an additive with a technological justification which is needed, or if the additive is used in the compound food at the different level than that in the component of the compound food, then such cases should be considered either under the appropriate category(ies) 1-15, e.g. via footnotes or as an alternative by amending the current FCS when it is necessary.

Finally, the EU reiterates that it may be questionable to group “unidentified” compound foods and be possibly confronted in a situation where none of these “composite food” fulfil the core criteria set for the identification of FCS i.e. (1) similarity of food consumption patterns, (2) similarity of food processing and (3) similarity of technological needs.

The EU therefore maintains its position regarding the lack of justification for maintaining the food category 16.0.

## INDIA

We accept the proposed revision of the name and descriptors of food category 16.0 “Composite foods – foods that can not be placed in categories 01-15” made in the paragraph 33 of the CX/FA 09/41/13, as referred in the paragraph 147 of the ALINORM 09/32/12.

## **Point 11 Information on the use of colours added to foods falling under the scope of food category 08.1 “Fresh meat, poultry, and games” and its sub-categories for purposes other than surface applications**

### ARGENTINA

Argentina only permits the use of natural colours in meat products.

### BRAZIL

Brazil presented comments on this issue for the 41<sup>st</sup> CCFA, which were included in CRD 15. However, due to the agenda and time schedule of the last Section, Brazil would like to keep those same comments for further discussion in the 42<sup>nd</sup> CCFA.

**EUROPEAN UNION**

As a general principle, the EU would like to note that the EU legislation does not permit the use of any colours in unprocessed foodstuffs (like fresh meat) except for a very limited number of cases.

The EU considers that the use of colours in such products for purposes other than surface application needs to be carefully considered by the CCFA bearing in mind that such uses have the potential to mislead the consumer. Within the EU glazes such as marinades for meats are considered as ‘sauces’ and therefore considered as compound foods (e.g. a mixture of sauce and meat with additives permitted in the respective portions) other than this the direct use of colours in meat is only permitted in a very limited number of specific products, e.g. certain sausages.

**Point 12 Comments on the project document proposing new work on the revision of food category 5.1 “Cocoa products and chocolate products including imitations and chocolate substitutes”****ARGENTINA**

Argentina believes it appropriate to revise food category 5.0 Confectionery; particularly the sub-category containing chocolate products, products with chocolate or with couverture chocolate and the category containing products chocolate products including imitations and chocolate substitutes.

**EUROPEAN UNION**

The EU agrees with the general recommendations that have been proposed in Appendix X.

However, with regard to the food category 05.4, the EU opposes the deletion of sugar- and chocolate-based coatings for confectionary from the food category 05.4 as in the European Union, these intermediates may also be sold directly to the consumer.