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FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 5(d)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

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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:

Australia, Malaysia, Mexico, United States of America, ICGA, ICGMA and IFAC

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

AUSTRALIA

Australia has a similar category within the Australia New Zealand Food Standards Code, 'Mixed Foods' (Standard 1.3.1, Schedule 1, 20.0). This category (20.0) has sub-categories including beverages; custard mix, custard powder and blanc mange powder; dairy and fat based desserts, dips and snacks; sauces and toppings (including mayonnaises and salad dressings); and soup bases (made up as directed). While Australia is supportive of food category 16.0 being retained, we note that its intent and scope is somewhat different to the 'Mixed Foods' category in the Australia New Zealand Food Standards Code.

UNITED STATES OF AMERICA

The USA supports the proposal to revise the title and descriptor of food category 16 and Section 5.0, paragraph (c) of the Preamble to the General Standard for Food Additives (GSFA) as presented in CX/FA 09/41/13 paragraphs 33 and 34. The USA believes that it is of particular importance to remove the text "foods that could not be placed in categories 01-15" from the title. The USA believes that this text is unnecessary and that it could be interpreted to mean that if the user of the GSFA could not identify an appropriate food category for the food in question, it would be placed in category 16.0, perhaps incorrectly, by default.

The USA does not have any additional examples of foods to be included in the descriptor.

If the Committee agrees to revise the scope of food category 16.0, the USA recommends that, when discussing the GSFA provisions for a particular food additive, the Committee pay particular attention to the reported use of the additive in this category and evaluate whether the use is appropriate for a composite food in light of the revised descriptor, or if the use is already covered by an existing provision in another food category (e.g., due to carry-over)

ICGMA (International Council of Grocery Manufacturers Associations)

ICGMA appreciates the opportunity to revise the descriptor of Food Category 16.0 "Composite Foods" and Section 5.0, paragraph (c) of the Preamble to the GSFA. The listing of food additive uses in this food category are intended to meet technological purposes that are required in the composite food and cannot be met as a result of carry-over.

ICGMA has tried to address some delegations' concerns regarding, generally, the dissimilarities of composite foods (i.e., food consumption pattern; food processing; technological needs). ICGMA attempts to narrow the scope and focus of this category to specifically prepared meals (e.g., "microwavable" meals, ready-to-eat meals, frozen meals, pizza, sandwich wraps, dried culinary products, stew, etc.) Recommendations on revisions to food category (FC)16.0 "Composite Foods" and, as a consequence, to FC 12.6.1 "Emulsified sauces (e.g., mayonnaise, salad dressing)" are made. [Currently listed under FC 16 as an example are "Snack Dips". Due to the consistency/texture of snack dips,

and the fact that, in some country regulations Dips are grouped with Sauces, Gravies and Condiments, ICGMA suggests removing Snack Dips from FC 16.0, Composite Foods, and placing it under FC 12.6.1 “Emulsified Sauces”.] In addition, revision to Section 5(c) of the Preamble to the GSFA is necessary for consistency of the Codex Food Category System. In support of the retention of FC 16.0, examples of food additive provisions that would be grouped under this category are also provided.

Recommendation

1. Revise the Descriptor of Food Category 16.0 Composite foods to better define Composite Foods –

16.0 Composite foods – foods that could not be placed in categories 01–15: (e.g., prepared meals):

Prepared meals are ~~Includes prepared or composite dishes~~ **foods** in which additives are directly added to **have a technical effect in** the composite food. Additives ~~may also be present as a result of carry-over from the ingredients~~ **components are captured under the appropriate food category^(a)**. ~~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~~ **prepared meals** include: **prepared dinners that must be heated prior to consumption (e.g., frozen culinary products consisting of a mixture of components, such as lasagna, casseroles, pizza, chicken with pasta in alfredo sauce, a single mixture of rice with fish and vegetables, beef and vegetable stew), ready-to-eat meals that are thermally-processed (e.g., canned beef hash), 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, mincemeat and snack dips (e.g., onion dip).**

(a) **Principles regarding the carry-over of food additives into composite foods is described in Section 4 of the Preamble. Application of the carry-over principle to composite foods is described in Section 5(c) of the Preamble.**

2. Revise Section 5(c) of the Preamble to the GSFA -

5c) The food category system takes into consideration the carry-over principle. By doing so, the food category system does not need to specifically mention ~~compound foodstuffs~~ **composite foods** (e.g., prepared meals, such as pizza, because they may contain, *pro rata*, all the additives endorsed for use in their components), unless the ~~compound foodstuff~~ **composite food** needs an additive that is not endorsed for use in any of its components.

3. Revise Food Category 12.6.1 –

12.6.1 Emulsified sauces and dips (e.g., mayonnaise, salad dressing, onion dip):

Sauces, gravies, ~~and dressings,~~ **and dips** based, at least in part, on a fat- or oil-in water emulsion. Examples include: salad dressing (e.g., French, Italian, Greek, ranch style), fat-based sandwich spreads (e.g., mayonnaise with mustard), salad cream, ~~and fatty sauces,~~ **and snack dips (e.g., bacon and cheddar dip, onion dip).**

4. Examples of Food Additive Provisions for Composite Foods

4(a) Food Additives with numerical ADIs

Additive	INS	Reason for addition/Type of Product	Maximum level for non-standardized foods	Notes/Justification
colour, annatto norbixin-based (NEW, include at Step 3 in the GSFA)	160b(ii)	Colour - microwavable meal (e.g., beef ravioli in tomato and meat sauce; chicken and noodle composite food; chicken flavored rice and vegetable products; spinach and cheese ravioli)	200 mg/kg	Norbixin-based annatto is used to restore the yellow color to the composite food. Color additives are typically used to standardize the color of the food product. Other purposes include to impart a yellow color to the food.
Sulfites (sodium metabisulfite) (NEW, include at Step 3 in the GSFA)	223	- antioxidant (antibrowning agent) - Beef and potato component with sauce	500 mg/kg as SO ₂	Sodium bisulfite in Beef Steak Tips would be used to help keep the potatoes from browning in the mixture of components.
L-Tartaric Acid	334	- flavor synergist	GMP	Tartaric acid in the microwavable meal “beef steak and peppers” has a flavor softening effect in products that might use salt/sodium substitutes which could impart harsh notes. As more of those components are used,

Additive	INS	Reason for addition/Type of Product	Maximum level for non-standardized foods	Notes/Justification
				there is a negative impact on acceptability.
Beta-carotene (step 3)	160a(ii)	Colour - Rice with chicken and vegetables	35 ppm	Beta-carotene is used to standardize the butter-like color of, for example, the entrée "Rice with chicken and vegetables" in a servable cup. beta-Carotene is used to restore color which was destroyed during heat processing.
Caramel III (step 3)	150c	Colour – dehydrated culinary product	50,000 ppm, Note 72	Caramel III is typically added in enough quantities to, for example, a dried culinary product, such that the color of the final food product as prepared by the consumer is of an appropriate brown tone.
Caramel IV (step 3)	150d	Colour – dehydrated culinary product	50,000 ppm, Note 72	Caramel IV is typically added in enough quantities to, for example, a dried culinary product, such that the color of the final food product as prepared by the consumer is of an appropriate brown tone.
disodium hydrogen phosphate (step 6)	339ii	Emulsifying, gelling, stabilizing or thickening agent - Product - Herb Chicken Flavored Vegetable Rice is a dried culinary product that contains dried vegetables, chicken fat, precooked rice, modified corn starch - frozen entrée (e.g., pasta with vegetables and cheese sauce)	5,000 mg/kg	Sodium phosphate acts as a stabilizer for after the frozen entrée is prepared. It has its technical effect in the heated finished product.
DATEM (=Diacetyltartaric and fatty acid esters of glycerol)	472e	<u>Emulsifying</u> (forms or maintains a uniform emulsion of two or more phases in a food), <u>gelling</u> (texture in food by creating a gel), <u>stabilizing</u> (maintain uniform dispersion between two or more components) or <u>thickening agent</u> (increase viscosity) DATEM is used, for example, in prepared meals such as chicken marsala.	1,000 mg/kg	DATEM is used in, for example, in chicken marsala and acts as a stabilizer.
potassium sorbate	202	Preservative	1000 mg/kg as sorbic acid	Sodium benzoate and potassium sorbate are used as yeast and mold inhibitors. They are often used concurrently since there is a synergistic effect.
sodium benzoate	211	Preservative-	1000 mg/kg	Sodium benzoate and potassium sorbate are used as yeast and mold inhibitors. They are often used concurrently since there is a synergistic effect.

*if used singly

Note 72: Ready-to-eat basis.

4(b) Food Additives with ADI "Not Specified" – Maximum Levels are GMP

Additive	INS	Reason for addition/Type of Product	Notes/Justification
Acid, ascorbic	300	Preservative - frozen breakfast entrée consisting of sausage, cheese, scrambled eggs, red and green peppers;	Ascorbic acid prolongs the shelf-life of this composite food by protecting against deterioration caused by mold formation.
Acid, citric*	330	preservative, pH adjusting agent - A ready-to-eat microwavable meal (e.g.,	The citric acid acts as a pH adjusting agent lowering the pH of the final

Additive	INS	Reason for addition/Type of Product	Notes/Justification
		chicken/beef meat component with some sauce, vegetables, and spaghetti)	product making the product more acidic. Citric acid allows the product to undergo a shorter cooking time. The shorter cooking time prevents the components (e.g., the pasta) from being destroyed. A higher pH would require longer cooking times to sterilize the product which would overcook some of the components.
Acid, lactic	270	pH adjusting agent - (ready-to-eat microwavable meal like "Rice with Chicken and Vegetables" that contains water, rice, vegetables)	Lactic acid controls the controls the acidity.
Colour, caustic caramel (plain)	150a	Colour - ready-to-eat microwavable meals (e.g., meat and gravy type of product; teriyaki chicken with rice;	Caramel coloring is added to the composite food in order to standardize the color.
Colour, paprika	160c	Colour	To standardize color in different types of "microwavable" meals.
Colour, turmeric	100ii	colour - Dried culinary product like "Chicken Flavor Broccoli with Fettuccini" which contains macaroni, corn syrup, dried chicken, broccoli, etc.	To standardize color in different types of "microwavable" meals or dried culinary product.
Disodium 5'-guanylate	627	Flavor Enhancer (enhances existing taste) - dried culinary products (e.g., herb chicken flavored vegetable rice; Chicken Flavor Broccoli with Fettuccini) - ready-to-eat "microwavable" meals such as "Rice with Chicken and Vegetables" - bacon and cheddar snack dip	Disodium guanylate is typically added in combination with disodium inosinate to enhance the organoleptic property of the composite food. It enhances the salty taste of the food. Like salt and MSG, disodium guanylate and disodium inosinate assist the taste buds to sense the product flavors better.
Disodium 5'-inosinate	631	Flavor Enhancer (enhances existing taste) - dried culinary products (e.g., herb chicken flavored vegetable rice; Chicken Flavor Broccoli with Fettuccini) - ready-to-eat "microwavable" meals such as "Rice with Chicken and Vegetables" - bacon and cheddar snack dip	Disodium inosinate is typically added in combination with disodium guanylate to enhance the organoleptic property of the composite food. It enhances the salty taste of the food. Like salt and MSG, disodium guanylate and disodium inosinate assist the taste buds to sense the product flavors better.
Gum, carrageenan	407	Emulsifying, gelling, stabilizing and <u>thickening agent</u> . (frozen lasagna, frozen sandwich wraps)	During the heating process, ingredients tend to release the moisture (water) contained in them (especially when they have been frozen) in products such as lasagna product, pizza, and frozen sandwich wrap. The addition of starches and/or cellulose help form a barrier between the bread/crust and the topping or filling by binding the water. The crust/bread can remain crisp and not become soggy.
Gum, gellan	418	<u>Emulsifying</u> , gelling, stabilizing or thickening agent	
gum, guar	412	Emulsifying, stabilizing, gelling or thickening agent	In fillings of composite foods (such as pot pies), it can prevent "weeping" (syneresis) of the water in the filling, keeping the crust crisp.
Gum, locust bean (= carob bean gum, carob gum, Saint John's bread, carubin)	410	Emulsifying, stabilizing, gelling or thickening agent	

Additive	INS	Reason for addition/Type of Product	Notes/Justification
Gum, xanthan	415	Emulsifying, stabilizing, gelling or thickening agent <ul style="list-style-type: none"> - dried culinary products (e.g., herb chicken flavored vegetable rice) - used in frozen entrée (e.g., butternut squash ravioli in a creamy sauce) - snack dip 	
Lecithin	322	Emulsifying, stabilizing, gelling or thickening agent	
Methyl cellulose	461	thickener(bind water in a lasagna product, pizza, and frozen sandwich wrap)	During the heating process, ingredients tend to release the moisture (water) contained in them (especially when they have been frozen) in products such as lasagna product, pizza, and frozen sandwich wrap. The addition of starches and/or cellulose help form a barrier between the bread/crust and the topping or filling by binding the water. The crust/bread can remain crisp and not become soggy.
Modified food starch	1400-1452	thickener(bind water in a lasagna product, pizza, and frozen sandwich wrap)	Generally, additives are added to meal-type "finished" products as moisture barriers to prevent syneresis (e.g., softening of crust or the "dough" component in frozen entrees, frozen lasagna, pizza, and frozen sandwich wraps.)
Mono- and diglycerides (= mono- and diglycerides of fat forming fatty acids)	471	Emulsifying, stabilizing, gelling or thickening agent <ul style="list-style-type: none"> - ready-to-eat microwavable meals (e.g., meat component with vegetable and grain component) 	
potassium chloride	508	Emulsifying, stabilizing, gelling or thickening agent or flavor enhancer	
Silicon Dioxide	551	Anticaking Agent	Anticaking agents such as silicon dioxide are added directly to CousCous and risotto products that contain processed vegetables or animal ingredients and spices. These anticaking agents are necessary to ensure the stability of the product, prevent clumping of the components, and improve flowability.
Sorbitol	420	Sweetener	
Titanium Dioxide	171	Color <ul style="list-style-type: none"> - Ready-to-eat microwavable meal such as "Chicken Alfredo with chicken with penne pasta in alfredo sauce" that contains water, penne pasta, chicken, alfredo sauce, cream, soybean oil, etc. spice, AND titanium dioxide (color). 	A product going through a normal retort/thermal processing will succumb to browning effect. Titanium dioxide acts as a whitening agent and helps retain the whiteness of the alfredo sauce in this product.

*if used singly

IFAC (International Food Additives Council)

IFAC believes this category is necessary, as certain foods, such as frozen entrées, cannot be placed in categories 01-15, but require food additives to keep individual items within the entrée separated. Technological functions of food additives in this category include thickener, acidity regulatory, colors, antioxidants, and flavor enhancers. Therefore, we request that this category remain in the GFSA.

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

MEXICO

Food category	Additive	Limit mg/kg
Fresh meat (in poultry genus Gallus only, pigmented after slaughter)	Sunset yellow FCF (INS 110)	500
	Annatto extracts (Bixa orellana seed (INS 160(b)))	20
	Azorubine (INS122)	500
	Ponceau 4R, Red 7 (INS101 (ii))	500
	Tartrazine, yellow 4 (INS102)	500
	Allura red AC (INS 129)	25
Cooked meat products Raw and cured meat products Cooked and cured meat products Matured and cured meat products Dried or desiccated meat products	Allura red AC (INS 129)	100
Poultry Fresh meat (in poultry genus Gallus only, pigmented after slaughter) Cooked meat products Raw and cured meat products Matured and cured meat products Dried or desiccated meat products Frozen breading or battered meat products Marinated or pickled meat products	Chlorophylls (INS 140(i)) Caramel I (INS 150(a)) Titanium dioxide (INS 171) Grape skin extract (INS 163(ii)) Carotenes natural (INS 160(a) ii)	GMP
Cooked meat products Raw and cured meat products Matured and cured meat products Dried or desiccated meat products Frozen breading or battered meat products Marinated or pickled meat products	Paprika extract (INS 161©) Caramel II (INS 161(b))	GMP

UNITED STATES OF AMERICA

The USA does not permit the use of colors, other than for surface application purposes (e.g., branding or marking), on fresh meat, poultry and game (9 CFR 424.21).

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”

MALAYSIA

Malaysia supports revision of relevant food categories of the GSFA for cocoa and chocolate products, hard and soft candy, and chocolate substitute products and the project document. However Malaysia notes that few elements of the project proposal for new work that are specified under Part 2 of the Procedures for the Elaboration of Codex Standards and Related Texts are not included, namely *Relevance to Codex Strategic Objectives, Information on the relation between the proposal and other existing Codex documents, Identification of any requirement for and availability of expert scientific advice, Identification of any need for technical input to the standard from external bodies so that this can be planned for and proposed timeline.*

Malaysia proposes the above information be included and the following information be considered for inclusion in the project document:

5. Relevance to Codex Strategic Objectives

The proposal is consistent with Activity 1.1 of Goal 1 Review and Develop Codex Standards and Related Texts for Food Safety of the Strategic Plan 2008-2013.

6. Information on the relation between the proposal and other existing Codex documents

The proposal relates to the Codex General Standard on Food Additives (CODEX STAN 192-1995) and Codex Standard for Chocolate and Chocolate Products (CODEX STAN 087-2003).

UNITED STATES OF AMERICA

The USA supports the revision of food category 05.0 (Confectionery), excluding food category 05.3 (Chewing gum) as new work, as outlined in the project document (ALINORM 09/32/12, Appendix X).

However, for clarity, the USA suggests the following editorial changes to the project document (deletions are shown in ~~strike through~~ and additions in **bold** text):

- Under the last paragraph of Item 2. Relevance and timeliness:

The proposal to revise the FCS may require: ~~(i)~~ revision of the food additive provisions in Tables 1 and 2 of the GSFA to reflect the reassignment of the food categories; .

- Under Item 3. The main aspects to be covered:

The GSFA (CODEX STAN 192-1995) would be revised as follows:

~~(ii)~~ **(i)** the FCS (**Annex B of the GSFA**) would be revised according to the proposal (~~Annex B of the GSFA~~);

~~(iii)~~ **(ii)** food additive provisions in Tables 1 and 2 of the GSFA in the affected food categories (05.1, 05.2, and 05.4) would be reassigned according to the proposal.

Finally, the USA notes that the detailed proposals that will be considered to implement this new work will directly impact progress on the General Standard for Food Additives (GSFA). The USA believes that, once approved as new work, the Committee should carefully consider not only the merit of each proposal to achieve the desired aim of clarifying the confectionery food categories, but also the consequences and impacts on the adopted food additive provisions in the GSFA and the continued progress on the GSFA.

ICGA (International Chewing Gum Association)

The ICGA generally supports the aim of this new work with the understanding that this work relates only to food categories 5.1.4, 5.1.5, 5.2.1 and 5.4. In order to clarify this objective, the ICGA would like to suggest the following amendments to the project document:

“- Revise food categories ~~05.0 (Confectionery), 5.1, 5.2 and 5.4 and their relevant sub-categories –excluding food category 05.3 (chewing gum)~~, so that chocolate, as defined in the Codex Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981), as well as comparable non-standardized chocolate products and products that use standardized chocolate, would be more appropriately categorized within the GSFA.

- Revise the descriptor for food categories ~~05.0 (Confectionery) and its sub-categories, 5.1, 5.2 and 5.4 and their relevant sub-categories –excluding food category 05.3 (chewing gum)~~, with respect to certain cocoa- and chocolate containing confections. In particular cocoa-containing hard and soft candies, “compound chocolate” and “compound chocolate coating” products, and sugar-based or chocolate-based coatings for confectionery.”