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FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 7(a) **CX/FA 10/42/12 Add.1**

February 2010

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-second Session

Beijing, China, 15-19 March 2010

COMMENTS ON PROPOSALS FOR CHANGES AND/OR ADDITIONS TO THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES

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

Brazil, Cuba, India and Iran

BRAZIL

Appendix I

PROPOSED CHANGES AND/OR ADDITIONS TO THE INS(At Step 3)

Section 1 – Introduction

Brazil agrees with the proposed changes.

Section 3 – International Numbering System for Food Additives, List in numerical order

Brazil supports the following recommendations:

- Do not include nutrient, yeast food and flavour encapsulator;
- To delete the technological purposes for so-called "parent" additives, such as 339 and 340, but only if they have at least one different technological purpose;
- Do not remove INS 428 Gelatin and 1503 Castor oil, because these substances are also approved as food additives in Mercosur. Therefore, these INS numbers are needed for labeling purposes;
- To delete "buffer" and "buffering agent" from the list, since the functional class "acidity regulator" is enough to describe the technological purpose of the additive.

Besides, Brazil would like to make the following comments:

INS	Technological purposes
339, 340, 341	- moisture-retention agent should not be removed (it could be replaced by humectant)
341i	- anticaking agent should not be removed - flour treatment agent should be maintained and dough conditioner should not be included
341ii	- anticaking agent and stabilizer should not be removed - flour treatment agent should be maintained and dough conditioner should not be included
341iii	- flour treatment agent, firming agent and raising agent should not be removed - the technological purpose "clouding agent" should be demonstrated according to criteria defined in CX/FA 10/42/13
385	- sequestrant should not be removed
400-407	- the new technological purposes should be demonstrated according to criteria defined in CX/FA 10/42/13
450ii	- acidity regulator and raising agent should not be removed
450iii, v, vi	- raising agent should not be removed (it was maintained for INS 450vii)

For some new technological purposes it is clear the need to include them, such as carrier, which had been discussed in the last CCFA Sessions. However, it is necessary to justify other proposed changes that seem inconsistent. For example, the exclusion of moisture-retention agent and raising agent for phosphates, the replacement of flour treatment agent by dough conditioner, and some inclusions such as bulking agent for INS 405. Therefore, Brazil considers that it is important to follow the criteria on discussion in CX/FA 10/42/13.

CUBA

On reviewing the proposals for changes and/or additions to the INS, Cuba points out that:

- INS 339, where it says "Fosfato de socio" this should be corrected to "fosfato de sodio".
- In Spanish, the function "secuestrante" is not written as "sequestrante", as appears in the document.
- In INS 341i and 341ii various functions are replaced by "acondicionador de masa". This term does not describe the function correctly. Cuba is of the opinion that the functions should remain as they were. In 450vii it says "condicionador de masa" ***[****dough conditioner]*.
- 452(vi) should keep that number and not be changed to 451(iii).
- In 541 "Fosfatos de aluminio y sodio" *["aluminium and sodium phosphates"]* should be written in the plural (it now says "fosfato" in the singular).

INDIA

Appendix I: Proposed Changes and/or Additions to the INS (At Step 3)

Section 1 – Introduction

The Paragraph 4 makes several proposals in its bullet points and invites the Committee to discuss them. Our comments on these are provided below:

a) Third bullet: We support deletion of the technological purposes for the 'parent' additives (the general categories), as not all the technological functions listed for the 'parent' food additives are applicable to all the specific sub-categories under it. This will reduce confusion in the use of the INS as only the specific technological functions would be retained against the specific food additives.

b) Fourth bullet and INS 452 in the Table: In view of the facts that the food additive is a polyphosphate and the associated technological functions are also similar to the other polyphosphates in the category, it would be appropriate to retain the number of the food additive as 452 (vi).

c) Fifth bullet: Gelatin (INS 428) and castor oil (INS 1503) are used as food additives. Therefore, these should be retained in the INS list.

Responses to CL 2009/8-FA on the information about Salts of Fatty Acids and Aluminum Sulfate

Paragraphs 6 and 7: Under the Indian Food Laws, use of myristates, palmitates or strearates of aluminum, ammonium, calcium, potassium or sodium is permitted, and these are used, as anticaking agents in cheese, sliced/cut/shredded cheese and some instant mixes.

As regards the new proposed name for the INS 470, it should be noted that it is not the fatty acids themselves but their salts that perform the technological functions associated with the INS 470.

In view of the above, we propose the following amendments in the entries pertaining to the INS 470 and 470(i):

470 Salts of fatty acids (with base aluminium, ammonium, calcium, magnesium, potassium and or sodium)'

'470(i) Salts of myrsitic, palmitic and or stearic acids with aluminium, ammoniuma, calcium, potassium and or sodium'

IRAN

INS No.	Name of food Additive	Technological purpose
101(i)	**Riboflavin (synthetic)**	**color**
339	**Sodium phosghates**	
339(i)	Sodium dihydrogen phosghate	Acidity regulator , sequestrant , **emulsifying agent , stabilizing agent** , nutrient
339(ii)	Disodium hydrogen phosghate	Acidity regulator , **emulsifying agent , stabilizing agent** , **stabilizer** , emulsifier ,texturizing agent
339(iii)	Trisodium phosphate	Acidity regulator , **emulsifying agent , stabilizing agent** , **stabilizer** , emulsifier ,texturizing agent , antimicrobial synergist , nutrient
340	**Potassium phosphates**	
340(i)	Potassium dihydrogen phosphate	Acidity regulator , sequestrant , **stabilizer** , **emulsifier ,texturizing agent , moisture retention agent** , nutrient
340(ii)	Dipotassium hydrogen phosphate	Acidity regulator , sequestrant , **stabilizer** , **emulsifier ,texturizing agent , moisture retention agent** , nutrient
340(iii)	Tripotassium phosphate	Acidity regulator , sequestrant , **stabilizer** , **emulsifier ,texturizing agent , moisture retention agent**
341	**Calcium phosphates**	
341(i)	Calcium dihydrogen phosphate	Acidity regulator , **flour treatment agent** , **firming agent ,** sequestrant , raising agent , **anticaking agent , moisture retention agent** , dough conditioner , yeast food **,texturizing agent ,** moisture retention agent , nutrient
341(ii)	Calcium hydrogen phosphate	**Acidity regulator** , **flour treatment agent** , **firming agent ,** sequestrant , raising agent , **anticaking agent , moisture retention agent** , dough conditioner , yeast food **,texturizing agent ,** moisture retention agent , nutrient
341(iii)	Tricalcium phosphate	Acidity regulator , **flour treatment agent** , **firming agent ,** sequestrant , **raising agent** , anticaking agent **, moisture retention agent** , **,texturizing agent , moisture retention agent** , nutrient, clouding agent
450	**Diphosphates**	
450(i)	Disodium diphosphate	Emulsifier , **stabilizer** , acidity regulator , sequestrant , **moisture retention agent**
450(ii)	Trisodium diphosphate	Emulsifier , **stabilizer** , **acidity regulator** , sequestrant , moisture retention agent , texturizing agent
450(iii)	Tetrasodium diphosphate	Emulsifier , **stabilizer** , acidity regulator , sequestrant , texturizing agent
450(v)	Tetrapotassium diphosphate	Emulsifier , **stabilizer** , acidity regulator , sequestrant , moisture retention agent , texturizing agent
450(vi)	Dcalcium diphosphate	**Emulsifier** , **stabilizer** , acidity regulator , **sequestrant , moisture retention agent** , tnutrient , yeast food
450(vii)	Calcium dihydrogen diphosphate	Emulsifier , stabilizer , **acidity regulator** , **sequestrant , moisture retention agent** , tnutrient
451	**Triphosphates**	
452	**Polyphosphates**	
452(i)	**Sodium polyphosphate**	Emulsifier, sequestrant **,** moisture retention agent, texturizing agent , **buffering agent**
452(ii)	**Potassium polyphosphate**	Emulsifier, sequestrant **,** moisture retention agent, texturizing agent , **buffering agent**
452(iv)	**Sodium potassium tripolyphosphate**	Emulsifier, sequestrant **,** moisture retention agent, texturizing agent , **buffering agent** , **stabilizing agent**
541	**Sodium aluminium phosphates**	
541(i)	Sodium aluminium phosphate (acidic)	Acidity regulator , emulsifier , stabilizer , **aerating agent , buffering agent**
541(ii)	Sodium aluminium phosphate (basic)	**Emulsifying agent , buffering agent**
1518	Triacetin	Humectants , emulsifier , plasticizer , **essence solvent or flavoring solvent**
1521	Polyethylene glycol	Antifoaming agent , glazing agent , emulsifier , carrier, plasticizer **, humactant**