

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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WORLD
HEALTH
ORGANIZATION



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AGENDA ITEM NO. 4(A)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
THIRTY-SIXTH SESSION
OTTAWA, CANADA, APRIL 28 - MAY 2, 2008**

**GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND
MARKETING OF ORGANICALLY PRODUCED FOODS:
DRAFT REVISED ANNEX 2: TABLE 3
(CL 2007/16-FL, ALINORM 07/30/22 – APPENDIX III)**

GOVERNMENT COMMENTS AT STEP 6

COMMENTS FROM:

**BRAZIL
COSTA RICA
EUROPEAN COMMUNITY
NORWAY**

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GOVERNMENT COMMENTS AT STEP 6

BRAZIL:

The delegation of Brazil does not agree with the inclusion of the substances listed in table 3.

The additives permitted in organic produced foods should be restrict to the additives authorized by Codex to be used under conditions of good manufacturing practice (GMP) and their use must be in accordance with the principles of organic production. We do not agree with the inclusion of sodium nitrite, potassium nitrate and phosphates since these additives are not approved to be used under GMP. The use of sodium ascorbate, calcium ascorbate and potassium ascorbate is linked to the use of nitrate/ nitrite and, therefore, should not be allowed.

COSTA RICA:

Costa Rica would like to thank the Codex Committee on Food Labelling for the opportunity of expressing our point of view regarding this issue.

Costa Rica considers important for countries to respect the criteria that, under the principles of organic production, it is necessary that the use of non agricultural products (additives) be authorized having as a priority the condition that they should derive from natural sources. However, we do not object either to the requirement that inclusion of these substances in Table 3 must be properly authorized by the FAO/WHO Expert Committee on Food Additives (JECFA) and approved by the Codex Commission.

Notwithstanding the aforesaid, we would like to remind that in our previous comments we agreed to eliminate the brackets in the list of additives that indicate: [*Not allowed*] for their use in vegetable origin products. However, in the case of additives for use in animal origin foods, and particularly in the case of Sodium Nitrite (INS N° 250) and Potassium Nitrate (INS N° 252), it is important to note that these substances are known to present a risk for human health as they generate nitrous N compounds that have been shown to be carcinogenic in experimental animals, some of them being mutagenic and others teratogenic, as well as having high levels of their salts associated with a higher incidence of stomach and esophagus cancers.

Therefore, and taking into account the foot note on Table 3, according to Annex III of ALINORM 07/30/22, our position is that the inclusion of these substances, as well as others requested in this Annex III to be used in organic production, should be kept within square brackets until we receive recommendations from the Codex Committee on Food Additives (CCFA) (at Steps 3 and 6) and their respective adoption by the Codex Alimentarius Commission. Therefore, our country does not accept their inclusion in this list until they meet the indications given by the CCFL at the appropriate time.

It is important to remember that, according to Section 5, “Requirements for Inclusion of Substances in Annex 2 and Criteria for the Development of Lists of Substances by Countries”, of the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (GL 32-1991, Rev. 1-2001), the criteria to produce the lists include, among others:

“e) Approved alternatives are not available in sufficient quantity and/or quality”.

And, in the requisites for its use as additives or processing aids in the preparation or preservation of the food, it is indicated that:

“- they are essential to prepare such foods because there are no other available technologies”.

It is necessary that, when the inclusion of these substances is proposed, as in the case of these comments about ingredients of non agricultural origin, in agreement with Annex III: “3.1 Additives allowed to be used under specific conditions in certain categories of organic food or individual organic food products”, of Table 3 of Annex II of these Guidelines, the country or countries that propose them should guarantee that the respective criteria and requisites previously mentioned, have been observed in the sense that “Approved alternatives are not available in sufficient quantity and/or quality” not leaving the inclusion of these substances subject to its availability in the appropriate quantity, quality and technology.

This way, and with the worthwhile purpose of not contravening the Organic Production Principles: *“Specific criteria for additives and production aids”* (Annex 1 of the Guidelines), the country or countries that propose their inclusion must demonstrate they are in compliance.

EUROPEAN COMMUNITY:

The European Community (EC) would like to submit the following comments as regards Appendix III of ALINORM 07/30/22, regarding the additives in table 3.1 of Annex II to 'Codex Guidelines' (CAC/GL 32):

Sodium nitrite, E-250 and potassium nitrate, E-252:

The EC considers that: these substances (E 250 and E 252) should be left at step 6 of the procedure.

Ascorbates, E 301, 302 and 303:

The use of sodium ascorbate (E 301) is linked to the use of sodium nitrite and potassium nitrate. Thus the EC considers that a decision on the use of this substance depends on the decision on sodium nitrite and potassium nitrate.

The EC however is of the view that calcium ascorbate (E 302) and potassium ascorbate (E 303) are not needed in organic food processing.

The EC therefore considers that: all three substances should be left at step 6 of the procedure.

Phosphates, E-339i, 339ii, 339iii, 340i, 340ii, 340iii, 450i, 450iii, 450v, 450vi, 452i, 452ii, 452iv, 452v:

Commercial phosphates used as additives are chemically synthesised, whilst alternatives to their functional uses are available.

Functional use as a stabiliser:

Phosphates are not essential as stabiliser for pasteurised milk/cream. Alternatives are available.

In fact, organic fluid milk has been marketed in both pasteurised and UHT forms for many years without additives.

Goat milk may have a problem with casein flocculation. Three solutions are known to solve this problem: management of the goat's stage of lactation, improving heat treatment technology and adding phosphates. Heat-treated organic goat's milk produced without phosphates is available on the market.

A number of different types of organic cream without added phosphates are currently on the market. Especially coffee cream that is UHT treated presents a special problem. But even this problem has been solved without the use of phosphates as additives. UHT treated coffee cream without added phosphates is on the market for many years in EU Member States, both in organic and non-organic quality.

Moreover, phosphates may detract from the overall quality of such products because pasteurised milk and cream can be kept stable through careful handling and inventory management without the use of phosphates. Phosphates may be added to processed products that are not handled with the same degree of care.

Functional use as an emulsifier:

There are alternatives to phosphates as emulsifying salts on cheese processing. Tri-sodium citrate is the most common emulsifying agent for processing organic heat-treated and melted cheeses.

The use of citrates results in a slightly different texture from melted cheeses that use phosphates. These cheeses are introduced to and well accepted by organic consumers in the EU.

NORWAY:

Norway would like to submit some comments regarding organically produced food.

Sodium nitrite (250) and potassium nitrate (252):

We do understand that use of nitrites/nitrates can suppress growth and survival of microorganisms, including inhibition of *C. botulinum* and could therefore influence the safety of the products. However, when good hygiene and HACCP systems are in place and the products undergo a realistically short storage times under good temperature control cured meat products can be produced without use of nitrites/nitrates.

In addition to the safety aspect, nitrate is used as contribution to the flavour and colour of the products. Nitrates and nitrites are chemicals and according to Guidelines for the production, processing, labelling and marketing of organically produced foods (Guidelines) should only take into account that the consumers' expectation that organic processed products will be

composed essentially of ingredients as they occur in nature, substance and quality, point 5.1 (c). The Guidelines also says that if other ingredients or processing aids which may be used in conventionally processed foodstuff should be included in Table 3, Annex II, it should be shown that it is impossible to produce or preserve these organic foodstuffs.

With respect to our organic consumers, our understanding is that nitrites/nitrates should not be used in organic meat production. This is due to the fact that nitrite can cause a health problem as it can be transformed into nitrosamines which are recognised carcinogenic. In addition nitrate/nitrite is not an ingredient composed essentially from nature, and it has been shown that cured meat products can be made without use of nitrate/nitrite. Aiming to keep the trust among the organic consumers, additives should be strictly limited. Nitrate/nitrite has caused a lot of concerns, even for conventional production. We are therefore of the opinion that nitrate/nitrite should not be used for organic meat products.

Sodium ascorbate (301), Calcium ascorbate (302) and Potassium ascorbate(303)

The use of this additive is linked to the use of nitrate/nitrite and should therefore not be used for organic meat production.

Monosodium orthophosphate (339i), Disodium ortophosohate (339ii) trisodium orthophosphate (339 iii, monopotassium orthophosphate (340i), Dipotassium ortophosohate (340ii), tripotassium orthophosphate (340iii), Disodium diphosphate (450i), Tetrasodium diphosphate (450 iii), Tetrapotassium diphosphate (450v), Dicalcium diphosphate (450vi), Sodium Polyphosphate (452i), Potassium polyphosphate (452ii), Calcium polyphosphate (452iv) and Ammonium polyphosphate (452v)

Commercial phosphates used as additives are chemically synthesised, whilst alternatives to their functional uses are available. We would briefly repeat earlier statements, where it is put forward that phosphates are not essential as stabiliser for pasteurised milk/cream, as alternatives are available. There are also alternatives to phosphates as emulsifying salts on cheese processing. Tri-sodium citrate is the most common emulsifying agent for processing organic heat-treated and melted cheeses.

We are therefore not in favour for including phosphates to Annex II, Table 3.