



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-First Session

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE EWG ON THE GSFA

Comments of Brazil, Canada, Costa Rica, Ghana, Guatemala, Indonesia, Japan, Kenya, Philippines, Republic of Korea, Russian Federation, Senegal, South Africa, Thailand, IACM/NATCOL, ICBA and IDF

Brazil

Appendix 2: Provision for trisodium citrate in FC 01.1.1

Brazil strongly supports the following proposal, based on the comments forwarded to the eWG:

Adopt with Note 438 “Only for use as emulsifier or stabilizer” and Note 227 “for use in sterilized and UHT treated milks only **at 1000 mg/L**”.

Remove Note 439 “For use in sterilized and UHT treated milks from non-bovine species only”

Brazil justifications for the use of trisodium citrate (INS 331iii) in bovine UHT milk.

- **Safety:** according to the 17th JECFA, this additive has “no limited IDA”, indicating no health concern (GMP additive). It is approved even in GSFA for use in infant formulae.
- **Technological need:** the thermal stability of milk is influenced by several factors, and can be reduced due to high calcium activity, low phosphate and citrate activity, as well as successive heat treatments (SILVA, 2003).

Several factors may influence the milk composition and, therefore, its stability. According to Fox (1991), feed has relatively little effect on the level of most elements in milk because the skeleton acts as a reservoir of such. Milk fever is the result of the cow depleting its skeleton Ca to maintain the level of Ca in its milk. The level of citrate in milk decreases on diets very deficient in roughage and results in the “Utrecht phenomenon” – milk of very low stability. Relatively small changes in the concentrations of milk salts, especially of Ca, Pi and citrate, can have very significant effects on the processing characteristics of milk and hence these can be altered by the level and type of feed, but definite studies on this are lacking.

Fox (1991) also states that the composition of milk salts is influenced by some factors, including breed, individuality of the cow, state of lactation, feed, infection of the udder and season of the year.

In Brazil, the study performed by Silva (2003), showed that the levels of calcium, phosphorus and citrate vary significantly among states and seasons, as observed in the figures below. This confirms Fox's (1991) statement that feed and season may affect the chemical composition of bovine milk.

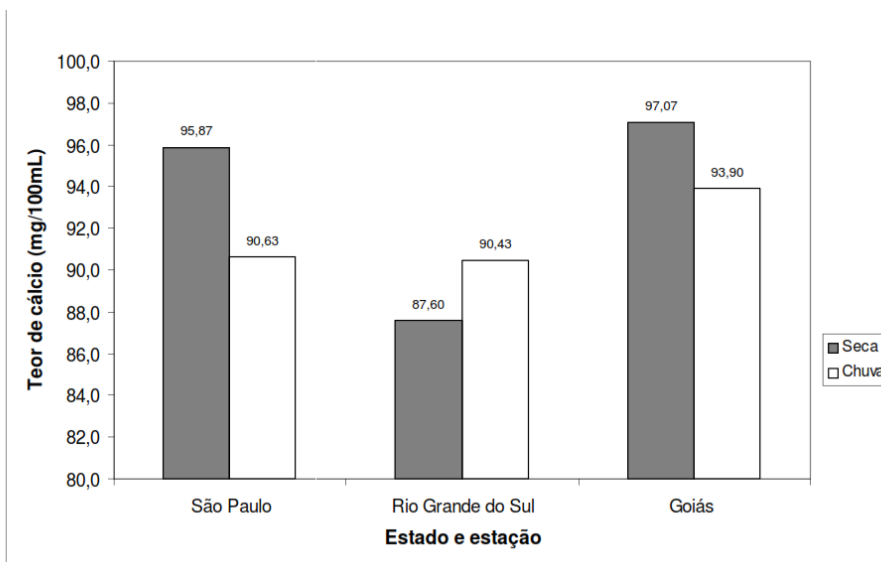


Figure 1. Average calcium content in raw milk by Brazilian State and season.

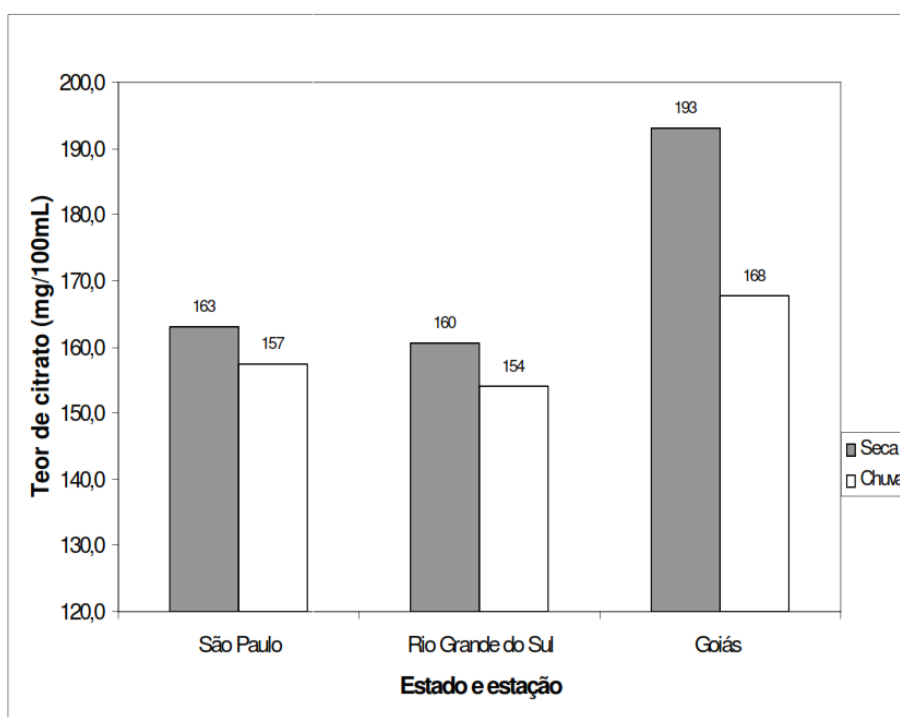


Figure 2. Average citrate content in raw milk by Brazilian State and season.

As reported in the eWG, Brazilian bovine cattle milk has a lower content of natural citrate, most probably by the influence of the extensive and semi-extensive breeding system, with the whole herd to the pasture. Feeding of Brazilian cattle based on low nutrient forage results in the production of a milk with saline imbalance (lower sodium citrate content). Here again we present the table that shows the difference in citrate levels of Brazilian cattle, when compared to the other countries:

Reference	Country	Citrate average (as citric acid)
FOX, P.F, 1991 (Fox,P.F Food chemistry. Part III. Cork: Cork University College, 1991. 201 p)	Ireland	176 mg/100 mL
JENNES AND PATTON, 1999	Maryland, EUA	175 mg/100 mL
WALSTRA P. AND JENNES, 1978	New York, EUA	175 mg/100 mL

Reference	Country	Citrate average (as citric acid)
(Walstra P, Jenness R. Dairy chemistry and physics. Wiley Intersciences, New York, 1984)		
WHITE & DAVIES, 1958 (Davies, D.T. and White, J.C.D. (1958). The relation between the chemical composition of milk and the stability of the casein complex. II. Coagulation by ethanol. J. Dairy Res., 25, 256-266)	EUA	179 mg/100 mL
SILVA, P.H.F, 2004	Brazil	158,5 mg/100 mL

The composition of the milk also varies according to the breed of the animal and climatic conditions. For example, in the arid and semi-arid regions of Brazil, where water is scarce, cattle, which are more rustic, tend to present milk with higher calcium contents. Moreover, in Brazil there are not always pastures in conditions of excellence. Brazil is a country of continental dimensions with climatic conditions that can be unfavorable to cattle, which turns the herd more rustic, mestizo and with low individual milk production. For this reason, in Brazil it is common to use a system of community tanks where the milk of several properties is agglomerated, in order to obtain enough milk volume to be sent to dairy industries.

Fox (1991) informs that the solubility of calcium phosphate is markedly temperature-dependent. Unlike most compounds, the solubility of calcium phosphate decreases with the increasing temperature – therefore, heating causes a precipitation of calcium phosphate, while cooling increases the concentrations of soluble calcium. So, UHT milk presents stability problems.

Fox (1991) also states that the addition of sodium phosphates and/or citrates to milk generally increases the stability both by sequestering Ca²⁺ and, especially in the case of citrates, by reducing citrate colloids through conversion to soluble unionized calcium citrates; high levels of citrate cause micellar disintegration. Phosphates and/or citrates are commonly added to concentrated milks to improve stability during heat sterilization.

It should also be noted that phosphates are already permitted as stabilizers for food category 01.1.1 with note 227: "For use in sterilized and UHT treated milks only", ie for phosphates there is no restriction on the animal species. Therefore, it is assumed that the stabilizer function is recognized for bovine milks as well. Considering that the function of stabilizer is recognized to citrate by CAC-GL 36/1989, it would be inconsistent/unreasonable not to approve it as a stabilizer for UHT bovine milks.

Finally, it should be clarified that the food category under discussion is UHT fluid milks, which are not used for cheeses manufacture. Therefore, the discussion raised by some members that the addition of citrates would negatively impact the process of coagulation for cheeses manufacture has no technological basement.

In UHT process, the denaturation of whey proteins is followed by the aggregation of molecules which may be caused by intermolecular disulphide bridges. This complex causes interaction of kappa-casein and beta-lactoglobulin. The observed release of sialic acid which is contained in the glycomacropeptide of kappa-casein on unfolding of the molecules due to UHT heating is reduced, so the UHT treatment is not recommended for cheese milks (FIL New monograph on UHT milk, 1981)

- **Milk Fraud:** in Brazil, several authors have reported the occurrence of casein instability in milk with normal acidity and low somatic cell count, which means that good quality bovine milks also have stabilization problems. In the State of Rio Grande do Sul, Brazil, a high frequency of cases of milk from healthy animals that react positively to the alcohol test was observed, without high titratable acidity (SILVA, 2003).

If the concern is the use of stabilizers to mask poor quality bovine milk with a high content of somatic cells, preventing its precipitation, it is worth clarifying that the same concern should be raised regarding the phosphates, ie the discussion should be around the stabilizing function rather than the citrate itself. Another important point to note is that citrate is a natural constituent of bovine milk, and its use is self-limiting, which means that the excessive use of citrate causes the decrease in the available calcium content, which can also promote coagulation by heat treatment.

If the concern is in fact fraud in bovine milks, the same concern should also be raised regarding non-bovine species milks, which are also susceptible to fraud. Therefore, the concern of frauds only for bovine milks, without considering non-bovine species, would be an incoherent and unreasonable discussion.

- **Conclusions:** in view of the above, Brazil strongly supports the use of trisodium citrate (INS 331 iii)

for UHT bovine milk, since it is safe, technologically necessary and is not used for the purpose of masking GMP failures. So it meets all principles set out in the GSFA.

Brazil understands that the purpose of the Codex Alimentarius is to establish food standards that are globally representative, what means that they should cover the conditions of all signatory countries, as far as possible, provided they ensure food safety and are always based on scientific references, as demonstrated by Brazil.

REFERENCES

FOX, P. F. Food Chemistry: Part. 111 – The milk proteins system, including milk salts and the proteins of egg white. Dept. of Food Chemistry, University College, Cork, Ireland, 1991.

SILVA, P. H. F. UHT MILKS: determinants for sedimentation and gelation (thesis). Federal University of Lavras, 2003.

Appendix 3: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

Brazil understands that reconstituted milk (FC 01.1.2) must have the same characteristics as the original milk (FC 01.1.1). Therefore, provisions for thickeners, which are not permitted in Food Category 01.1.1, are not justified in Food Category 01.1.2. Brazil requests that countries which support the use of these additives submit studies and analytical data (with the respective methodologies) that prove that these additives when used at the proposed limits, do not cause thickening of the products.

Appendix 4: Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0, with the exception of those additives with technological functions of colour (excluding those provisions discussed in point (i)) or sweetener, adipates, nitrites and nitrates, the provisions in food category 14.2.3 and its subcategories, and provisions awaiting a reply from CCSC, CCPV or CCFO

- Food Category No. 01.1.2 (Other fluid milks (plain)) - SODIUM HYDROXIDE (INS 524)

As commented in the 1st circular, Brazil strongly opposes to the use of sodium hydroxide in fluid milk, since in Brazil this additive has been frequently associated with fraud, being used to mask poor quality (acid) milk. This additive has also been targeted by police operations involving milk fraud in Brazil. Although some acidity regulators have already been approved for this food category in the GSFA, it should be emphasized that, unlike the other approved acidity regulators, except for potassium hydroxide, sodium hydroxide is alkalinizing, ie it increases the pH of the product, masking acid milk of poor quality. We emphasize that Brazil is opposed to the inclusion of sodium hydroxide in fluid milk not because of the health risk of the additive itself but because it contradicts one of the principles established in the GSFA preamble that the additive cannot be used to disguise the use of poor raw materials or undesirable (including hygienic) practices. In addition, in comparison to potassium hydroxide, sodium hydroxide is economically more viable, justifying its extensive use in milk fraud. It should also be remembered that, as sodium hydroxide is degraded into calcium caseinate and sodium, it is not detected in the laboratory analyzes, which hampers sanitary inspection of these products and hampers the responsibility of fraudsters. Moreover, there are alternative acidity regulators already approved for these products, and that do not present the concerns pointed out. Finally, Brazil highlights that the issue “food fraud” is so important that a guideline to help authorities to address the dramatic increase in food fraud is being discussed in the CCFICS (Codex Committee on Food Import and Export Inspection and Certification Systems).

- Food Categories No. 14.1.4.1 Carbonated water-based flavoured drinks, No. 14.1.4.2 Non-carbonated water-based flavoured drinks and No. 14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks - PROPYLENE GLYCOL (INS 1520)

As informed in previous circulars, Brazil supports the discontinuation of the provision. The propylene glycol is carried to the final beverage by means of flavourings (ingredient) and plays no technological function in the final beverage. So, it is already covered by the carry-over principle mentioned in the GSFA preamble. Moreover, according to item 3.5 of CAC-GL 66/2008 (Guidelines for the use of flavourings), “Flavourings may contain non-flavouring food ingredients, including food additives and foodstuffs, necessary for their production, storage, handling, and use. Such ingredients should be: c) used in accordance with the provisions of the Codex General Standard for Food Additives (GSFA; CODEX STAN 192) whenever they are intended to provide a technological function in the finished food”. Therefore, since propylene glycol has no function in final beverages, its mention in GSFA should not be made. Finally, Brazil fears that the approval of this provision may open precedent for the inclusion in the GSFA of additives carried by the ingredients, and the carry-over principle is already clearly expressed in the GSFA preamble.

Canada

(a) Appendix 4: Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0, with some exceptions**(i) FC 05.1.4:**

General Note: CCFA49 discussed the use of INS 473 in this FC but it was noted that this additive was not listed in CODEX STAN 87-1981. It was decided that proposals to list INS 473, 473a, and 474 in FC 05.1.4 and CODEX STAN 87-1981 should be submitted in response to the CL for new or revised adopted provisions (REP 17/FA para 61).

Although Canada agrees with the final eWG proposal, we suggest that the same wording be used for the New Note associated to INS 473, 473a and 474. Canada suggests the following revisions to the Note associated to INS 473a (note: new text is presented in **bold and underlined font**; text to be deleted is ~~strikethrough~~):

Additive	INS	Max Level (mg/kg)	Notes	Step	INS Functional Class	Final eWG Propos
SUCROGLYCERIDES	474	6000	348	2	Emulsifier, Stabilizer	Adopt at 3000 with new note "except for use in chocolate containing not less than 70% total cocoa solids at 6000 mg/kg".
SUCROSE ESTERS OF FATTY ACIDS	473	6000	348	2	Emulsifier, Foaming agent, Glazing agent, Stabilizer	Adopt at 3000 with new note "except for use in chocolate containing not less than 70% total cocoa solids at 6000 mg/kg".
SUCROSE OLIGOESTERS, TYPE I AND TYPE II	473a	6000	348	2	Emulsifier, Glazing agent, Stabilizer	Adopt at 3000 with new note "except for use at 6000 mg/kg in chocolate containing not less than 70% total cocoa solids <u>at 6000 mg/kg</u> ".

(ii) FC 14.1.4.1 (Carbonated water-based flavoured drinks); FC 14.1.4.2 (Non-carbonated water-based flavoured drinks, including punches and ades); and FC 14.1.4.3 (Concentrates (liquid or solid) for water-based flavoured drinks):

Canada received comments from industry with respect to the proposed provisions for propylene glycol. Propylene glycol is used for its effect on flavouring preparations only (notably to maintain solubility of citrus-based flavourings), and has no effect on the finished food. In addition, as flavourings are not a food category in the GSFA, but are addressed by the *Guidelines for the Use of Flavourings* (CAC/GL 66-2008).

Indeed, section 3.5 of CAC/GL 66-2008 states:

Flavourings may contain non-flavouring food ingredients, including food additives and foodstuffs, necessary for their production, storage, handling, and use. Such ingredients may also be used to facilitate the dilution, dissolution, or dispersion of flavourings in food. Non-flavouring food ingredients should be:

- a) Limited to the lowest level required to ensure the safety and quality of the flavourings, and to facilitate their storage and ease of use;
- b) Reduced to the lowest level reasonably possible when not intended to accomplish a technological function in the food itself; and,
- c) used in accordance with the provisions of the Codex General Standard for Food Additives (GSFA; CODEX STAN 192) **whenever they are intended to provide a technological function in the finished food.**

As the condition of paragraph (c) does not apply, this suggests that they do not need to be listed in the GSFA.

The adoption of the provisions as proposed would seem to contradict an existing Codex text, and thus, Canada supports discontinuing the provisions in the GSFA.

(b) Appendix 7: Provisions in Table 1 and 2 of the GSFA in food categories 14.1.4 and 14.1.5**(i) Stearoyl Lactylates (INS 481(i), 482(i)):**

a. FC 14.1.4.2:

3rd Circular Proposal: Adopt with New note “for use in cocoa containing beverages and coffee and tea products containing milk constituents only”

Final eWG Proposal: (1) Discuss 3rd Circular proposal further; (2) Request information on “ready-to-drink products” and “protein containing beverages”; *Chair’s Notes:* Cocoa-based beverage does not appear to be covered under FC 14.1.4.2. See FCs 1.1.4 and 5.1.1.

Canada agrees that ‘finished cocoa beverages and chocolate’ would fall within FC 1.1.4 (Flavoured fluid milk drinks) or FC 05.1.1 (Cocoa mixes (powders) and cocoa mass/cake). However, the descriptor of 14.1.4.2 does not specifically exclude ‘cocoa-containing beverages’. If the use of stearyl lactylates is needed in ‘cocoa-containing beverages’, Canada supports requesting information on these types of beverages in order to determine in which food category, FC 1.1.4, FC 05.1.1 or FC 14.1.4.2, they fit best.

b. FC 14.1.4.3:

Similarly to the comments made for FC 14.1.4.2. Canada would like to request confirmation that there are concentrates for ‘cocoa-containing beverages’ that would fit in FC 14.1.4.3.

(ii) Diocetyl sodium sulfosuccinate (INS 48) in FC 14.1.4:

3rd Circular Proposal: Adopt in FC 14.1.4 with a new note “For use in fruit-flavoured beverages only” and Note 127 “On the served to the consumer basis”. Request additional information on actual use level and types of fruit-flavoured beverages”

Final eWG Proposal: Discuss 3rd Circular proposal further; Request additional information on types of fruit-flavoured beverages.

Based on information provided by industry, Canada understands that INS 480 is used as a emulsifier in fruit-flavoured beverages (mostly carbonated, but sometimes in non-carbonated sports drinks), to improve the stability of the beverage-flavour emulsions. This use prevents ringing, creaming and sedimentation of emulsions in beverages. In addition, the use of DSS may lower the quantities of other emulsifiers necessary. Canada supports the Chair’s proposal presented in the third circular to the working group of the GSFA.

Also, given that previous exposure estimates show daily intakes to be well below the ADI, Canada would question any arguments about toxicological concerns due exposure, if based on acute (one-time) intakes in infants or young children.

(iii) Polyglycerol esters of fatty acids (INS 475) in FC 14.1.4

Final eWG Proposal: Adopt in FC 14.1.4 at 5,000 mg/kg with Note 127 “On the served to the consumer basis”.

Canada would like to re-iterate its support for the Chair’s final eWG proposal.

Costa Rica

English**Agenda Item 5(a): General Standard for Food Additives (GSFA): Report of the EWG on the GSFA (CX/FA 19/51/7).**

Costa Rica wishes to reiterate its previous positions expressed to the eWG **in favor of the discontinuation of all provisions on beverages with propylene glycol (INS 1520) of the GSFA for water-based beverages (food categories 14.1.4.1, 14.1.4.2, 14.1.4.3)**. Propylene glycol does not fulfill any technological function in the finished beverage. Ingredients that are not flavorings that do not have a technological function in the finished beverage are covered in the Codex *Guidelines for the Use of Flavorings* (see Section 3.5 in CAC / GL 66-2008). Specifically, food ingredients that are not flavoring should be used in compliance with the provisions set forth in the *General Standard for Food Additives* (NGAA, CODEX STAN 192), provided they are intended to provide a technological function in the finished food.

Español**Tema 5(a) del programa: Norma General para los Aditivos Alimentarios: Informe del eWG sobre la GSFA (CX/FA 19/51/7). Apéndice IV sobre las disposiciones relativas al propilenglicol para las bebidas.**

Costa Rica desea reiterar sus anteriores posiciones expresadas al eWG **en favor de la interrupción de todas las disposiciones en materia de bebidas con propilenglicol (INS 1520) de la NGAA para las bebidas en base de agua (categorías de alimentos 14.1.4.1, 14.1.4.2, 14.1.4.3)**. El propilenglicol no cumple ninguna función tecnológica en la bebida terminada. Los ingredientes que no son aromatizantes que no tienen una función tecnológica en la bebida terminada están cubiertos en las *Directrices para el Uso de Aromatizantes* del

Codex (ver la Sección 3.5 en CAC/GL 66-2008). Específicamente, los ingredientes alimentarios que no son aromatizantes deberían utilizarse respetando las disposiciones establecidas en la *Norma General para los Aditivos Alimentarios* (NGAA; CODEX STAN 192), siempre que tengan como propósito proporcionar una función tecnológica en el alimento terminado.

Ghana

Appendix 1

Draft and proposed draft provisions for colors in the Step process in food categories 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Position: Ghana supports adoption of the recommendations of the eWG in appendix 1

Rationale: Use of the colors is technologically justified and the proposed levels are safe for use in the products to which they are added.

Appendix 2

Use of tri-sodium citrate in food category FC 01.1.1 (Fluid milk plain) at GMP level (Appendix 2).

Position: We do not support the use of tri-sodium citrate in this food category **FC 01.1.1 (Fluid milk plain)**.

Rationale: UHT milk has been in existence for a long time and has remained stable for this period without the need for additives. UHT treatment destroys microorganisms in milk that are responsible for pH changes and heat treatment does not interfere with the acidic status of milk to warrant the use of sodium citrates as acidity regulators.

Appendix 3:

Use of food additives (List of proposed food additives) in food category FC 01.1.2 (Other fluid milk plain)

Position: Ghana does not support the use of proposed food additives in this category

Rationale: The distinction between FC 01.1.1 and FC 01.1.2 is unclear and thus very difficult to distinguish the products in the market especially by consumers. There is a potential to use one instead of the other thus providing an opportunity for milk fraud. Ghana is therefore of the opinion that food subcategories under category 01.1 should not contain food additives.

Appendix 4:

Adopt use of sodium hydroxide with note “excluding lactose reduced milks” – no information provided why use would mask spoiled milk when other approved acidity regulators were found to be technologically justified at GMP by 50th CCFA

Position: Ghana does not support this recommendation.

Rationale: There is no technological justification for the use of sodium hydroxide in plain fluid milk.

Food category 4 Fresh fruits and vegetables

Proposed use of food additives as glazing agents as listed in appendix 4 of CX/FA 19/51/7.

Position: Ghana supports the use of the listed food additives in this food category as indicated in appendix 4 of the document CX/FA 19/51/7.

Rationale: Glazing agents reduce post-harvest loss and extend shelf life of food products.

Food Category No. 06.2.1 (Flours)

Use of calcium sulphate and magnesium carbonate in flour FC 06.2.1

Position. Ghana seeks clarification on why this applies to only the INS functional class from the GSFA and not the specific technological justification.

Appendix 6: Standard for Mozzarella (CXS 262-2006)

The technological justification for the use of preservatives and anticaking agents for surface treatment of mozzarella with high moisture content covered by the Standard for Mozzarella (CXS 262-2006)

Position: Ghana supports the recommendation of the eWG to inform CAC on the technological justification for the use of preservatives and anticaking agents for surface treatment of mozzarella with high moisture and the recommendation of revision of the standards.

Guatemala

Guatemala's Codex Contact Point is requesting your support for the discontinuation of the propylene glycol beverage provision, to be discussed at the upcoming 51st Codex Committee on Food Additives (CCFA51) meeting in Jinan, China.

In response to Agenda Item 5(a) Report CX/FA 19/51/7: "Guatemala supports its prior eWG submissions **in favor of discontinuation of all propylene glycol (INS 1520) beverage provisions within the GSFA for water-based beverages (food categories 14.1.4.1, 14.1.4.2., 14.1.4.3)**. Propylene glycol does not serve a technological function in the finished beverage. Non-flavoring ingredients that do not have a technological function in the finished beverage are addressed by the *Codex Guidelines for the Use of Flavourings* (see Section 3.5 in CAC/GL 66-2008). Specifically, non-flavouring food ingredients should be ... used in accordance with the provisions of the Codex General Standard for Food Additives (GSFA; CODEX STAN 192) whenever they are intended to provide a technological function in the finished food."

Indonesia

Appendix 1- Draft and proposed draft provisions for colours in the Step process in food categories (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (non- fruit) and sweet sauces)

Category No. 05.2.1 (Hard candy)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
BROWN HT	155	300			Colour	Adopt at 50 mg/kg.	Indonesia supports maximum level at 50 mg/kg.
CARAMEL II - SULFITE CARAMEL	150b	50000	183		Colour	Adopt at 50,000 mg/kg with removal of Note 183.	Caramel II - Sulfite Caramel contains sulfite up to 0,2% (JECFA Compendium 2011). The use of Caramel II - Sulfite Caramel at the level of 50000 mg/kg will result sulphite residue of 100 mg/kg. At this level, sulphite will have technological function as a preservative and could stimulate asthmatic symptom. Therefore Indonesia proposes the maximum use level for Caramel II - Sulfite Caramel at 5000 mg/kg.
CURCUMIN	100(i)	300			Colour	Adopt at 150 mg/kg with New Note: "Except for use at 300 mg/kg in candies with yellow fruit flavour."	Indonesia proposes the maximum level for Curcumin at 300 mg/kg. The use of 300 mg/kg gives exposure to 0.32% ADI. Curcumin is obtained from turmeric and it is close to the traditional use in Indonesian cuisines.
LUTEIN FROM TAGETES ERECTA	161b(i)	300			Colour	Hold provision until additive has been considered for inclusion in Table 3.	Indonesia supports eWG Proposal.
LYCOPEN E, TOMATO	160d(i)	50000		3	Colour	Discontinue.	Indonesia supports eWG Proposal.
PAPRIKA EXTRACT	160c(ii)	95	39	2	Colour	Adopt at 100 mg/kg.	Indonesia supports eWG Proposal.
QUINOLIN E YELLOW	104	300			Colour	Adopt at 100 mg/kg. with New Note: "Except for use at 300 mg/kg in lemon flavored candies."	Indonesia supports eWG Proposal.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
TARTRAZINE	102	300			Colour	Adopt at 300 mg/kg.	Indonesia proposes maximum level for Tartrazine at 100 mg/kg. At this use level, this additive produces sufficient yellow colour.
ZEAXANTHIN, SYNTHETIC	161h(i)	300			Colour	Hold provision until additive has been considered for inclusion in Table 3.	Indonesia supports eWG Proposal.

Category No. 05.2.2 (Soft candy)

Corresponding commodity standards: CODEX STAN 309R-2011: allows acidity regulators and emulsifiers listed in Table 3

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
AMARANTH	123	100		7	Colour	Discontinue.	Indonesia does not allow this additive. Amaranth has very low ADI (0.5 mg/kg bw/d JECFA) and there are other additive having higher ADI values can be used as alternatives.
AZORUBINE (CARMOISINE)	122	300			Colour	Adopt at 100 mg/kg.	Indonesia supports adoption. The actual use of this colour in Indonesia is up to 88 mg/kg. For that reason, Indonesia proposes the maximum level Azorubine (Carmoisine) at 100 mg/kg. The use of 100 mg/kg gives exposure to 0,9% ADI.
BROWN HT	155	300			Colour	Adopt at 50 mg/kg	Indonesia supports eWG Proposal.
CARAMEL II - SULFITE CARAMEL	150b	50000	183		Colour	Adopt at 50,000 mg/kg with removal of Note 183.	Caramel II - Sulfite Caramel contains sulfite up to 0,2% (JECFA Compendium 2011). The use of Caramel II - Sulfite Caramel at the level of 50000 mg/kg will result sulphite residue of 100 mg/kg. At this level, sulphite will have technological function as a preservative and could stimulate asthmatic symptom. Therefore Indonesia proposes the maximum use level for Caramel II - Sulfite Caramel at 5000 mg/kg.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
CURCUMIN	100(i)	300			Colour	Adopt at 150 mg/kg.	Indonesia proposes the maximum level for Curcumin at 300 mg/kg. The use of 300 mg/kg gives exposure to 0.32% ADI. Curcumin is obtained from turmeric and it is close to the traditional use in Indonesian cuisines.
LUTEIN FROM TAGETES ERECTA	161b(i)	300			Colour	Hold provision until additive has been considered for inclusion in Table 3.	Indonesia supports eWG Proposal.
LYCOPENE, E, TOMATO	160d(i)	5000		3	Colour	Discontinue.	Indonesia supports eWG Proposal.
PAPRIKA EXTRACT	160c(ii)	95	39	2	Colour	Adopt at 100 mg/kg.	Indonesia supports eWG Proposal.
QUINOLIN E YELLOW	104	300			Colour	Adopt at 100 mg/kg	Indonesia supports eWG Proposal.
TARTRAZINE	102	300			Colour	Adopt at 300 mg/kg.	Indonesia proposes maximum level for Tartrazine at 100 mg/kg. At this use level, this additive produces sufficient yellow colour.
ZEAXANTHIN, SYNTHETIC	161h(i)	300			Colour	Hold provision until additive has been considered for inclusion in Table 3.	Indonesia supports eWG Proposal.

Category No. 05.2.3 (Nougats and marzipans)

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
CARAMEL II - SULFITE CARAMEL	150b	50000	183		Colour	Adopt at 50,000 mg/kg with removal of Note 183.	Caramel II - Sulfite Caramel contains sulfite up to 0,2% (JECFA Compendium 2011). The use of Caramel II - Sulfite Caramel at the level of 50000 mg/kg will result sulphite residue of 100 mg/kg. At this level, sulphite will have technological function as a preservative and could stimulate asthmatic symptom.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
							Therefore Indonesia proposes the maximum use level for Caramel II - Sulfite Caramel at 5000 mg/kg.
CURCUMIN	100(i)	300			Colour	Adopt at 150 mg/kg.	Indonesia proposes the maximum level for Curcumin at 300 mg/kg. The use of 300 mg/kg gives exposure to 0.32% ADI. Curcumin is obtained from turmeric and it is close to the traditional use in Indonesian cuisines.
LUTEIN FROM TAGETES ERECTA	161b(i)	300			Colour	Hold provision until additive has been considered for inclusion in Table 3.	Indonesia supports eWG Proposal.
PAPRIKA EXTRACT	160c(ii)	95	39	2	Colour	Adopt at 100 mg/kg.	Indonesia supports eWG Proposal.
QUINOLINE YELLOW	104	300			Colour	Adopt at 100 mg/kg.	Indonesia supports eWG Proposal.
TARTRAZINE	102	300			Colour	Adopt at 300 mg/kg.	Indonesia proposes maximum level for Tartrazine at 100 mg/kg. At this use level, this additive produces sufficient yellow colour.
ZEAXANTHIN, SYNTHETIC	161h(i)	300			Colour	Hold provision until additive has been considered for inclusion in Table 3.	Indonesia supports eWG Proposal.

Category No. 05.3 (Chewing gum) Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
AMARANTH	123	300		7	Colour	Adopt at 100 mg/kg.	Indonesia does not allow this additive. Amaranth has very low ADI (0.5 mg/kg bw/d JECFA) and there are other colouring agent having higher ADI values can be used as

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
							alternatives.
ANNATTO EXTRACTS, BIXIN- BASED	160b(i)	500	8	4	Colour	Adopt at 50 mg/kg.	There are no actual use of this colour in Indonesia. Indonesia supports maximum level for Annatto Extracts, Bixin- Based at 50 mg/kg. This natural colour is expected to reduce the use of synthetic azo colour.
AZORUBINE (CARMOISINE)	122	300		7	Colour	Adopt at 100 mg/kg.	Indonesia supports eWG Proposal. The actual use of this colour is up to 50 mg/kg. For that reason, Indonesia supports adoption the maximum level for Azorubine (Carmoisine) at 100 mg/kg. The use of 100 mg/kg gives exposure to 0.33% ADI.
BROWN HT	155	300		7	Colour	Adopt at 300 mg/kg.	Indonesia proposes the maximum level for Brown HT at 50 mg/kg. The use of 50 mg/kg gives exposure to 0.44% ADI.
CARAMEL II - SULFITE CARAMEL	150b	50000	183		Colour	Adopt at 20,000 mg/kg with removal of Note 183.	Caramel II - Sulfite Caramel contains sulfite up to 0,2% (JECFA Compendium 2011). The use of Caramel II - Sulfite Caramel at the level of 50000 mg/kg will result sulphite residue of 100 mg/kg. At this level, sulphite will have technological function as a preservative and could stimulate asthmatic symptom. Therefore Indonesia proposes the maximum use level for Caramel II - Sulfite Caramel at 5000 mg/kg.
CURCUMIN	100(i)	700		7	Colour	Adopt at 300 mg/kg with New Note "Except for use at 700 mg/kg to provide brigher coloring in yellow fruit or spice flavoured chewing gum."	Indonesia proposes the maximum level for Curcumin at 300 mg/kg. The use of 300 mg/kg gives exposure to 0.32% ADI. Curcumin is obtained from turmeric and it is close to the traditional use in Indonesian cuisines.
LYCOPENE, TOMATO	160d(ii)	50000		3	Colour	Discontinue.	Indonesia supports eWG Proposal.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
PAPRIKA EXTRACT	160c(ii)	60	39	2	Colour	Adopt at 150 mg/kg.	Indonesia supports eWG Proposal.
QUINOLINE YELLOW	104	300		7	Colour	Adopt at 30 mg/kg with new note "Except for use at 300 mg/kg in lemon and citrus flavoured products."	Indonesia supports eWG Proposal.
TARTRAZINE	102	300		7	Colour	Adopt at 300 mg/kg.	Indonesia proposes maximum level for Tartrazine at 100 mg/kg. At this use level, this additive produces sufficient yellow colour.
ZEAXANTHIN, SYNTHETIC	161h(i)	100		4	Colour	Hold provision until additive has been considered for inclusion in Table 3.	Indonesia supports eWG Proposal.

Category No. 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
AMARANTH	123	300		7	Colour	Adopt at 100 mg/kg.	Indonesia does not allow this additive. Amaranth has very low ADI (0.5 mg/kg bw/d JECFA) and there are other colouring agent having higher ADI values can be used as alternatives.
AZORUBINE (CARMOISINE)	122	500		7	Colour	Adopt at 300 mg/kg.	The actual use of Azorubine (Carmoisine) is up to 135 mg/kg. For that reason, Indonesia supports adoption the maximum use level of 300 mg/kg. The use of 300 mg/kg gives exposure to 1% ADI
BROWN HT	155	500		7	Colour	Adopt at 50 mg/kg.	Indonesia supports eWG Proposal.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
CARAMEL II - SULFITE CARAMEL	150b	50000	183		Colour	Adopt at 50,000 mg/kg with removal of Note 183.	Caramel II - Sulfite Caramel contains sulfite up to 0,2% (JECFA Compendium 2011). The use of Caramel II - Sulfite Caramel at the level of 50000 mg/kg will result sulphite residue of 100 mg/kg. At this level, sulphite will have technological function as a preservative and could stimulate asthmatic symptom. Therefore Indonesia proposes the maximum use level for Caramel II - Sulfite Caramel at 5000 mg/kg.
CURCUMIN	100(i)	500		7	Colour	Adopt at 500 mg/kg.	Indonesia supports adoption the maximum level for Curcumin at 500 mg/kg. Curcumin is obtained from turmeric and it is close to the traditional use in Indonesian cuisines
LUTEIN FROM TAGETES ERECTA	161b(i)	500		4	Colour	Hold provision until additive has been considered for inclusion in Table 3.	Indonesia supports eWG Proposal.
PAPRIKA EXTRACT	160c(ii)	300	39	2	Colour	Adopt at 100 mg/kg.	Indonesia supports eWG Proposal.
TARTRAZINE	102	500		7	Colour	Adopt at 500 mg/kg.	Indonesia proposes the maximum level for Tartrazine at 300 mg/kg. At this use level, this colour produce sufficient yellow colour.

A. Appendix 2: Provision for Trisodium citrate in FC 01.1.1

Trisodium citrate INS 331(iii)		Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Sequestrant, Stabilizer					
Food Cat No.	Food Category	ML (mg/kg)	Notes	Step	EWG Final Proposal		Indonesia's Comment

01.1.1	Fluid milk (plain)	GMP	438, 439	7	Adopt with Note 438 "Only for use as emulsifier or stabilizer" and Note 227 "for use in sterilized and UHT treated milks only". Remove Note 439 "For use in sterilized and UHT treated milks from non-bovine species only"	Indonesia supports eWG Proposal.
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Appendix 3: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer
Food Category No. 01.1.2 (Other fluid milks (plain))

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Final Proposal	Indonesia's Comment
CAROB BEAN GUM	410	GMP		2	Emulsifier, Stabilizer, Thickener	Discuss further the proposal options: i. Adopt at 800 mg/kg with New Note, "Except for use at GMP in milk-based beverages only" ii. GMP in these products	Indonesia supports ML of GMP for these products.
CARRAGEENAN	407	GMP		2	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discuss further the proposal options: i. Adopt at 1700 mg/kg with New Note, "Except for use at GMP in milk-based beverages only" i. GMP in these products	Indonesia supports ML of GMP for these products.
GELLAN GUM	418	GMP		2	Thickener, Stabilizer	Discuss further the proposal options: i. Adopt at 1500 mg/kg with New Note, "Except for use at GMP in milk-based beverages only" i. GMP in these products	Indonesia supports ML of GMP for these products.
GUAR GUM	412	GMP		2	Emulsifier, Stabilizer, Thickener	Discuss further the proposal options: i. Adopt at 6000 mg/kg with New Note, "Except for use at GMP in milk-based beverages only" i. GMP in these products	Indonesia supports GMP in these products.

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	EWG Final Proposal	Indonesia's Comment
POLYDEXTROSES	1200	GMP		2	Stabilizer, Thickener	Discuss further the proposal options: i. Adopt at 5000 mg/kg with New Note, "Except for use at GMP in milk-based beverages only" ii. GMP in these products	Indonesia supports GMP in these products.
POTASSIUM CARBONATE	501(i)	GMP	Use in non-flavored vitamin and mineral fortified milks only	2	Acidity regulator, Anticaking agent, Raising agent, Stabilizer, Thickener Acidity regulator, Stabilizer	According to CXG 36-1989, Potassium Carbonate INS 501(i) only has the technological functions of Acidity regulator, Stabilizer. Therefore, the food additive will not have a technological function of Thickener on the milk product. Adopt as listed.	Indonesia supports eWG Proposal.
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	GMP		2	Bulking agent, Emulsifier, Firming agent, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Discuss further the proposal options: i. Adopt at 3000 mg/kg with New Note, "Except for use at GMP in milk-based beverages only" ii. GMP in these products	Indonesia supports GMP in these products.
XANTHAN GUM	415	GMP		2	Emulsifier, Foaming agent, Stabilizer, Thickener	Discuss further the proposal options: i. Adopt at 800 mg/kg with New Note, "Except for use at GMP in milk-based beverages only" ii. GMP in these products	Indonesia supports GMP in these products.

Appendix 4: Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0, with the exception of those additives with technological functions of colour (excluding those provisions discussed in point (i)) or sweetener, adipates, nitrites and nitrates, the provisions in food category 14.2.3 and its subcategories, and provisions awaiting a reply from CCSCH, CCPFV or CCFO

Food Category No. 01.1.2 (Other fluid milks (plain))

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	Final eWG Proposal	Indonesia's Comment
SODIUM HYDROXIDE	524	GMP	AAA ³	2	Acidity regulator	Adopt with note "excluding lactose reduced milks" – no information provided why use would mask spoiled milk when other approved acidity regulators were found to be technologically justified at GMP by 50 th CCFA.	Indonesia supports eWG Proposal.

Food Category No. 01.7 (Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt))

Additive	INS	Max Level (mg/kg)	Notes	Step	INS Functional Class	Final eWG Proposal	Indonesia's Comment
SORBITAN ESTERS OF FATTY ACIDS	491-495	5000	362	2	Emulsifier , Stabilizer	Revise the adopted provisions in the FC to remove note XS243 and add Note 362 "excluding plain products conforming to CODEX STAN 243"	Indonesia supports the proposal to align with CXS 243-2003.
SUCROSE ESTERS OF FATTY ACIDS	473	5000	348 & 362	2	Emulsifier, Glazing agent, Stabilizer	Revise the adopted provisions in the FC to remove note XS243 and add Note 362 "excluding plain products conforming to CODEX STAN 243"	Indonesia supports the proposal to align with CXS 243-2003.

Food Category No. 04.1.1.2 (Surface treated fresh fruit)

Additive	INS	Max Level (mg/kg)	Notes	Step	INS Functional Class	Final eWG Proposal	Indonesia's Comment
CARRAGEENAN	407	GMP		7	Bulking agent, Carrier, Emulsifier, Gelling agent, Glazing agent, Humectant, Stabilizer, Thickener	Adopt with New Note "For use in waxes, coatings, or glazes applied to the surface of fresh fruit only"	Indonesia supports eWG Proposal.
MAGNESIUM CHLORIDE	511	GMP	16	7	Colour retention agent, Firming agent, Stabilizer	Discontinue as per horizontal approach	Indonesia supports eWG Proposal.

Food Category No. 05.1.4 (Cocoa and chocolate products)

Additive	INS	Max Level (mg/kg)	Notes	Step	INS Functional Class	Final eWG Proposal	Indonesia's Comment
SUCROSE ESTERS OF FATTY ACIDS	473	6000	348	2	Emulsifier, Foaming agent, Glazing agent, Stabilizer	Adopt at 3000 with new note "except for use in chocolate containing not less than 70% total cocoa solids at 6000 mg/kg"	Indonesia supports eWG Proposal.

Food Category No. 06.2.1 (Flours)

Additive	INS	Max Level (mg/kg)	Notes	Step	INS Functional Class	Final eWG Proposal	Indonesia's Comment
CALCIUM SULFATE	516	GMP	57	7	Acidity regulator, Firming agent, Flour treatment agent, Sequestrant, Stabilizer	Adopt in GSFA, forward to alignment WG to discuss revising CODEX STAN 152-1985 to add INS 516 to list of allowed flour treatment agents.	Indonesia supports eWG Proposal.

Food Category No. 07.2.3 (Mixes for fine bakery wares (e.g. cakes, pancakes))

Additive	INS	Max Level (mg/kg)	Notes	Step	INS Functional Class	Final eWG Proposal	Indonesia's Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	16000		2	Emulsifier, Stabilizer	Revise adopted provision to ML of 16,000 mg/kg, remove Note 11, and add new note "On the dry mixture basis".	Indonesia proposes maximum level at 10,000 mg/kg. The exposure is 80% ADI in children. ML of 16,000 mg/kg gives exposure 128% ADI for children.

Food Category No. 14.1.4.1 Carbonated water-based flavoured drinks

Additive	INS	Max Level (mg/kg)	Notes	Step	INS Functional Class	Final eWG Proposal	Indonesia's Comment
PROPYLENE GLYCOL	1520	3000		7	Emulsifier, Carrier, Glazing agent, Humectant	Adopt with new note "for use as carrier only"	Indonesia proposes maximum level at 600 mg/kg. Indonesia considers the ML of 600 mg/kg has already gives the technological function. Support eWG proposal to adopt new note "for use as carrier only".
SUCROSE ESTERS OF FATTY ACIDS	473	1000		7	Emulsifier, Glazing agent, Stabilizer	3rd Circular Proposal : Discontinue	Indonesia supports eWG Proposal.

Food Category No. 14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades

Additive	INS	Max Level I (mg/kg)	Notes	Step	INS Functional Class	3 rd Circular	Indonesia's Comment
PROPYLENE GLYCOL	1520	3000		7	Emulsifier, Carrier, Glazing agent, Humectant	Adopt with new note "for use as carrier only"	Indonesia proposes maximum level at 600 mg/kg. Indonesia considers the ML of 600 mg/kg has already gives the technological function. Support eWG proposal to adopt new note "for use as carrier only".

Food Category No. 14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks

Additive	INS	Max Level I (mg/kg)	Notes	Step	INS Functional Class	3 rd Circular	Indonesia's Comment
PROPYLENE GLYCOL	1520	200000		7	Emulsifier, Carrier, Glazing agent, Humectant	Adopt with new note "for use as carrier only" and note 2 "On the dry ingredient, dry weight, dry weight, dry mix or concentrate basis"	Indonesia proposes maximum level at 600 mg/kg. Indonesia considers the ML of 600 mg/kg has already gives the technological function. Support eWG proposal to adopt new note "for use as carrier only"

Appendix 5 - Proposed draft provisions for tamarind seed polysaccharide (INS 437) and gum ghatti (INS 419) in Table 3

INS	Additive	INS Functional Class	Step	Year	Acceptable, including foods conforming to the following commodity standards	Final eWG Proposal	Indonesia's Comment
419	Gum ghatti	Thickener, Stabilizer, Emulsifier, Carrier	3			Adopt as listed	Indonesia supports eWG Proposal.

Appendix 6: Standard for Mozzarella (CXS 262-2006)

- 1) The use of anti-caking agents in the surface treatment of high-moisture mozzarella is technologically justified only when that mozzarella is in a shredded or diced format.

Indonesia comment:

Indonesia supports that the use of anti-caking agents in the surface treatment of shredded high-moisture mozzarella since it is technologically justified .

- 2) The use of preservatives in the surface treatment of high-moisture mozzarella is technologically justified when that mozzarella is not packaged in liquid

Indonesia comment:

Indonesia supports that the use of preservatives in the surface treatment of high-moisture mozzarella since is technologically justified when that mozzarella is not packaged in liquid.

- 3) Recommend that the table on “Justified Use” in CODEX STAN 262-2006 be revised as shown in **bolded text** below to reflect the technologically justified use of these additives in high-moisture mozzarella:

Additive functional class	JUSTIFIED USE			
	Mozzarella with low moisture content		Mozzarella with high moisture content	
	Cheese mass	Surface treatment	Cheese mass	Surface treatment
Colours:	X ^(a)	–	X ^(a)	–
Bleaching agents:	–	–	–	–
Acidity regulators:	X	–	X	–
Stabilizers:	X	–	X	–
Thickeners:	X	–	X	–
Emulsifiers:	–	–	–	–
Antioxidants:	–	–	–	–
Preservatives:	X	X	X	X^(c)
Foaming agents:	–	–	–	–
Anti-caking agents:	–	X ^(b)	–	X^(d)

(a) Only to obtain the colour characteristics, as described in Section 2.

(b) For the surface of sliced, cut, shredded or grated cheese, only.

c. (c) Only for high-moisture mozzarella not packaged in liquid.

(d) For the surface treatment of shredded and/or diced cheese, only.

- X The use of additives belonging to the class is technologically justified.
 – The use of additives belonging to the class is not technologically justified

Indonesia comment:

Indonesia supports the table on “Justified Use” in CODEX STAN 262-2006 be revised to reflect the technologically justified use of these additives in high-moisture mozzarella.

Appendix 7: Provisions in Table 1 and 2 of the GSFA in food categories 14.1.4 and 14.1.5

Food Category No. 14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks Corresponding commodity standards: None

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	3 rd Circular Proposal	EWG Final Proposal	Indonesia's Comment
DIOCTYL SODIUM SULFOSUCCINATE	480	10		7	Emulsifier, Humectant	Adopt in FC 14.1.4 with a new note “For use in fruit-flavoured beverages only” and Note 127 “On the served to the consumer basis” Request additional information on actual use level and types of fruit-flavoured beverages	Discuss 3 rd Circular proposal further Request additional information on types of fruit-flavoured beverages	Indonesia does not allow the use of Dioctyl Sodium Sulfosuccinate as food additive due to very low ADI value (0 – 0.1 mg/kg bw/day).

Food Category No. 14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	3 rd Circular Proposal	EWG Final Proposal	Indonesia's Comment
STEAROYL LACTYLATES	481(i), 482(i)	2000			Emulsifier, Flour treatment agent, Foaming agent, Stabilizer	Adopt with New note "for use in cocoa containing beverages and coffee and tea products containing milk constituents only" and Note 127 "On the served to the consumer basis"	Discuss 3 rd Circular proposal further Request information on "ready-to-drink products" and "protein containing beverages" Chair's Notes: Cocoa-based beverage does not appear to be covered under FC 14.1.4.2. See FCs 1.1.4 and 5.1.1.	Indonesia does not allow the use of Stearoyl Lactylates in food category 14.1.4.3. There are other emulsifiers for this food category that are already permitted.

Food Category No. 14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	INS Functional Class	3 rd Circular Proposal	EWG Final Proposal	Indonesia's Comment
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	5000		7	Emulsifier, Stabilizer	Adopt at 5000 mg/kg with Note 160 "For use in ready- to-drink products and pre-mixes for ready-to-drink products only" Request clarification on the use level as served to the consumer basis. Request additional information in products at 10,000 mg/kg.	Adopt at 5000 mg/kg with Note 127 "On the served to the consumer basis".	Indonesia does not support the proposed maximum level. At the maximum level of 5000 mg/kg give the high exposure up to 176% ADI for children and 73% ADI for adults.

Japan

Japan would like to provide exposure estimates to sucrose esters of fatty acids from their use as a food additive. (Appendix 4)

1. Method of estimation of dietary exposure

We calculated dietary exposure to sucrose esters of fatty acids for young children (1-6 years) and general population. Dietary exposure was calculated by multiplying the maximum use level of sucrose esters of fatty acids for each food with its mean food consumption amount. The sum of exposure was calculated for all foods.

2. Premise

i. Mean food consumption

- Mean food consumption data were obtained by an MHLW research project in 2010. The survey conditions were as follows;
 - 24hr dietary recall
 - 3 non-consecutive days (2 days in weekdays, 1 day in weekend)
 - Four seasons
- Food consumption data were obtained on ready-to-eat weight. If maximum use level were established in dry products, mean food consumption data were converted to dry product basis by processing factor.
- Assumption that all the foods listed in the GSFA contain sucrose esters of fatty acids.

ii. Maximum use level

- Each of the foods covered in the food category contains sucrose esters of fatty acids at the maximum use level.
- If the maximum use levels reported by the food industries in Japan are lower than the codex maximum use levels of corresponding food categories in the GSFA, the maximum use level in the GSFA were used.

iii. Average body weight

- 16.5 kg for young children
- 55.1 kg for general population

3. Dietary exposure to sucrose esters of fatty acids

Table 1 summarises the estimated dietary exposure to sucrose esters of fatty acids from foods

	Dietary exposure (mg/kg bw/day)	Main food categories contributing to exposure
Young children (1-6 years)	50	"Fine bakery wares and mixes" (21 %), "Flavoured fluid milk drinks" (14 %), "Bread and ordinary bakery wares and mixes" (9 %)
General population	18	"Fine bakery wares and mixes" (16 %), "Soybean-based beverages" (11 %), "Bread and ordinary bakery wares and mixes" (10 %)

4. Uncertainty in the exposure estimates

Table 2: Influence of uncertainty in the exposure estimates

Uncertainty	Overestimate(+) Underestimate(-)
Food consumption data	
Representativeness of respondents	+/-

	Appropriateness of processing factor	+/-
	Assumption that all the foods listed in the GSFA contain sucrose esters of fatty acids while its share among the emulsifiers in Japan is approximately 17%	+
	While the GSFA permits the use of sucrose esters of fatty acids only in the category of flavoured fluid milks, the food consumption data are only available for broader food category. In the estimation, broader food category was used	+
	Unavailability of food consumption data on some foods	-
Maximum use level		
	Not all foods in the market contain sucrose esters of fatty acids at maximum use level	+
	Sucrose esters of fatty acids are not used in some foods/ Sucrose esters of fatty acids are used at lower level than the GSFA maximum use level	+
Others		
	Assumption of average body weight	+/-

Kenya

Issue 1: Draft and proposed draft provisions for colours in the Step process in food categories 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Comment: We support the recommendations of the eWG and proceed as proposed for the various food categories

Justification: The recommendations are based on the results of safety evaluation as provided by JECFA

Issue 2: Provision for trisodium citrate in FC 01.1.1

Comment: Kenya does not support the use of food additives in this food category

Justification: There is no technological justification to emulsifier or stabilizers in milks whether from bovine origin or non-bovine origin

Issue 3: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

Comment: Kenya does not support use of food additives in this category

Justification: This food category in the first place provide ambiguity of the specific products to which it covers. This will be an opportunity to introduce similar additives to fluid milk which we use to wean our infants and young children. The opinion of CCNFSDU should be sought before final decision is made.

Philippines

Appendix 1 - Draft and proposed draft provisions for colours in the Step process in food categories 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Category No. 05.0 (Confectionery)						
Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	Final EWG Proposal	Philippines Comment
CARAMEL II - SULFITE - CARAMEL	150b	50000	483	4	Discuss use in subcategories (discontinue if adopted in subcategories)	Philippines supports the discussion in subcategories

Category No. 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4)						
Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	Final EWG Proposal	Philippines Comment
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	200	185	4	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories
AZORUBINE (CARMOISINE)	122	300	-	7	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories
BRILLIANT BLACK (BLACK PN)	151	300	-	7	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories
BROWN HT	155	300	-	7	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories
CURCUMIN	100(i)	300	-	7	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories
LUTEIN FROM TAGETES ERECTA	161b(i)	300	-	4	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories
QUINOLINE YELLOW	104	300	-	7	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories
TARTRAZINE	102	300	-	7	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories

ZEAXANTHIN, SYNTHETIC	161b(i)	300	-	4	Discuss use in subcategories (discontinue if adopted in subcategories (as appropriate))	Philippines supports the discussion in subcategories
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Category No. 05.2.1 (Hard candy)						
Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	Final EWG Proposal	Philippines Comment
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	200	8	4	Adopt at 200 mg/kg	Philippines supports the adoption at 200 mg/kg
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	200	185		Adopt at 30 mg/kg with New Note: "Except for use at 200 mg/kg in hard candy with hard panned sugar coating."	Philippines supports the adoption at 30 mg/kg
AZORUBINE (CARMOISINE)	122	300			Adopt at 50 mg/kg with New Note: "Except for use at 300 mg/kg in candies with red fruit flavour."	Philippines supports the adoption at 50 mg/kg
BRILLIANT BLACK (BLACK PN)	151	300			Adopt at 100 mg/kg	Philippines supports the adoption at 100 mg/kg
BROWN HT	155	300			Adopt at 50 mg/kg.	Philippines supports the adoption at 50 mg/kg
CARAMEL II - SULFITE CARAMEL	150b	50000	183		Adopt at 50,000 mg/kg with removal of Note 183.	Philippines supports the adoption at 50,000 mg/kg
CURCUMIN	100(i)	300			Adopt at 150 mg/kg with New Note: "Except for use at 300 mg/kg in candies with yellow fruit flavour."	Philippines supports the adoption at 300 mg/kg
PAPRIKA EXTRACT	160c(ii)	95	39	2	Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
QUINOLINE YELLOW	104	300			Adopt at 100 mg/kg with	Philippines supports the

					New Note: "Except for use at 300 mg/kg in lemon flavored candies."	adoption at 100 mg/kg
TARTRAZINE	102	300			Adopt at 300 mg/kg.	Philippines supports the adoption at 300 mg/kg

Category No. 05.2.2 (Soft candy)						
Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	Final EWG Proposal	Philippines Comment
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	200	8	4	Adopt at 200 mg/kg	Philippines supports the adoption at 200 mg/kg
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	200	185		Adopt at 30 mg/kg with New Note: "Except for use at 200 mg/kg in milk toffees."	Philippines supports the adoption at 30 mg/kg
AZORUBINE (CARMOISINE)	122	300			Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
BRILLIANT BLACK (BLACK PN)	151	300			Adopt at 100 mg/kg	Philippines supports the adoption at 100 mg/kg
BROWN HT	155	300			Adopt at 50 mg/kg.	Philippines supports the adoption at 50 mg/kg
CARAMEL II - SULFITE CARAMEL	150b	50000	183		Adopt at 50,000 mg/kg with removal of Note 183.	Philippines supports the adoption at 50000mg/kg
CURCUMIN	100(i)	300			Adopt at 150 mg/kg.	Philippines supports the adoption at 150 mg/kg
PAPRIKA EXTRACT	160c(ii)	95	39	2	Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
QUINOLINE YELLOW	104	300			Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
TARTRAZINE	102	300			Adopt at 300 mg/kg.	Philippines supports the adoption at 300 mg/kg

Category No. 05.2.3 (Nougats and marzipans)
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Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	Final EWG Proposal	Philippines Comment
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	100	8	4	Adopt at 200 mg/kg.	Philippines supports the adoption at 200 mg/kg
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	200	185		Adopt at 30 mg/kg.	Philippines supports the adoption at 30 mg/kg
AZORUBINE (CARMOISINE)	122	300			Adopt at 50 mg/kg.	Philippines supports the adoption at 50 mg/kg
BRILLIANT BLACK (BLACK PN)	151	300			Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
BROWN HT	155	300			Adopt at 50 mg/kg	Philippines supports the adoption at 50 mg/kg
CARAMEL II - SULFITE CARAMEL	150b	50000	183		Adopt at 50,000 mg/kg with removal of Note 183.	Philippines supports the adoption at 50000 mg/kg
CURCUMIN	100(i)	300			Adopt at 150 mg/kg.	Philippines supports the adoption at 150 mg/kg
PAPRIKA EXTRACT	160c(ii)	95	39	2	Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
QUINOLINE YELLOW	104	300			Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
TARTRAZINE	102	300			Adopt at 300 mg/kg.	Philippines supports the adoption at 300 mg/kg

Category No. 05.3 (Chewing gum)						
Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	Final EWG Proposal	Philippines Comment
AMARANTH	123	300		7	Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	500	8	4	Adopt at 50 mg/kg.	Philippines supports the adoption at 50mg/kg
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	500	185	4	Adopt at 50 mg/kg.	Philippines supports the adoption at 50 mg/kg
AZORUBINE (CARMOISINE)	122	300		7	Adopt at 100 mg/kg.	Philippines supports the

						adoption at 100 mg/kg
BRILLIANT BLACK (BLACK PN)	151	300		7	Adopt at 300 mg/kg	Philippines supports the adoption at 300 mg/kg
BROWN HT	155	300		7	Adopt at 300 mg/kg	Philippines supports the adoption at 300 mg/kg
PAPRIKA EXTRACT	160c(ii)	60	39	2	Adopt at 150 mg/kg.	Philippines supports the adoption at 150 mg/kg
TARTRAZINE	102	300		7	Adopt at 300 mg/kg.	Philippines supports the adoption at 300 mg/kg

Category No. 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Additive	INS	Max Level (mg/kg)	Notes	Step/ Adopted	Final EWG Proposal	Philippines Comment
AMARANTH	123	300		7	Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	50		4	Adopt at 50 mg/kg.	Philippines supports the adoption at 50 mg/kg
AZORUBINE (CARMOISINE)	122	500		7	Adopt at 300 mg/kg	Philippines supports the adoption at 300 mg/kg
BRILLIANT BLACK (BLACK PN)	151	500		7	Adopt at 500 mg/kg	Philippines supports the adoption at 300 mg/kg
BROWN HT	155	500		7	Adopt at 50 mg/kg.	Philippines supports the adoption at 500 mg/kg
CURCUMIN	100(i)	500		7	Adopt at 500 mg/kg.	Philippines supports the adoption at 500 mg/kg
PAPRIKA EXTRACT	160c(ii)	300	39	2	Adopt at 100 mg/kg.	Philippines supports the adoption at 100 mg/kg
QUINOLINE YELLOW	104	500		7	Adopt at 50 mg/kg.	Philippines supports the adoption at 50 mg/kg
TARTRAZINE	102	500		7	Adopt at 500 mg/kg.	Philippines supports the adoption at 300 mg/kg

General Comment:

Colours are used to improve the organoleptic properties of the foods under the Food Categories 5.2, 5.3 and 5.4 and provisions for colours in these food categories have been adopted. Food colours are also used to restore colors that may have been lost during the manufacturing process.

Appendix 3: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

Food Category No. 01.1.2 (Other fluid milks (plain))						
Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	EWG Proposal	Final Philippines Comment
CARRAGEENAN	407	GMP		2	Discuss further the proposal options: i. Adopt at 1700 mg/kg with New Note, "Except for use at GMP in milk-based beverages only" ii. GMP in these products	Carrageenan is often used in varied levels, in combination with other stabilizers and emulsifier, which limits the identification of single use level. Use of carrageenan should be permitted as GMP instead of a specific maximum level. The use of these additive is self-limiting that it is not desirable to thicken the product beyond what is expected of a fluid milk. If there are concerns that the permission of these additives at GMP level for FC 01.1.2 products will result in products having less milk components than is acceptable, we believe that this is not an additives issue. Instead, such concerns are better dealt with in by product composition standards and labeling requirements rather than through restricting additive use.

Republic of Korea

Appendix 1 : Draft and proposed draft provisions for colours in the Step process in food categories 05.2(Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3(Chewing gum), 05.4(Decorations(e.g. for fine bakery wares), toppings(non-fruit) and sweet sauces)

The Republic of Korea supports proposed maximum level of 300 mg/kg of INS 102 to FC 05.2.1(hard candy), 05.2.2(Soft candy) and 05.3(Chewing gum). We permit this colour in candy(hard, soft) and chewing gum at up to 300 mg/kg.

And we do support discontinuance of INS 123 in FC 05.2.2(soft candy). But we do not support establishing maximum level of INS 123 to FC 05.3(Chewing gum). We do not permit INS 123 to FC 05.2.2(soft candy) and FC 05.3(Chewing gum) due to the low ADI. And natural colours are used as alternatives.

Appendix 2 : Provision for trisodium citrate in FC 01.1.1

The Republic of Korea does not agree with using this stabilizer, trisodium citrate, to UHT treated or sterilized milk of FC 01.1.1. We do not permit using any food additives to not only bovine milk but also non-bovine milk. And no information from Korean industry has been received on the technical needs for this stabilizer in UHT treated or sterilized milk of FC 01.1.1.

Appendix 3 : Proposed draft provisions related to FC 01.1.2(Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

The Republic of Korea supports those 13 food additives as GMP in FC 01.1.2(Other fluid milk (plain)). We permit these stabilizers (INS 410, 407, 418, 412, 414, 1440, 460(i), 440, 1200, 501(i), 405, 415) as GMP, and we have the limits of using INS 466 not more than 2 % of the food.

Russian Federation

Appendix 2: Provision for trisodium citrate in FC 01.1.1

Proposal EWG: Adopt with Note 438 “Only for use as emulsifier or stabilizer“ and Note 227 “for use in sterilized and UHT treated milks only” and Note 439 “For use in sterilized and UHT treated goats milks only”

We believe that this proposal cannot be accepted. Currently, INS 331(iii) is used as a stabilizer in the manufacture of goat's milk. However, there is no technological justification to support the use of INS 331(iii) in the production of bovine species, camel's and other types milk obtained from non-bovine species (mare, camel, sheep and other species of milk).

There is not enough data on how the use of INS 331(iii) will affect the processes of milk fermentation and other processes of milk processing bovine and non-bovine species.

Appendix 3: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

According to the definition given in 192-1995 CAC, other types of fluid milk (plain) depending on the used physiologically functional food ingredients produce could be:

- enriched with milk protein;
- vitamins and their complexes (premixes);
- prebiotics;
- dietary fiber;
- micro and / or microelements;
- polyunsaturated fatty acids (PUFA) et al.

Milk can be skimmed or lactose reduced. Depending on this, it is necessary to determine the possibility of using emulsifiers and fillers in these types of fluid milk (plain).

In this regard, the proposals of the electronic working group on the use of stabilizers, gelling agent, thickeners, emulsifiers in this food category cannot be approved before the introduction of classification and definition for the various types of milk included in the food categories 01.1.1 and 01.1.2. Technological justification of the use of stabilizers, gelling agent, thickeners, emulsifiers in all types of liquid milk that are part of the food category №01.1.2, absents.

Appendix 4: Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0.

Food Category No. 01.1.2 (Other fluid milks (plain))

THE RUSSIAN FEDERATION strongly opposite proposal. The proposal cannot be considered before the introduction of classification and definition for the different types of milk included in the FC 01.1.1 and FC 01.1.2. Use of SODIUM HYDROXIDE INS 524 could mislead consumers about quality if milk (plain).

Food Category No. 01.6.4 (Processed cheese)

The Russian Federation Does not support proposals on use of polyglycerol esters of interesterified ricinoleic acid INS 476 and tartrates INS 334,335(ii),337 because there had not take into consideration of ADI these FA.

Food Category No. 01.7 (Dairy-based desserts (e.g. pudding, fruit or flavoured yoghurt))

The Russian Federation agrees with use of FA INS 491-495, INS 474, INS 473, INS 473(a), INS 334, 335(ii), 337 if these proposals are aligned with Codex standard for fermented milks (CODEX STAN 243-2003). For example, these additives can not used in plain fermented milk.

Food Category No. 04.1.1.2 (Surface treated fresh fruit)

The Russian Federation agrees with final EWG Proposal: Apply a horizontal approach to FC 04.1.1.2 that all Table 3 additives with ES&T function (with the exception of those with the technological function of firming agent) are justified at GMP with the note “For use in waxes, coatings, or glazes applied to the surface of fresh fruit only.” Adopt those provisions for Table 3 ES&T that do not have the technological function of firming agent and discontinue all provisions with the technological function of firming agent (INS 511 and 466).

Food Category No. 04.2.1.2 (Surface-treated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds)

Russian Federation cannot agree with the proposal of the electronic working group on the possibility of applying a horizontal approach to the regulation of food additives in category No. 04.2.1.2. This approach provides that all additives of table 3 with the function of stabilizers and thickeners (except additives with the technological function of the sealer) used according GMP can be applied in this food category in accordance with the footnote "for use in waxes, coatings or glazes applied only to the surface of fresh fruit." This approach cannot be used for a number of foods in this category (e.g. mushrooms and algae).

Food Category No. 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4)

TARTRATES INS 334, 335(ii),337 could not be used in ML=20,000 mg/kg because it exceeds current ADI of 30 mg/kg bw. According to the preamble of the CAC 192-1995, if a food additive does not perform a technological function in the established ADI, such additive is not used in this food category. The reference to the fact that the ADI cannot be exceeded by the use of one candy sounds very convincing. At the same time, a few people consume up to 100-1000 g of confectionery daily. Very rarely confectionery consumed in quantity 5 g per day. Therefore proposed ML is highly inflated, which could lead to negative impact on consumers health. Agrees with ML= 600 mg/kg. In this case, the ADI for children weighing 20 kg will not be exceeded.

Food Categories No. 08.2.2 (Heat-treated processed meat, poultry, and game products in whole pieces or cuts) and Food Category No. 08.3.2 (Heat-treated processed comminuted meat, poultry, and game products)

Preservative LAURIC ARGINATE ETHYL ESTER INS 243 could be used in these FC in ML=160 mg/kg (not 200 mg/kg), because low level ADI=4 mg/kg bw.

Food Category No. 10.2 Egg products and subcategories No. 10.2.1 Liquid egg products, No. 10.2.2 Frozen egg products, No. 10.2.3 Dried and/or heat coagulated egg products

SORBITAN ESTERS OF FATTY ACIDS INS 491-495 have established ADI 0-25 mg/kg bw. Therefore, the use of these additives cannot be considered for inclusion in Table 3.

Food Category No. 14.1.4.1 Carbonated water-based flavoured drinks and Food Category No. 14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades

PROPYLENE GLYCOL INS 1520 may be used in these FC only in ML=1000 mg/kg.

Food Category No. 14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks

PROPYLENE GLYCOL INS 1520 may be used in this FC only in ML=1000 mg/kg. INS 1520 is not a food nutrient. ML= 200000 mg/kg exceeds ADI (0-25 mg/kg bw) for 60 kg bw by 133 times, for children which are main consumers of these production – by 400 times. It is unlikely that in ready-to-consume drinks propylene glycol content will decrease to an acceptable level og ML=1000 mg/kg.

Food Category No. 14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

POLYGLYCEROL ESTERS OF FATTY ACIDS INS 475 are not allowed in this food category in Russia. Proposed ML=5000 mg/kg exceeds ADI (0-25 mg/kg bw) more than three times. There is no technological justification for the use of this FA in this FC.

Senegal

- Dispositions pour les colorants dans le processus par étapes dans les catégories d'aliments 05.2, 05.3 et 05.4;
- Dispositions restantes dans les tableaux 1 et 2 de la NGAA dans les catégories d'aliments 01.0 jusqu'à 16.0;
- Avant- projets de dispositions dans le tableau 3 pour la gomme ghatti (sin 419) et graines de tamarinier polysaccharide;
- La justification technologique pour l'emploi des agents de conservation et d'antiagglomérants pour le traitement de la surface de la mozzarella avec une teneur élevée d'humidité couverte par la norme pour la mozzarella;
- Requête pour et la compilation d'informations sur les données d'exposition alimentaires pertinentes et le niveau d'emploi actuel et la justification technologique pour certains additifs alimentaires dans les catégories d'aliments 14.1.4 et 14.1.5

Question : Il est demandé au CCFA51 d'examiner les recommandations du groupe de travail électronique figurant dans le document CX / FA 19/51/7 et dans les annexes 1 à 7.

Annexe 2 : Disposition pour le citrate trisodique SIN 331 (ii) dans FC 01.1.1 (Lait liquide (nature))

Contexte : le CCFA50 avait examiné la possibilité d'autoriser l'utilisation du citrate de trisodique dans le FC 01.1.1 (Lait liquide (nature)). Au cours de la session, aucun consensus ne s'est dégagé sur le fait que le lait tel que défini dans cette catégorie ne devrait pas contenir d'additifs alimentaires. Cependant, la proposition était variée de manière à exclure le lait de bovins et, par conséquent, une note A17 qui se lisait à l'origine comme "Pour le lait UHT d'espèce non bovine uniquement" a été modifiée comme suit: "Pour utilisation dans les laits stérilisés et traités UHT d'espèce non bovine uniquement » pour tenir compte de la réserve de certains pays membres.

Le comité a décidé de maintenir la norme à l'étape 7 en attendant les commentaires pour confirmer s'il existait une justification technologique à l'appui de l'utilisation de l'additif dans le lait provenant d'espèces bovines.

Question : dispositions pour le citrate de trisodium dans le FC 01.1.1

Position: le Sénégal s'était opposée à l'utilisation d'additifs alimentaires dans cette catégorie, quel que soit leur origine, étant donné que ces additifs sont non seulement inutiles sur le plan technologique, mais qu'ils vont également modifier la nature du produit.

Le Sénégal confirme sa position, il n'approuve pas l'utilisation de citrate trisodique dans cette catégorie d'aliments FC 01.1.1 Lait liquide (nature)

Justification: Le lait UHT existe depuis longtemps et reste stable sans nécessiter d'additif. Le traitement UHT détruit les microorganismes présents dans le lait qui sont responsables des changements de pH et le traitement thermique n'interfère pas avec le statut acide du lait, donc l'utilisation du citrates de sodium comme régulateurs de l'acidité ne se justifie pas.

Annexe 3 : Avant-projet de dispositions associées à la catégorie d'aliments FC 01.1.2 (Autres laits liquides (nature) avec la fonction technologique d'émulsifiant et de stabilisant

Contexte : Avant-projet de dispositions relatives à la FC 01.1.2 (Autres laits liquides) avec la fonction technologique d'émulsifiant et de stabilisant

Le CCFA48 a noté que le document CF 01.1.2 (Autre lait liquide (nature)) n'avait assigné aucun additif alimentaire à cette catégorie et a appelé à la proposition d'additifs alimentaires applicables à cette catégorie. À la 50e session du CCFA, la réunion a examiné la proposition soumise pour cette catégorie. Cependant, au cours des discussions, il était évident que les produits couverts par cette catégorie d'aliments n'étaient pas clairement définis.

Les propositions incluaient les laits reconstitués qui, dans certains pays, sont réglementés en tant que produits laitiers dans la norme FC 01.1.1, entraînant ainsi potentiellement des conflits. Cependant, le comité a poursuivi les discussions mais n'a pas été en mesure de parvenir à un consensus sur le projet de dispositions relatives à l'utilisation d'additifs avec des classes fonctionnelles incluant «épaississant». En outre, l'utilisation de stabilisants et d'émulsifiants n'a pas pu être conclue. Le comité a donc décidé que la discussion se poursuivrait au cours du CCFA51.

Question : Utilisation d'additifs alimentaires (liste des additifs alimentaires proposés) dans la catégorie de denrées alimentaires FC 01.1.2 (Autres produits laitiers nature)

Position: le Sénégal n'approuve pas l'utilisation des additifs alimentaires proposés dans cette catégorie

Justification: La distinction entre le FC 01.1.1 et le FC 01.1.2 n'est pas claire et il est donc très difficile de distinguer les produits sur le marché, en particulier pour les consommateurs. Il est possible d'utiliser l'un au lieu de l'autre, offrant ainsi une possibilité de fraude liée au lait.

Le Sénégal est donc d'avis que les sous-catégories d'aliments de la catégorie 01.1 ne devraient pas contenir d'additifs alimentaires.

Annexe 4

Catégories d'aliments N° 01.1.2 (Autre lait liquide (nature))

Question : dispositions sur l'utilisation de l'hydroxyde de sodium avec la mention « à l'exclusion des laits à teneur réduite en lactose » - aucune information fournie sur les raisons pour lesquelles l'utilisation masquerait le lait gâté quand d'autres régulateurs d'acidité approuvés ont été jugés technologiquement justifiés au niveau BPF par le CCFA50

Position : le Sénégal ne souscrit pas à cette recommandation.

Justification : Il n'existe aucune justification technologique pour l'utilisation de l'hydroxyde de sodium dans le lait liquide nature.

Catégorie d'aliments n°. 04.1.1. 2. (Fruits frais traités en surface)

Question : Utilisation proposée d'additifs alimentaires comme agents d'enrobage, comme indiqué à l'annexe 4 du document CX / FA 19/51/7.

Position: le Sénégal approuve l'utilisation des additifs alimentaires énumérés pour cette catégorie d'aliments

Justification: les agents d'enrobage ou de glaçage réduisent les pertes après récolte et prolongent la durée de conservation des produits alimentaires.

South Africa

Appendix 1- Draft and proposed draft provisions for colours in the Step process in food categories 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

1. Category No. 05.2.1 (Hard candy)

Additive- ANNATTO EXTRACTS, BIXIN-BASED160b (i)

Comment: South Africa supports the proposed ML at 200 mg/kg

Additive-ANNATTO EXTRACTS, NORBIXIN-BASED160b (ii)

Comment: South Africa supports adoption at 150 mg/kg.

Additive - CURCUMIN 100(i)

Comment: Propose the ML of 300 mg/kg. The actual usage levels in South Africa is between 50 – 300 mg/kg

2. Category No. 05.2.2 (Soft candy)

Additive - LUTEIN FROM TAGETES ERECTA

Comment: Supports at ML of 300 mg/kg

Additive - PAPRIKA EXTRACT 160c (ii)

Comment: Supports at the ML of 50 mg/kg

Appendix 2: Provision for trisodium citrate in FC 01.1.1

South Africa supports the provision for the use of INS 331 (iii) in UHT treated milk from bovine species. To prevent coagulation and sedimentation.

Appendix 3: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

Comment: South Africa supports the proposal.

Rationale:

There is a sale of products belonging to this food category. The examples thereof includes, the dairy liquid blends", lactose-reduced milk, recombined milk, reconstituted milk etc. The composition of these products is such that components may separate during manufacturing or storage and thus affect homogeneity and stability. The addition of emulsifiers and stabilisers are technologically justified when required to ensure products do not separate and are thus stable and consumer-acceptable over the shelf life.

A variety of emulsifiers and stabilisers should be available to allow for an effective selection and thus support lower levels of use, and to cover a range of processes that could be used during manufacture of products falling under FC 01.1.2. Without stabilizers and emulsifiers, it would not be possible to manufacture many FC 01.1.2 products; products would be of an unacceptable quality to the consumer (reduced shelf life with sedimentation and/or other functional issues); and nutrient levels for fortified products could possibly be inconsistent.

Appendix 4: Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0, with the exception of those additives with technological functions of colour (excluding those provisions discussed in point (i)) or sweetener, adipates, nitrites and nitrates, the provisions in

food category 14.2.3 and its subcategories, and provisions awaiting a reply from CCSC, CCPV or CCFO

1. Food Category No. 04.1.1.2 (Surface treated fresh fruit)
Additive - MONO-AND DI-GLYCERIDES OF FATTY ACIDS (INS 471)
Comment: - South Africa supports the proposal at GMP level.
Rationale: This food additive will extend the postharvest shelf life of fresh fruits.
2. Food Category No.04.2.1.2 (Surface-treated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds)
Additive - MONO-AND DI-GLYCERIDES OF FATTY ACIDS (INS 471)
Comment: - South Africa supports the proposal at GMP level.
Rationale: This food additive will extend the postharvest shelf life of fresh vegetables.
3. Food Category No.14.1.4.1 Carbonated water-based flavoured drinks.
Additive - PROPYLENE GLYCOL (INS 1520)
Comment: South Africa supports the discontinuation of all propylene glycol (INS 1520) beverage provisions within the GSFA for water-based beverages (food categories 14.1.4.1, 14.1.4.2., 14.1.4.3). Propylene glycol does not serve a technological function in the finished beverage. Non-flavouring ingredients that do not have a technological function in the finished beverage are addressed by the Codex Guidelines for the Use of Flavourings (see Section 3.5 in CAC/GL 66-2008). Specifically, non-flavouring food ingredients should be ... used in accordance with the provisions of the Codex General Standard for Food Additives (GSFA; CODEX STAN 192) whenever they are intended to provide a technological function in the finished food."

Appendix 5-Proposed draft provisions for tamarind seed polysaccharide (INS 437) and gum ghatti (INS 419) in Table 3

Additive - Gum ghatti (INS 419)

Comment: - South Africa supports the proposal at GMP level.

Rationale: Widely used in various food categories as a stabiliser. INS 419 was evaluated by JECFA and allocated an ADI of NS, therefore should be adopted in Table 3.

Thailand

Thailand would like to thank the United States for great work and leading the electronic Working Group (eWG) on the General Standard for Food Additives (GSFA) to the 51st session of the Codex Committee on Food Additives (CCFA). We are pleased to provide our comments on the Appendix 1 and 7 as follows:

Appendix 1: Draft and proposed draft provisions for colours in the Step process in food categories 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Category No. 05.3 (Chewing gum)

1. Curcumin (INS 100(i)):

Thailand supports the eWG proposal on the adoption of provision for curcumin (INS 100(i)) at 300 mg/kg with the new Note "Except for use at 700 mg/kg to provide brighter coloring in yellow fruit or spice flavoured chewing gum."

Curcumin is needed to impart yellow shades to chewing gum and thus enhances product organoleptic properties. Regarding the dietary intake assessment of curcumin by using the candy and chewing gum consumption data of Thailand, at the proposed maximum use level, the daily intake is 0.56% of the JECFA ADI in total population and the daily intake of young children (3-6 years old) is 2.4% of the JECFA ADI.

2. Tartrazine (INS 102):

We support the eWG proposal on the adoption of provision for tartrazine (INS 102) at 300 mg/kg. The level is required to impart yellow shades to chewing gum and enhance organoleptic properties.

With regard to the dietary intake assessment of curcumin by using the candy and chewing gum consumption data of Thailand, at the proposed maximum use level, the daily intake is 0.07% of the JECFA ADI in total population and the daily intake of young children (3-6 years old) is 0.27% of the JECFA ADI.

Appendix 3: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

General comments:

Thailand is of the view that setting a numeric maximum use level is the most possible approach to achieve consensus on the discussion on the draft provisions for the use of Table 3 additives with functional class that include “thickener” in FC 01.1.2. This approach takes into account the different opinions of the country members concerning that the use of these food additives had the potential to increase the viscosity of the products and the countries that support the use of these food additives.

We believe that the use of these additives does not mislead the consumer as to the composition of milk products are required to meet component specifications and the incidental thickening effect as a result of use these additives does not significantly change the viscosity of the products. In addition, products covered under food category 01.1.2 are specialized milk products that are not intended to replace milk products in which fall under food category 01.1.1 and the product labelling clearly shows the product description and the list of food additives.

Regarding sub-categorization of products in FC 01.1.2, Thailand would like to express its concern that the term “milk-based beverages” is not clearly defined.

Specific comments:

Thailand supports the adoption of proposed maximum use level of 8 food additive provisions in FC 01.1.2 and also proposes to apply a **new Note “For use as emulsifier and stabilizer only”** to each provision as follows:

- 1) Carrageenan: adopt at 1,700 mg/kg
- 2) Gellan gum: adopt at 1,500 mg/kg
- 3) Guar gum: adopt at 6,000 mg/kg
- 4) Hydroxypropyl starch: adopt at 4,500 mg/kg
- 5) Microcrystalline cellulose: adopt at 4,500 mg/kg
- 6) Pectin: adopt at 3,000 mg/kg
- 7) Polydextrose: adopt at 5,000 mg/kg
- 8) Sodium carboxymethyl cellulose: adopt at 3,000 mg/kg

Technological justification:

Emulsifier and stabilizer additives are technological justified in food category 01.1.2 according to the requirements of section 3.2 of the preamble of the GSFA. Emulsifiers are needed to improve milk-fat emulsion and prevent fat separation as the milk fat is added to this product separately. Stabilizers are used to improve protein stability and prevent protein sedimentation. Moreover, in case of fortified formula, stabilizer can improve the suspension of added insoluble nutrients and also prevent them from sedimentation.

Appendix 7: Provisions in Table 1 and 2 of the GSFA in food categories 14.1.4 and 14.1.5

Draft provision for Polyglycerol esters of fatty acids (INS 475)

Thailand conducted dietary intake assessment of polyglycerol esters of fatty acids (INS 475) from the consumption of beverages in food categories 14.1.4 and 14.1.5 by using national food consumption data, at the proposed maximum use level of 5,000 mg/kg. The results showed that the daily intake of 4 age groups exceeded the JECFA ADI (3-6 years old = 181.71 %ADI, 6-13 years old = 145.17 %ADI, 13-18 years old = 126.93 %ADI, 18-35 years old = 121.65 %ADI), so dietary exposure to polyglycerol esters of fatty acids present a health concern.

Therefore, we do not support the eWG proposal to adopt provision for Polyglycerol esters of fatty acids at 5,000 mg/kg in food categories 14.1.4 and 14.1.5.

IACM/NATCOL



NATCOL and IACM would like to thank the US delegation as chairs of the GSFA EWG for the efficiency of the process and for the final proposals, which demonstrate clear progress regarding colours. This work was a


necessary first step to bring further clarity regarding the use of colours. NATCOL and IACM look forward for extending this process to all the other draft and proposed draft colour provisions.


Additionally, NATCOL and IACM would like to submit the following additional comments in support of final EWG proposals and notes for color provisions in Appendix 1 to Agenda Item 5(a): Report of the GSFA, CX/FA 19/51/7.

Category No. 05.2.1 (Hard candy)

Corresponding commodity standards: none


Additive	INS	Max Level (mg/kg)	Notes	Step	Final EWG Proposal	Additional Comments
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	200	8	4	Adopt at 200 mg/kg	<p>NATCOL/IACM support the EWG proposal to adopt at 200 mg/kg. An example of annatto/bixin used at 180 mg/kg in the panning coating to give an orange shade is below.</p> <p style="text-align: center;">180 mg/kg</p> 
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	200	185		Adopt at 30 mg/kg with New Note: "Except for use at 200 mg/kg in hard candy with hard panned sugar coating."	<p>NATCOL/IACM support the proposal to adopt at 30 mg/kg with an exception for hard panned confectionery as 200 mg/kg is needed for opacity and vibrant red colour.</p> <p>Below is an example of the color tone of annatto at 30 mg/kg in a clear hard boiled sweet.</p> <p style="text-align: center;">30 mg/kg</p>  <p><u>Justification for requested exception:</u></p> <p><u>Technological explanation for 200 mg/kg annatto extract, norbixin-based, in sugar-coated confections:</u></p>




					<p>When dissolved or highly dispersed, norbixin imparts a yellow color to the candy matrix, such as the hard-panned shell in sugar-coated confections. When norbixin is added at levels significantly beyond the solubility threshold in the shell formula and the pigment fills more of the matrix with particulate pigment, the coating appears red, more opaque, and reflective. This color provides a technical alternative to synthetic red pigments that are otherwise difficult to match with other naturally-derived pigments. Our tests have shown that a level of up to 200 mg/kg norbixin is necessary on <u>a whole candy basis</u> to achieve a true red replacement. In the coating portion of the candy, the level may reach 4000 ppm, when the shell constitutes 5% of the full mass of the candy. A photo of representative sugar-coated candy is shown below.</p> <p>In light of its higher ADI, we acknowledge that bixin may be preferred by reviewers for this application, but bixin is less polar and does not disperse as efficiently as norbixin in the candy shell matrix. Therefore, norbixin is the form of annatto color that is required to give a uniform color in this application.</p> 
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<p>AZORUBINE (CARMOISINE)</p>	<p>122</p>	<p>300</p>		<p>Adopt at 50 mg/kg with new note: “Except for use at 300 mg/kg in candies with red fruit flavour.”</p>	<p>IACM considers the note is necessary for products where this level is not sufficient to impart a color hue needed to match organoleptic properties associated with flavors other than the typical strawberry, such as cherry/raspberry, or cranberry. For the latter, darker shades are needed that require levels of 100 and 300 mg/kg, respectively. We request exceptions for products where a darker shade is needed to associate considering that there is no safety concern.</p> <p>The photo below shows products of hard-boiled candy with Azorubine (Carmoisine):</p> <p style="text-align: center;"> 50 mg/kg 100 mg/kg 300 mg/kg </p> 
<p>CURCUMIN</p>	<p>100(i)</p>	<p>300</p>		<p>Adopt at 150 mg/kg with New Note: “Except for use at 300 mg/kg in candies with yellow fruit flavour.”</p>	<p>300 mg/kg is needed for a vibrant yellow color associated with lemon flavor in opaque hard candy to overcome the matrix effect on color hue and vibrancy. See also comment in soft candy.</p>

Category No. 05.2.2 (Soft candy)



Corresponding commodity standards: CODEX STAN 309R-2011: allows acidity regulators and emulsifiers listed in Table 3

Additive	INS	Max Level (mg/kg)	Notes	Step	Final EWG Proposal	Additional Comments
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	200	185		Adopt at 30 with new note: "Except for use at 200 mg/kg in milk toffees."	<p>We request an exception for use at 200 mg/kg in soft candy with hard-panned sugar-coating similar to the exception requested for hard candy coating, where the higher level is needed for opacity and vibrant red colour:</p> <p>This shows that 30 mg/kg in clear jellies is sufficient to give an orange appearance.</p> <p style="text-align: center;">30 mg/kg</p>  <p>Justification for exception requested:</p> <p>Technological explanation for 200 mg/kg annatto extract, norbixin-based, in sugar-coated confections:</p> <p>When dissolved or highly dispersed, norbixin imparts a yellow color to the candy matrix, such as the hard-panned shell in sugar-coated confections. When norbixin is added at levels significantly beyond the solubility threshold in the shell formula and the pigment fills more of the matrix with particulate pigment, the coating appears red, more opaque, and reflective. This color provides a technical alternative to synthetic red pigments that are otherwise difficult to match with other naturally-derived pigments. Our tests have shown that a level of up to 200 mg/kg norbixin is necessary on a whole candy basis to achieve a true red replacement. In the coating portion of the candy, the level may reach 4000 ppm, when the shell constitutes 5% of the full mass of the candy. A photo of representative sugar-coated candy is shown below.</p>

					<p>In light of its higher ADI, we acknowledge that bixin may be preferred by reviewers for this application, but bixin is less polar and does not disperse as efficiently as norbixin in the candy shell matrix. Therefore, norbixin is the form of annatto color that is required to give a uniform color in this application.</p> 
<p>CURCUMIN</p>	<p>100(i)</p>	<p>300</p>		<p>Adopt at 150 mg/kg.</p>	<p>We request adoption at 300 mg/kg, which is supported by the majority of delegations providing input on the 3rd circular and is not reasonably expected to pose a safety concern. Use at 300 mg/kg is needed for a vibrant yellow color associated with lemon flavor in opaque matrices.</p> <p>The examples below show the pastel appearance of 146 mg/kg curcumin in a marshmallow (left) compared to 150 mg/kg mg/kg in clear gelly confectionery (right).</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>146 mg/kg in opaque matrix</p>  <p>matrix</p> </div> <div style="text-align: center;"> <p>150 mg/kg in clear</p>  </div> </div>


Category No. 05.2.3 (Nougats and marzipans)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step / Adopted	Final EWG Proposal	Additional Comments
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	100	8	4	Adopt at 200 mg/kg	<p>NATCOL and IACM support the proposal to adopt at 200 mg/kg. Here are examples of difference in colour shade between 30 and 200 mg/kg.</p> <p style="text-align: center;">30 mg/kg 200</p> <p style="text-align: center;">mg/kg</p> 
CURCUMIN	100(i)	300			Adopt at 150 mg/kg.	<p>NATCOL and IACM support the recommendation to adopt at 150 mg/kg but consider that higher levels up to 300 mg/kg could be needed for stronger flavours.</p> <p style="text-align: center;">150 mg/kg</p> 

Category No. 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Corresponding commodity standards: none

Additive	INS	Max Level (mg/kg)	Notes	Step	Final EWG Proposal	Additional Comments
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	50	8	4	Adopt at 50 mg/kg.	<p>Considering that there is no safety concern, we request an exception for use at 80 mg/kg to achieve orange color in decorations with fat-based matrices. This level was noted to be the minimum required in some applications to achieve darker shades.</p> <p>This level was noted to be the minimum required in some applications to achieve darker shades and is within the range permitted in and supported by several member countries. An example of shade change is provided below for fat-based matrices, to match flavor tones from citrus to pumpkin:</p> <div style="display: flex; justify-content: space-around; text-align: center;"> <div>30 mg/kg</div> <div>50 mg/kg</div> <div>80 mg/kg</div> </div> 
ANNATTO EXTRACTS, NORBIXIN-BASED	160b(ii)	1000	185	4	Adopt at 25 mg/kg with New Note: "Except for use at 100 mg/kg in sugar-based icings."	<p>NATCOL/IACM accepts the proposal to adopt at 25 mg/kg with an exception for use up to 100 mg/kg in sugar-based icings. The higher level is needed to achieve darker shades of yellow, orange-to-brown colors to match expected flavors, ranging from citrus, to pumpkin and toffee. The darker colors may be used less frequently or in seasonal products.</p> <p>Sugar icings representing the range of color effects are shown below.</p>

						<p>20 mg/kg 30 mg/kg 80 mg/kg 100</p> 
AZORUBINE (CARMOISINE)	122	500		7	Adopt at 300 mg/kg.	<p>IACM supports the proposal to adopt at 300 mg/kg, with a note for use level “up to 500 mg/kg to achieve a vibrant pink color in fat-based matrices”, due to matrix effect. A higher level is needed for fat-based icing or frosting matrix that is opaque and aerated, as shown below.</p> <p>300 mg/kg 500 mg/kg</p> 
PAPRIKA EXTRACT	160c(ii)	300	39	2	Adopt at 100 mg/kg.	<p>IACM and NATCOL support the proposal for use level up to 100 mg/kg to achieve a darker orange color in fat-based matrices”, due to matrix effect, as shown below:</p> <p>60 mg/kg 100 mg/kg</p> 

ICBA

The International Council of Beverages Associations (ICBA) represents the interests of the worldwide non-alcoholic beverage industry. ICBA members include national and regional beverage associations and international beverage companies that operate in more than 200 countries and territories and produce, distribute and sell a variety of non-alcoholic sparkling (carbonated) and still (non-carbonated) beverages including soft drinks, sports drinks, energy drinks, bottled waters, flavored and/or enhanced waters, ready-to-drink teas and coffees, 100% fruit or vegetable juices, nectars and juice drinks, and dairy-based beverages.

ICBA thanks the U.S. delegation, as Chair to the Codex Committee on Food Additives (CCFA) General Standard on Food Additives (GSFA) electronic Working Group (eWG), for preparing the GSFA eWG report. ICBA is pleased to submit the below Conference Room Document (CRD) comments in response to the 51st CCFA Agenda Item 5(a) General Standard for Food Additives (GSFA): Report of the EWG on the GSFA (CX/FA 19/51/7) Appendix IV and Appendix VII.

Appendix IV – Discontinuation of Beverage Propylene Glycol Provisions

ICBA favors discontinuation of all propylene glycol (INS 1520) beverage provisions within the GSFA for water-based beverages (food categories 14.1.4.1, 14.1.4.2., 14.1.4.3). Propylene glycol does not serve a technological function in the finished beverage. Non-flavoring ingredients that do not have a technological function in the finished beverage are addressed by the [Codex Guidelines for the Use of Flavourings](#) (see Section 3.5 in CAC/GL 66-2008).^{1/} Specifically, “non-flavouring food ingredients should be ... used in accordance with the provisions of the Codex General Standard for Food Additives (GSFA; CODEX STAN 192) whenever they are intended to provide a technological function in the finished food.”

Appendix VII – Further Clarification of Beverage Provisions

(1) DIOCTYL SODIUM SULFOSUCCINATE (DSS)

ICBA Recommendation – ICBA supports adoption at 10 ppm with a new note “For use in fruit-flavored beverages only” and Note 127 “On the served to the consumer basis”. DSS is used as an emulsifier in various fruit-flavored beverages (mostly carbonated, but also in a few non-carbonated sports drinks specifically) to facilitate ease of the beverage emulsion formation. DSS levels in fruit-flavored beverages are used up to 9.6 mg/kg. DSS improves the physical stability of the beverage emulsion. DSS use affords the opportunity for lesser amounts of other emulsifiers and emulsifier stabilizers to be used. Together, DSS prevents the instability (ringing, creaming and/or sedimentation) in emulsion that may otherwise result which would then not conform to consumer expectations, and therefore, not be accepted by the consumer. Furthermore, a conservative dietary intake assessment using the conservative Budget screening method suggests no concern even in view of an ADI of 0.1 mg/kg/bw day.

Detailed Budget Evaluation

Recently, a dietary intake calculation was performed using the conservative Budget screening method. The percentage of beverages and foods labeled with DSS globally were identified through the Mintel database. The DSS theoretical maximum daily exposure (TMDE) was 81% of the ADI under the most conservative scenario which assumed maximum use rates of 10 ppm in beverages and 15 ppm in foods. In the more likely consumer scenario which excludes certain beverage categories (e.g., malt, hot chocolate, meal replacement beverages) to calculate the % beverages with DSS, exposure was 56% of the ADI (lower and upper bounds were 50% and 81%).

The Budget screening method was further refined to include the 95th percentile of typical use levels of DSS found in foods (1.3 mg/kg) and beverages (6.2 mg/kg). The refined method resulted in exposures ranging

^{1/} The Codex *Guidelines for the Use of Flavourings* (CAC/GL 66-2008) addresses the use of 'non-flavouring food ingredients'. Specifically:

Section 2.3: **Non-flavouring food ingredients** are food ingredients, such as food additives and foodstuffs that can be added to flavourings and are necessary for dissolving, dispersing, or diluting flavourings, or are necessary for the production, storage, handling and use of flavourings.

Section 3.5: Flavourings may contain non-flavouring food ingredients, including food additives and foodstuffs, necessary for their production, storage, handling, and use. Such ingredients may also be used to facilitate the dilution, dissolution, or dispersion of flavourings in food. Non-flavouring food ingredients should be:

- a) Limited to the lowest level required to ensure the safety and quality of the flavourings, and to facilitate their storage and ease of use;
- b) Reduced to the lowest level reasonably possible when not intended to accomplish a technological function in the food itself; and,
- c) used in accordance with the provisions of the Codex General Standard for Food Additives (GSFA; CODEX STAN 192) whenever they are intended to provide a technological function in the finished food.

between 0.006 to 0.025 mg/kg bw/day. Lower bound and upper bound estimates were 6% and 25% of the ADI, respectively.

Based on the results from multiple scenarios using the Budget method, the ADI of 0.1 mg/kg/bw day is not exceeded.

(2) POLYGLYCEROL ESTERS OF FATTY ACIDS

ICBA Recommendation 1 – Support eWG recommendation to adopt in FC 14.1.4 at 5,000 mg/kg with Note 127 “On the served to the consumer basis”.

ICBA Recommendation 2 – Support eWG recommendation to adopt in FC 14.1.5 at 5,000 mg/kg with Note 127 “On the served to the consumer basis”.

(3) STEAROYL LACTYLATES

ICBA Recommendation 1 – Support eWG recommendation to discontinue in FC 14.1.4, and consider only in subcategories 14.1.4.2 and 14.1.4.3

ICBA Recommendation 2 – Support eWG 3rd circular proposal to adopt at 2,000 ppm in FC 14.1.4.2 and 14.1.4.3 with new note, “For use in cocoa-containing beverages and coffee and tea products containing milk constituents only” and Note 127 “On the served to the consumer basis.”

ICBA Recommendation 3 – Recommend discontinuation of stearyl lactylates in FC 14.1.5. as this additive is used in a limited number of products.

IDF

Appendix 3 - Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer with the exception of food additives provisions with the function of colour and sweetener CRD from the International Dairy Federation (IDF)

IDF wishes to thank the delegation of USA for their comprehensive coverage of a number of complex topics. In order to facilitate discussion, IDF wishes to share with the CCFA delegates a list of examples of products available on the markets that corresponds to the category 1.1.2.

As ‘FAO/WHO Guidelines on Food Fortification with Micronutrients’ refers, milk is an important vehicle of micronutrients such as calcium, iron, etc., of which deficiencies are prevalent in Asia, Africa and Latin America.

The list in annex is a representative extract of over 90 products proposed by IDF’s membership and illustrate the variety of fortified products available in different local markets, including those internationally traded.

They are processed differently than and modified significantly from FC01.1.1 milks with the addition of nutritional and/or functional ingredients other than milk component, which are mixed with and suspended by stabilizer(s) and emulsifiers that may also have a thickener function to deliver the full nutritional value to the consumer through the entire shelf life.

The technological justification of the stabilizers and emulsifiers that may also have a thickener function is supported by the remarks in the page 132 of the above mentioned ‘FAO/WHO guidelines’, that is, to fortified milk, ‘Gums (such as carrageenan, guar gum) must be added to prevent the calcium salt from sedimenting’.

All the products on the list clearly states the fortification on the front of the package, in addition to the listing of the added nutrients as well as the additives used on the label, to emphasize the nutritional and/or health functional advantages over liquid milks under FC01.1.1.

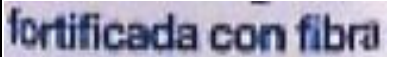


IDF position on proposals from the EWG report




As in position expressed to the eWG, IDF supports GMP as maximum level for all provisions under discussion in category 1.1.2.

IDF understand GMP means that only the lowest amount needed to achieve the technological effect is to be used, therefore making GMP more restricted than a set numerical level. Since stabilisation is the effect needed, a note ‘as stabiliser only’ could be added.

Annex - Examples of fortified products belonging to category 1.1.2 (information publicly available)

Country	Nutrition Claims on the product package	Front of Pack Nutrition Claims (in English)	Stabilizers used	Technological justification for additives	Ingredients label
Argentina	 <p>Alimento lácteo estandarizado al 1% de materia grasa, homogeneizado, UAT, con leche entera, concentrado lácteo, calcio, fortificado con vitaminas A y D – Libre de gluten. Fuente de calcio. Sin T.A.C.C.</p>	'Fortified with vitamins A and D'	INS 466 (Sodium carboxymethyl cellulose) INS 412 (Gellan gum)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	Standardized liquid whole milk, water, concentrated dairy, tricalcium phosphate, vitamin A, vitamin D, stabilizers (INS 466 and/or INS 415 and/or INS 418 and/or INS 339ii and/or modified starch)
China		'Zero lactose milk, high calcium type', 'Calcium 25% increased'	INS 412 (Gellan gum)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	raw milk, milk minerals, food additives (mono-and diglycerides, gellan gum, sodium polyphosphate, lactase)
Columbia		Fortified with Calcium, Iron, Zinc and Vitamins A,B1,B2 and D'	INS 407 (Carrageenan) INS 412 (guar gum)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	water, whole milk, milk cream, milk solids, skim milk powder, lactose, stabilizer (mono and diglycerides of fatty acids, carrageenan, guar gum, sodium polyphosphates, soy lecithin), acidity regulator (sodium citrate) , vitamins (vitamin A, vitamin B1, vitamin B2, niacin (vitamin B3), vitamin C, vitamin D), minerals (calcium, iron, zinc)

Country	Nutrition Claims on the product package	Front of Pack Nutrition Claims (in English)	Stabilizers used	Technological justification for additives	Ingredients label
Ecuador		'Fortified with Fiber and Vitamins A, D and E'	INS 407 (Carrageenan) INS 412 (Guar gum)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	liquid skim milk, polydextrose fiber, skim milk powder, emulsifier (and) stabilizer (mono and diglycerides of fatty acids, carrageenan, guar gum), stabilizer (sodium polyphosphate, sodium orthophosphate, sodium triphosphate, sodium diphosphate), vitamins E, vitamin A, vitamin D3
Malaysia		'+ Iron' '+ Vitamin C+D' '+Calcium'	INS 401 (Sodium arginate) INS 407 (Carrageenan) INS 412 (Guar gum)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	Low fat milk, Milk Solids, Mineral (Iron), Emulsifier (471), Vegetable Gums (401, 407, 412), Vitamins C&D
The Phillipines		'Calcium+B Vitamines+Zinc'	INS 407 (Carrageenan)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	water, skimmed milk powder, milk fat, buttermilk powder, emulsifier (soya lecithin), vitamins (vitamin C, vitamin B3, vitamin E, vitamin B1, vitamin B6, vitamin B2, vitamin A, folic acid, biotin, vitamin D3), minerals (calcium phosphate, zinc sulfate), stabilizer (carrageenan)

Country	Nutrition Claims on the product package	Front of Pack Nutrition Claims (in English)	Stabilizers used	Technological justification for additives	Ingredients label
Thailand		'50% of Thai recommended daily amount of calcium, two times protein and is free from lactose and low in fat.'	INS 460(i) (Microcrystalline cellulose) INS 466 (Sodium carboxymethyl cellulose) INS 407 (Carrageenan)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	cow's milk (30%), concentrated whey protein (5.5%), non fat milk powder (2.6%), whey powder (0.5%), calcium powder (0.2%), vitamin complex (0.01%), stabiliser (INS 460i, INS 471, INS 466, INS 407) cow's milk (30%), concentrated whey protein (5.5%), non fat milk powder (2.6%), whey powder (0.5%) calcium powder (0.2%), vitamin complex (0.01%), stabiliser (INS 460i, INS 471, INS 466, INS 407)
USA		'Calcium enriched 50% of Daily Value''Vitamin D''100% lactose free' 'easy to digest'	INS 407 (Carrageenan) INS 412 (Guar gum)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	Milk, Tribasic Calcium Phosphate (Calcium), Carrageenan, Guar Gum, Lactase Enzyme And Vitamin D3.
Vietnam		'50% more calcium and 50% less fat'	INS460(i) (Microcrystalline cellulose) INS466 (Sodium carboxymethyl cellulose) INS407 (Carrageenan)	FAO/WHO Guidelines for Food Fortification with Micronutrients page 132	milk (99.3%)(water, fresh cow's milk, milk powder), stabilisers (460i, 472e, 466, 471, 407), calcium citrate, acidity regulator (339iii), vitamin D3 milk (99.3%)(water, fresh cow's milk, milk powder) VND 30700