codex alimentarius commission E

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item7(a) **CX/FA 07/39/9-Add. 1**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Thirty-ninth Session

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COMMENTS ON REPORT OF THE ELECTRONIC WORKING GROUP ON THE GSFA

The following comments have been received from the following Codex Members and observers:
Brazil ,Malaysia, CEFS, ELC, IADSA, ICBA, ICGA, IFAC and ISA

Brazil

PART I – MISCELLANEOUS FOOD ADDITIVES

Diacetyltartaric and Fatty Acid Esters of Glycerol (INS 472e) – Page 6 (Part 1)

The maximum levels proposed by the eWG for the food categories 06.2 e 06.4.2 are not sufficient to achieve the intended technological effect. Besides, the level of 10000 mg/kg for noodles was endorsed at the 38ª CCFAC (Annex IV of ALINORM 06/29/12, pg. 102). Therefore, Brazil supports the maximum levels proposed originally, of 10000 mg/kg and 5000 mg/kg for the categories 06.4.2 e 06.2, respectively.

Sulphites (INS 220, 221, 222, 223, 224, 225, 227, 228, 539) – Page 16 (Part 1)

Brazil would like to request the table 1of the Annex, which is mentioned in the technological justification for food categories 09.2.4.2 e 09.2.5: "*Summarized results of the study are given in table 1 of the Annex*".

Brazil maintains the comments sent as response to CL 2006/34. For food category 12.6, Brazil would like to remark that there are other preservatives and antioxidants approved for this category, such as sodium benzoate, BHT, TBHQ (Tables 1 and 2 of CX/FA 07/39/8).

PART II – SWEETENERS

General comments:

1. Considering that some sweeteners may also perform the function of flavouring enhancer at much lower levels than those needed for sweetening, Brazil would like to suggest that provisions for the use of sweeteners as flavouring enhancer be treated separately. Moreover, while flavouring enhancers are used in a wide number of food categories, the use of sweeteners is technologically justified in only a limited number of products.
2. Brazil supports the use of sweeteners only in foods for special dietary uses in which the content of sugar was partially or totally replaced, such as those for sugar restricted or sugar reduced diets.
3. The maximum levels of sweeteners should not be set taking into account its use individually, but its use in mixtures with other sweeteners in order to reduce the intake of each of them and the possibility to exceed the respective ADI. This procedure would also allow the use of sweeteners in a wider range of food categories.

4. The maximum level established for any sweetener in any food category should never allow that the intake of a portion of the food results in intakes above the ADI for the general population and special groups, as children.
5. Sweeteners with numerical ADI should have maximum levels of use, except in the category 11.6.

Specific comments:

1. Brazil considers that maximum levels at 350 mg/kg and 750 mg/kg for acesulfame potassium (pages 22 to 31) and aspartame (pages 33 to 41), respectively, for most food categories, are enough to achieve the technological effect.
2. Page 56: since the ADI of saccharin is low (5.0 mg/kg b.w.), Brazil considers the level of 5000 mg/kg in the category 04.1.2.7 too high.
3. As regards to the provisions in which the use of sweeteners is justified because the food is processed, Brazil doesn't agree that being a processed food technologically justify the use of sweeteners (for example, acesulfame K, aspartame, aspartame-acesulfame, neotame). Therefore, Brazil requests further information on the real need for these additives in analogues (food categories 01.4.4, 01.5.2 and 01.6.5). In these cases, aren't sweeteners used as flavour enhancers?
4. For the food categories 02.3 and 04.1.2.3, Brazil considers that the correct functional class is flavour enhancer.
5. Brazil suggests the inclusion of the following note to the category 14.1.5: "Excluding treated coffee beans for the manufacture of coffee products".

PART III – COLOURS

1. Although in its former comment to the eWG on the food categories for which the use of colours is justified Brazil didn't support the use of these additives in food categories 08.1.2, 08.2.1, 08.2.2, 08.2.3, 08.3.2 and 08.3.3, in this opportunity, having made a detailed comparison between GSFA's Food Category System for meat products and those currently approved in Brazil, we have noticed that many products in which the use of natural colours is permitted in Brazil (technologically justified) are included in some of above mentioned categories.

   Examples:

Codex category	Products in which natural colours are permitted in Brazil
08.1.2	fresh sausage
08.2.1	cured sausage
08.2.2	cooked ham
08.2.3	cooked meat cuts
08.3.3	frozen hamburger

   In face of this situation, Brazil would like to discuss what would be the best approach to include these uses in the draft GSFA. Should notes be added specifying the products in which the use of specific colours is acceptable?

2. Brazil doesn't support the use of artificial colorants in fruit and vegetable products.
3. Taking into account the ADI of 0.1 mg/kg b.w. for erythrosine, which indicates that the consumption of small daily portions of food containing this colour can exceed the ADI, Brazil recommends to restrict the use of erythrosine to specific categories for which the consumption isn't so high and when the use of erythrosine can't be replaced by another colorant. For example: the consumption of 1 portion (200 mL) of food from the category 01.1.2 containing 300 mg/kg of erythrosine is equivalent to the consumption of 1 mg/kg b.w. of this colour for adults with 60 kg, that is, 10 (ten) times the ADI. For a child with 30 kg, consume would be equal to 20 (twenty) times the ADI.

4. For other artificial colours with proposed levels higher than 300 mg/kg, Brazil suggests reducing them and recommends the maximum level of 300 mg/kg. We consider this level is enough to achieve the intended technological effect.
5. Brazil doesn't support the use of grape skin extract in wines (category 14.2.3.3) in order to avoid misleading the consumer.
6. Finally, Brazil considers being necessary to set maximum levels to the colours with numerical ADI and these levels should be the lowest for canthaxanthin, since this colour has a low ADI.

Following, Brazil's comments (in red text) on individual colour provisions are presented. As regards to the justifications provided to eWG, Brazil doesn't consider the improvement of food organoleptic properties to be a technological justification for colours. Effects on flavour and taste are not expected, since these additives are used in order to provide or improve the colour of foods, making products more attractive to the consumer. In addition, the justification "provides numeric ML to replace adopted GMP limit in the category" is not enough to explain the technological need.

ALLURA RED AC (INS 129)

Recommendation 1 – Allura Red AC, INS 129
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for allura red AC in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	mg/kg		6	Brazilian legislation allows the maximum level of 50 mg/kg to dairy-based drinks and fermented milk

Recommendation 2 – Allura Red AC, INS 129
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for allura red AC in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	300	mg/kg		6	1) Used for fruit preparations 2) To improve organoleptic properties of food Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be added a note "excluding coconut milk".
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	**300**	**mg/kg**		6	Brazil doesn't support this provision and asks for technological justification
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and	200	mg/kg		6	1) Potentially used for e.g. rootstalks 2) To improve organoleptic

	fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds					properties of food Brazil doesn't support this provision and asks for examples; if this provision will be adopted, it is suitable to include a note referring to only the products in which colours are used
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g. vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg		6	1) Potentially used for sugared vinegar pickled vegetables 2) To improve organoleptic properties of food Brazil doesn't support this provision and asks for clarification on the technological need
05.1.3	cocoa-based spreads, including fillings	300	mg/kg		6	(…) Brazil doesn't support this provision; the use of colours in these products could mislead the consumer because their characteristic colour is brown
05.1.4	cocoa and chocolate products	300	mg/kg		6	(…) Brazil doesn't support this provision; the use of colours in these products could mislead the consumer because their characteristic colour is brown
06.2	flours and starches (including soybean powder)	**300**	**mg/kg**		6	Potentially used for starches Brazil doesn't support this provision and asks for clarification on the technological need
08.4	edible casings (e.g., sausage casings)	**300**	**mg/kg**	Note 16	6	Brazil would like to ask for examples; in general, natural colours are used in this food category
09.2.4.1	cooked fish and fish products	**300**	**mg/kg**	Note 95	6	Brazil suggests including the Note 95
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	**250**	**mg/kg**		6	Brazil doesn't support this provision and asks for technological justification
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	**50**	**mg/kg**		6	Brazil doesn't support this provision due to the purpose of this kind of product
13.6	food supplements	**300**	**mg/kg**	Note 3 or	6	(…)

				similar		Wouldn't Note 3 or similar be necessary, for example "for coating and shell coloring"?

Recommendation 3 – Allura Red AC, INS 129 **Comments are requested** on the following food additive provisions for allura red AC in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
08.3.2	heat-treated processed comminuted meat, poultry, and game products	25	mg/kg		6	1) Potentially used for heat processed meat. (…) Brazil doesn't support this provision and asks for clarification on the technological need and examples
14.1.5	**Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa**	**100**	**mg/kg**			Proposed new use If this provision will be adopted, a note should be added excluding coffee, tea and herbal infusions

BRILLIANT BLUE FCF (INS 133)

Recommendation 2 – Brilliant Blue FCF, INS 133 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for brilliant blue FCF in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	**100**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products
04.1.2.7	candied fruit	**100**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be included the Note 16.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	**100**	**mg/kg**		6	(…) Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be added a note "excluding coconut milk".
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and	**100**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in vegetable products

	sauces, candied vegetables) other than food category 04.2.2.5					
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	**100**	**mg/kg**	**Note 92**	3	Brazil doesn't support the use of artificial colours in vegetable products
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	**100**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in this food category

Recommendation 3 – Brilliant Blue FCF, INS 133
Comments are requested on the following food additive provisions for brilliant blue FCF in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
04.1.2.5	jams, jellies and marmelades	500	mg/kg		6	CX STANs 79 and 80 allow for the use of other colours Brazil doesn't support the use of artificial colours in fruit products
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg		6	The draft Codex Standard for pickled fruits allows for the use of other colors Brazil doesn't support the use of artificial colours in vegetable products
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg		6	(…) Brazil doesn't support this provision and asks for examples; if this provision will be adopted, it is more reasonable to include a note referring to only the products in which colours are used

CANTHAXANTHIN (INS 161g)

Recommendation 2 - Canthaxanthin, INS 161g
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for canthaxanthin in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
04.1.2.5	jams, jellies and marmelades	200	mg/kg		6	(…) Brazil would like to ask for justification on the maximum level

04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	**10**	**mg/kg**		6	Brazil doesn't support this provision; there isn't technological need; besides, heat treatments can oxide canthaxanthin (carotenoids)
06.4.2	dried pastas and noodles and like products	**15**	**mg/kg**		6	Brazil doesn't support this provision, since the ADI of canthaxanthin is very low and consumption of this kind of product is high
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	100	mg/kg	Note 118		Brazil would like to ask for technological justification and examples
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	**15**	**mg/kg**	Note 95	6	Brazil suggests including the Note 95
14.1.4.3	concentrates (liquid or solid) for waterbased flavoured drinks	**5**	**mg/kg**	Note 127	6	(…) 2) Max limit in Brazil, Argentina, Uruguay and Paraguay legislation is 35 mg/kg (…) Brazil would like to clarify that this comment wasn't submitted by the Codex Brazilian Delegation, and the information isn't correct. In Brazil, the use of canthaxanthin for this food category isn't authorized

CARAMEL COLOUR, CLASS III (INS 150c)

Recommendation 1 – Caramel Colour Class III, INS 150c
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for caramel colour class III in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
02.2.1.2	margarine and similar products	20000	mg/kg		3	Brazil supports this provision at the maximum level of 500 mg/kg, because there is technological need for flavourized products; besides, for consistency with the Draft Standard for Fat Spreads and Blended Spreads (step 8) – App. II ALINORM 07/30/17, 20th CCFO,

						the provision should be adopted

Recommendation 3 - Caramel Colour Class III, INS 150c The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for caramel colour class III in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
02.1.2	vegetable oils and fats	20000	mg/kg		3	Used for vegetable oils and fats Brazil would like to ask for clarification on the technological need
02.1.3	lard, tallow, fish oil, and other animal fats	20000	mg/kg		3	Used for coloring edible lard Brazil would like to ask for clarification on the technological need
04.1.2	processed fruit	**50000**	**mg/kg**		3	Use in broader food category. Coloring for processed fruits Brazil asks to add a note "excluding coconut milk"
08.0	meat and meat products, including poultry and game	GMP		Note 3, **Note 4, Note 16**		Add notes to adopted provision that restricts use to glazes and coatings Caramel class III is used at the level of 3000 mg/kg to uniform the colour of raw meat utilized in processed products of the categories 08.1.2, 08.2 and 08.3, such as hamburger, meat balls, fresh sausage, and pâtés. Therefore, the Notes 3, 4 and 16 should not be applied to these products.
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		3	(…) Brazil considers that there isn't a consumer expectative to have this product coloured. Therefore, Brazil suggests the addition of a subcategory for flavourized table-top sweeteners, which could be coloured.
13.3	dietetic foods intended for special medical purposes (excluding prod. of cat.	20000	mg/kg		3	(…) Brazil doesn't support this provision due to the

	13.1)					purpose of this kind of product
13.6	food supplements	20000	mg/kg	Note 3 or similar	3	(…) Wouldn't Note 3 or similar be necessary, for example "for coating and shell coloring"?
14.1.3.2	vegetable nectar	50000	mg/kg		3	Provides numeric ML to replace adopted GMP limit in this category Brazil asks for clarification on the technological need. The provisions for caramel class III for food categories 14.1.2.2 and 14.1.2.4 (vegetable juice and concentrates for vegetable juices, respectively) were discontinued (page 11). For consistency, this provision should be discontinued too. Also, the use of colours in these products could mislead the consumer.
14.1.3.4	concentrates for vegetable nectar	50000	mg/kg	Note 127	3	(…) Brazil asks for clarification on the technological need. The provisions for caramel class III for food categories 14.1.2.2 and 14.1.2.4 (vegetable juice and concentrates for vegetable juices, respectively) were discontinued (page 11). For consistency, this provision should be discontinued too. Also, the use of colours in these products could mislead the consumer.
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	100000	mg/kg			Proposed new use If this provision will be adopted, a note should be added excluding coffee, tea and herbal infusions

CARAMEL COLOUR, CLASS IV (INS 150d)

Recommendation 1 – Caramel Colour Class IV, INS 150d
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for caramel colour class IV in the GSFA.

Food	Food Category	Max Level	Comments	Step	Justification provided

Cat No.						to eWG
02.2.1.2	margarine and similar products	20000	mg/kg		3	Brazil supports this provision at the maximum level of 500 mg/kg, because there is a technological need for flavourized products; besides, for consistency with the Draft Standard for Fat Spreads and Blended Spreads (step 8) – App. II ALINORM 07/30/17, 20th CCFO, the provision should be adopted
02.2.1.3	blends of butter and margarine	20000	mg/kg		3	Technological need is questioned, as this use could mislead the consumer Brazil supports this provision at the maximum level of 500 mg/kg, since the same provision is being adopted for caramel class III and it is included in the Draft Standard for Fat Spreads and Blended Spreads (step 8) – App. II ALINORM 07/30/17, 20th CCFO
02.2.2	emulsions containing less than 80% fat	20000	mg/kg		3	(…) Brazil supports this provision at the maximum level of 500 mg/kg, since the same provision is being adopted for caramel class III and it is included in the Draft Standard for Fat Spreads and Blended Spreads (step 8) – App. II ALINORM 07/30/17, 20th CCFO
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products	20000	mg/kg		3	(…) Brazil supports this provision at the maximum level of 500 mg/kg, since the same provision is being adopted for caramel class III and it is included in the Draft Standard for Fat Spreads and Blended Spreads

						(step 8) – App. II ALINORM 07/30/17, 20th CCFO

Recommendation 3 - Caramel Colour Class IV, INS 150d The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for caramel colour class IV in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
08.0	meat and meat products, including poultry and game	GMP		Note 3, Note 4, Note 16		Add notes 3 and 16 to adopted provision Caramel class IV is used at the level of 3000 mg/kg to uniform the colour of raw meat utilized in processed products of the categories 08.1.2, 08.2 and 08.3, such as hamburger, meat balls, fresh sausage, and pâtés. Therefore, the Notes 3, 4 and 16 should not be applied to these products.
12.2.2	**seasonings and condiments**	**100000**	**mg/kg**			**Provides numeric ML to replace adopted GMP limit in this category** Caramel class IV is normally used in Brazil at the maximum level of 10000 mg/kg for this food category
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000	mg/kg		3	Brazil doesn't support this provision due to the purpose of this kind of product
13.6	food supplements	20000	mg/kg	Note 3 or similar	3	(…) Wouldn't Note 3 or similar be necessary, for example "for coating and shell coloring"?

Recommendation 4 - Caramel Colour Class IV, INS 150c **Comments are requested** on the following food additive provisions for caramel colour class IV in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
04.1.2	processed fruit	**80000**	**mg/kg**		3	Use in broader food category. Coloring for processed fruits Brazil asks to add a note "excluding coconut milk" if this provision will be adopted
06.4.2	dried pastas and noodles	**50000**	**mg/kg**		3	The technological need

	and like products					is questioned. This is a basic food and this use could mislead the consumer Brazil supports this provision for consistency with the adoption of the same one for caramel class III
07.1.2	crackers, excluding sweet crackers	50000	mg/kg		3	The technological need is questioned. This is a basic foodstuff with wide consumption that would increase intake of colors. Brazil supports this provision for consistency with the adoption of the same one for caramel class III
07.1.4	bread-type products, including bread stuffing and bread crumbs	50000	mg/kg		3	The technological need is questioned. This is a basic foodstuff with wide consumption that would increase intake of colors. Brazil supports this provision for consistency with the adoption of the same one for caramel class III
07.1.5	steamed breads and buns	50000	mg/kg		3	(...) Brazil supports this provision for consistency with the adoption of the same one for caramel class III
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg	Note 95	3	Justification for higher ML and whether there is a need in foods other than fish roe. Used for color pressure-heat treated products e.g. canned foods. Brazil supports this provision for consistency with the adoption of the same one for caramel class III, including the Note 95
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		3	(…) Brazil considers that there isn't a consumer expectative to have this product coloured. Therefore, Brazil

						suggests the addition of a subcategory for flavourized table-top sweeteners, which could be coloured.
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	100000	mg/kg			(...) If this provision will be adopted, a note should be added excluding coffee, tea and herbal infusions

CARMINES (INS 120)

Recommendation 2 - Carmines, INS 120 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for carmines in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500	mg/kg	**Note BB**	6	Colours are used to restore colour. A wide range of colours is equally justified and should be equally permitted. Brazil doesn't support this provision and asks for clarification on the technological need

Brazil would like to know why the provisions for the food categories 01.6.4 and 02.2.1.2 were not included in the recommendations for carmines. Brazil supports the maximum level of 500 mg/kg of this colour for the category 02.2.1.2, for consistency with the Draft Standard for Fat Spreads and Blended Spreads (step 8) – App. II ALINORM 07/30/17, 20th CCFO.

CAROTENES, VEGETABLE (INS 160aii)

Recommendation 3 - Carotenes, Vegetable, INS 160aii The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for vegetable carotenes in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
02.2.1.2	margarine and similar products	**30**	**mg/kg**	**Note CC**	3	Brazil supports this provision at the maximum level of 1000 mg/kg, because there is a technological need for flavourized products; besides, for consistency with the Draft Standard for Fat Spreads and Blended Spreads (step 8) – App. II ALINORM 07/30/17, 20th CCFO, the provision should be adopted
04.1.2.8	fruit preparations, including pulp, purees,	100	mg/kg	**Note CC**	6	Brazil asks to add a note "excluding coconut

	fruit toppings and coconut milk					milk"
05.1.3	cocoa-based spreads, including fillings	**100**	**mg/kg**	**Note CC**	3	Brazil doesn't support this provision; the use of colours in these products could mislead the consumer because their characteristic colour is brown
05.1.4	cocoa and chocolate products	**100**	**mg/kg**	**Note CC**	6	Brazil doesn't support this provision; the use of colours in these products could mislead the consumer because their characteristic colour is brown

Recommendation 4 – Carotenes, Vegetable, INS 160aii
Comments are requested on the following food additive provisions for carotenes in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
06.4.2	dried pastas and noodles and like products	**1000**	**mg/kg**		3	Technological need is questioned, as this use could mislead the consumer Brazil supports this provision, since the use of other colours, as caramel class III, is being adopted
08.1.2	fresh meat, poultry, and game, comminuted	**20**	**mg/kg**	**Notes 4, 16 & 117**		The technological need is questioned. This is a basic food and this use could mislead the consumer. Carotenes, vegetable, are used to uniform the colour of raw meat utilized in processed products of the categories 08.1.2, 08.2 and 08.3, such as hamburger, meat balls, fresh sausage, and pâtés. Therefore, the Notes 4 and 16 should not be applied to these products.

CAROTENOIDS (INS 160ai, 160aii, 160e, 160f)

After the CCFA reestablishing the INS of all carotenoids, Brazil considers that the INS 160aii should be excluded from these provisions, since there already are provisions for CAROTENES, VEGETABLE (INS 160aii) separately.

Recommendation 2 - Carotenoids, INS 160ai, 160aii, 160e, 160f
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for carotenoids in the

GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
02.2.1.2	margarine and similar products	**25**	**mg/kg**	**Note CC**	3	Brazil supports this provision at the maximum level of 35 mg/kg (INS 160ai, 160e and 160f, singly or in combination), for consistency with the Draft Standard for Fat Spreads and Blended Spreads (step 8) – App. II ALINORM 07/30/17, 20th CCFO
02.2.2	emulsion containing less than 80% fat	**25**	**mg/kg**	**Note CC**		Brazil supports this provision at the maximum level of 35 mg/kg for this food category (singly or in combination)
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	**100**	**mg/kg**	**Note CC**	6	Brazil asks to add a note "excluding coconut milk"
04.2.1.2	surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	**500**	**mg/kg**	**Note 4 &16**	6	Brazil doesn't support this provision and asks for technological justification
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	**50**	**mg/kg**	**Note CC**	6	Brazil doesn't support this provision and asks for technological justification
05.1.2	cocoa mixes (syrups)	**100**	**mg/kg**	**Note CC**	6	(…) Brazil doesn't support this provision; the use of colours in these products could mislead the consumer because their characteristic colour is brown
05.1.3	cocoa-based spreads, including fillings	**100**	**mg/kg**	**Note CC**	6	(…) Brazil doesn't support this provision; the use of colours in these products could mislead the consumer because their characteristic colour is brown
05.1.4	cocoa and chocolate products	**100**	**mg/kg**	**Note CC**	6	(…) Brazil doesn't support

						this provision; the use of colours in these products could mislead the consumer because their characteristic colour is brown
13.3	dietetic foods intended for special medical purposes (excluding products of cat. 13.1)	**50**	**mg/kg**	**Note CC**	6	Brazil doesn't support this provision due to the purpose of this kind of product
13.6	food supplements	**300**	**mg/kg**	**Note CC Note 3 or similar**	6	(…) Wouldn't Note 3 or similar be necessary, for example "for coating and shell coloring"?
14.1.3.2	vegetable nectar	**100**	**mg/kg**	**Note CC**	6	(…) Brazil asks for clarification on the technological need. The use of colours in these products could mislead the consumer.
14.1.3.4	concentrates for vegetable nectar	**100**	**mg/kg**	**Note CC & 127**	6	Used for vegetable nectar concentrates Brazil asks for clarification on the technological need. The use of colours in these products could mislead the consumer.

Recommendation 3 - Carotenoids, INS 160ai, 160aii, 160e, 160f
Comments are requested on the following food additive provisions for carotenoids in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
02.1.2	vegetable oils and fats	20000	mg/kg		3	(…) Brazil considers that there isn't a technological need and the use of colour could mislead the consumer
02.1.3	lard, tallow, fish oil, and other animal fats	20000	mg/kg		3	(…) Brazil considers that there isn't a technological need
14.2.1	**Beer and malt beverages**	**200**	**mg/kg**			Carotenes vegetable is already adopted. Brazil asks for clarification on the technological need and considers that the use of colour could mislead the consumer

CHLOROPHYLL, COPPER COMPLEXES (INS 141i & 141ii)

Recommendation 2 - Chlorophyll, Copper Complexes, INS 141i, 141ii

The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for copper complexes of chlorophyll in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	150	mg/kg	Note 62	6	(…) Brazil would like to ask for clarification on the product "nata de coco", included in this food category. A note excluding this product should be added.
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	75	mg/kg		3	Brazil asks to add a note excluding tapioca pudding
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg		3	Brazil doesn't support this provision because there isn't a technological need for green colour in this food category

Recommendation 3 - Chlorophyll, Copper Complexes, INS 141i, 141ii **Comments are requested** on the following food additive provisions for copper complexes of chlorophyll in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
14.1.5	**Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa**					(…) Brazil doesn't support this provision. However, if a maximum level will be proposed, a note should be added excluding coffee, tea and herbal infusions

ERYTHROSINE (INS 127)

Considering the former comment presented in page 2 of this document, regarding the ADI of erythrosine, Brazil supports the use of this colour only for the following food categories:

04.1.2.4 (with the Note 54)
05.2 (at the maximum level of 50 mg/kg)
05.3
05.4 (at the maximum level of 50 mg/kg)
11.4 (at the maximum level of 50 mg/kg)
13.6 (at the maximum level of 50 mg/kg and including the Note 3 or similar)
14.1.4 (at the maximum level of 10 mg/kg)

FAST GREEN FCF (INS 143)

Recommendation 3 - Fast Green FCF, INS 143 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for fast green FCF in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
04.1.2.6	fruit-based spreads (e.g.,	100	mg/kg		6	Brazil doesn't support

	chutney) excluding products of food category 04.1.2.5					the use of artificial colours in fruit products
04.1.2.7	candied fruit	100	mg/kg		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be included the Note 16.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	100	mg/kg		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be added a note "excluding coconut milk".
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean prod. of category 12.10	**100**	**mg/kg**		3	(…) Brazil doesn't support the use of artificial colours in vegetable products
06.4.2	dried pastas and noodles and like products	**1000**	**mg/kg**		6	(…) Brazil doesn't support the use of fast green for this food category
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	100	mg/kg		6	Brazil asks to add a note excluding tapioca pudding
07.0	bakery wares	100	mg/kg		6	Brazil suggests discussing the subcategories separately, because in Brazil it isn't authorized the use of fast green for some products of the broader category. For example, colours are not permitted for bread.
13.6	food supplements	300	mg/kg	Note 3 or similar	6	(…) Wouldn't Note 3 or similar be necessary, for example "for coating and shell coloring"?

INDIGOTINE (INS 132)

Recommendation 2 - Indigotine, INS 132 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for indigotine in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
04.1.2.5	jams, jellies and marmelades	**300**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products
04.1.2.6	fruit-based spreads (e.g.,	**300**	**mg/kg**		6	Brazil doesn't support

	chutney) excluding products of food category 04.1.2.5					the use of artificial colours in fruit products
04.1.2.7	candied fruit	**200**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be included the Note 16.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	**150**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be added a note "excluding coconut milk".
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	**150**	**mg/kg**		6	Brazil would like to ask for clarification on the product "nata de coco", included in this food category. A note excluding this product should be added.
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	**150**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in vegetable products
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	**200**	**mg/kg**	**Note 92**	6	Brazil doesn't support the use of artificial colours in vegetable products
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean prod. of category 12.10	**300**	**mg/kg**		3	Brazil doesn't support the use of artificial colours in vegetable products
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	**50**	**mg/kg**		6	Brazil doesn't support this provision due to the purpose of this kind of product
13.6	food supplements	**300**	**mg/kg**	**Note 3 or similar**	6	(…) Wouldn't Note 3 or similar be necessary, for example "for coating

						and shell coloring"?

Recommendation 3 - Indigotine, INS 132 **Comments are requested** on the following food additive provisions for indigotine in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		6	Potentially used for topping syrups Brazil supports this provision, since there is a technological need for decorating bakery products (e.g., coloured sugar crystals for cookies). Provisions for other colours, as allured red, canthaxanthin and caramel class III, are being adopted.
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		3	(…) Brazil considers that there isn't a consumer expectative for table-top sweeteners having blue colour
14.1.5	**Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa**					(…) If this provision will be adopted, a note should be added excluding coffee, tea and herbal infusions

PONCEAU 4R (INS 124)

Recommendation 2 - Ponceau 4R, INS 124 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for ponceau 4R in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.6.4.2	**Flavoured processed cheese, including containing fruit, vegetables, meat, etc.**	**100**	**mg/kg**		**6**	**Reassigned from broader food category** Brazil considers that only natural colours should be proposed for this food category
04.1.2.5	jams, jellies and marmelades	**100**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	**500**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products
04.1.2.7	candied fruit	**200**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be

						included the Note 16.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	**50**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be added a note "excluding coconut milk".
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	**50**	**mg/kg**		6	Brazil would like to ask for clarification on the product "nata de coco", included in this food category. A note excluding this product should be added.
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	**50**	**mg/kg**		6	Brazil asks to add a note excluding tapioca pudding
13.6	food supplements	300	mg/kg	Note 3 or similar	6	(…) Wouldn't Note 3 or similar be necessary, for example "for coating and shell coloring"?

Recommendation 3 - Ponceau 4R, INS 124 **Comments are requested** on the following food additive provisions for ponceau 4R in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
07.0	bakery wares	200	mg/kg		6	Brazil suggests discussing the subcategories separately. In Brazil, the use of ponceau 4R is authorized at the maximum level of 50 mg/kg for cookies, cakes and pies, and for mixtures to prepare them. Colours are not permitted for bread.
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	200	mg/kg		6	Request justification of technological need Brazil supports this provision, since there is a technological need for decorating bakery products (e.g., coloured sugar crystals for cookies) at the maximum level of 300 mg/kg. Provisions for other colours, as allured red, canthaxanthin and caramel class III, are being adopted.
11.6	table-top sweeteners,	200	mg/kg		3	(…)

	including those containing high-intensity sweeteners					Brazil considers that there isn't a consumer expectative to have this product coloured. Therefore, Brazil suggests the addition of a subcategory for flavourized table-top sweeteners, which could be coloured.
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		6	Brazil doesn't support this provision due to the purpose of this kind of product

RIBOFLAVINS (INS 101i, 101ii)

Recommendation 2 - Riboflavins, INS 101i, 101ii
The eWG recommends that the 39th CCFA **revoke** the following food additive provisions for riboflavins in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
12.5.1	ready-to-eat soups and broths, including canned, bottled, and frozen	200	mg/kg			Superseded by 12.5 at 400 mg/kg from commodity standard. See recommendation 3. The provision for food category 12.5 it's not included in recommendation 3. Brazil supports the proposed maximum level of 400 mg/kg.
12.5.2	mixes for soups and broths	150	mg/kg			

Recommendation 3 - Riboflavins, INS 101i, 101ii
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for riboflavins in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	300	mg/kg	**Note 92**	3	Brazil doesn't support this provision and asks for technological justification
08.2	**Processed meat, poultry, and game products in whole pieces or cuts**	**1000**	**mg/kg**		**6**	**To improve organoleptic properties of food** Brazil asks for clarification on the technological need and examples

08.3	**Processed comminuted meat, poultry, and game products**	**1000**	**mg/kg**		**6**	**To improve organoleptic properties of food** Brazil asks for clarification on the technological need and examples
08.4	**Edible casings (e.g., sausage casings)**	**1000**	**mg/kg**		**6**	**To improve organoleptic properties of food** Brazil asks for clarification on the technological need and examples
14.1.3.2	**vegetable nectar**	**300**	**mg/kg**		**3**	**Brazil asks for clarification on the technological need. The use of colours in these products could mislead the consumer.**
14.1.3.4	**concentrates for vegetable nectar**	**50000**	**mg/kg**	**Note 127**	**3**	**Brazil asks for clarification on the technological need. The use of colours in these products could mislead the consumer.**

SUNSET YELLOW FCF, INS 110

Recommendation 1 – Sunset Yellow FCF, INS 110
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for sunset yellow FCF in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		6	Brazil supports this provision, since there is a technological need for decorating bakery products (e.g., coloured sugar crystals for cookies). Provisions for other colours, as allured red, canthaxanthin and caramel class III, are being adopted.

Recommendation 2 - Sunset Yellow FCF, INS 110
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for sunset yellow FCF in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.6.4.2	**Flavoured processed cheese, including containing fruit, vegetables, meat, etc.**	**100**	**mg/kg**		**6**	**Reassigned from broader food category** Brazil considers that only natural colours should be proposed for this food category

02.1.3	lard, tallow, fish oil, and other animal fats	**300**	**mg/kg**		6	Used for colored lard, tallow, fish oil, and other animal fats by using the fat emulsion color preparations Brazil would like to ask for clarification on the technological need
04.1.2.5	jams, jellies and marmelades	**300**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	**300**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products
04.1.2.7	candied fruit	**200**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be included the Note 16.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	**300**	**mg/kg**		6	Brazil doesn't support the use of artificial colours in fruit products. If this provision will be adopted, there should be added a note "excluding coconut milk".
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	**50**	**mg/kg**		6	Brazil would like to ask for clarification on the product "nata de coco", included in this food category. A note excluding this product should be added.
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	**50**	**mg/kg**		6	Brazil doesn't support this provision and asks for technological justification
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	**50**	**mg/kg**		6	Brazil asks to add a note excluding tapioca pudding
07.0	bakery wares	**200**	**mg/kg**		6	Brazil suggests discussing the subcategories separately. The use of fast green in Brazil isn't authorized for some products of the broader category. For example, colours are not

						permitted for bread.
08.3.1.2	cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products	**135**	**mg/kg**		6	Brazil doesn't support this provision and asks for technological justification
10.4	egg-based desserts (e.g., custard)	**50**	**mg/kg**		6	Brazil doesn't support this provision. The use of yellow colours in these products could mislead the consumer
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		6	Brazil doesn't support this provision due to the purpose of this kind of product
13.6	food supplements	300	mg/kg	Note 3 or similar	6	Wouldn't Note 3 or similar be necessary, for example "for coating and shell coloring"?

Recommendation 3 - Sunset Yellow FCF, INS 110
Comments are requested on the following food additive provisions for sunset yellow FCF in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
14.1.4.1	carbonated water-based flavoured drinks	300	mg/kg		6	Sunset yellow is authorized in Brazil at the maximum level of 100 mg/kg for this food category
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	300	mg/kg		6	Sunset yellow is authorized in Brazil at the maximum level of 100 mg/kg for this food category
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	391	mg/kg		6	(…) Sunset yellow is authorized in Brazil at the maximum level of 100 mg/kg for this food category

Malaysia

PART 1

BUTYLATED HYDROXYANISOLE (BHA) (INS 320)

Recommendation 1 – Butylated Hydroxyanisole (BHA), INS 320 The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for BHA in the GSFA

Food Cat No.	Food Category	Max Level		Comments	Step	Justification
02.2.1.2	margarine and similar products	175	mg/kg	Notes 15 & 133	6	Pending decision by CCFO on the draft standard for fat spreads and blends of fat spreads

Comment by Malaysia

Malaysia supports Recommendation 1 to discontinue the proposed maximum level of 175 mg/kg BHA in food category *02.2.1.2 margarine and similar products* as this level is not justified to achieve the technological function as antioxidant to prohibit lipid oxidation in margarines. Malaysia notes that the maximum level of 200 mg/kg in food category *02.2.1.2 margarine and similar products* was adopted by the CAC in 2005 and this level was agreed at the 20th Session of the Codex Committee on Fats and Oils for the draft Standard on Fat Spreads and Blended Spreads which includes margarine.

BUTYLATED HYDROXYTOLUENE (BHT) (INS 321)

Recommendation 1 – Butylated Hydroxytoluene (BHT), INS 321) The eWG recommends that the 39th CCFA **discontinue**further work on the following food additive provisions for BHT in the GSFA						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification**
02.2.1.2	margarine and similar products	75	mg/kg	Notes 15 & 133	3	Pending decision by CCFO on the draft standard for fat spreads and blends of fat spreads. The maximum The use level of BHT at 75 mg/kg is insufficient to function as an antioxidant in foods covered by this food category.

Recommendation 2 - Butylated Hydroxytoluene (BHT), INS 321) The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for BHT in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification**
01.3.2	beverage whiteners	100	mg/kg	Notes 15	3	To prevent oxidation of vegetable fat component of these foods
02.2.1.2	margarine and similar products	**200**	**mg/kg**	Notes 15 & 130	6	The use of BHT at a maximum level of 200 mg/kg is necessary to achieve its technological function as antioxidant to prohibit lipid oxidation.

Note 15: Fat or oil basis.

Note 130: Singly or in combination: Butylated Hydroxyanisole (BHA, INS 320), Butylated Hydroxytoluene (BHT, INS 321), Tertiary Butylated Hydroquinone (TBHQ, INS 319), and Propyl Gallate (INS 310).

Comment by Malaysia

Malaysia supports Recommendation 1 to discontinue the proposed maximum level of 75mg/kg BHT in food category *02.2.1.2 margarine and similar products* as this level is not justified to achieve the technological function as antioxidant to prohibit lipid oxidation in margarines. However, Malaysia supports the adoption of the proposed maximum level of 200mg/kg BHT in food category *02.2.1.2 margarine and similar products* as in Recommendation 2 as this level is necessary and justified to achieve the intended technical need as antioxidant to prohibit lipid oxidation. The 20th Session of the Codex Committee on Fats and Oils agreed on the level of 200 mg/kg BHT for the draft Standard on Fat Spreads and Blended Spreads which includes margarine.

CASTOR OIL (INS 1503)

Recommendation 2 - Castor Oil, INS 1503 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for castor oil in the GSFA.					
Food Cat No.	**Food Category**	**Max Level**	**Comments**	**Step**	**Justification**

05.1.4	**Cocoa and chocolate products**	**350**	**mg/kg**			Used as a glazing agent in panned chocolates to impart shiny appearance. The use of castor oil is not justified for food categories *05.1.1 Cocoa mixes (powders) and cocoa mass/cake*, *05.1.2 Cocoa mixes (syrups)*and *05.1.3 Cocoa-based spreads, including fillings*and *05.1.5 Imitation chocolate, chocolate substitute products*. Castor oil is a vehicle and carrier solvent used in confectionery, imitation chocolate and cocoa products.

Comment by Malaysia

Malaysia would like to support Recommendation 2 to adopt the maximum use level of 350mg/kg of Castor Oil (INS 1503) in food category 05.1.4 *Cocoa and chocolate products*, which is justified to achieve the intended technical need as glazing agent for panned chocolates.

POLYDIMETHYLSILOXANE (INS 900A)

Recommendation - Polydimethylsiloxane, INS 900a The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for polydimethylsiloxane in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification
02.2.2	emulsions containing less than 80% fat	10	mg/kg	Note 152	3	1) The proposed maximum use level of 10 mg/kg is justified to achieve the intended technical need as antifoaming

Note 152: For frying purposes only.

Comment by Malaysia

Malaysia would like to support the Recommendation to adopt the provision for polydimethylsiloxane in food category *02.2.2 emulsions containing less than 80% fat* at a maximum use level of 10mg/kg for the technological function as antifoaming agent. Malaysia notes that the maximum level of 10 mg/kg was agreed at the 20th Session of the Codex Committee on Fats and Oils for the draft Standard on Fat Spreads and Blended Spreads which includes food category *02.2.2 emulsions containing less than 80% fat*.

SULPHITES (INS 220, 221, 222, 223, 224, 225, 227, 228, 539)

Recommendation 3 - Sulphites, INS 220, 221, 222, 223, 224, 225, 227, 228, 539 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for sulphites in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	70	mg/kg	Note 44	6	1) Sulphites are necessary to preserve these products notably the molasses. The use of sulpites in such products at a maximum level of 70 mg/kg would not contribute significantly to the sulphite intake. 2) Sodium Metabisulphite is used as a bleaching agent to decolourize syrups. The proposed maximum use level of 70 mg/kg is justified to achieve the intended technical need as a bleaching agent. 3) Used as a preservative and an antioxidant.The shelf-life of the product is substantially reduced because of the development of a poor colour in absence of sulphites, long before the

						reduction of the nutritive value of the food 4) This food category corresponds to a non-standardized and very heterogeneous group of products including molasses and other concentrated products whose contribution to the sulphite intake is limited, particularly at a maximum level of 70 mg/kg. Sulphites can be used as an additive, in particular as a preservative, on these products and their use is authorized by the EU legislation, which sets a maximum level of 70 mg/kg. Suppressing the proposed level of 70 mg/kg may in addition, not serve the purpose of Codex to eliminate unnecessary trade barriers.

Note 44: As residual SO2.

Comment by Malaysia

Malaysia supports Recommendation 3 to adopt the provision of sulfites in food category 11.3 *Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3* at the maximum use level of 70 mg/kg to function as bleaching agent in the decolourization of syrup.

ACESULFAME POTASSIUM (INS 950)

Recommendation 1 – Acesulfame Potassium, INS 950 The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for acesulfame potassium in the GSFA.						
Food Cat No.	**Food Category**	**Max**	**Level**	**Comments**	**Step**	**Justification provided to eWG**
06.4.3	pre-cooked pastas and noodles and like products	200	mg/kg		3	

Comment by Malaysia

Malaysia supports Recommendation 1 to discontinue the provision of acesulfame potassium in food category *06.4.3 pre-cooked pastas and noodles and like products* at the maximum use level of 200mg/kg since instant noodles is consumed in the unsweetened state as a staple diet in certain region or countries. Malaysia notes that the 38th Session of the Codex Committee on Food Additives and Contaminants agreed to delete all additives associated with the technological function "Sweetener" from the list in view of the information provided by Members that sweeteners were not used for manufacturing instant noodles in themselves. Therefore, the use of sweeteners including Acesulfame K should not be allowed in particular when the food is consumed in the unsweetened state.

PART 2

CAROTENES, VEGETABLE (INS 160aii)

Recommendation 2 - Carotenes, Vegetable, INS 160aii The eWG recommends that the 39th CCFA **revoke** the following adopted food additive provisions for vegetable carotenes in the GSFA.					
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Justification provided to eWG**
02.2.1.2	margarine and similar products	25	mg/kg		See recommendation 3

Recommendation 3 - Carotenes, Vegetable, INS 160aii The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for vegetable carotenes in the GSFA.					
Food Cat No.	**Food Category**	**Max Level**	**Comments**	**Step**	**Justification provided to eWG**

02.2.1.2	margarine and similar products	**30**	**mg/kg**	**Note CC**	3	

Note CC: Expressed as beta-carotene.

Comment by Malaysia

Malaysia would like to support Recommendation 2 to revoke the maximum use level of 25mg/kg Carotenes, vegetable in food category *02.2.1.2 margarine and similar products* as this level is insufficient for use as colour. However, Malaysia would like to propose the maximum use level of 1,000mg/kg to replace 30mg/kg in food category *02.2.1.2 margarine and similar products* in Recommendation 3 as the level of 1000mg/kg is necessary to achieve the technological function as colour. Malaysia notes that the 20th Session of the Codex Committee on Fats and Oils agreed on the level of 1000 mg/kg for carotenes, vegetable for the draft Standard on Fat Spreads and Blended Spreads which includes margarine.

The 41st Joint Expert Committee on Food Additives (JECFA) which met in 1993 determined vegetable carotenes to be acceptable for use as a colour, provided the level of use does not exceed the level normally found in vegetables.

Malaysia notes that a maximum level of 1,000 mg/kg of carotenes vegetable has been provided in the General Standard for Food Additives (GSFA) for the food category 02.2.2 *emulsions containing less than 80% fat* which applies to fat spreads in the Draft Standard. In addition, a similar maximum level has also been provided in the food category 02.3 *fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions*. We also note that the eWG of the General Standard for Food Additives (GSFA) under the Codex Committee on Food Additives (CCFA) is also recommending a maximum level of 1000 mg/kg carotenes vegetable in some products, for example in food category 06.4.3 *pre-cooked pastas and noodles and like products*; and in food category 09.2.4.1 *cooked fish and fish products* and is proposing a maximum level of 2,000 mg/kg in food category 14.1.2.2 *vegetable juice* and in food category 14.1.2.4 *concentrates for vegetable juice*.

Therefore, Malaysia would like to propose that a provision at a maximum level of 1000 mg/kg be provided for carotenes vegetable as a colour in food category *02.2.1.2 margarine and similar products* as Recommendation 3 for adoption by the 39th Session of the Codex Committee on Food Additives in order to be consistent with the provision in the food category *02.2.2 emulsions containing less than 80% fat* which applies to fat spreads and the decision of the 20th Session of the Codex Committee on Fats and Oils.

CAROTENOIDS ((INS 160ai, 160aii, 160e, 160f)

Recommendation 1 – Carotenoids, INS 160ai, 160aii, 160e, 160f The eWG recommends that the 39th CCFA **discontinue**further work on the following food additive provisions for carotenoids in the GSFA.

Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
02.2.1.2	margarine and similar products	1000	mg/kg		6	See recommendation 2

Recommendation 2 - Carotenoids, INS 160ai, 160aii, 160e, 160f The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for carotenoids in the GSFA.

Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
02.2.1.2	margarine and similar products	25	mg/kg	**Note CC**	3	These carotenoids are already permitted in *Butter and concentrated butter* at 25mg/kg. *They* perform in these blends the same technological function. Therefore the same levels for blends of butter and margarine should be used.

02.2.1.3	blends of butter and margarine	**100**	**mg/kg**	**Note CC**	6	1) Permitted in food category 2.1 – fats and oils essentially free of water so provision in this food category should be retained 2) Carotenoids are already permitted in *Butter and concentrated butter*at 25 mg/kg. They perform in these blends the same technological function. Therefore the same levels for blends of butter and margarine should be used. 3) Used for mixtures of butter and margarine 4) To provide colour (other colours are permitted). 5) Needed to standardize the color of these products, and permitted in food category 2.1(fats and oils essentially free of water) so provision in this food category should be retained at a level of 1000 mg/kg, as found in the above categories.
02.2.2	emulsions containing less than 80% fat	**25**	**mg/kg**	**Note CC**	6	1) There is a technological need to coloring variety of products with flavors. 2) Used for emulsions 3) This food category includes reduced-fat counterparts of butter, margarine, and their mixtures. Since such products are also derived from butter(e.g., “butterine,” a spreadable butter blend with vegetable oils) it makes sense to permit carotenoids at the same level as in butter and concentrated butter. 4) To provide colour (other colours are permitted) 5) This food category includes reduced-fat counterparts of butter, margarine, and their mixtures. Since such products are also derived from butter(e.g., “butterine,” a spreadable butter blend with vegetable oils) it makes sense to

						permit carotenoids at the same level as in butter and concentrated butter.

Comment by Malaysia

Malaysia would like to propose that a maximum level of 35mg/kg be provided for food categories *02.2.1.2 margarine and similar products, 02.2.1.3 blends of butter and margarine* and *02.2.2 emulsions containing less than 80% fat* for beta-carotene (synthetics) (INS 160a(i), beta-apo-8' Carotenal (INS 160e) and beta-apo-8'-Carotenoic acid, methyl or ethyl ester (INS 160f), as a maximum level of 35mg/kg for the carotenes with INS 160a(i), INS 160e and INS 160f was agreed by the 20th Session of the Codex Committee on Fats and Oils for the draft Standard on Fat Spreads and Blended Spreads which includes these food categories. Malaysia is of the view that a maximum level of 35 mg/kg is adequate to achieve the technological function as colours in view that these synthetic colours are stable.

CEFS

CEFS would like to reiterate its attachment to the principle that, as far as non-standardised sugars (subcategories 11.2-11.4) are concerned, the addition of new additives should only be permitted if there is a technological justification and need, and in amounts which do not present a hazard for health. Moreover, the labelling should mention the presence of the additives.

In particular, food category No. 11.3 covers sugar solutions, invert sugar solutions and invert sugar syrups as defined in the EU "Sugars Directive". There is neither a technological need for colouring these sugars or mixing them with sweeteners nor permission for the use of the above additives by EU legislation. In addition, such mixed products are already covered by GSFA food category 11.4 (*other sugars and syrups - e.g. xylose, maple syrup, sugar toppings* -), which includes all types of table syrups, syrups for fine bakery wares and edible ices (e.g. caramel syrup flavoured syrups), and decorative sugar toppings (e.g. coloured sugar crystals for cookies) *[see GSFA food category descriptors]*.

According to this principle, CEFS would suggest that **the following draft provisions for sweeteners and colours should be deleted from category 11.3** (*Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3.*) of the GSFA :

Subcategory	Additives	Max Level (mg/kg)
11.3. Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3.	Sucralose (INS 955) (Sweetener) Canthaxanthin (INS 161G) (Colour) Indigotine (INS 132) (Colour) Sunset Yellow FCF (INS 110) (Colour) Carotenoids (INS 160ai, 160aii, 160e,160f) (Colour) Carotenes, Vegetable, INS 160aii	*1500mg/kg (step 6)* *15mg/kg (step 6)* *300 mg/kg (step 6)* *300 mg/kg(step 6)* *50mg/kg (proposed new use)* *50mg/kg (proposed new use)* **- Suppression -**

In addition, it was agreed by the 38th CCFAC that the e-WG should take a "horizontal" approach when discussing the GSFA provisions for colours. The e-WG therefore established a positive list of food categories in which the use of one or more colours was considered as technologically justified (*Appendix III of the Report of the e-WG*). Category 11.3, in particular, has been included in this list due to the fact that a single colour is currently permitted for use in products covered by this category (*namely "riboflavins 101 i,ii" at the maximum level of 300 mg/kg*).

It is worth recalling that the above-mentioned provision was only recently adopted (2005) and that there might have been some confusion as to the distinction between categories 11.3 and 11.4 of the GSFA. GSFA's food category descriptors make it clear, however, that category 11.4 covers artificially-coloured sugars and syrups, and not category 11.3.

The use of riboflavins or any other colour is therefore not justified in GSFA food category 11.3. CEFS would recommend that CCFA **suppresses the wrongly adopted provision for riboflavins from category 11.3** (noting that the same provision was also proposed and adopted - this time rightly - for category 11.4) and would subsequently support the **deletion of category 11.3 from Appendix III**, containing the list of food categories in which the use of colours is justified.

ELC

ELC would like to thank you for giving the opportunity to comment on the report of the e-WG, and would draw your attention to the following:

Caramel colour class III and IV – INS 150c and 150d

Food category 14.2 *"alcoholic beverages, including alcohol-free and low-alcoholic counterparts"*.

ELC has some concern about the justification provided in the e-WG final report for discontinuing further work on Caramel colour Class III and IV in the food category 14.2 (alcoholic beverages, including alcohol-free and low-alcoholic counterparts): "technological need is questioned, as this use could mislead the consumer."

ELC would like to draw the attention to the fact that there are several technological reasons for the use of Caramel colour Class III and IV in beverages of category 14.2:

a) Caramel colour has been shown to protect the flavour profile of beverages in clear glass bottles.

b) Caramel colour is an emulsifier in its own right and helps keep certain flavours in suspension without the use of gums.

c) Caramel colour is used to "level" the colour of beverages so that the consumer sees the same product every day and is not concerned that there is a problem with a particular batch that has less colour.

d) Caramel also has a flavour profile, which is important for the manufacture of various sodas, beers and distilled spirits.

ELC supports the GMP principle for Caramel colour Class III and IV in beverages of category 14.2. Should the Committee consider that the upholding of the GMP principle for caramel colour Class III or IV is not appropriate, ELC supports a provision of 80 000mg/kg.

IADSA

PART I – MISCELLANEOUS FOOD ADDITIVES

1. Castor Oil

IADSA supports the recommendation to adopt at Step 8 the food additive provision for Castor Oil (INS 1503) at a maximum level of use in food supplements of 1000 mg/kg.

2. Polysorbates

IADSA supports the recommendation to adopt at Step 8 the food additive provision for Polysorbates (INS 432, 433, 434, 435 and 436) at a maximum level of use in food supplements of 25000 mg/kg.

3. Polyvinyl Alcohol

IADSA supports the recommendation to adopt at Step 5 the food additive provision for Polyvinyl Alcohol (INS 1203) at a maximum level of use in food supplements of 45000 mg/kg.

PART II – SWEETENERS

IADSA would like to comment on Recommendation 2 for CCFA to consider whether additional notes restricting the use of food additive sweeteners to energy reduced products should be included in the GSFA.

With respect to Notes E, G, J, K and M, IADSA finds the approach of utilising these footnotes to distinguish among the three disparate forms of food supplements confusing and incomplete. Furthermore, maximum levels of use of some sweeteners in food supplements supplied in syrup-type or chewable form are missing, i.e. acesulfame potassium, aspartame and cyclamates.

We consider that the most useful and transparent way to present the levels would be through the introduction of three sub-categories and assign maximum levels to each category:

13.6.1 Food supplements (liquid form)

13.6.2 Food supplements (solid form)

13.6.3 Food supplements (syrup-type or chewable form)

It is appreciated that whilst this would be the most accurate way to present the levels, there will also be the need to formally create the sub-categories under the Codex food category system. However, taking into account that the use of sweeteners in food supplements is very low when compared to other product categories due to the unit-dose form of supplements and their low individual weight (most food supplements weight less than 1,5 grams), IADSA proposes a more pragmatic approach and that is, to retain the highest level determined for each sweetener for food supplements and remove the footnotes.

IADSA therefore supports the approach of one level for all three sub-categories of food supplements.

4. Acesulfame Potassium

IADSA supports the justification given with the recommendation and proposes to delete Note E and retain the highest level determined for Acesulfame Potassium (INS 950) ie 2000 mg/kg.

In addition, IADSA also notes that Note E fails to include the maximum level of use of this sweetener in food supplements supplied in a syrup-type or chewable form, which should be 2000 mg/kg.

IADSA supports that this provision should be adopted at Step 8 at the above-mentioned level.

5. Aspartame

IADSA supports the justification given with the recommendation and proposes to delete Note G and retain the highest level determined for Aspartame (INS 951) ie 5500 mg/kg.

In addition, IADSA also notes that Note G fails to include the maximum level of use of this sweetener in food supplements supplied in a syrup-type or chewable form, which should be 5500 mg/kg.

IADSA supports that this provision should be adopted at Step 8 at the above-mentioned level.

6. Aspartame – Acesulfame Salt

IADSA supports the recommendation to adopt at Step 5 the food additive provisions for Aspartame – Acesulfame Salt at a maximum level of use in food supplements of 2000 mg/kg.

Aspartame – Acesulfame Salt (INS 962) is used in food supplements (category 13.6) as an intense sweetener. It appears that only one level is given in relation to this sweetener, whereas in some countries it is split into 3. IADSA supports the proposed level of 2000mg/kg as long as it is applied to all groups of supplements in their three forms.

7. Cyclamates

IADSA supports the justification given with the recommendation and proposes to delete Note J and retain the highest level determined for Cyclamates (INS 952) ie 1250 mg/kg.

In addition, IADSA also notes that Note J fails to include the maximum level of use of this sweetener in food supplements supplied in a syrup-type or chewable form, which should be 1250 mg/kg.

IADSA supports that this provision should be adopted at Step 8 at the above-mentioned level.

8. Neotame

IADSA supports the recommendation to adopt at Step 5 the food additive provisions for Neotame (INS 961) at a maximum level of use in food supplements of 90 mg/kg.

9. Saccharin

IADSA supports the justification given with the recommendation and proposes to delete Note K and retain the highest level determined for Saccharin (INS 954) ie 1200 mg/kg. IADSA supports that this provision should be adopted at Step 8 at the above-mentioned level.

10. Sucralose

IADSA supports the justification given with the recommendation and proposes to delete Note M and retain the highest level determined for Sucralose (INS 955) ie 2400 mg/kg. IADSA supports that this provision should be adopted at Step 5 at the above-mentioned level.

PART III – COLOURS

11. Allura Red AC

IADSA supports the justification given with the recommendation and therefore to adopt at Step 8 the food additive provision for Allura Red AC (INS 129) at a higher maximum level of use in food supplements of 600 mg/kg.

12. Caramel Colour Class III

IADSA supports the recommendation to adopt at Step 5 the food additive provision for Caramel Colour Class III (INS 150c) at a maximum level of use in food supplements of 20000 mg/kg.

13. Caramel Colour Class IV

IADSA supports the recommendation to adopt at Step 5 the food additive provision for Caramel Colour Class IV (INS 150d) at a maximum level of use in food supplements of 20000 mg/kg.

14. Carotenoids

IADSA supports the justification given with the recommendation and therefore to adopt at Step 8 the food additive provision for Carotenoids (INS 160ai, 160aii, 160e and 160f) at a higher maximum level of use in food supplements of 600 mg/kg for 160ai and 160 aii and at a maximum level of 300 mg/kg for 160e and 160f.

15. Chlorophylls, Copper Complexes of Chlorophylls

IADSA supports the recommendation to adopt at Step 8 the food additive provision for Chlorophylls and their copper complexes (INS 141i and 141ii) at a maximum level of use in food supplements of 500 mg/kg.

16. Erythrosine

IADSA supports the justification given with the recommendation and therefore to adopt at Step 8 the food additive provision for Erythrosine (INS 127) at a higher maximum level of use in food supplements of 500 mg/kg.

17. Fast Green FCF

IADSA supports the recommendation to adopt at Step 8 the food additive provision for Fast Green FCF (INS 143) at a maximum level of use in food supplements of 600 mg/kg.

18. Grape Skin Extracts

IADSA supports the justification given with the recommendation and therefore to adopt at Step 5 the food additive provision for Grape skin extracts (INS 163ii) at a higher maximum level of use in food supplements of 1500 mg/kg.

19. Indigotine

IADSA supports the justification given with the recommendation and therefore to adopt at Step 8 the food additive provision for Indigotine (INS 132) at a higher maximum level of use in food supplements of 600 mg/kg.

20. Iron Oxides

IADSA supports the recommendation to adopt at Step 8 the food additive provision for Iron oxides (INS 172i, 172ii and 172iii) at a maximum level of use in food supplements of 7500 mg/kg.

21. Ponceau 4R

IADSA supports the justification given with the recommendation and therefore to adopt at Step 8 the food additive provision for Ponceau 4R (INS 124) at a higher maximum level of use in food supplements of 600 mg/kg.

22. Sunset Yellow FCF

IADSA supports the justification given with the recommendation and therefore to adopt at Step 8 the food additive provision for Sunset Yellow FCF (INS 110) at a higher maximum level of use in food supplements of 600 mg/kg.

ICBA

ICBA, being a member of the e-working group, generally agrees with the proposed text and the recommendations, except that we would like to express the following additional comments and suggestions on proposed recommendations mostly **concerning categories 14.1.4 and 14.1.5**:

PART I - MISCALLANEOUS ADDITIVES

POLYSORBATES (INS 432, 433,434, 435, 436)

Recommendation 1(discontinue): Category **14.1.4.1, 14.4.1.2** and **14.1.4.3**

ICBA **supports** the recommendation to combine the maximum levels under 14.1.4.

Recommendation 2 (adopt): Category **14.1.4**: **500 mg/kg (Note 127)**

ICBA **supports** the recommendation based on justification #2) and suggests adopting the provision **at Step 5/8**.

QUILLAIA EXTRACTS (INS 999)

Recommendation 1 (revoke): Category **14.1.4**

ICBA **supports** the recommendation to base the maximum level on the saponin content.

Recommendation 2 (adopt): Category **14.1.4 50 mg/kg (Note 132 & Note C)**

ICBA **supports** the recommendation **with Note 132** [except for use at 130 mg/kg (dried basis) in semi-frozen beverages] **and Note C** [Quillaia Extract Type 1 (INS 999i) only. Acceptable maximum use level is expressed on saponin basis] based on the justification provided. Quillaia Extract Type 1 (INS 999i) is mostly used in semi-frozen beverages as a foaming agent with some reported use (according to JECFA) in certain other beverages where foaming is a desired characteristic.

PART II - SWEETENERS

Recommendation 1 - Sweeteners – Justified Categories (Appendix II)

ICBA **supports** the recommendation and the inclusion of categories 14.1.2.2, 14.1.2.2, 14.1.2.4, 14.1.3.1, 14.1.3.2, 14.1.3.3, 14.1.3.4, 14.1.4, and 14.1.5.

Recommendation 2 - Sweeteners - Additional Notes

ICBA supports the recommendation to discuss the additional notes but **does not support including the notes, such as Note 145,** concerning restricting the use of food additive sweeteners to energy-reduced categories. ICBA does not support these proposed notes because Codex has not defined "energy-reduced" and this is a labeling issue not a safety issue. Further, the proposed notes, e.g. Note 145, "products that are energy-reduced or with no added sugar," are unnecessary because the food additive sweeteners are intended to reduce calories of the final product. In addition, such restrictions would impact on new product innovation especially now when manufacturers have been asked to develop products with less sugar by public health authorities.

ACESULFAME POTASSIUM (INS 950)

Recommendation 2 (adopt): 350 mg/kg in 14.1.4

ICBA **can support** the recommendation as a compromise although we note that the proposed level is adequate only when acesulfame potassium is used in a blend with other sweeteners. The **Sucrose Sweetness Equivalent (S.S.E)** required for the range of soft drinks generally marketed is 9% to 13% at ready-to-drink strength. The sweetness factor of acesulfame potassium is 150 and permitting 350 mg would provide only a S.S.E. of only 5.2 %. The original proposal of 600 mg/kg would have provided an S.S.E of 9%. ICBA **supports deleting Note 145.**

Recommendation 3 (comments are requested): 600 mg/kg in 14.1.4

ICBA notes that the technological need has been shown in this category (e.g., canned ready-to-drink coffees that are served hot) and we suggest adopting at least 350 mg/kg.

ALITAME (INS 956)

Recommendation 2 (adopt): 40 mg/kg in 14.1.4

ICBA **supports** the recommendation **and deleting Note 145**.

ASPARTAME (INS 951)

Recommendation 2 (adopt): 600 mg/kg in 14.1.4

ICBA **can accept** 600 mg/kg as a compromise although we note that the proposed level is adequate only when aspartame is used in a blend with other sweeteners. We had originally supported 1000 mg/kg that is a permitted level in a number of countries. The sweetness factor of aspartame is 200 and a level of 600 mg/kg will provide a S.S.E of 12%. Some of the current use levels in the industry would support a maximum level of 750 mg/kg, i.e., a S.S.E of 15%. We **support deleting Note 145**.

Recommendation 3 (comments are requested): 5 000 mg/kg in 14.1.5

ICBA **supports** requesting additional comments to clarify the use of aspartame in certain dry coffee products.

ASPARTAME-ACESULFAME (INS 962)

Recommendation 1 (expressing the maximum level)

ICBA **can support** the proposed recommendation.

Recommendation 3 (adopt): 950 mg/kg in 14.1.4 Notes 119 & 145

ICBA **supports** the recommendation with note 119 but **requests deleting note 145**.

CYCLAMATES (INS 952)

Recommendation 3 (comments are requested): 1 500 mg/kg in 14.1.4.1, 14.1.4.2 with Note 17

ICBA has provided information to support a maximum level of 1000 mg/kg as noted in the justification. Further, the sweetness factor of cyclamate is only 40 and the proposed 1500 would provide a S.S.E of 6%. The EC level of 250 mg/kg only provides a S.S.E of 1% and does not provide an adequate synergy factor even when cyclamate is used in sweetener blends. The adoption of 250 mg/kg in the EC resulted in reformulating cyclamate out of a large number of soft drink products. The use of cyclamate in beverages likely will be dramatically reduced or disappear if a maximum level is lowered below the one providing a sweetness level that consumers will accept. **ICBA could accept the proposed 800 mg/kg** (a S.S.E. of 3.2%) **as a compromise although we note that 1 000 mg/kg better reflects the current use levels** in many countries where cyclamate is used as a blend with other food additive sweeteners. We note that there is no entry in 14.1.4.3 thus limiting the use of cyclamate only to ready-to-drink products. In some countries, cyclamate is used in concentrates (Category 14.1.4.3) and restricting the use in 14.1.4.1 and 14.1.4.2 would considerably reduce the intake from drink concentrates (e.g., cordials, squashes) that reportedly are significant sources of intake by young children.

NEOTAME (INS 961)

Recommendation 2 (adopt): 33 mg/kg in 14.1.4

ICBA **supports** the recommendation but **requests that the note 145 be deleted**.

Recommendation 3 (comments are requested): 50 mg/kg in 14.1.5

ICBA **supports** the recommendation. Neotame is a new sweetener that is more stable than aspartame and its use could be supported in 14.1.5.

SACCHARIN (INS 954)

Recommendation 3 (comments are requested): 500 mg/kg in 14.1.4.1 and 14.1.4.2, 2000 mg/kg in 14.1.4.3 and 500 mg/kg in 14.1.5

ICBA **supports adopting at least 300 mg/kg in 14.1.4 and 14.1.5** but **does not support including Note 145.** Many countries permit up to 500 mg/kg saccharin in beverages. The sweetness factor of saccharin is 400 and 300 mg/kg would provide a S.S.E. of 12% that is reasonable. Saccharin is used both as a sole sweetener and in combination with other food additive sweeteners. It is very useful in fountain drinks due to its stability. Adopting the EC level of 80 mg/kg only provides a S.S.E of 3.2% that is not technologically adequate in a significant number of existing products and would require significant product formulations and increase manufacturing costs. Stable, safe, and inexpensive sweeteners are essential in providing consumer choice in many tropical developing countries and, further, saccharin is used in fountain drinks in many parts of the world at levels well above 80 mg/kg.

SUCRALOSE (INS 955)

Recommendation 1 (discontinue): 14.1.4.1, 14.1.4.2, 14.1.4.3

ICBA **supports** the recommendation to combine the maximum levels in 14.1.4.

Recommendation 2 (adopt): 300 mg/kg in 14.1.4 and 14.1.5 Note 127

ICBA **supports** the recommendation but requests that Note 145 be deleted.

PART III – COLORS

Recommendation 1 – Food categories in which the use of colors is technologically justified (Appendix III)

ICBA **supports** including categories 14.1.4 and its subcategories, and 14.1.5 based on the justification provided.

ALLURA RED AC (INS 129)

Recommendation 1 (discontinue): 14.1.4.1, 14.1.4.2 and 14.1.4.3

ICBA **supports** combining maximum levels under 14.1.4.

Recommendation 2 (adopt): 100 mg/kg in 14.1.4 Note 127

ICBA **supports** the recommendation.

Recommendation 3 (comments are requested): 100 mg/kg in 14.1.5

ICBA **supports** the recommendation.

CANTHAXANTHIN (INS 161g)

Recommendation 2 (adopt): 5 mg/kg in 14.1.4.2 and 14.1.4.3 Note 127

ICBA **supports** the recommendation based on the justification provided. Canthaxanthin only is in a limited use in certain juice drinks and a maximum level of 5 mg/kg reflects the current use level in 14.1.4.2.

CARAMEL COLOR CLASS III (INS 150c)

Recommendation 3 (revoke): 14.1.4 (GMP)

ICBA has requested several times to consider maintaining the maximum level based on GMP due to the high ADI of this color and the long history of safe use of caramel colors in foods. Most countries permit the use of caramel colors according to GMP.

Recommendation 3 (adopt): 50 000 in 14.1.4 and 100 000 in 14.1.5

ICBA **can support** the recommendation while we still request reconsidering moving this color to Table 3.

CARAMEL COLOR CLASS IV (INS 150d)

Recommendation 2 (revoke): **14.1.4 (GMP)**

ICBA has requested several times to consider maintaining the maximum level based on GMP due to the high ADI of this color and the long history of safe use of caramel colors. Most countries permit the use of caramel colors according to GMP.

Recommendation 3 (adopt): 50 000 mg/kg in 14.1.4

ICBA **can support** the recommendation while we still request reconsidering moving this color to Table 3.

Recommendation 4 (comments are requested): 100 000 mg/kg in 14.1.5

ICBA **supports adopting** the proposed provision. Caramel colors are widely used in all types of beverages and have a long history of safe use.

CARMINES (INS 120)

Recommendation 2 (adopt): 100 mg/kg in 14.1.4 Note BB

ICBA **supports** the recommendation **with Note BB** (as carminic acid) based on the justification provided.

Recommendation 3 (comments are requested): 14.1.5

ICBA **supports** the recommendation to request information on use levels and technological need since the category also includes herbal infusions that are served hot.

CAROTENOIDS (INS 160ai, 160aii, 160e, 160f)

Recommendation 2 (adopt): 100 mg/kg in 14.1.4

ICBA **supports** the recommendation **but suggests adding Note CC** (expressed as beta-carotene)

CHLOROPHYLL, COPPER COMPLEXES (INS 141i & INS 141ii)

Recommendation 2 (adopt): 300 mg/kg in 14.1.4

ICBA **supports** the recommendation,

Recommendation 3 (comments are requested): 14.1.5

ICBA **supports** the recommendation to request information on use levels and technological need because herbal infusions are included in 14.1.5.

ERYTHROSINE (INS 127)

Recommendation 2 (adopt): 300 mg/kg in 14.1.4

ICBA **can accept to discontinue** the provision due to the relatively low ADI (0.1 mg/kg bw) and the limited use of this color based on the justification #2. The use of erythrosine in beverages is severely restricted in many countries.

GRAPE SKIN EXTRACT (INS 163ii)

Recommendation 2 (adopt): 300 mg/kg in 14.1.4 Note DD

ICBA **supports** the recommendation with Note DD (expressed as anthocyanin)

INDIGOTINE (INS 132)

Recommendation 2 (adopt): 100 mg/kg in 14.1.4

ICBA **supports** the recommendation.

Recommendation 3 (comments are requested): 14.1.5

ICBA **supports** the recommendation because herbal infusions are included in 14.1.5.

PONCEAU 4R (INS 124)

Recommendation 2 (adopt): 50 mg/kg in 14.1.4

ICBA **requests 100 mg/kg** because some current use levels exceed 50 mg/kg and would require product reformulations if a maximum level is below 100 mg/kg. However, the manufacturers are currently investigating if 50 mg/kg would be achievable to meet the technological need.

SUNSET YELLOW FCF (INS 110)

Recommendation 1 (discontinue): 70 mg/kg in 14.1.5

ICBA **suggests moving this provision to Recommendation 3 (comments are requested)** because the category includes herbal infusions where colors may be used.

Recommendation 3 (comments are requested): 14.1.4.1, 14.1.4.2, 14.1.4.3

ICBA **supports adopting 100 mg/kg in 14.1.4** that reflects the current use level in several countries based on the justification provided.

ICGA

The International Chewing Gum Association (ICGA) welcomes the opportunity to provide comments on the draft report of the electronic working group on the GSFA.

The ICGA represents the interests of the international chewing gum industry (chewing gum and gum base manufacturers and suppliers) and ensures that chewing gum and gum base products produced by its members are safe, wholesome and fulfill the highest quality standards wherever in the world they are manufactured and sold.

The ICGA has participated in the works of the electronic working group on the GSFA and wishes to congratulate the chair and members for the completion of the report.

At this stage, the ICGA wishes to provide comments as follows on some selected additives provisions regarding chewing gum products.

PART 1 – Miscellaneous additives

1) ICGA requests a level of 20.000 mg/kg polysorbates in chewing gum for the following reasons:

Polysorbates (INS 432, 433, 434, 435, 436)

Polyoxyethylene sorbitan esters are available in a hydrophilic/ lipophilic balance (HLB) range from 10 to 17 where ordinary mono- and diglycerides and acetylated monoglycerides are between HLB 1.8 to 5. These additives are needed in order to establish the desired taste profiles for different types of chewing gums. An emulsifier can change the release rate of a specific flavour. It affects the release rate of the flavour making the consumer distinguish the different flavour notes available in the gums. Flavours differ very much, dependent on the type of flavour (i.e. a lemon flavour is chemically very different from a spearmint flavour). That is why it is necessary to be able to use different emulsifiers for different flavours. It has been proven that emulsifiers with high HLB increase flavour release compared to emulsifiers with low HLB. Blends of various polysorbates permit selection of the exact HLB needed in the chewing gum, in accordance with the type of flavour used. Moreover, polyoxyethylene sorbitan esters have a positive effect on the texture properties of chewing gum, and they also assist in providing breath freshening characteristics to the flavours.

The level of 20.000 mg/kg reflects the quantities needed for achieving a safe effect on the release.

JECFA assigned a group ADI for the polysorbates considered of 25 mg/kg body weight. The consumption of 3 g of chewing gum containing 20.000 mg/kg of polysorbates by a 60 kg adult would result in the ingestion of 60 mg of polysorbates or about 4 % of the ADI. This assumes 100% extraction of the polysorbates during chewing.

PART II – Sweeteners

2) ICGA does not support the notes restricting the use of sweeteners to energy reduced and/or or with no added sugar products.

3) ICGA supports the recommended approach for expressing the acceptable maximum use levels for aspartame-acesulfame salt (INS 962)

4) ICGA supports the recommendations by the eWG to adopt the following levels of use for chewing gum products:

1. Alitame at 300mg/kg
2. Aspartame at 10 000mg/kg
3. Aspartame-Acesulfame salt at 4550mg/kg
4. Cyclamates at 3 000mg/kg
5. Neotame at 1 000 mg/kg

5) ICGA submits that chewing gum contributes only a very small fraction of the total exposure to the remaining intense sweeteners for which comments have been requested on the levels of use in chewing gum.

- The table below shows the ADI for each remaining sweetener and the percentage of that ADI taken up by the use of the sweetener in chewing gum. The ADI analysis demonstrates the safety of these authorizations, particularly since the percentage of the ADI taken up by chewing gum as shown in the table is based on several exaggerated assumptions, i.e., 1) each sweetener is used to the exclusion of all others; 2) all chewing gum consumed is sugar-free; and 3) each sweetener is used at maximum levels.

- Even with such exaggerations, the table demonstrates that only a very small percentage of the ADI is taken up by chewing gum. Most importantly, the exposure data support the view that where multiple sweeteners are legally permitted the exposure to individual sweeteners is less than where limits are imposed on their availability. It is self-evident that where many sweeteners are used individually or in combination, exposure to each will be less and that the safety margin, defined as the difference between the ADI and the actual intake of individual sweeteners, will be larger than if only one or two sweeteners were permitted.

INS NUMBER		**JECFA'S ADI Mg/kg bw/day**	**Maximum use level requested in chewing gum (mg/kg)**	**Daily intake of sweetener provided by chewing gum [1] for a heavy user at 3 g/day assuming an 100% extraction of the sweetener during chewing**	
				In mg per capita	**% of the ADI**
950	Acesulfame K	15	5.000	15	1.7
954	Saccharin	5	3.000	9	3.0
955	Sucralose	15	5.000	15	1.7

6) Accordingly, in response to the request for comments on the level of 5 000 mg/kg of acesulfame potassium in chewing gum, ICGA wishes to reiterate its previous comments, as follows:

Acesulfame Potassium (INS 950)

- AcesK is technologically needed at levels up to 5 000 mg per kilogram of chewing gum. Although the literature notes its solubility in water of 27 grams in 100ml, acesulfame K does not dissolve rapidly in the mouth and therefore, it requires this level to compensate for this delayed sensory perception.
- There is trade in chewing gum containing 5 000mg/kg. For example, India, Kenya, South Korea, Malaysia, Japan, Philippines, Hong Kong, and Vietnam have set a ML at 5 000 mg/kg. In addition, Mexico, Taiwan, Singapore and the USA have established a GMP limit

7) In response to the request for comments on the level of 3 000 mg/kg of saccharin in chewing gum, ICGA wishes to reiterate its previous comments, as follows:

Saccharin (INS 954)

- Saccharin is technologically needed up to levels of 3000mg per kilogram of chewing gum. Saccharin's low solubility in water requires, as for aspartame, higher use levels to get the required sweetness. We believe that the small contribution of chewing gum products to the overall intake of saccharin justifies such level. Moreover, saccharin limits itself by its unpleasant after-taste if used at levels too high. The salts of saccharin have their own benefit in that they provide the fastest impact of flavour, due to their very high solubility in water. For consistency reasons with other intense sweeteners, Note 168 should not be included.
- There is trade in chewing gums containing more than 1200 mg/kg saccharin. Just by way of example, South Africa currently authorises saccharin at 2500 mg/kg in chewing gum.

[1]Taking the EU as an example, figures collected in all EU countries show that the daily per capita consumption of chewing gum is 1 g/day. The heavy users consumption is 3 times the consumption per capita as demonstrated in the FAO/WHO 18th session of the Codex Committee on Food Additives: "Guidelines for simple evaluation of food additive intake" and confirmed by a survey conducted in some of its Member States.

8) In response to the request for comments on the level of 5 000 mg/kg of sucralose in chewing gum, ICGA wishes to reiterate its previous comments, as follows:

Sucralose (INS 955)

- Sucralose may be used as a sugar substitute in sugar free chewing gum and is technologically needed up to levels of 5 000 mg/kg either singly or in combination with other permitted sweeteners. Sucralose provides benefits over the other intense sweeteners such as Aspartame, by demonstrating enhanced stability at high processing temperatures, as well as enhanced stability in the presence of certain flavourings such as aldehydes and ketones. Sucralose also imparts a more sugary clean aftertaste than other intense sweeteners such as Acesulfame-K or saccharin.
- Sucralose's high solubility in water requires higher use levels to get the required sweetness. Chewing gum also required relatively high percentage levels of Sucralose because the sweetener must be released slowly over the course of a 20 or 30 minutes chewing period.
- There is trade in chewing gum containing sucralose at this level. Just by way of example, Russia is authorising sucralose at 5 000 mg/kg in chewing gum.

PART III – Colours

9) ICGA supports the recommendations by the eWG to adopt the following levels of use for chewing gum products:

- **Chlorophylls, Copper Complexes** (INS 141i and 141ii) at 700 mg/kg
- **Indigotine** (INS 132) at 300mg/kg
- **Iron oxydes** (INS 172i, 172ii, and 172iii) at 10.000 mg/kg
- **Sunset Yellow** FCF (INS 110) at 300 mg/kg

10) ICGA reiterates its request for a level of 460 mg/kg of Allura Red (INS 129) in chewing gum:

Allura Red AC (INS 129)

- Allura Red AC imparts a red-orange colour to chewing-gum products. It is used primarily in cinnamon flavoured chewing-gums. Consumers relate colour to flavour and vice versa. Consumers associate the fire red-orange colour of Allura Red AC to that of the red hot cinnamon flavoured chewing-gum. The use of 467 mg/kg of Allura Red AC is justified because it takes this level of colour to produce the fire red-orange colour by masking the dark chocolate brown colour imparted by natural gum base or the whiteness of the gum sweeteners such as sucrose or sorbitol.
    - The consumption of 3g of chewing gum containing 460 mg/kg of Allura Red by a 60 kg adult would result in the ingestion of 1.4 mg of colour or about 0.3% of the ADI. This assumes 100% extraction of the colour during chewing and assumes that all chewing gum products would be coloured using Allura Red AC.

11) In response to the request for comments on the level of 300 mg/kg of Ponceau 4R in chewing gum, ICGA wishes to reiterate its previous comments, as follows:

Ponceau 4R (INS 124)

- This additive is needed to obtain desired red, pink, and purple shades in certain chewing gum products. Ponceau 4R is one of only a few synthetic red colours that are available for colouring chewing gum. Ponceau 4R is associated with a unique shade of red and is desirable in bubble gums, fruit flavored gums, and cinnamon flavored gums. Particularly in the absence of any safety concerns, the General Standard on Food Additives should allow for its continued use in chewing gum, so as to give manufacturers needed flexibility as they design products for various markets. A minimum of 300 mg/kg is needed to get a consumer acceptable colour.

- There is no question about the safety of Ponceau 4R when used in chewing gum at the level of use under consideration, up to 300 mg/kg. The JECFA ADI for Ponceau 4R is currently 0-4 mg/kg b.w. A three-gram piece of chewing gum containing Ponceau 4R at 300 mg/kg contains only 0.9 mg of the colour additive. This corresponds to a very small fraction of the JECFA ADI, which allows for up to 240 mg of Ponceau 4R daily in the diet of a 60kg adult.

IFAC

SWEETENERS

Recommendation 2 - Sweeteners

IFAC supports the removal of footnotes relating to the term "energy reduced" as Codex has not defined this term. Furthermore, this is a labeling issue not a safety issue. Also, proposed notes, such as Note 145, "products that are energy-reduced or with no added sugar," are unnecessary because intense sweeteners by their very nature reduce the calories of the final product.

ACESULFAME POTASSIUM (INS 950)

Recommendation 2 (adopt):

05.2.1 Hard Candy

IFAC requests a level of 2500 mg/kg for micro-sweets and breath-freshening mints – as an exception in this category. The proposed 500 mg/kg will not provide for the intended technological effect in micro-sweets and breath-freshening mints. Intense sweeteners are used in conjunction with polyols in sugar-free confections to round out the sweetness of the product, as polyols are generally less sweet than sugars. Intense sweeteners, like the polyols, are non-cariogenic.

05.2.2 Soft Candy and 05.2.3 Nougats and Marzipans

A level of 1000 mg/kg will not provide the intended effect in these categories and IFAC requests a level of 2000 mg/kg. Intense sweeteners are used in conjunction with polyols in sugar-free confections to round out the sweetness of the product, as polyols are generally less sweet than sugars. Intense sweeteners, like the polyols, are non-cariogenic**.**

14.1.4 Water-based flavoured drinks

It is important to note that the proposed level of 350 mg/kg is adequate only when acesulfame K is blended with other sweeteners. IFAC supports deleting Note 145.

Recommendation 3 (comments requested):

05.3 Chewing Gum

IFAC requests the adoption of 5000 mg/kg in this category. This level is technologically needed for the desired effect. As noted earlier, acesulfame K does not dissolve rapidly in the mouth so this level is needed to compensate for the delayed sensory effect.

12.2 Herbs spices, seasoning and condiments

IFAC supports the justification given earlier to the eWG and the adoption of a level of 2000 mg/kg for this category.

14.1.3.2 Vegetable Nectar

IFAC supports the adoption of a level of 350 mg/kg with the addition of Note 127 – as consumed.

14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

A technological need has been shown for this category (e.g., canned ready-to-drink coffees that are served hot) and IFAC supports adopting a level of at least 350 mg/kg.

ALITAME (INS 956)

Recommendation 2 (adopt):

14.1.4 Water-based flavoured drinks

IFAC supports the recommendation of 40 mg/kg and deleting Note 145.

ASPARTAME

Recommendation 2 (adopt):

5.3 Chewing Gum

IFAC supports deleting Note 68 as several countries allow the use of intense sweeteners in sugar containing chewing gum.

14.1.4 Water-based flavoured drinks

It is important to note that the proposed 600 mg/kg level is adequate only when aspartame is used in a blend with other sweeteners. IFAC supports deleting Note 145.

Recommendation 3 (comments requested):

05.2.1 Hard Candy

IFAC supports a level of 10,000 mg/kg for micro-sweets and breath-freshening mints in order to obtain the desired technical effect. Intense sweeteners are used in conjunction with polyols in sugar-free confections to round out the sweetness of the product, as polyols are generally less sweet than sugars. Intense sweeteners, like the polyols, are non-cariogenic.

05.2.2 Soft Candy

The use of intense sweeteners in this category is technologically justified and a level of 3000 mg/kg is needed to obtain the desired effect. IFAC requests that this provision be adopted. Intense sweeteners are used in conjunction with polyols in sugar-free confections to round out the sweetness of the product, as polyols are generally less sweet than sugars. Intense sweeteners, like the polyols, are non-cariogenic.

05.2.3 Nougats and Marzipans

The use of intense sweeteners in this category is technologically justified and a level of 3000 mg/kg is needed to obtain the desired effect. IFAC requests that this provision be adopted.

Intense sweeteners are used in conjunction with polyols in sugar-free confections to round out the sweetness of the product, as polyols are generally less sweet than sugars. Intense sweeteners, like the polyols, are non-cariogenic.

14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

IFAC supports requesting additional comments to clarify the use of aspartame in certain dry coffee products.

ASPARTAME-ACESULFAME (INS 962)

Recommendation 3 (adopt):

05.3 Chewing Gum

IFAC requests deletion of Note 68 as some countries allow the use of intense sweeteners in sugar-containing chewing gum.

14.1.4 Water-based flavoured drinks

IFAC supports the proposed 950 mg/kg level with Note 119 but requests deleting Note 145.

CYCLAMATES (INS 952)

Recommendation 2 (adopt):

05.3 Chewing Gum

IFAC requests deletion of Note 138.

Recommendation 3 (comments requested):

14.1.4.1 Carbonated water-based flavoured drinks and 14.1.4.2 Non-carbonated water-based flavoured drinks

IFAC supports the comment provided to the eWG that 250 mg/kg is not sufficient for the desired technological effect and would require numerous reformulations in many countries. IFAC could accept the proposed 800 mg/kg.

NEOTAME (INS 961)

Recommendation 2 (adopt):

5.3 Chewing Gum

IFAC requests that Note 145 be deleted.

14.1.4 Water-based flavoured drinks

IFAC requests that the note 145 be deleted.

SACCHARIN (INS 954)

Recommendation 2 (adopt):

05.2 Confectionery including hard and soft candy, nougats, etc.

IFAC supports the 500 mg/kg recommendation but requests an exception for micro-sweets and breath freshening mints where a level of 3000 mg/kg is required to obtain the desired effect. Intense sweeteners are used in conjunction with polyols in sugar-free confections to round out the sweetness of the product, as polyols are generally less sweet than sugars. Intense sweeteners, like the polyols, are non-cariogenic.

Recommendation 3 (comments requested):

14.1.4.1 Carbonated water-based flavoured drinks

14.1.4.2 Non-carbonated water-based flavoured drinks

IFAC supports adopting 500 mg/kg in 14.1.4 and 14.1.5 but does not support including Note 145. Many countries permit up to 500 mg/kg saccharin in beverages. Saccharin is used both as a sole sweetener and in combination with other intense sweeteners. It is very useful in fountain drinks, providing stability. Stable, safe, and inexpensive sweeteners are essential in providing consumer choices in many tropical developing countries. Also, saccharin is used in fountain drinks in many parts of the world at levels well above the EU level of 80 mg/kg.

SUCRALOSE (INS 955)

Recommendation 2 (adopt):

14.1.4 Water-based flavoured drinks

14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

IFAC requests that Note 145 be deleted.

Recommendation 3 (comments requested):

01..3.2 Beverage Whiteners

Sucralose is used to replace sugar in low and reduce calorie plain dairy products. Intense sweeteners (e.g., sucralose) make pre-sweetened, no added sugar, beverage whiteners possible.

05.3 Chewing Gum

Sucralose, for technological purposes, is needed at levels up to 5000 mg/kg for sugar free chewing gum. IFAC supports the comments provided earlier to justify this level. IFAC does not support the addition of Note 68.

COLORS

CARAMEL COLOUR CLASS III (INS 150c) AND CARAMEL COLOUR CLASS IV (INS 150d)

Recommendation 1 (discontinue work):

14.2 Alcoholic beverages, including alcohol-free and low-alcoholic counterparts

IFAC requests that work not be discontinued for the proposed levels of 50,000 mg/kg for Caramel Colour Classes III and IV in category 14.2. If this recommendation is accepted, work would discontinue on all subcategories under 14.2 except 14.2.2, 14.2.4 and 14.2.5. This is a major concern since Caramels III and IV are currently used in distilled spirits and other beverage alcohol and non-alcohol products. Caramels III and IV are used to help preserve the color quality thereby preventing batch to batch variation in color. This is particularly important so that consumers always see the same color product and are not concerned with the quality of the product. Caramel color also protects the flavor profile of beverages in clear bottles. Importantly, caramel has a flavor profile. Removal of caramel, for example, would affect the taste profile of products in Category 14.2.

ISA

ISA notes that the 38th CCFAC agreed that the eWG take a "horizontal" approach to its discussion of the provisions for the use of sweeteners and we welcome the endeavour to adopt a positive list of food categories where the use of sweeteners is permitted. However, ISA regrets that this horizontal approach does not appear to be reflected in the final eWG report, where there are several inconsistencies across the category.

ISA agrees with Recommendation 1 (sweeteners) of the eWG report, to discuss the list of food categories for which the use of sweeteners is technologically justified. ISA would support all the categories listed in the attached Matrix for sweetener provisions (**Appendix II**), as presented to the Electronic Working Group on the GSFA.

ISA welcomes Recommendation 2 (sweeteners) to discuss the use of additional notes restricting the use of sweeteners to energy reduced products in the GSFA. ISA does not support the use of such footnotes relating to the term "energy reduced", as Codex has not defined this term for claims purposes and this is a labelling issue. ISA supports the listing of footnote 127 (as consumed) for all concentrates, such as juice concentrates and nectars.

Where there is a recommendation for adoption for the use of Aspartame-Acesulfame salt in a particular food category, the use of Aspartame and Acesulfame K should also be justified in this category, as Aspartame-Acesulfame salt is composed of these two individual sweeteners and the technological need is the same.

The report of the eWG agrees that the use of intense sweeteners in category 5.2 is technologically justified. ISA supports the use of intense sweeteners in this category. However, the listed maximum levels for category 5.2.1, hard candy, for Acesulfame K (500 mg/kg), Aspartame (2000 mg/kg), Cyclamate (500 mg/kg) and Saccharin (500 mg/kg), will not allow the intended technological effect to be achieved in micro sweets and breath-freshening mints, which fall into the 5.2.1 category. ISA would therefore ask for an exception for a particular food within this category "micro sweets, including breath-freshening mints", as indicated in the ISA detailed comments attached (Appendix I).

PART II - SWEETENERS

53. The 38th CCFAC agreed that the eWG should take a "horizontal" approach to its discussion of the GSFA provisions for sweeteners. The eWG reached general consensus on a positive list of food categories in which the use of one or more food additive sweeteners were technologically justified (see Appendix II). The CCFA may wish to consider this list of food categories as work on the GSFA progresses.

54. Some members of the eWG proposed including additional Notes (e.g., 138,[2] 144,[3] 145[4]) to a number of the draft (Step 6) and proposed draft (Step 3) provisions for food additive sweeteners to reduce the potential for misleading consumers, when foods are promoted as "energy reduced" or contain high intensity sweeteners. Other members of the eWG did not support adding such notes because Codex has not defined the term "energy reduced" for labeling/claims purposes. In addition, it was questioned whether such additional restrictions were necessary since the use of high intensity sweeteners to replace all or part of the sugar in full-calorie or full-sugar counterpart will result in a product that is reduced in both calories and sugar content. Moreover, some members considered these notes too specific in the context of a world-wide standard. Intense sweeteners make numerous low and reduced calorie foods and beverages possible. With the increase in obesity worldwide these products can be important tools to assist individuals in controlling and losing weight, when incorporated into an overall healthy diet.

Recommendation 1 - Sweeteners
The eWG recommends that the 39th CCFA discuss the list of food categories for which the use of food additive sweeteners is justified (Appendix II), with a view toward reaching consensus and using the list as a working document in its future discussion of food additive sweeteners.

Recommendation 2 – Sweeteners
The eWG recommends that the 39th CCFA consider whether additional notes restricting the use of food additive sweeteners to energy reduced products etc (i.e., Notes 68,[5]138[6]. 144[7], 145[8], , D[9], E[10], F[11], G[12], H[13], J[14], K[15], L[16], M[17], N[18]) should be included in the GSFA.

ISA fully supports the removal of the footnotes relating to the term "energy reduced", as Codex has not defined this term for claims purposes and this is a labelling issue.

ISA would ask that all concentrates, such as juice concentrates and nectars, are listed on an 'as consumed' basis (footnote 127).

[2] **Note 138**: For use in energy-reduced products only.
[3] **Note 144:** For use in sweet and sour products only.
[4] **Note 145**: Products are energy reduced or with no added sugar.
[5] **Note 68** For use in products with no added sugar only.
[6] **Note 138**: For use in energy-reduced products only.
[7] **Note 144:** For use in sweet and sour products only.
[8] **Note 145**: Products are energy reduced or with no added sugar.
[9] **Note D:** For use in products for special nutritional purposes only.
[10] **Note E:** For use in products in liquid form; 500 mg/kg for use in products in solid form.
[11] **Note F:** For milk-based sandwich spreads only.
[12] **Note G:** For use in products in liquid form; 2000 mg/kg for products in solid form.
[13] **Note H:** For use in energy-reduced or alcohol-free beer only
[14] **Note J:** For use in products in liquid form; 500 mg/kg for products in solid form.
[15] **Note K:** For use in syrup-type or chewable products; 500 mg/kg for in products in solid form; 80 mg/kg in products in liquid form.
[16] **Note L:** Fat-based sandwich spreads
[17] **Note M:** 240 mg/kg for liquid forms, 800 mg/kg for solid forms, 2400 mg/kg for syrup-type or chewable forms
[18] **Note N:** For use in breakfast cereals with a fibre content of more than 15% and containing at least 20% bran only.

ACESULFAME POTASSIUM (INS 950)

55. The 37th JECFA (1990) assigned an ADI of 15 mg/kg bw/d for acesulfame potassium.

Recommendation 1 – Acesulfame Potassium, INS 950
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for acesulfame potassium in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification provided to eWG
01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)	500	mg/kg		3	Codex draft Standard for Fermented Milk does not contain any provisions for sweeteners in plain fermented milks
01.4	cream (plain) and the like	1000	mg/kg		3	See recommendation 3. Foods in some food sub-categories would not be expected to contain added sweeteners.
01.5	milk powder and cream powder and powder analogues (plain)	3000	mg/kg		3	
01.5.1	milk powder and cream powder (plain)		GMP		6	The use of food additive sweeteners is not justified in these food categories
01.6.1	unripened cheese	500	mg/kg		3	
05.1.1	cocoa mixes (powders) and cocoa mass/cake	2500	mg/kg		6	Category 05.1.1 contains only standardized foods and the commodity standards permit only 350 mg/kg
06.1	whole, broken, or flaked grain, including rice	300	mg/kg		3	
06.4.3	pre-cooked pastas and noodles and like products	200	mg/kg		3	
07.2.1	cakes, cookies and pies (e.g., fruit-filled or custard types)	1000	mg/kg		6	Combined under category 07.2 (see recommendation 2)
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	2000	mg/kg		6	
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)	1000	mg/kg		6	
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	1000	mg/kg		6	Combined under category 12.6 (see recommendation 2)
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	500	mg/kg		6	
12.6.3	mixes for sauces and gravies	1000	mg/kg		6	
12.6.4	clear sauces (e.g., fish sauce)	500	mg/kg		6	
13.1.3	formulae for special medical purposes for infants	450	mg/kg		3	There are no non-standardized foods in this category. For consistency with the Draft revised Codex standard for infant formula
14.2.3	grape wines	500	mg/kg		3	
14.2.5	mead	500	mg/kg		3	
14.2.6	distilled spirituous beverages containing more than 15% alcohol	350	mg/kg		3	
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	1000	mg/kg		6	Combined under category 15.0 (see recommendation 2)
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	1000	mg/kg		6	
15.3	snacks - fish based	350	mg/kg		6	

Recommendation 2 - Acesulfame Potassium, INS 950
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for acesulfame potassium in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification provided to eWG
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	**350**	**mg/kg**	**[Note 145[19]]**	6	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	**350**	**mg/kg**	**[Note 145]**	6	An ML of 500 mg/kg is needed to achieve the intended technical effect
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	**350**	**mg/kg**	**[Note 145]**	6	An ML of 500 mg/kg is needed to achieve the intended technical effect
03.0	edible ices, including sherbet and sorbet	800	mg/kg	**[Note 145]**	6	
04.1.2.3	fruit in vinegar, oil, or brine	200	mg/kg	**[Note 145]**	6	
04.1.2.4	canned or bottled (pasteurized) fruit	**350**	**mg/kg**	**[Note 145]**	6	
04.1.2.5	jams, jellies and marmelades	1000	mg/kg	**[Note 138[20]]**	6	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	1000	mg/kg	**[Note 138]**	6	
04.1.2.7	candied fruit	500	mg/kg	**[Note 145]**	6	Candied fruit requires a bulk sweetener to get its rather firm texture. Sugar substitutes used for sugar-free products are less sweet and require intense sweeteners like acesulfame K to bring the sweetness to the customary level.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	**350**	**mg/kg**	**[Note 138]**	6	An ML of 500 mg/kg is needed to achieve the intended technical effect
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	**350**	**mg/kg**	**[Note 138]**	6	An ML of 500 mg/kg is needed to achieve the intended technical effect
04.1.2.10	fermented fruit products	**350**	**mg/kg**	**[Note 138]**	3	
04.1.2.11	fruit fillings for pastries	**350**	**mg/kg**	**[Note 138]**	6	An ML of 500 mg/kg is needed to achieve the intended technical effect
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	**200**	**mg/kg**	**[Note 144[21]]**	3	
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	350	mg/kg	**[Note 138]**	6	Intense sweeteners allow production of sweet sugar-free products. Acesulfame K was found to withstand the sterilisation conditions used for the common types of canned vegetables. The listed acesulfame K level is not sufficient to provide adequate sweetness. It is proposed to align it with the level proposed for category 04.2.2.5 (1000 mg/kg).
05.1.1	cocoa mixes (powders) and cocoa mass/cake	**350**	**mg/kg**	**Note 97[22]**	6	1) For consistency with Codex commodity standards. There are no non-standardized foods in

[19] **Note 145**: Products are energy reduced or with no added sugar.
[20] **Note 138**: For use in energy-reduced products only.
[21] **Note 144:** For use in sweet and sour products only
[22] **Note 97:** In the finished product/final cocoa and chocolate products

Recommendation 2 - Acesulfame Potassium, INS 950
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for acesulfame potassium in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification provided to eWG
						this category. This category includes products for the preparation of cocoa-based beverages. For sugar-free products intense sweeteners can be the only source of sweetness. The listed level is necessary as the dilution to prepare a cocoa beverage can be 10 fold and even higher. A 10 fold dilution results in 250 mg/L in the beverage. 2) An ML of 2500 mg/kg is needed to achieve the intended technical effect
05.1.2	cocoa mixes (syrups)	**350**	**mg/kg**	**[Note 145] Note 97**	6	1) For sugar-free products intense sweeteners can be the only source of sweetness. The level listed for this category is too low to achieve the intended technological need. 2500 mg/kg is technologically needed. 2) An ML of 2500 mg/kg is needed to achieve the intended technical effect
05.1.3	cocoa-based spreads, including fillings	**1000**	**mg/kg**	**[Note 145]**	6	An ML of 2000 mg/kg is needed to achieve the intended technical effect
05.1.4	**cocoa and chocolate products**	**500**	**mg/kg**		**3**	**A MLof 1000 mg/kg is technologically needed**
05.1.5	**imitation chocolate, chocolate substitute products**	**500**	**mg/kg**	**[Note 145]**	**6**	**A MLof 1000 mg/kg is technologically needed**
05.2.1	**hard candy**	**500**	**mg/kg**	**[Note 145]**	**6**	**A maximum level of 2500 mg/kg is necessary for micro sweets and breath-freshening mints. Sugar-free hard candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic. The proposed level represents the case of need for hard candy.**
05.2.2	**soft candy**	**1000**	**mg/kg**	**[Note 145]**	**6**	**A maximum level of 2000 mg/kg is necessary for microsweets and breath-freshening mints. Sugar-free soft candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products.**

ISA comment:
Adopting a level of 500 in category 5.2.1 will not allow the intended technological effect to be achieved in micro sweets and breath-freshening mints. ISA would ask for an exception for this particular food product as follows:

Micro-sweets including breath-freshening mints: ML 2500 mg/kg

Sugar-free hard candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are particularly well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic

ISA Comment:
Adopting a level of 1000 mg/kg in category 5.2.2 will not allow the intended technological effect to be achieved.

ISA would request 2000 mg/kg for soft candy (5.2.2). Sugar-free soft candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are particularly well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic.

Recommendation 2 - Acesulfame Potassium, INS 950
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for acesulfame potassium in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification provided to eWG
						The sweetness is then rounded with sweeteners. Intense sweeteners are well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic. The proposed level represents the case of need for soft candy.
05.2.3	**nougats and marzipans**	**1000**	**mg/kg**	**[Note 145]**	**6**	**Intense sweeteners are used as sugar-free products of this category, which are often based on polyols instead of sugar. Very often these products contain intense sweeteners to round their sweetness and bring it to the higher lever of sugar-based products. Use of intense sweeteners in these products is common in many countries. An ML of 2000 mg/kg represents the case of need for nougats and marzipan**
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg	[**Note 145]**	6	
06.3	breakfast cereals, including rolled oats	1200	mg/kg	[**Note 145] & Note N**[23]	6	
06.4.2	dried pastas and noodles and like products	200	mg/kg		3	1) To provide sweetness (other sweeteners are permitted) 2) Flavour enhancer / Sweetener for specific groups of products
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	350	mg/kg	**[Note 145]**	6	An ML of 500 mg/kg is technologically needed.
07.1	bread and ordinary bakery wares	1000	mg/kg		3	1)To provide sweetness (other sweeteners are permitted) 2) Currently used in breads in various countries. In some countries sweetened products of this category are on the market. Acesulfame K allows production of sweetened products without addition of soluble carbohydrates. It is stable during baking. 3) In some countries sweetened products of this category are on the market. Acesulfame K allows production of sweetened products without addition of soluble carbohydrates. Acesulfame K is stable during baking. The right category for these

ISA comment:
Adopting a level of 1000 in category 5.2.3 will not allow the intended technological effect to be achieved.

ISA would request 2000 mg/kg for nougats and marzipans (5.2.3). Intense sweeteners are used as sugar-free products of this category, which are often based on polyols instead of sugar. Very often these products contain intense sweeteners to round their sweetness and bring it to the higher lever of sugar-based products. Use of intense sweeteners in these products is common in many countries.

[23] **Note N:** For use in breakfast cereals with a fibre content of more than 15% and containing at least 20% bran only.

Recommendation 2 - Acesulfame Potassium, INS 950
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for acesulfame potassium in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification provided to eWG
						products should be identified if this considered not the right category for such products. Instead, category 7.1.1 breads and rolls may better describe the presently available products.
07.2	**Fine bakery wares (sweet, salty, savoury) and mixes**	**1000**	**mg/kg**	**[Note D[24]]**	**6**	
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	[Note 144]	6	
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	**200**	**mg/kg**	**[Note 144]**	3	
10.4	egg-based desserts (e.g., custard)	350	mg/kg	**[Note 145]**	6	An ML of 500 mg/kg is technologically needed.
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	1000	mg/kg		6	1) Flavour enhancer / Sweetener for specific groups of products 2) Products not based on sucrose or high-fructose corn syrup or having lower dry solids levels are less sweet than customary products. Stable sweeteners like acesulfame K bring their sweetness to the standard level.
11.6	table-top sweeteners, including those containing high-intensity sweeteners		**GMP**		3	
12.4	Mustards	350	mg/kg		6	
12.5	soups and broths	110	mg/kg	**[Note 138]**	6	
12.6	**sauces and like products** ***Step missing***	**1000**	**mg/kg**			**1)Used for emulsified and non-emulsified sauces 2) Flavour enhancer / Sweetener for specific groups of products. 3)Heat resistant, non-nutritive sweetener for low calorie products**
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	1000	mg/kg	**[Note 145]**	6	
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	**500**	**mg/kg**		6	1) Flavour enhancer / Sweetener for specific groups of products 2) These products are used by a limited population under the care of a health professional. Availability of these sweetened palatable products aids patient compliance with an otherwise very restricted diet.

[24] **Note D:** For use in products for special nutritional purposes only.

Recommendation 2 - Acesulfame Potassium, INS 950 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for acesulfame potassium in the GSFA.						
Food Cat No.	**Food Category**	**Max**	**Level**	**Comments**	**Step**	**Justification provided to eWG**
13.4	dietetic formulae for slimming purposes and weight reduction	450	mg/kg		6	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	**450**	**mg/kg**		3	
13.6	food supplements	**350**	**mg/kg**	**[Note E[25]]**	6	1) Acesulfame Potassium is used in food supplements as an intense sweetener. It is specifically used in liquid food supplements, in chewable tablets and capsules and in effervescent food supplement tablets that dissolve in water to make a drink. Usage levels depend on the application and the level of sweetness required to mask unpleasant tastes of some vitamins, minerals and other substances. However, all applications could be accommodated within a **maximum level of 2000mg / kg.** It is noted that the previous eWG recommendation only gave the maximum level of use of this sweetener in food supplements in liquid form and referred to Note 155 for the maximum level of the solid form. However, Note 155 failed to include the maximum level of use of this sweetener in food supplements supplied in a syrup-type or chewable form. 2) Proposed Note E is confusing and incomplete because it fails to account for syrup-type or chewable forms of dietary supplements. An ML of 2000 mg/kg acesulfame potassium is needed for such products . The use of sweeteners in food supplements is very low when compared to other product categories due to the unit-dose form of supplements and their low individual weight. The highest level should be retained level determined for each sweetener for food supplements and remove the footnotes.
14.1.2.2	vegetable juice	**350**	**mg/kg**	**[Note 145]**	6	Owing to its good stability in liquids acesulfame K is widely used in beverages of all types, ready-to-drink as

[25] **Note E:** For use in products in liquid form; 500 mg/kg for use in products in solid form.

Recommendation 2 - Acesulfame Potassium, INS 950 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for acesulfame potassium in the GSFA.						
Food Cat No.	**Food Category**	**Max**	**Level**	**Comments**	**Step**	**Justification provided to eWG**
						well as concentrates. The level should be aligned with 14.1.2.1 Fruit juice. As carbohydrates from juice provide some sweetness a lower level than for water-based beverages is sufficient
14.1.2.4	concentrates for vegetable juice	**350**	**mg/kg**	**Note 127, [145]**	3	Owing to its good stability in liquids and during pasteurisation acesulfame K is widely used in beverages of all types, ready-to-drink as well as concentrates. Allocation of a numerical level for concentrates is, however, not in line with the carry-over provisions of the preamble of the standard. It is therefore proposed to list the same level as for the ready-to drink beverages
14.1.3.4	concentrates for vegetable nectar	**350**	**mg/kg**	**Note**, **127, [145]**	3	Owing to its good stability in liquids and during pasteurisation acesulfame K is widely used in beverages of all types, ready-to-drink as well as concentrates. Allocation of a numerical level for concentrates is, however, not in line with the carry-over provisions of the preamble of the standard. It is therefore proposed to list the same level as for the ready-to drink beverages.
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	**350**	**mg/kg**	**[Note 145]**	6	**1) Acesulfame K is widely used in water-based flavoured drinks** **We request removal of Footnote 147 since it is unnecessary and the term" energy-reduced" is not defined by Codex.** **2) Owing to its good stability in liquids and during pasteurisation acesulfame K is widely used in beverages of all types, ready-to-drink as well as concentrates.** **3) An ML of 600 mg/kg is technologically needed.**
14.2.1	beer and malt beverages	350	mg/kg		6	1) In EU permitted for use in energy-reduced or alcohol-free beer only. 2) Owing to its good stability in liquids and during pasteurisation acesulfame K is widely used in beverages of all types, including sweet types of beer. In products bottled with micro-organisms, intense sweeteners are not degraded by these.
14.2.2	cider and perry	350	mg/kg		6	Owing to its good stability

Recommendation 2 - Acesulfame Potassium, INS 950
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for acesulfame potassium in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification provided to eWG
						in liquids and during pasteurisation acesulfame K is widely used in beverages of all types, including cider and perry.
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	**350**	**mg/kg**		3	1) Intense sweeteners are used to produce sugar-free beverages of this category. Owing to its good stability in liquids and during pasteurisation acesulfame K is widely used in beverages of all types. 2) An ML of 500 mg/kg is technologically needed.
15.0	**Ready-to-eat savouries**	**350**	**mg/kg**		**6**	

ISA supports the justifications provided to the eWG below. Where there is a justified technological need for the use of Aspartame-Acesulfame Salt in a particular food category, the use of Aspartame and Acesulfame K should also be justified in these categories, as the technological need is the same. Where the eWG has recommended provisions for adoption (R2) for Aspartame-Acesulfame Salt, ISA would ask that these categories also be recommended for adoption for Aspartame and acesulfame K.

Recommendation 3 - Acesulfame Potassium, INS 950
Comments are requested on the following food additive provisions for acesulfame potassium in the GSFA

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification Provided to eWG
01.3.2	beverage whiteners	2000	mg/kg		3	Acesulfame K use at a level up to 3000 mg/kg in this category allows for the manufacture of pre-sweetened beverage whiteners with no added carbohydrates. Beverage whiteners are produced for direct sale to or direct use by consumers and are mostly used in coffee. As many people prefer sweet over unsweetened coffee they also use table-top sweeteners. Listing of acesulfame K for this category allows production of combination products. It should be noted that addition of carbohydrates to such products may result in undesired browning reactions with impaired appearance of the product while Acesulfame K remains inert.
01.4.4	Cream analogues	1000	mg/kg		3	1) Reassigned to subcategory. 2) Acesulfame K use in this category allows for the manufacture of pre-sweetened cream analogues with no added carbohydrates, no added flavours and no other added foods.
01.5.2	Milk and cream powder analogues	1000	mg/kg		3	1) Reassigned to subcategory. 2) Acesulfame K use in this category allows for the manufacture of pre-sweetened milk and cream powders with no added carbohydrates, no added flavours and no other added foods. Addition of carbohydrates to such products may result in browning reactions

E WG recommends this category for adoption (R2) for APM/AcK Salt

Recommendation 3 - Acesulfame Potassium, INS 950
Comments are requested on the following food additive provisions for acesulfame potassium in the GSFA

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification Provided to eWG
						with impaired appearance of the product and impaired value of proteins while Acesulfame K remains inert.
01.6.5	cheese analogues	350	mg/kg		3	Acesulfame K use at a level up to 500 mg/kg in this category allows manufacture of certain types of pre-sweetened unripened cheese analogues with no added carbohydrates; no added flavours and no other added foods. Carbohydrates may be degraded by lactic acid bacteria which results in loss of sweetness and increase in acidity while acesulfame K is not metabolised by these bacteria and remains inert.
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	1000	mg/kg		3	Acesulfame K is proposed for this category to allow manufacture of pre-sweetened, flavoured products, as this category includes products with added flavours. They have the same technological requirements as their dairy-based counterparts.
04.1.2.1	frozen fruit	500	mg/kg		6	Fruits are often frozen as such but sometimes also pre-sweetened with sugar. Intense sweeteners allow production of pre-sweetened sugar-free products. The listed acesulfame K level provides adequate sweetness.
04.1.2.2	dried fruit	500	mg/kg		6	Fruits are often dried as such but sometimes also pre-sweetened with sugar. Intense sweeteners allow production of pre-sweetened sugar-free products. The listed acesulfame K level provides adequate sweetness.
04.1.2.12	cooked fruit	500	mg/kg		6	Intense sweeteners allow production of pre-sweetened sugar-free products. The listed acesulfame K level provides adequate sweetness.
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	350	mg/kg		6	Some of these products are sweetened. Intense sweeteners allow production of sweetened sugar-free products. Acesulfame K was found to withstand the sterilisation conditions used for the common types of canned fruit. The listed acesulfame K level provides adequate sweetness.
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	2500	mg/kg		6	Some products of this category are sweet. Acesulfame K allows production of sweet products with no added sugar as it withstands heat processing. The listed level seems higher than technologically required. It is proposed to replace it by 1000 mg/kg.
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	1000	mg/kg		3	Sweetening agents can balance the acidity in these products and provide a balanced sweet-sour taste. Acesulfame K is neither degraded by lactic acid bacteria which may occur in brined products and ca therefore improve their shelf stability nor is it degraded during pasteurisation or

Recommendation 3 - Acesulfame Potassium, INS 950
Comments are requested on the following food additive provisions for acesulfame potassium in the GSFA

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification Provided to eWG
						storage of these products. The level is in line with 04.1.2.3, 04.1.2.10 and 04.2.2.3.
05.3	**chewing gum**	**5000**	**mg/kg**		**6**	**1) 3500 mg/kg is technologically justified.** **2) Acesulfame K is technologically needed at levels up to 5.000 mg per kilogram of chewing gum. Although the literature notes its solubility in water of 27 grams in 100 ml, acesulfame K does not dissolve rapidly in the mouth and, therefore, requires this level to compensate for this delayed sensory perception** **3) There is trade in chewing gum containing 5000 mg/kg. For example, India, Kenya, South Korea, Malaysia, Japan, Philippines, Hong Kong, and Vietnam have set an ML of 5000 mg/kg. In addition, Mexico, Taiwan, Singapore and the USA have established a GMP limit.**
						ISA would request adoption of 5000 mg/kg in category 05.3. ***Acesulfame K is used as a sugar substitute in sugar free chewing gum and is technologically needed up to levels of 5.000 mg/kg either singly or in combination with other permitted sweeteners for the technological need to be achieved.*** ***ISA supports the justification given to the eWG.***
09.2	**Processed fish and fish products, including mollusks, crustaceans, and echinoderms**	**200**	**mg/kg**	**[Note 144]**		**Proposed new use.**
12.2	herbs, spices, seasoning, and condiments (e.g., seasoning for instant noodles)	2000	mg/kg		3	Herbs, spices, seasoning and condiments are sometimes rounded by addition of sweet-tasting and flavour-enhancing products. Acesulfame K is a sweetener and flavour enhancer. Seasonings and condiments are also directly sold to consumers; a listing of acesulfame K for use in this product category is necessary.
						ISA supports the justification given to the eWG. A level of 2000 mg/kg is required for the technological need to be achieved.
12.3	Vinegars	2000	mg/kg		3	Vinegar is sometimes rounded and mellowed by addition of sweet-tasting, flavour-enhancing products. Acesulfame K is stable in vinegar and balances its acidity well. Vinegar is also directly sold to consumers; a listing of acesulfame K for this category is necessary.
14.1.3.2	Vegetable nectar	350	mg/kg	[Note 145]		1) Proposed new use 2) Owing to its good stability in liquids and during pasteurisation acesulfame K is widely used in beverages of all types, ready-to-drink as well as concentrates. 3) An ML of 500 mg/kg is technologically needed without note 145
						ISA would request this provision be adopted at 350 mg/kg with the addition of footnote 127 (as consumed).
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	600	mg/kg		3	1) Acesulfame potassium is widely use in canned coffees 2) Owing to its good stability in liquids and during pasteurisation acesulfame K is widely used in beverages of all types, ready-to-drink as well as concentrates.

Recommendation 3 - Acesulfame Potassium, INS 950 **Comments are requested** on the following food additive provisions for acesulfame potassium in the GSFA						
Food Cat No.	**Food Category**	**Max**	**Level**	**Comments**	**Step**	**Justification Provided to eWG**
14.2.4	wines (other than grape)	500	mg/kg		3	Owing to its good stability in liquids and during pasteurisation acesulfame K is widely used in beverages of all types, including cider and perry
16.0	composite foods - foods that could not be placed in categories 01 - 15	350	mg/kg		3	Permitted in jelly and dairy and fat based desserts, dips and snacks

ALITAME (INS 956)

56. The 46th JECFA (1996) assigned an ADI of 1 mg/kg bw/d for alitame

Recommendation 1 - Alitame, INS 956 The eWG recommends that the 39th CCFA **discontinue** work on the following food additive provisions for alitame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)	60	mg/kg		6	Codex draft Standard for Fermented Milk does not contain any provisions for sweeteners in plain fermented milks
01.4	cream (plain) and the like	100	mg/kg		6	No technological need identified
05.0	confectionery	300	mg/kg		6	There are no non-standardized foods in food category 05.1.1 and the relevant Codex commodity standards do not provide for the use of Alitame
07.0	bakery wares	200	mg/kg		6	Limited to subcategory 07.1 (see recommendation 2)

Recommendation 2 - Alitame, INS 956 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for alitame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	100	mg/kg	**[Note 145]**	6	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	100	mg/kg	**[Note 145]**	6	
03.0	edible ices, including sherbet and sorbet	100	mg/kg	**[Note 145]**	6	
04.1.2.5	jams, jellies and marmelades	100	mg/kg	**[Note 138]**	6	
05.1.2	**cocoa mixes (syrups)**	**300**	**mg/kg**		**6**	**Alitame is technologically needed at up to 300 mg/kg of chewing gum. It has 2000 times the sweetness of sucrose and provides a very clean sugary sweet taste with no aftertaste. Alitame also provides the following additional benefits: It is a significantly more potent sweetener than aspartame, acesulfame K, saccharin, cyclamates and sucralose, so less is required for a given level of sweetness. It has a much better taste quality and is more thermally and hydrolytically stable than some of the other high intensity sweeteners, giving the chewing gum a longer shelf life.**
05.1.3	**cocoa-based spreads, including fillings**	**300**	**mg/kg**		**6**	
05.1.4	**cocoa and chocolate products**	**300**	**mg/kg**		**6**	
05.1.5	**imitation chocolate, chocolate substitute products**	**300**	**mg/kg**		**6**	
05.2	**confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4**	**300**	**mg/kg**		**6**	
05.3	**chewing gum**	**300**	**mg/kg**		**6**	
05.4	**decorations (e.g., for fine bakery wares), toppings (non-fruit), and sweet sauces**	**300**	**mg/kg**		**6**	
07.1	**Bread and ordinary bakery wares**	**200**	**mg/kg**		**6**	**Approved for Biscuits, cakes and pastries**
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar	**200**	**mg/kg**		6	1) Flavour enhancer / Sweetener for specific groups of products

Recommendation 2 - Alitame, INS 956 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for alitame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
	toppings)					2) Alitame improves the sweetness and flavor profile of these products and provides hydrolytic stability. 3) Improves sweetness and flavour profile. 4) Products not based on sucrose or high-fructose corn syrup or having lower dry solids levels are less sweet than customary products. Stable sweeteners like alitame bring their sweetness to the standard level. Alitame improves sweetness and flavour profile.
11.6	table-top sweeteners, including those containing high-intensity sweeteners		GMP		6	
12.5	soups and broths	40	mg/kg	**[Note 145]**	6	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		6	
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	40	mg/kg	**[Note 145]**	6	

Recommendation 3 - Alitame, INS 956 **Comments are requested** on the following food additive provisions for alitame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.4.4	**Cream analogues**	**100**	**mg/kg**			**1) Proposed new use** **2) Alitame allows for the manufacture of pre-sweetened cream analogues with no added carbohydrates, no added flavours and no added other foods.**
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	100	mg/kg		6	Herbs, spices, seasoning and condiments are sometimes rounded by the addition of sweet-tasting and flavour-enhancing products such as alitame and other intense sweeteners.

ASPARTAME, INS 951

57. The 25th JECFA (1981) assigned an ADI of 40 mg/kg bw/d for aspartame.

Recommendation 1 – Aspartame, INS 951 The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for aspartame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)	2000	mg/kg		6	Codex draft Standard for Fermented Milk does not contain any provisions for sweeteners in plain fermented milks
01.4.1	pasteurized cream (plain)	6000	mg/kg		3	
01.4.3	clotted cream (plain)	6000	mg/kg		3	
10.2.3	dried and/or heat coagulated egg products	1000	mg/kg		6	
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	500	mg/kg		6	Combined ML in category 12.6 (see recommendation 2)

Recommendation 1 – Aspartame, INS 951 The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for aspartame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	350	mg/kg		6	
12.6.3	mixes for sauces and gravies	350	mg/kg		6	
12.6.4	clear sauces (e.g., fish sauce)	350	mg/kg		6	
13.1.3	formulae for special medical purposes for infants	800	mg/kg	Note 84[26]	3	There are no non-standardized foods in this category. For consistency with the Draft revised Codex standard for infant formula

Recommendation 2 - Aspartame, INS 951 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	600	mg/kg	**[Note 145]**	6	
01.4.2	sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	6000	mg/kg		3	1) Approved for Cream, reduced cream and light cream) 2) It used at a level of 1000 mg/kg for whipping cream as an artificial sweetener when significantly lower energy values are needed for lower calorie products.
01.5.2	milk and cream powder analogues	2000	mg/kg		6	Aspartame is used in place of sugars to make low and reduced joule sweetened plain (unflavoured) dairy products. Aspartame allows for the manufacture of pre-sweetened milk and cream powders with no added carbohydrates, no added flavours and no other added foods.
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	**1000**	**mg/kg**	**[Note 145]**	6	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	**1000**	**mg/kg**	**[Note 145]**	6	
03.0	edible ices, including sherbet and sorbet	**1000**	**mg/kg**	**[Note 145]**	6	
04.1.2.3	fruit in vinegar, oil, or brine	300	mg/kg	**[Note 144]**	6	
04.1.2.4	canned or bottled (pasteurized) fruit	1000	mg/kg	**[Note 145]**	6	Fruits are often sterilised in the presence of sugar. Intense sweeteners allow production of sweet sugar-free products. The listed level provides adequate sweetness.
04.1.2.5	jams, jellies and marmelades	1000	mg/kg	**[Note 138]**	6	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	**1000**	**mg/kg**	**[Note 138]**	6	1) There are fruit spreads on the Canadian market which contain amounts of aspartame at this level of use. 2) For these products, considerations as for jams, jellies and marmalades apply. The listed level provides adequate sweetness.
04.1.2.7	candied fruit	2000	mg/kg	**[Note 145]**	6	Candied fruit requires a bulk sweetener to get its rather firm texture. Sugar substitutes used for

[26] **Note 84:** For infants over 1 year of age only.

Recommendation 2 - Aspartame, INS 951
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
						sugar-free products are less sweet and require intense sweeteners to bring the sweetness to the customary level.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	**1000**	**mg/kg**	**[Note 138]**	6	
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	**1000**	**mg/kg**	**[Note 145]**	6	
04.1.2.10	fermented fruit products	**1000**	**mg/kg**	**[Note 138]**	6	
04.1.2.11	fruit fillings for pastries	**1000**	**mg/kg**	**[Note 138]**	6	
04.1.2.12	cooked fruit	**1000**	**mg/kg**	**[Note 145]**	6	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	**300**	**mg/kg**	**[Note 144]**	3	Sweetening agents can balance the acidity of vinegar used in these products and provide a balanced sweet-sour taste. Aspartame is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	1000	mg/kg	**[Note 138]**	6	
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	**1000**	**mg/kg**	**[Note 138]**	6	
05.1.1	cocoa mixes (powders) and cocoa mass/cake	3000	mg/kg	**Note 97**	6	1) For consistency with Codex commodity standards. There are no non-standardized foods in this category. 2) This category includes products for the preparation of cocoa-based beverages. For sugar-free products intense sweeteners can be the only source of sweetness. The listed level is necessary as the dilution to prepare a cocoa beverage can be 10 fold and even higher.
05.1.2	cocoa mixes (syrups)	1000	mg/kg	[**Note 145]**	6	This category includes products for the preparation of cocoa-based beverages. For sugar-free products intense sweeteners can be the only source of sweetness. The listed level is necessary as the dilution to prepare a cocoa beverage can be 10 fold and even higher.
05.3	**chewing gum**	**10000**	**mg/kg**	**[Note 68[27]]**	**6**	**1) 10,000 mg/kg of aspartame (provision under the Canadian Regulations) corresponds to the level of this sweetener in chewing gums on the Canadian market.** **2) Aspartame is technologically needed at levels up to 10.000 mg per**

ISA would propose the deletion of the footnote 68, as several countries allow for the use of sweeteners in chewing gum products containing sugar.

Recommendation 2 - Aspartame, INS 951 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
						kilogram of chewing gum. Aspartame provides a very clean sweet taste with no after-taste. Aspartame is much less soluble than sucrose and requires a higher use level to achieve a sweetness impact compared to a sucrose-sweetened product. Its benefit over the Saccharin product is its clean after-taste. **3) Aspartame is technologically needed at levels up to 10000 mg/kg. Aspartame provides a very clean sweet taste with no after-taste. Aspartame is much less soluble than sucrose and requires a higher use level to achieve a sweetness impact compared to a sucrose-sweetened product. The sweetener is released progressively as the gum is chewed.**
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	1000	mg/kg	**[Note 145]**	6	
06.3	breakfast cereals, including rolled oats	**1000**	**mg/kg**	**[Note 145, & N[28]]**	6	
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	1000	mg/kg	**[Note 145]**	6	
07.1	bread and ordinary bakery wares	4000	mg/kg		6	1) This level of use applies in Canada for use in encapsulated aspartame (to prevent its degradation during baking) in unstandardized bakery products and baking mixes. JP Used for bread and ordinary bakery wares. 2) To provide sweetness (other sweeteners are permitted) 3) Used in some breads to improve taste. 4) In some countries sweetened products of this category are on the market. Aspartame allows production of sweetened products without addition of soluble carbohydrates. Aspartame can also be used to improve the flavour of multigrain breads. The right category for these products should be identified if this is not considered the right category for such products. Instead, category 7.1.1 breads and rolls may better describe the presently available products.
07.2	fine bakery wares (sweet, salty, savoury) and mixes	**1700**	**mg/kg**	**[Note D]**	6	
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg	**[Note 144]**	6	
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	300	mg/kg	**[Note 144]**	6	

Recommendation 2 - Aspartame, INS 951 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	**300**	**mg/kg**	**[Note 144]**	3	
10.4	egg-based desserts (e.g., custard)	1000	mg/kg	**[Note 145]**	6	
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	3000	mg/kg		6	1) Used for syrups. 2) Used in various pancake syrups not including maple syrup 3) Flavour enhancer / Sweetener for specific groups of products
11.6	table-top sweeteners, including those containing high-intensity sweeteners		**GMP**		6	
12.4	Mustards	350	mg/kg		6	
12.6	**Sauces and like products**	**350**	**mg/kg**		**6**	
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	**350**	**mg/kg**	**[Note 145, F[29]]**	6	Some vegetable salads falling in this category contain some vinegar, the taste of which has to be mellowed as discussed for category 12.3 vinegar.
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	1000	mg/kg		6	1) Flavour enhancer / Sweetener for specific groups of products 2) Aspartame is currently used in a number of foods for special dietary purposes in the EU and medical foods in the US. These products are used by a limited population under the care of a health professional. Availability of these sweetened palatable products aids patient compliance with an otherwise very restricted diet.
13.4	dietetic formulae for slimming purposes and weight reduction	800	mg/kg		6	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	**1000**	**mg/kg**		6	
13.6	**food supplements**	**600**	**mg/kg**	**[Note G[30]]**	**6**	1) Aspartame is used in food supplements (category 13.6) as an intense sweetener. It is specifically used in liquid food supplements, in chewable tablets and capsules and in effervescent food supplement tablets that dissolve in water to make a drink. Usage levels depend on the application and the level of sweetness required to mask unpleasant tastes of some vitamins, minerals and other substances. However, **all applications could be accommodated within a maximum level of 5500mg / kg.** 2) Proposed Note G is confusing and incomplete as it fails to account for the use of aspartame in syrup-type or chewable forms of dietary

Recommendation 2 - Aspartame, INS 951
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
						supplements. **An ML of 5500 mg/kg aspartame is needed in these types of products**.. The use of sweeteners in food supplements is very low when compared to other product categories due to the unit-dose form of supplements and their low individual weight. The highest level should be retained level determined for each sweetener for food supplements and remove the footnotes. 3) **An ML of 5500 mg/kg is needed to achieve the intended technical effect.**
14.1.2.2	vegetable juice	**600**	**mg/kg**	**[Note 145]**	6	Aspartame is widely used in beverages of all types, ready-to-drink as well as concentrates.
14.1.2.4	concentrates for vegetable juice	**600**	**mg/kg**	**Note 127, [Note 145]**	6	
14.1.3.2	vegetable nectar	**600**	**mg/kg**	**[Note 145]**	6	
14.1.3.4	concentrates for vegetable nectar	**600**	**mg/kg**	**Note 127, [Note 145]**	6	
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	**600**	**mg/kg**	**[Note 145]**	6	
14.2.1	beer and malt beverages	600	mg/kg	[**Note H[31]**]	6	
14.2.2	cider and perry	600	mg/kg		6	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	**600**	**mg/kg**		6	

ISA supports the justifications provided to the eWG below. Where there is a justified technological need for the use of Aspartame-Acesulfame Salt in a particular food category, the use of Aspartame and Acesulfame K should also be justified in these categories, as the technological need is the same. Where the eWG has recommended provisions for adoption (R2) for Aspartame-Acesulfame Salt, ISA would ask that these categories also be recommended for adoption for Aspartame and acesulfame K.

Recommendation 3 - Aspartame, INS 951
Comments are requested on the following food additive provisions for aspartame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.3.2	beverage whiteners	6000	mg/kg		3	Aspartame is used in place of sugars to make low and reduced joule sweetened plain (unflavoured) dairy products. Intense sweeteners such as aspartame allow for the manufacture of pre-sweetened beverage whiteners with no added carbohydrates.
01.4.4	cream analogues	1000	mg/kg		6	Aspartame is used in place of sugars to make low and reduced joule sweetened plain (unflavoured) dairy products. Aspartame allows for the manufacture of pre-sweetened cream analogues with no added carbohydrates, no added flavours and no other added foods.
01.5.1	milk powder and cream powder (plain)	5000	mg/kg		3	Approved for Dried milk, milk powder, cream powder

E WG recommends this category for adoption (R2) for APM/AcK Salt

E WG recommends this category for adoption (R2) for APM/AcK Salt

Recommendation 3 - Aspartame, INS 951
Comments are requested on the following food additive provisions for aspartame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.6.1	unripened cheese	1000	mg/kg		3	Some unripened cheeses such as low fat cottage cheese are deemed as dietary products and so retention of approval for aspartame would offer opportunities for flavoured versions where some sweetening is needed but without significantly affecting energy value.
01.6.5	cheese analogues ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	1000	mg/kg		6	Aspartame allows for the manufacture of certain types of pre-sweetened unripened cheese analogues with no added carbohydrates; no added flavours and no other added foods. Carbohydrates may be degraded by lactic acid bacteria which results in loss of sweetness and increase in acidity while aspartame is not metabolised by these bacteria and remains inert.
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	1000	mg/kg		3	Aspartame allows for the manufacture of pre-sweetened, flavoured products, as this category includes products with added flavours. They have the same technological requirements as their dairy-based counterparts.
04.1.2.1	frozen fruit ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	2000	mg/kg		3	Fruits are often frozen as such but sometimes also pre-sweetened with sugar. Intense sweeteners allow production of pre-sweetened sugar-free products. The listed level provides adequate sweetness.
04.1.2.2	dried fruit ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	3000	mg/kg		6	Fruits are often dried as such but sometimes also pre-sweetened with sugar. Intense sweeteners allow production of pre-sweetened sugar-free products. The listed level provides adequate sweetness.
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	1000	mg/kg		6	Sweetening agents can balance the acidity of vinegar used in these products and provide a balanced sweet-sour taste. Aspartame is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	1000	mg/kg		6	Sweetening agents can balance the acidity of vinegar used in these products and provide a balanced sweet-sour taste. Aspartame is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	1000	mg/kg		6	Some of these products are sweetened. Intense sweeteners allow production of sweetened sugar-free products. The listed aspartame level provides adequate sweetness.
04.2.2.5	vegetable (including mushrooms	3000	mg/kg		6	Some products of this category are sweet. Aspartame allows production

Recommendation 3 - Aspartame, INS 951
Comments are requested on the following food additive provisions for aspartame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
	and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)					of sweet products with no added sugar.
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	1000	mg/kg		6	Sweetening agents can balance the acidity in these products and provide a balanced sweet-sour taste. Aspartame is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.
05.1.3	cocoa-based spreads, including fillings ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	3000	mg/kg		6	1) An ML of 1000 mg/kg with Note 145 is technologically justified. 2) An ML of 3000 mg/kg is technologically justified.
05.1.4	cocoa and chocolate products ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	2500	mg/kg		6	1) An ML of 2000 mg/kg with Note 145 is technologically justified. 2) An ML of 2500 mg/kg is technologically justified.
05.1.5	imitation chocolate, chocolate substitute products ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	3000	mg/kg		6	1) An ML of 2000 mg/kg with Note 145 is technologically justified. 2) An ML of 3000 mg/kg is technologically justified.
0	***ISA would request that this provision be returned to R2 (adopt).*** ***The use of intense sweeteners in 5.2 is technologically justified (Appendix II).*** ***A ML of 2000 mg/kg in category 5.2.1 will not allow for the intended technological effect to be achieved in micro sweets and breath-freshening mints. ISA would ask for an exception for this particular food product as follows:*** ***Micro sweets including breath-freshening mints- ML 10,000 mg/kg*** ***Sugar-free hard candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are particularly well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic.***		**mg/kg**		**6**	**1) An ML of 2000 mg/kg in the broader category (05.2) with Note 147 is technologically justified. 2) Sugar-free hard candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic. The proposed level of 10,000 mg/kg represents the case of need for hard candy.**

ISA would request that this provision be returned to R2 (adopt).

The use of intense sweeteners in 5.2 is technologically justified (Appendix II).

A ML of 2000 mg/kg in category 5.2.2 would not allow the technological effect to be achieved.

3000 mg/kg is needed for soft candy. Sugar-free soft candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic.

Recommendation 3 - Aspartame, INS 951
Comments are requested on the following food additive provisions for aspartame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
05.2.2	**soft candy**	**3000**	**mg/kg**		**6**	**1) An ML of 2000 mg/kg in the broader category (05.2) with Note 147 is technologically justified. 2) Sugar-free soft candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic. The proposed level of 3000 mg/kg represents the case of need for soft candy.**
05.2.3	**nougats and marzipans**	**3000**	**mg/kg**		**6**	**1) An ML of 2000 mg/kg in the broader category (05.2) with Note 147 is technologically justified. 2) Intense sweeteners are used as sugar-free products of this category, which are often based on polyols instead of sugar. Very often these products contain intense sweeteners to round their sweetness and bring it to the higher lever of sugar-based products. Use of intense sweeteners in these products is common in many countries. The proposed level of 3000 mg/kg represents the case of need for nougats and marzipan**
08.2	processed meat, poultry, and game products in whole pieces or cuts	300	mg/kg		6	Flavour enhancer / Sweetener for specific groups of products, e.g. low calorie products. Heat resistant
08.3	processed comminuted meat, poultry, and game products	300	mg/kg		6	Flavour enhancer / Sweetener for specific groups of products, e.g. low calorie products. Heat resistant
12.2.2	seasonings and condiments	2000	mg/kg		6	Seasoning and condiments are sometimes rounded by the addition of sweet-tasting and flavour-enhancing products such as aspartame and other intense sweeteners.
12.3	Vinegars		GMP		3	1) Numeric ML of **2000** mg/kg is proposed. 2) Vinegar is sometimes rounded and mellowed by addition of sweet-tasting, flavour-enhancing products. Aspartame is stable in vinegar and balances its acidity well.
12.5	soups and broths	600	mg/kg		6	1) An ML of110 mg/kg with Note 138 is technologically justified. 2) An ML of 600 mg/kg is technologically justified.

ISA would request that this provision be returned to R2 (adopt).

The use of intense sweeteners in 5.2 is technologically justified (Appendix II).

A ML of 2000 mg/kg in category 5.2.3 would not allow the intended technological effect to be achieved.

2000 mg/kg is needed for nougats and marzipans. Intense sweeteners are used as sugar-free products of this category, which are often based on polyols instead of sugar. Very often these products contain intense sweeteners to round their sweetness and bring it to the higher lever of sugar-based products. Use of intense sweeteners in these products is common in many countries.

E WG recommends this category for adoption (R2) for APM/AcK Salt

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Recommendation 3 - Aspartame, INS 951
Comments are requested on the following food additive provisions for aspartame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	5000	mg/kg		3	1) ICBA members produce canned coffees that are served hot but no use of aspartame has been reported in these products 2) Owing to its good stability in liquids aspartame is widely used in beverages of all types, ready-to-drink as well as concentrates.
14.2.4	wines (other than grape) ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	700	mg/kg		6	Intense sweeteners are widely used in these beverages, including cider and perry.
14.2.5	mead	700	mg/kg		6	Technological need is questioned
14.2.6	distilled spirituous beverages containing more than 15% alcohol	700	mg/kg		6	To provide sweetness (other sweeteners are permitted)
15.0	ready-to-eat savouries	500	mg/kg		6	1) Products should be placed into appropriate categories. 2) Snacks may be salted, spicy, or sweetened. For sugar-free sweetened products intense sweeteners like Aspartame have to be used.

ASPARTAME-ACESULFAME, (INS 962)

58. The 55th JECFA (2000) concluded that the aspartame and acesulfame moieties of the salt would be covered by the ADI for aspartame (40 mg/kg bw) and acesulfame potassium (15 mg/kg bw).

59. The proposed draft acceptable maximum use levels for aspartame-acesulfame salt are currently expressed in the GSFA in terms of aspartame-acesulfame salt. Expressing the use levels in terms of the salt is scientifically valid because the levels can easily be converted to their corresponding aspartame or acesulfame-K equivalents. Because JECFA concluded that the aspartame and acesulfame moieties in aspartame-acesulfame salt are included within the ADI established for aspartame and acesulfame-K, any combined use of the individual sweeteners and the equivalent level of the sweetener from the double salt should not exceed the maximum use level for the individual sweetener. Based on these concepts, the eWG recommends that the CCFA agree to the following approach for expressing the acceptable maximum use levels for aspartame-acesulfame salt.

Recommendation 1 - Aspartame-Acesulfame, INS 962
The acceptable maximum use levels will be expressed on the following:
a. Aspartame-acesulfame salt basis.
b. Singly or in combination with aspartame or acesulfame-potassium.
c. Replace the current notes 113[32] and 119[33] associated with the proposed draft provisions for aspartame-acesulfame with the following note:

Use levels are expressed as mg of aspartame-acesulfame salt per kg of food. When used as a mixture with aspartame or acesulfame-K: 1) Combined use of aspartame and aspartame-acesulfame salt (expressed as aspartame equivalents by multiplying the aspartame-acesulfame use level by 0.44) should not exceed the maximum use level for aspartame; 2) Combined use of acesulfame-K and aspartame-acesulfame salt (expressed as acesulfame-K equivalents by multiplying the use level for aspartame-acesulfame salt by 0.64) should not exceed the maximum use level for acesulfame-K.

d. Add the following note to all of the provisions for acesulfame-K

Not to exceed the maximum use level for acesulfame-K (INS 950) singly or in combination with aspartame-acesulfame salt (INS 952) expressed in the form of acesulfame-K equivalents (acesulfame-K equivalent level for aspartame-acesulfame salt calculated by multiplying aspartame-acesulfame salt use level by 0.44).

e. Add the following note to all of the provisions for aspartame:

Not to exceed the maximum use level for aspartame (INS 951) singly or in combination with aspartame-acesulfame salt (INS 952) expressed as aspartame equivalents (aspartame-equivalent level for aspartame-acesulfame salt calculated by multiplying aspartame-acesulfame salt use level by 0.64).

60. For a particular acceptable maximum use level for aspartame or acesulfame-K a conversion factor (1.55 or 2.27, respectively) is applied to obtain an equivalent acceptable maximum use level expressed in terms of aspartame-acesulfame salt. Examples for select aspartame and acesulfame-K use levels are shown, below.

Aspartame		
Aspartame Level	**Aspartame level expressed as acesulfame-potassium salt**	**Level rounded up or down to nearest multiple of 50**
300	465	450
350	543	550
500	775	750
600	930	950
700	1085	1100
800	1240	1250
1000	1550	1550
2000	3100	3100
2500	3875	3850
3000	4650	4650
4000	6200	6200
5000	7750	7750
5500	8525	8500
6000	9300	9300
10000	15500	15500

Acesulfame		
Acesulfame-K Level	**Acesulfame-K level expressed as acesulfame-potassium salt**	**Level rounded up or down to nearest multiple of 50**
110	250	250
200	454	450
350	795	800
450	1022	1000
500	1135	1150
600	1362	1350
800	1816	1800
1000	2270	2250
1200	2724	2700
2000	4540	4550
2500	5675	5650
3000	6810	6800
3500	7945	7950
5000	11350	11350
15000	34050	34050

Recommendation 2 – Aspartame-Acesulfame, INS 962
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for aspartame-acesulfame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy-based drinks)	1130	mg/kg	Note 113	3	Codex draft Standard for Fermented Milk does not contain any provisions for sweeteners in plain fermented milks
01.4.1	pasteurized cream (plain)	2270	mg/kg	Note 113	3	
01.4.2	sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)	2270	mg/kg	Note 113	3	
01.4.3	clotted cream (plain)	2270	mg/kg	Note 113	3	
01.5.1	milk powder and cream powder (plain)	6820	mg/kg	Note 113	3	
01.6.1	unripened cheese	1130	mg/kg	Note 113	3	
05.1.1	cocoa mixes (powders) and cocoa mass/cake	4660	mg/kg	Note 119	3	There are no non-standardized foods in this category and the relevant Codex standards (105 & 141) do not provide for the use of this food

Recommendation 2 – Aspartame-Acesulfame, INS 962
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for aspartame-acesulfame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
						additive.
05.2.1	hard candy	5680	mg/kg	Notes 113 & 145	3	
05.2.2	soft candy	4540	mg/kg	Notes 113 & 145	3	Combined ML in category 05.2 (see recommendation 2)
05.2.3	nougats and marzipans	2270	mg/kg	Notes 113 & 145	3	
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	770	mg/kg	Note 119	3	
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	540	mg/kg	Note 119	3	Combined ML in category 12.6 (see recommendation 2)
12.6.3	mixes for sauces and gravies	540	mg/kg	Note 119	3	
12.6.4	clear sauces (e.g., fish sauce)	540	mg/kg	Note 119	3	
13.1.3	formulae for special medical purposes for infants	1020	mg/kg	Note 113	3	There are no non-standardized foods in this category. For consistency with the Draft revised Codex standard for infant formula
14.2.5	mead	1080	mg/kg	Note 113	3	
14.2.6	distilled spirituous beverages containing more than 15% alcohol	790	mg/kg	Note 113	3	

Recommendation 3 – Aspartame-Acesulfame, INS 962
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame-acesulfame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	**800**	**mg/kg**	Notes 113[34] & 145[35]	3	
01.3.2	beverage whiteners	**4545**	**mg/kg**	Note 113	3	
01.4.4	cream analogues	1550	mg/kg	Note 119[36]	3	
01.5.2	milk and cream powder analogues	3100	mg/kg	Note 119	3	
01.6.5	cheese analogues	**800**	**mg/kg**	Note 113	3	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	**1150**	**mg/kg**	Notes 113 & 145	3	
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	1550	mg/kg	Note 119	3	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	**1150**	**mg/kg**	Notes 113 & 145	3	
03.0	edible ices, including sherbet and sorbet	1550	mg/kg	Notes 119 & 145	3	
04.1.2.1	frozen fruit	**1150**	**mg/kg**	Note 113	3	
04.1.2.2	dried fruit	**1150**	**mg/kg**	Note 113	3	
04.1.2.3	fruit in vinegar, oil, or brine	**1150**	**mg/kg**	Notes 113 & 144[37]	3	
04.1.2.4	canned or bottled (pasteurized) fruit	**450**	**mg/kg**	Notes 113 & 145	3	
04.1.2.5	jams, jellies and marmelades	**550**	**mg/kg**	Notes 119 & 138[38]	3	
04.1.2.6	fruit-based spreads (e.g., chutney) exlcuding products of	**2250**	**mg/kg**	Notes 113 & 138	3	

Recommendation 3 – Aspartame-Acesulfame, INS 962
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame-acesulfame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
	food category 04.1.2.5					
04.1.2.7	candied fruit	**1150**	**mg/kg**	Note 113	3	
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings, and coconut milk	**800**	**mg/kg**	Notes 113 & 138	3	
04.1.2.9	fruit-based desserts, incl. fruit-flavoured water-based desserts	**800**	**mg/kg**	Notes 113 & 145	3	
04.1.2.10	fermented fruit products	**800**	**mg/kg**	Note 113	3	
04.1.2.11	fruit fillings for pastries	**800**	**mg/kg**	Note 113	3	
04.1.2.12	cooked fruit	**1150**	**mg/kg**	Note 113	3	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	**450**	**mg/kg**	Note 119 & 144	3	
04.2.2.4	canned or bottles (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds	**800**	**mg/kg**	Note 113	3	
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	**4650**	**mg/kg**	Note 119	3	
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	**800**	**mg/kg**	Notes 113 & 145	3	
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed products, excluding fermented soybean products of food category 12.10	**2250**	**mg/kg**	Note 113	3	
05.1.2	cocoa mixes (syrups)	**1150**	**mg/kg**	Note 113	3	
05.1.3	cocoa-based spreads, incl. fillings	**4550**	**mg/kg**	Notes 113 & 145	3	
05.1.4	cocoa and chocolate products	**2250**	**mg/kg**	Notes 113 & 145	3	
05.1.5	cocoa and chocolate products	**2250**	**mg/kg**	Notes 113 & 145	3	
05.2	**Confectionery**	**5700**	**mg/kg**	**Notes 113 & 145**	**3**	Combined ML evel from all subcategories

ISA supports the eWG recommendation to adopt level of 5700 mg/kg for category 5.2, which allows for intended technological effect to be achieved for 5.2.1 (hard candy)

Recommendation 3 – Aspartame-Acesulfame, INS 962
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame-acesulfame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
05.3	**chewing gum**	**4550**	**mg/kg**	**Notes 68 & 113**	**3**	**Aspartame-acesulfame salt is approximately 350 times sweeter than sugar. Aspartame-acesulfame salt has several advantages compared with a physical mixture of the individual sweeteners aspartame and acesulfame-K. In chewing gum it is highly important, that during chewing the taste is preserved as long as possible. A longer lasting sweetness is an essential condition for this. When using mixtures of aspartame and acesulfame-K the duration of the sweetness can be extended by encapsulating the sweeteners, thereby gradually releasing the sweetness during chewing. Aspartame-acesulfame salt does not have to be encapsulated, but already leads to a prolonged sweetness by itself. On top of that, use of the aspartame-acesulfame salt results in an extra sweetness boost after a few minutes of chewing, which leads to better tasting chewing gum for the consumer.**
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	**1150**	**mg/kg**	Note 113	3	
06.3	breakfast cereals, including rolled oats	1550	mg/kg	Notes 119 & 145	3	
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	**800**	**mg/kg**	Notes 113 & 145	3	
07.1	bread and ordinary bakery wares	**2250**	**mg/kg**	Note 113	3	
07.2	fine bakery wares (sweet, salty, savoury) and mixes	**2250**	**mg/kg**	Notes 77[39] & 113	3	
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	450	mg/kg	Note 113	3	
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	450	mg/kg	Note 113	3	
10.4	egg-based desserts (e.g., custard)	**800**	**mg/kg**	Notes 113 & 145	3	
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	**2250**	**mg/kg**	Note 113	3	
11.6	table-top sweeteners, including those containing high-intensity sweeteners		GMP	Note 113	3	
12.2.2	seasonings and condiments	3100	mg/kg	Note 113	3	
12.3	vinegars	**4550**	**mg/kg**	Note 113	3	
12.4	mustards	**550**	**mg/kg**	Note 119	3	

ISA would ask that footnote 68 be deleted. Some countries allow for the use of sweeteners in chewing gum products that contain sugar

Recommendation 3 – Aspartame-Acesulfame, INS 962
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for aspartame-acesulfame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
12.5	soups and broths	250	mg/kg	Notes 113 & 138	3	
12.6	**sauces and like products**	**750**	**mg/kg**	**Note 119**		
12.7	salads (e.g., macaroni salad, potato salad), and sandwich spreads excluding coco-a dn nut-based spreads of food categories 04.2.2.5 and 05.1.3	1550	mg/kg	Notes 113 & 145	3	
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	**1000**	**mg/kg**	Note 113	3	
13.4	dietetic formulae for slimming purposes and weight reduction	**1000**	**mg/kg**	Note 113	3	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	**1150**	**mg/kg**	Note 113	3	
13.6	food supplements	2000	mg/kg	Note 113	3	
14.1.2.2	vegetable juice	**1350**	**mg/kg**	Note 113	3	
14.1.2.4	concentrates for vegetable juice	**1350**	**mg/kg**	Note 113 & **127**[40]	3	
14.1.3.2	**Vegetable nectar**	**1350**	**mg/kg**	Note 113		Proposed new use for consistency with use in category 14.1.3.4
14.1.3.4	concentrates for vegetable nectar	**1350**	**mg/kg**	Note 113 & **127**	3	
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks **ISA would ask that note 145 be deleted**	**950**	**mg/kg**	Notes 119 & 145	3	
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	**1350**	**mg/kg**	Note 113	3	
14.2.1	beer and malt beverages	**800**	**mg/kg**	Notes 113 & 138	3	
14.2.2	cider and perry	**800**	**mg/kg**	Note 113	3	
14.2.4	wines (other than grape)	**1200**	**mg/kg**	Note 113	3	
14.2.7	aromatized alcoholic beverrages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	**950**	**mg/kg**	Note 119	3	
15.0	ready-to-eat savouries	**750**	**mg/kg**	Notes 113 & 144	3	

CYCLAMATES (INS 952)

61. The 26th JECFA (1982) assigned a group ADI of 11 mg/kg bw/d for calcium cyclamate, cyclohexylsulfamic acid, and sodium cyclamate all expressed as cyclamic acid

Recommendation 1 – Cyclamates, INS 952
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for cyclamates in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)		GMP	Note 17	6	Codex draft Standard for Fermented Milk does not contain any provisions for sweeteners in plain fermented milks
04.1.2.7	candied fruit	500	mg/kg	Note 17	6	
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	100	mg/kg	Note 17	6	
05.1	cocoa products and chocolate products including imitations and chocolate substitutes	500	mg/kg	Note 17	6	Subcategory 05.1.1 contains no non-standardized foods. CX STANs 105 & 141 do not contain any provisions for the use of cyclamates.
05.2.1	hard candy	2500	mg/kg	Note 17	6	**Combined ML under category 05.2 (see recommendation 2)**
05.2.2	soft candy	500	mg/kg	Note 17	6	
05.2.3	nougats and marzipans	500	mg/kg	Note 17	6	
07.2.1	cakes, cookies and pies (e.g., fruit-filled or custard types)	1600	mg/kg	Note 17	6	Combined ML under category 07.2 (see recommendation 2)
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	2000	mg/kg	Note 17	6	
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)	1600	mg/kg	Note 17	6	

Recommendation 2 - Cyclamates, INS 952
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for cyclamates in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	**250**	**mg/kg**	Note 17[41] **[Note 145]**[42]	6	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	250	mg/kg	Note 17 **[Note 145]**	6	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	250	mg/kg	Note 17 **[Note 145]**	6	
03.0	edible ices, including sherbet and sorbet	250	mg/kg	Note 17 **[Note 145]**	6	
04.1.2.4	canned or bottled (pasteurized) fruit	1000	mg/kg	Note 17 **[Note 145]**	6	
04.1.2.5	jams, jellies and marmelades	1000	mg/kg	Note 17 **[Note 145]**	6	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	2000	mg/kg	Note 17 **[Note 145]**	6	
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	250	mg/kg	Note 17 **[Note 138]**	6	
04.1.2.9	fruit-based desserts, including	250	mg/kg	Note 17 **[Note**	6	

Recommendation 2 - Cyclamates, INS 952
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for cyclamates in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
	fruit-flavoured water-based desserts			**138]**		
05.1.2	**Cocoa mixes (syrups)**	**250**	**mg/kg**	**Note 17 127[43] [Note145]**	**6**	
05.1.3	**Cocoa-based spreads, incl. fillings**	**500**	**mg/kg**	**Note 17 [Note145]**	**6**	
05.1.4	**Cocoa and chocolate products**	**500**	**mg/kg**	**Note 17**	**6**	
05.1.5	**Imitation chocolate, chocolate substitute products**	**500**	**mg/kg**	**Note 17 [Note145]**	**6**	
05.2	**Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4**	**500**	**mg/kg**	**Note 17 [Note145]**	**6**	
	ISA supports the eWG recommendation of 500 mg/kg for category 5.2, for use in soft candy (5.2.2) and nougats and marzipans (5.3), as this level would allow the intended technological effect to be achieved. ***However, 500 mg/kg will not allow the technological effect to be achieved in micro sweets and breath-freshening mints. ISA would ask for an exception for this particular food product only as follows:*** ***Micro-sweets including breath-freshening mints - ML 2500 mg/kg*** ***Sugar-free hard candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are well suited for these products as their taste rounds the sweetness of sugar alcohols.***					
05.3	**chewing gum** ***ISA would ask that the footnote 138 be removed.***	**3000**	**mg/kg**	**Note 17 [Note 138]**	**6**	**Cyclamate is approximately 30 times sweeter than sucrose. This sweetener is suitable for use in chewing gum as it has both a high sweetening power and a "pure" taste without the bitter aftertaste of saccharin.** **Cyclamate is technologically needed at levels up to 3.000 mg per kilogram of chewing gum. At this level, cyclamate is released gradually and is available to sweeten the product during the whole chewing period. With the requested level of 3.000 mg of cyclamate per kilogram of chewing gum, due regard has also been paid to the sweetener's ADI value.**
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg	Note 17 **[Note 145]**	6	
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	250	mg/kg	Note 17 **[Note 145]**	6	

Recommendation 2 - Cyclamates, INS 952
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for cyclamates in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
07.2	**Fine bakery wares (sweet, salty, savoury) and mixes**	**1600**	**mg/kg**	**Note 17 [Note D[44]]**	**6**	
10.4	egg-based desserts (e.g., custard)	250	mg/kg	Note 17 **[Note 145]**	6	
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	500	mg/kg	Note 17	6	
11.6	table-top sweeteners, including those containing high-intensity sweeteners		GMP	Note 17	6	
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	400	mg/kg	Note 17	6	
13.4	dietetic formulae for slimming purposes and weight reduction	**400**	**mg/kg**	Note 17	6	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	**400**	**mg/kg**	Note 17	3	
13.6	food supplements	**400**	**mg/kg**	Note 17 **[Note J[45]]**	6	Cyclamates are used in food supplements (category 13.6) as an intense sweetener. They are specifically used in liquid food supplements, in chewable tablets and capsules and in effervescent food supplement tablets that dissolve in water to make a drink. Usage levels depend on the application and the level of sweetness required to mask unpleasant tastes of some vitamins, minerals and other substances. However, all applications could be accommodated within a maximum level of 1250mg / kg. 2) Proposed Note J is confusing and incomplete because it fails to account for the use of cyclamates in syrup-type or chewable forms. An ML of 1250 m/kg cyclamates is needed in such foods.. The use of sweeteners in food supplements is very low when compared to other product categories due to the unit-dose form of supplements and their low individual weight. The highest level should be retained level determined for each sweetener for food supplements and remove the footnotes.
14.1.3.2	vegetable nectar	**250**	**mg/kg**	Note 17 **[Note 145]**	3	
14.1.3.4	concentrates for vegetable nectar	**250**	**mg/kg**	Notes 17 & 127[46] **[Note 145]**	3	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	250	mg/kg	Note 17	6	

Recommendation 3 - Cyclamates, INS 952 **Comments are requested** on the following food additive provisions for cyclamates in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	500	mg/kg	Note 17	6	For reasons of taste and microbial stability these products contain vinegar. To avoid growth of pathogenic bacteria the pH of these products is lowered to values around 4. This would result in a marked acid taste unless the acidity is mellowed by sweetening agents. Intense sweeteners such as cyclamates are not attacked by bacteria which may be found in these products and do not support their growth. In sweet-sour products with a high fat content it may even be necessary to use an intense sweetener as the solubility of sugar would not be sufficient to achieve the intended sweetness. The listed level is necessary as these products are often used in composite foods like delicatessen salads and have to provide a sweet-sour taste to the composite product.
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	500	mg/kg	Note 17	6	Some vegetable salads falling in this category contain vinegar the taste of which has to be mellowed by adding intense sweeteners, such as cyclamate.
14.1.4.1	**carbonated water-based flavoured drinks** ***ISA supports the comments submitted to the eWG that a ML of 250 mg/kg is not technologically feasible. This low level would require significant product reformulations in many countries where cyclamate is permitted.*** ***ISA supports the request for 800 mg/kg in the category 14.1.4 (water-based flavoured drinks), based on the technological justification provided.***	**1500**	**mg/kg**	**Note 17**	**6**	**The eWG could not reach consensus on ML for use in these categories. The eWG recommends that the CCFA consider whether an ML of 800 mg/kg is acceptable in the broader category food category 14.1.4 with notes 17, 127 & [145]. The eWG was informed that an ML of 250 mg/kg is not technologically feasible and would require significant product reformulations in many countries where cyclamate is permitted. Cyclamate is an effective and stable sweetener with a good taste profile. At levels low levels (<<400 ppm), the improvement of taste quality by cyclamate becomes negligible and the synergistic effects are substantially reduced. The optimum sweetness in three component mixtures is reached at use level about 600-700 while two component mixtures with saccharin require higher use levels.**
14.1.4.2	**non-carbonated water-based flavoured drinks, including punches and ades**	**1500**	**mg/kg**	**Note 17**	**6**	

NEOTAME (INS 961)

62. The 61st JECFA (2003) assigned an ADI of 2 mg/kg bw/d for neotame.

Recommendation 1 – Neotame, INS 961 The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for neotame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.4.1	pasteurized cream (plain)		GMP		3	
01.4.2	sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)		GMP		3	

Recommendation 1 – Neotame, INS 961
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for neotame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.4.3	clotted cream (plain)		GMP		3	
01.5.1	milk powder and cream powder (plain)		GMP		3	
01.6.1	unripened cheese	33	mg/kg		3	
05.1.1	cocoa mixes (powders) and cocoa mass/cake	100	mg/kg		3	Subcategory 05.1.1 contains no non-standardized foods. CX STANs 105 & 141 do not contain any provisions for the use of neotame.
08.2	processed meat, poultry, and game products in whole pieces or cuts	10	mg/kg		3	
08.3	processed comminuted meat, poultry, and game products	10	mg/kg		3	
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	10	mg/kg		3	
10.2.3	dried and/or heat coagulated egg products	33	mg/kg		3	
13.1.3	formulae for special medical purposes for infants	25	mg/kg		3	There are no non-standardized foods in this category. For consistency with the Draft revised Codex standard for infant formula

Recommendation 2 - Neotame, INS 961
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for neotame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	20	mg/kg	**[Note 145]**	3	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	100	mg/kg	**[Note 145]**	3	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	100	mg/kg	**[Note 145]**	3	
03.0	edible ices, including sherbet and sorbet	100	mg/kg	**[Note 145]**	3	
04.1.2.3	fruit in vinegar, oil, or brine	100	mg/kg	**[Note 138]**	3	
04.1.2.4	canned or bottled (pasteurized) fruit	33	mg/kg	**[Note 145]**	3	
04.1.2.5	jams, jellies and marmelades	**70**	**mg/kg**	**[Note 138]**	3	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	**70**	**mg/kg**	**[Note 138]**	3	
04.1.2.7	candied fruit	65	mg/kg	**[Note 145]**	3	
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	100	mg/kg	**[Note 138]**	3	
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	100	mg/kg	**[Note 145]**	3	
04.1.2.10	fermented fruit products	65	mg/kg	**[Note 138]**	3	
04.1.2.11	fruit fillings for pastries	100	mg/kg	**[Note 138]**	3	
04.1.2.12	cooked fruit	65	mg/kg	**[Note 138]**	3	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or	10	mg/kg	**[Note 144]**	3	

Recommendation 2 - Neotame, INS 961
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for neotame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
	soy sauce					
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	33	mg/kg	**[Note 138]**	3	
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	33	mg/kg	**[Note 138]**	3	
05.1.2	cocoa mixes (syrups)	33	mg/kg	**Note 97[47] [Note 145]**	3	
05.1.3	cocoa-based spreads, including fillings	100	mg/kg	**[Note 145]**	3	
05.1.4	cocoa and chocolate products	80	mg/kg	**[Note 145]**	3	
05.1.5	imitation chocolate, chocolate substitute products	100	mg/kg	**[Note 145]**	3	
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and ***ISA supports the eWG recommendation to adopt a level of 1000 mg/kg for category 5.2, which allows the intended technological effect to be achieved when used in hard candy products (5.2.1).***	1000	mg/kg	**[Note 145]**	3	
05.3	**chewing gum** ***ISA would ask that footnote 145 be removed***	**1000**	**mg/kg**	**[Note 145]**	**3**	**Neotame is an intense sweetener derived from aspartame. It is 7.000 – 13.000 times as sweet as sugar and 30-60 times as sweet as aspartame. Neotame is technologically needed at levels up to 1.000 mg/kg of chewing gum. It provides zero calories and has a clean, sweet, sugar-like taste with no undesirable taste characteristics like the ones of many other high intensity sweeteners. It can be used alone or blended with other high intensity or carbohydrate sweeteners. It is stable under dry conditions and more stable than aspartame in neutral pH conditions.**
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	**100**	**mg/kg**		3	
06.3	breakfast cereals, including rolled oats	**160**	**mg/kg**	**[Note 145 & Note N[48]**	3	
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	33	mg/kg	**[Note 145]**	3	
07.1	bread and ordinary bakery wares	70	mg/kg		3	1)To provide sweetness (other sweeteners are permitted)ISA May be used to enhance the

Recommendation 2 - Neotame, INS 961 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for neotame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
						flavor of certain specialty breads 2) Used in some breads to improve taste.
07.2	Fine bakery wares (sweet, salty, savoury) and mixes	130	mg/kg	**[Note D[49]]**		
10.4	egg-based desserts (e.g., custard)	**100**	**mg/kg**	**[Note 145]**	3	
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	**70**	**mg/kg**		3	1) Flavour enhancer / Sweetener for specific groups of products 2) Products not based on sucrose or high-fructose corn syrup or having lower dry solids levels are less sweet than customary products. Stable sweeteners bring their sweetness to the standard level.
11.6	table-top sweeteners, including those containing high-intensity sweeteners		**GMP**		3	
12.4	mustards	12	mg/kg		3	
12.5	soups and broths	20	mg/kg	**[Note 138]**	3	
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	65	mg/kg		3	1) To provide sweetness (other sweeteners are permitted) 2) Flavour enhancer / Sweetener for specific groups of products
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	70	mg/kg		3	1) To provide sweetness (other sweeteners are permitted) 2) Flavour enhancer / Sweetener for specific groups of products
12.6.3	mixes for sauces and gravies	12	mg/kg		3	1) To provide sweetness (other sweeteners are permitted) 2) Flavour enhancer/ sweetener for specific groups of products
12.6.4	clear sauces (e.g., fish sauce)	12	mg/kg		3	To provide sweetness (other sweeteners are permitted)
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	33	mg/kg	**[Note 145 & F[50]]**	3	
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	33	mg/kg		3	Flavour enhancer / Sweetener for specific groups of products
13.4	dietetic formulae for slimming purposes and weight reduction	33	mg/kg		3	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	65	mg/kg		3	
13.6	food supplements	90	mg/kg		3	Neotame is used in food supplements (category 13.6) as an intense sweetener. It is specifically used in liquid food supplements, in chewable tablets and capsules and in effervescent food supplement tablets that dissolve in water to make a drink. Usage levels depend on the application and the level of sweetness required to mask unpleasant tastes of some vitamins, minerals and other substances. However, all

Recommendation 2 - Neotame, INS 961
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for neotame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
						applications could be accommodated within a maximum level of 90mg / kg.
14.1.2.2	vegetable juice	65	mg/kg	**[Note 145]**	3	Neotame is widely used in fruit and vegetable juices and nectars including concentrates, to replace sucrose.
14.1.2.4	concentrates for vegetable juice	65	mg/kg	**[Note 145] Note 127**	3	
14.1.3.2	vegetable nectar	65	mg/kg	**[Note 145]**	3	
14.1.3.4	concentrates for vegetable nectar	65	mg/kg	**[Note 145] Note 127**	3	
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks **ISA would ask that footnote 145 be removed**	33	mg/kg	**Note 145]**	3	
14.2.1	beer and malt beverages	20	mg/kg	**[Note H[51]]**	3	
14.2.2	cider and perry	20	mg/kg		3	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	33	mg/kg		3	
15.0	ready-to-eat savouries	**32**	**mg/kg**		3	

Recommendation 3 - Neotame, INS 961
Comments are requested on the following food additive provisions for neotame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.2	fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy based drinks)	65	mg/kg		3	1) Technological need is questioned. 2) Like aspartame, acesulfame K and alitame, this artificial sweetener is used in the manufacture of "diet" fermented milk products. Technological need is based on the requirement for a significantly lower energy value than "regular" fermented milk products.
01.3.2	beverage whiteners ***E WG recommends this category for adoption (R2) for APM/AcK Salt***		GMP		3	1) Technological need is questioned. 2) Neotame is used to replace sugars in the manufacture of pre-sweetened beverage whiteners with no added carbohydrates. An ML of 65 mg/kg is proposed in place of GMP, only
01.4.4	cream analogues ***E WG recommends this category for adoption (R2) for APM/AcK Salt***	33	mg/kg		3	1) Technological need is questioned. 2) Neotame is used to replace sugars for making low and reduced joule/calorie and no added sugar sweetened creams and related products, including cream analogues.
01.5.2	milk and cream powder analogues	65	mg/kg		3	1) Technological need is questioned. 2) Neotame is used to replace sugars, for making low and reduced joule/calorie and no added sugar sweetened milk and cream powders and analogues.
01.6.5	cheese analogues	33	mg/kg		3	1) Technological need is questioned. 2) Neotame at 33 mg/kg allows for the manufacture of certain types of pre-sweetened unripened cheese analogues with no added carbohydrates; no added flavours and no other added foods. Carbohydrates

Recommendation 3 - Neotame, INS 961
Comments are requested on the following food additive provisions for neotame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
						may be degraded by lactic acid bacteria which results in loss of sweetness and increase in acidity while intense sweeteners are not metabolised by these bacteria and remain inert.
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	10	mg/kg		3	1) Technological need is questioned. 2) Neotame at 10 mg/kg allows for the manufacture of pre-sweetened, flavoured products, as this category includes products with added flavours. They have the same technological requirements as their dairy-based counterparts.
04.1.2.1	frozen fruit	100	mg/kg		3	Technological need
04.1.2.2	dried fruit	100	mg/kg		3	Technological need
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	33	mg/kg		3	Technological need
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	33	mg/kg		3	Technological need
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	33	mg/kg		3	Technological need

ISA comment- Technological need: Fruits are often frozen and pre-sweetened with sugar. Intense sweeteners allow production of pre-sweetened sugar-free/low calorie products. The listed level provides adequate sweetness.

ISA comment- Technological need: Fruits are often and pre-sweetened with sugar. Intense sweeteners allow production of pre-sweetened sugar-free/low calorie products. The listed level provides adequate sweetness.

ISA comment- Technological need: Sweetening agents can balance the acidity of vinegar used in these products and provide a balanced sweet-sour taste. Neotame is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.

ISA comment- Technological need: Sweetening agents can balance the acidity of vinegar used in these products and provide a balanced sweet-sour taste. Neotame is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf

ISA comment- Technological need: Some of these products are sweetened. Intense sweeteners allow production of sweetened sugar-free products. The listed neotame level provides adequate sweetness.

Recommendation 3 - Neotame, INS 961
Comments are requested on the following food additive provisions for neotame in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	33	mg/kg	***ISA comment- Technological need: Some products in this category are sweetened. Neotame allows production of sweet products with no added sugar.***	3	Technological need
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	33	mg/kg	***ISA comment- Technological need: Sweetening agents can balance the acidity in these products and provide a balanced sweet-sour taste. Neotame is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.***	3	Technological need
07.2	fine bakery wares (sweet, salty, savoury) and mixes	80	mg/kg		3	1) Low calorie versions of this product can be made with the addition of intense sweetener such as Neotame, to replace sugar. An ML of 130 mg/kg is needed. 2) An ML of 80 mg/kg is needed to achieve the intended technological effect
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	10	mg/kg	***ISA comment – Technological need: Marinated fish, crustaceans and molluscs are often sour-sweet. Intense sweeteners like neotame mellow the taste of vinegar and provide the desired sweetness. In products undergoing fermentation intense sweeteners are not degraded by micro-organisms. Technological need – same as for all sweeteners***	3	Technological need
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	10	mg/kg	***ISA comment – Technological need: Marinated fish, crustaceans and molluscs are often sour-sweet. Intense sweeteners like neotame mellow the taste of vinegar and provide the desired sweetness. In products undergoing fermentation intense sweeteners are not degraded by micro-organisms. Technological need – same as for all sweeteners***	3	Technological need
12.2	herbs, spices, seasonings, and condiments (e.g., seasoning for instant noodles)	65	mg/kg		3	Seasoning and condiments are sometimes rounded by the addition of sweet-tasting and flavour-enhancing products such as Neotame and other intense sweeteners. An ML of 65 mg/kg is needed to achieve the intended technological effect
12.3	vinegars	12	mg/kg		3	Vinegar is often rounded and mellowed by addition of sweet-tasting, flavour-enhancing products such as Neotame.

Recommendation 3 - Neotame, INS 961 **Comments are requested** on the following food additive provisions for neotame in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	50	mg/kg		3	Intense sweeteners are widely used in these beverages (ready-to-drink as well as concentrates), owing to their relative stability in liquids. Sweeteners are already used in this category in Japan and several other countries in water and milk-based malted beverages.
14.2.4	wines (other than grape)	23	mg/kg		3	Intense sweeteners are widely used beverages of this type, including cider and perry.
14.2.5	mead	23	mg/kg		3	
14.2.6	distilled spirituous beverages containing more than 15% alcohol	23	mg/kg		3	To provide sweetness (other sweeteners are permitted)

SACCHARIN (INS 954)

63. The 41st JECFA (1993) assigned a group ADI of 5 mg/kg bw/d for calcium saccharin, potassium saccharin, sodium saccharin and saccharin.

Recommendation 1 – Saccharin, INS 954 The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for saccharin in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.2.1	fermented milks (plain)	200	mg/kg		6	Codex draft Standard for Fermented Milk does not contain any provisions for sweeteners is plain fermented milks
01.2.2	renneted milk (plain)	100	mg/kg		6	No technological need identified
01.6.1	unripened cheese	100	mg/kg		6	No technological need identified
05.1	cocoa products and chocolate products including imitations and chocolate substitutes	500	mg/kg		6	There are no non-standardized foods in this category and the relevant standards (105 & 141)do not contain any provision for the use of saccharin
05.2.1	hard candy	3000	mg/kg		6	**Combined ML under category 05.2 (see recommendation 2)**
05.2.2	soft candy	500	mg/kg		6	
05.2.3	nougats and marzipans	500	mg/kg		6	
08.2.1.1	cured (including salted) non-heat treated processed meat, poultry, and game products in whole pieces or cuts	2000	mg/kg		6	
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	500	mg/kg		6	**Combined ML under category 12.6 (see recommendation 2)**
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	160	mg/kg		6	
12.6.3	mixes for sauces and gravies	300	mg/kg		6	
12.6.4	clear sauces (e.g., fish sauce)	160	mg/kg		6	
12.9.1.3	other soybean products (including non-fermented soy sauce)	500	mg/kg		6	
13.1.3	formulae for special medical purposes for infants	200	mg/kg		3	There are no non-standardized foods in this category. For consistency with the Draft revised Codex standard for infant formula
16.0	composite foods - foods that could not be placed in categories 01 - 15	200	mg/kg		6	

Recommendation 2 - Saccharin, INS 954
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for saccharin in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	**80**	**mg/kg**	**[Note 145]**[52]	6	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	**100**	**mg/kg**	**[Note 145]**	6	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	100	mg/kg	**[Note 145]**	6	
03.0	edible ices, including sherbet and sorbet	**100**	**mg/kg**	**[Note 145]**	6	
04.1.2.3	fruit in vinegar, oil, or brine	160	mg/kg	**[Note 144**[53]**]**	6	
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg	**[Note 145]**	6	
04.1.2.5	jams, jellies and marmelades	200	mg/kg	**[Note 138**[54]**]**	6	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	200	mg/kg	**[Note 138]**	6	
04.1.2.7	candied fruit	5000	mg/kg	**[Note 138]**	3	Candied fruit requires a bulk sweetener to get its rather firm texture. Sugar substitutes used for sugar-free products are less sweet and require intense sweeteners like saccharin to bring the sweetness to the customary level.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	200	mg/kg	**[Note 138]**	6	
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	100	mg/kg	**[Note 138]**	6	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	**160**	**mg/kg**	**[Note 144]**	6	
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	**200**	**mg/kg**	**[Note 138]**	6	
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	**200**	**mg/kg**	**[Note 138]**	6	
05.1.2	**Cocoa mixes (syrups)**	**80**	**mg/kg**	**[Note 145]**		
05.1.3	**Cocoa-based spreads, incl. fillings**	**200**	**mg/kg**	**[Note 145]**		
05.1.4	**Cocoa and chocolate products**	**500**	**mg/kg**			**For consistency with CX STAN 87**
05.1.5	**Imitation chocolate, chocolate substitute products**	**500**	**mg/kg**	**[Note 145]**		

Recommendation 2 - Saccharin, INS 954
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for saccharin in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
05.2	**Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4**	**500**	**mg/kg**	**[Note 145]**		
	ISA supports the eWG recommendation of 500 mg/kg for use in soft candy (5.2.2) and nougats and marzipans (5.3), as this level would allow the intended technological effect to be achieved. ***However, 500 mg/kg for category 5.2 will not allow the technological effect to be achieved in micro sweets and breath-freshening mints. ISA would therefore ask for an exception for this particular food product only as follows:*** ***Micro-sweets including breath-freshening mints- ML 3000 mg/kg*** ***Sugar-free hard candy is based on sugar alcohols many of which have a lower sweetness than the sugar-glucose syrup basis of customary products. The sweetness is then rounded with sweeteners. Intense sweeteners are well suited for these products as their taste rounds the sweetness of sugar alcohols. Intense sweeteners are non-cariogenic.***					
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	500	mg/kg		6	Saccharin is used to sweeten sugar-free products of this category.
06.3	breakfast cereals, including rolled oats	100	mg/kg	**[Notes 145 & N[55]**	6	
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	100	mg/kg	**[Note 145]**	6	
07.2	fine bakery wares (sweet, salty, savoury) and mixes	**170**	**mg/kg**	**[Note D][56]**	6	
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	160	mg/kg	[Note 144[57]]	6	Marinated fish, crustaceans and molluscs are often sour-sweet. Intense sweeteners like saccharin mellow the taste of vinegar and provide the desired sweetness. In products undergoing fermentation intense sweeteners are not degraded by micro-organisms.
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	160	mg/kg	[Note 144]	6	
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	**160**	**mg/kg**	[Note 144]		
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg	**[Note 144]**	6	
10.4	egg-based desserts (e.g., custard)	100	mg/kg	**[Note 144]**	6	
11.6	table-top sweeteners, including those containing high-intensity sweeteners		GMP		6	
12.4	mustards	320	mg/kg		6	
12.5	soups and broths	110	mg/kg	**[Note 138]**	6	
12.6	sauces and like products	**160**	**mg/kg**		6	
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and	200	mg/kg	**[Note 145, F[58]]**	6	Some vegetable salads falling in this category contain some vinegar the taste of which has to be mellowed as discussed for category 12.3 vinegar.

Recommendation 2 - Saccharin, INS 954
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for saccharin in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
	nut-based spreads of food categories 04.2.2.5 and 05.1.3					
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	**200**	**mg/kg**		6	1) Flavour enhancer / Sweetener for specific groups of products 2) These products are used by a limited population under the care of a health professional. Availability of these sweetened palatable products aids patient compliance with an otherwise restricted diet.
13.4	dietetic formulae for slimming purposes and weight reduction	300	mg/kg		6	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	**200**	**mg/kg**		6	
13.6	food supplements	1200	mg/kg	**[Note K[59]]**	6	The use of sweeteners in food supplements is very low when compared to other product categories due to the unit-dose form of supplements and their low individual weight. The highest level should be retained level determined for each sweetener for food supplements and remove the footnotes.
14.1.2.2	**vegetable juice**	**80**	**mg/kg**	**[Note 145]**		Saccharin is used in beverages of all types, ready-to-drink as well as concentrates.
14.1.2.4	concentrates for vegetable juice	**80**	**mg/kg**	**Note 127 [Note 145]**	6	
14.1.3.4	concentrates for vegetable nectar	300	mg/kg	**Note 127 & [Note145[60]]**	6	
	ISA would ask that the ML in this provision be the same as for the other concentrates, for consistency: ML 80 mg/kg With the addition of footnote 127 (as consumed)					
14.2.1	beer and malt beverages	80	mg/kg	**[Note H[61]]**	6	Saccharin is widely used in beverages of all types, including sweet types of beer. In products bottled with micro-organisms, saccharin is not degraded by these.
14.2.2	cider and perry	80	mg/kg		6	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	80	mg/kg		6	
15.0	ready-to-eat savouries	100	mg/kg		6	Snacks may be salted, spicy, or sweetened. For sugar-free sweetened products intense sweeteners like saccharin have to be used.

Recommendation 3 - Saccharin, INS 954
Comments are requested on the following food additive provisions for saccharin in the GSFA

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.6.5	Cheese analogues	100	mg/kg			Saccharin allows for the manufacture of certain types of pre-sweetened unripened cheese analogues with no added carbohydrates, no added flavours and no other added foods.

Recommendation 3 - Saccharin, INS 954 **Comments are requested** on the following food additive provisions for saccharin in the GSFA						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
						Carbohydrates may be degraded by lactic acid bacteria which results in loss of sweetness and increase in acidity while saccharin is not metabolised by these bacteria and remains inert.
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	500	mg/kg		6	Sweetening agents can balance the acidity of vinegar used in these products and provide a balanced sweet-sour taste. Saccharin is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	500	mg/kg		6	
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	500	mg/kg		6	Some of these products are sweetened. Intense sweeteners allow production of sweetened sugar-free products. The listed saccharin level provides adequate sweetness.
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	**160**	**mg/kg**		6	Technological need
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	500	mg/kg		6	Sweetening agents can balance the acidity in these products and provide a balanced sweet-sour taste. Saccharin is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.
05.3	chewing gum	3000	mg/kg		6	1) An ML of 1200 mg/kg with Note 68 s technologically needed. 2) Saccharin is technologically needed up to levels of 3.000 mg/kg of chewing gum. Saccharin's low solubility in water requires, as for aspartame, higher use levels to get the required sweetness. We believe that the small contribution of chewing gum products to the overall intake of saccharin justifies such level. Moreover, saccharin limits itself by its unpleasant aftertaste if used at levels too high. The salts of saccharin have their own benefit in that they provide the fastest impact of flavour, due to their very high solubility in water. For consistency reasons with other intense sweeteners Note 168 should not be included. The safety at this level has been documented There is trade in chewing gums containing more than 1200 mg/kg saccharin Just by way of example, South Africa currently authorizes saccharin at 2500 mg/kg in chewing gum
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	15	mg/kg		6	Technological need
08.2.2	heat-treated processed meat,	500	mg/kg		6	Sweetener for calorie reduced products

Recommendation 3 - Saccharin, INS 954
Comments are requested on the following food additive provisions for saccharin in the GSFA

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
	poultry, and game products in whole pieces or cuts					
08.3.2	heat-treated processed comminuted meat, poultry, and game products	500	mg/kg		6	Sweetener for calorie reduced products
09.2.4.1	cooked fish and fish products	500	mg/kg		6	Technological need
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	1200	mg/kg		6	Technological need
09.3.3	salmon substitutes, caviar, and other fish roe products	160	mg/kg		6	Technological need
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		6	1) Flavour enhancer / Sweetener for specific groups of products 2) Used in various pancake syrups not including maple syrup. 3) Intense sweeteners are widely used in these beverages (ready-to-drink as well as concentrates), owing to their relative stability in liquids. Sweeteners are already used in this category in Japan and several other countries in water and milk-based malted beverages.
12.2.2	**Seasonings and condiments**	**1500**	**mg/kg**			**Seasoning and condiments are sometimes rounded by the addition of sweet-tasting and flavour-enhancing products such as Saccharin and other intense sweeteners.**
12.3	vinegars	300	mg/kg		6	Vinegar is sometimes rounded and mellowed by addition of sweet-tasting, flavour-enhancing products. Saccharin balances acidity well.
14.1.4.1	**carbonated water-based flavoured drinks**	**500**	**mg/kg**		**6**	The eWG could not reach consensus on an ML for use in these categories. **The eWG recommends that the CCFA consider whether an ML of 500 mg/kg is of acceptable in the broader category food category** 14.1.4 with note127 & [145]. The eWG was informed that an ML of **80 mg/kg is not technologically feasible** and would require significant product reformulations in many countries as well as significant financial impacts, especially to manufacturers in developing countries, There also would be increased ingredient cost, decreased stability (shorter shelf life in many cases), and in some cases lower consumer acceptability.
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	500	mg/kg		6	
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	2000	mg/kg		6	
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	200	mg/kg		6	1) Our members produce canned Ready to drink coffees that are served hot but there is no reported use of saccharin in these products that are common in Japan. 2) Saccharin is widely used in beverages of all types, ready-to-drink as

ISA supports the comments submitted to the eWG that a ML of 80mg/kg is not technologically feasible. This low level would require significant product reformulations in many countries where cyclamate is permitted.

ISA supports the request for 500 mg/kg for category 14.1.4, (water-based flavoured drinks), based on the technological justification provided.

Recommendation 3 - Saccharin, INS 954 **Comments are requested** on the following food additive provisions for saccharin in the GSFA						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
						well as concentrates.

SUCRALOSE, INS 955

64. The 37th JECFA (1990) assigned a group ADI of 15 mg/kg bw/d for sucralose.

Recommendation 1 – Sucralose, INS 955
The eWG recommends that the 39th CCFA **discontinue** further work on the following food additive provisions for sucralose in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	Step	Justification provided to eWG
01.2.1	fermented milks (plain)	400	mg/kg		3	Codex draft Standard for Fermented Milk does not contain any provisions for sweeteners is plain fermented milks
01.2.1.2	fermented milks (plain), heat-treated after fermentation	250	mg/kg		6	
01.2.2	renneted milk (plain)		GMP		6	No Technological Need Identified
01.3.1	condensed milk (plain)		GMP		6	No Technological Need Identified
01.5	milk powder and cream powder and powder analogues (plain)		GMP		6	No Technological Need Identified
01.6.1	unripened cheese		GMP		6	No Technological Need Identified
01.6.2	ripened cheese		GMP		6	No Technological Need Identified
01.6.4	processed cheese		GMP		6	No Technological Need Identified
01.8.1	liquid whey and whey products, excluding whey cheeses		GMP		6	
06.6	batters (e.g., for breading or batters for fish or poultry)	600	mg/kg		6	
07.2.1	cakes, cookies and pies (e.g., fruit-filled or custard types)	750	mg/kg		6	See Recommendation 3 to combine under category 07.2
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	800	mg/kg		6	
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)	750	mg/kg		6	
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	450	mg/kg		6	**Combined ML under category 09.3 (see recommendation 2)**
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	450	mg/kg		6	
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	450	mg/kg		6	Combined ML under category 12.6 (see recommendation 2)
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	450	mg/kg		6	
12.6.3	mixes for sauces and gravies	450	mg/kg	Note 127	6	
12.6.4	clear sauces (e.g., fish sauce)	450	mg/kg		6	
13.1.3	formulae for special medical purposes for infants	400	mg/kg		3	There are no non-standardized foods in this category. For consistency with the Draft revised Codex standard for infant formula
14.1.4.1	carbonated water-based flavoured drinks	600	mg/kg		6	Combined ML under category 14.1.4 (see recommendation 2)
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	600	mg/kg		6	
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	1500	mg/kg		3	

Recommendation 2 - Sucralose, INS 955
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for sucralose in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	mg/kg	**[Note 145]**	6	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	400	mg/kg	**[Note 145]**	6	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	400	mg/kg	**[Note 145]**	3	
03.0	edible ices, including sherbet and sorbet	**320**	**mg/kg**	**[Note 145]**	6	
04.1.2.3	fruit in vinegar, oil, or brine	180	mg/kg	**[Note 144]**	3	
04.1.2.4	canned or bottled (pasteurized) fruit	**400**	**mg/kg**	**[Note 145]**	6	
04.1.2.5	jams, jellies and marmelades	**400**	**mg/kg**	**[Note 138]**	3	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	**400**	**mg/kg**	**[Note 145]**	6	
04.1.2.7	candied fruit	800	mg/kg	**[Note 145]**	6	Candied fruit requires a bulk sweetener to get its rather firm texture. Sugar substitutes used for sugar-free products are less sweet and require intense sweeteners to bring the sweetness to the customary level.
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	**400**	**mg/kg**	**[Note 145]**	6	
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	**400**	**mg/kg**	**[Note 145]**	6	
04.1.2.10	fermented fruit products	150	mg/kg	**[Note 138]**	6	
04.1.2.11	fruit fillings for pastries	400	mg/kg	**[Note 138]**	3	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	**400**	**mg/kg**		6	
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	**400**	**mg/kg**	**[Note 145, L[62]]**	6	Some products of this category are sweet. Sucralose allows production of sweet products with no added sugar.
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	**400**	**mg/kg**	**[Note 145]**	6	
05.1.1	cocoa mixes (powders) and cocoa mass/cake	**580**	**mg/kg**	**Note 97[63]**	6	Category 05.1.1 does not contain any non-standardized foods. ML and note are consistent with the relevant CX STANs 105 & 141
05.1.2	cocoa mixes (syrups)	**400**	**mg/kg**	**Note 97 [Note 145]**	6	This category includes products for the preparation of cocoa-based beverages. For sugar-free products intense sweeteners can be the only

Recommendation 2 - Sucralose, INS 955
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for sucralose in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
						source of sweetness. An ML of 1000 mg/kg is necessary as the dilution to prepare a cocoa beverage can be 10 fold and even higher.
05.1.3	cocoa-based spreads, including fillings	**400**	**mg/kg**	**[Note 145, L]**	6	An ML of 700 mg/kg is necessary to achieve the intended technical effect.
05.1.4	cocoa and chocolate products	**800**	**mg/kg**	**[Note 145]**	6	
05.1.5	imitation chocolate, chocolate substitute products	**800**	**mg/kg**	**[Note 145]**	6	
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	1000	mg/kg	[Note 68]	3	
06.3	breakfast cereals, including rolled oats	**1000**	**mg/kg**	**[Note 145, N[64]]**	6	A level of 1000 mg/kg has been assessed as technologically justified.
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	**400**	**mg/kg**	**[Note 145]**	6	
06.7	pre-cooked or processed rice products, including rice cakes (Oriental type only)	**200**	**mg/kg**	**Note 72**	6	
07.1	bread and ordinary bakery wares	**650**	**mg/kg**		6	1) To provide sweetness (other sweeteners are permitted) 2) Sucralose allows production of sweetened products without addition of soluble carbohydrates. Used in some breads to improve taste.
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	120	mg/kg	**[Note 144]**	3	
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans and echinoderms	120	mg/kg	**[Note 144]**	3	
10.4	egg-based desserts (e.g., custard)	400	mg/kg	**[Note 145]**	3	
11.6	table-top sweeteners, including those containing high-intensity sweeteners		**GMP**		3	
12.4	mustards	**140**	**mg/kg**		6	
12.5	soups and broths	**600**	**mg/kg**	**[Note 138]**	6	Used for soups and broths
12.6	**Sauces and like products**	**450**	**mg/kg**	**Note 127**	**6**	Proposed use level in broader food category. 1) To provide sweetness (other sweeteners are permitted) 2) Flavour enhancer / Sweetener for specific groups of products Sugar like sweetness for low calorie products

ISA supports the eWG recommendation to adopt a level of 1000 mg/kg for category 5.2, which allows the intended technological effect to be achieved when used in hard candy products (5.2.1).

Recommendation 2 - Sucralose, INS 955
The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for sucralose in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	1250	mg/kg	**[Note 138, L]**	6	
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	400	mg/kg		6	1) Used as a sweetener for dietetic foods intended for special medical purposes. 2) Flavour enhancer / Sweetener for specific groups of products 3) These products are used by a limited population under the care of a health professional. Availability of these sweetened palatable products aids patient compliance with an otherwise very restricted diet.
13.4	dietetic formulae for slimming purposes and weight reduction	**320**	**mg/kg**		6	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	**400**	**mg/kg**		6	
13.6	food supplements	2400	mg/kg	**[Note M[65]]**	3	1) Sucralose is used in food supplements as an intense sweetener. It is specifically used in liquid food supplements, in chewable tablets and capsules and in effervescent food supplement tablets that dissolve in water to make a drink. Usage levels depend on the application and the level of sweetness required to mask unpleasant tastes of some vitamins, minerals and other substances. However, all applications could be accommodated within a maximum level of 2400mg / kg. 2) The use of sweeteners in food supplements is very low when compared to other product categories due to the unit-dose form of supplements and their low individual weight. The highest level should be retained level determined for each sweetener for food supplements and remove the footnotes.
14.1.3.2	vegetable nectar	300	mg/kg	**[Note 145]**	3	Sucralose is used in beverages of all types, including vegetable juices, concentrates and nectars.
14.1.3.4	concentrates for vegetable nectar	**300**	**mg/kg**	**Note 127 [Note 145]**	3	Sucralose is used in beverages of all types, including vegetable juices, concentrates and nectars.
14.1.4	**Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks** ***Step missing***	**300**	**mg/kg**	**Note 127 [Note 145]**		**Proposed new use in broader food category**
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot	300	mg/kg	**[Note 145]**	3	1) Only allow in water or milk-based malted beverages such as Ovaltine and Horlicks

Recommendation 2 - Sucralose, INS 955 The eWG recommends that the 39th CCFA **adopt** the following food additive provisions for sucralose in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
	cereal and grain beverages, excluding cocoa					2) Sucralose is used as a sweetener in canned coffee products that are served hot. The permitted level in Japan where these products are common is 400 mg/kg but we can accept 300 mg/kg. 3)Owing to its stability in liquids, sucralose is widely used in beverages of all types, ready-to-drink as well as concentrate 4) Intense sweeteners are widely used in these beverages (ready-to-drink as well as concentrates). owing to their relative stability in liquids. Sweeteners are already used in this category in Japan and several other countries in water and milk-based malted beverages.
15.0	ready-to-eat savouries	1000	mg/kg		6	Snacks may be salted, spicy, or sweetened. For sugar-free sweetened products intense sweeteners like sucralose have to be used.

Recommendation 3 - Sucralose, INS 955 **Comments are requested** on the following food additive provisions for sucralose in the GSFA.						
Food Cat No.	**Food Category**	**Max Level**		**Comments**	**Step**	**Justification provided to eWG**
01.3.2	beverage whiteners	580	mg/kg		3	Technological need
01.4	cream (plain) and the like	580	mg/kg		3	1) Used for cream (plain) and the like. 2) Used as sweetener for the manufacture of products under Food Category 01.4.4(Cream analogues), so it should be included in the broader category of 01.4.
01.6.5	**cheese analogues**		**GMP**		**6**	Sucralose allows for the manufacture of certain types of pre-sweetened unripened cheese analogues with no added carbohydrates; no added flavours and no other added foods. Carbohydrates may be degraded by lactic acid bacteria which results in loss of sweetness and increase in acidity while Sucralose is not metabolised by these bacteria and

ISA comment- Technological need: Sucralose is used in place of sugars to make low and reduced joule sweetened plain (unflavoured) dairy products. Intense sweeteners such as sucralose allow for the manufacture of pre-sweetened beverage whiteners with no added carbohydrates.

Recommendation 3 - Sucralose, INS 955
Comments are requested on the following food additive provisions for sucralose in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
						remains inert. **An ML of 500 mg/kg is technologically needed**
02.3	**Fat emulsions**					
	This provision has disappeared from the report. ISA would propose to adopt 500 mg/kg. Sucralose allows for the manufacture of pre-sweetened flavoured products, as this category includes products with added flavours. They have the same technological requirements as their dairy-based counterparts.					
04.1.2.1	frozen fruit	400	mg/kg		3	Fruits are often frozen as such but sometimes also pre-sweetened with sugar. Intense sweeteners allow production of pre-sweetened sugar-free products. The listed level for sucralose provides adequate sweetness.
04.1.2.2	dried fruit	1500	mg/kg		3	Fruits are often dried as such but sometimes also pre-sweetened with sugar. Intense sweeteners allow production of pre-sweetened sugar-free products. The listed level for sucralose provides adequate sweetness.
04.1.2.12	cooked fruit	150	mg/kg		6	Intense sweeteners allow the production of pre-sweetened sugar-free products. The listed level for sucralose provides adequate sweetness.
04.2.2.1	frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	150	mg/kg		6	Sweetening agents can balance the acidity of vinegar used in these products and provide a balanced sweet-sour taste. Sucralose is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	150	mg/kg		6	Sweetening agents can balance the acidity of vinegar used in these products and provide a balanced sweet-sour taste. Sucralose is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve shelf stability.
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	150	mg/kg		6	Some of these products are sweetened. Intense sweeteners allow production of sweetened sugar-free products. The listed level for sucralose provides adequate sweetness.
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	150	mg/kg		6	Sweetening agents can balance the acidity in these products and provide a balanced sweet-sour taste. Sucralose is not degraded by lactic acid bacteria which may occur in brined products and can therefore improve their shelf stability
04.2.2.8	cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and	150	mg/kg		6	Sweetening agents can balance the acidity in these products and provide a balanced sweet-sour taste. Sucralose is not degraded by lactic acid bacteria which may occur in brined products

Recommendation 3 - Sucralose, INS 955
Comments are requested on the following food additive provisions for sucralose in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
	seaweeds					and can therefore improve their shelf stability
05.3	chewing gum	5000	mg/kg		6	1) An ML of 3000 mg/kg is justified. 2) Note 68 should be added. **3) An ML of 5000 mg/kg is needed based on the following.** Sucralose may be used as a sugar substitute in sugar free chewing gum and is technologically needed up to levels of 5.000 mg/kg either singly or in combination with other permitted sweeteners. Sucralose provides benefits over the other intense sweeteners such as Aspartame, by demonstrating enhanced stability at high processing temperatures, as well as enhanced stability in the presence of certain flavourings such as aldehydes and ketones. Sucralose also imparts a more sugary clean aftertaste than other intense sweeteners such as Acesulfame-K or Saccharin. Sucralose's high solubility in water requires higher use levels to get the required sweetness. Chewing gum also requires relatively high percentage levels of Sucralose because the sweetener must be released slowly over the course of a 20 or 30 minutes chewing period. The safety at this level has been documented There is trade in chewing gum containing sucralose at this level. For example, Russia is authorizing sucralose at 5000 mg/kg in chewing gum
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	1000	mg/kg		6	Sucralose is needed to sweeten sugar-free products of this category.
07.2	Fine bakery wares (sweet, salty, savoury) and mixes	700	mg/kg	[Note D]		Proposed new use in broader food category. Use of intense sweeteners allows production of sweetened products without addition of soluble carbohydrates or in combination with sugar alcohols. It is stable during baking. Fine bakery wares containing intense sweeteners are available.
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	1500	mg/kg		6	Flavour enhancer / Sweetener for specific groups of products
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	1500	mg/kg		6	1) Flavour enhancer / Sweetener for specific groups of products 2) Products not based on sucrose or high-fructose corn syrup or having lower dry solids levels are less sweet than customary products. Stable sweeteners such as sucralose bring their sweetness to the standard level. Used in various pancake syrups not including maple syrup.
12.2.1	herbs and spices	400	mg/kg		3	1) Flavour enhancer / Sweetener for specific groups of products Sugar like sweetness for low calorie products

ISA would request adoption of 5000 mg/kg.
Sucralose is used as a sugar substitute in sugar free chewing gum and is technologically needed up to levels of 5.000 mg/kg either singly or in combination with other permitted sweeteners for the technological need to be achieved.

ISA does not support the addition of note 68

Recommendation 3 - Sucralose, INS 955
Comments are requested on the following food additive provisions for sucralose in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	Step	Justification provided to eWG
12.2.2	seasonings and condiments	700	mg/kg		6	1) Seasoning and condiments are sometimes rounded by the addition of sweet-tasting and flavour-enhancing products such as sucralose or other intense sweeteners.
12.3	vinegars		GMP		3	1) Vinegar is sometimes rounded and mellowed by addition of sweet-tasting, flavour-enhancing products. Sucralose is stable in vinegar and balances its acidity well. An ML of 1000 mg/kg is necessary to achieve the intended sweetening effect.
14.1.2.2	vegetable juice	300	mg/kg		3	1) Sucralose is used in beverages of all types, including vegetable juices, concentrates and nectars.
14.1.2.4	concentrates for vegetable juice	1500	mg/kg		3	2) Sucralose is used in beverages of all types, including vegetable juices, concentrates and nectars.
ISA would request adoption at 300 mg/kg with the addition of footnote 127 (as consumed)						
14.2	alcoholic beverages, including alcohol-free and low-alcoholic counterparts	700	mg/kg		6	A variety of alcoholic beverages containing intense sweeteners such as sucralose are already available on the market.
14.2.1	Beer and malt beverages	250	mg/kg			1) New proposal 2) Owing to its good stability in liquids and during pasteurisation sucralose is widely used in beverages of all types, including sweet types of beer. In products bottled with micro-organisms is not degraded by these.
14.2.2	Cider and perry	50	mg/kg			1) New proposal 2) Owing to its good stability in liquids and during pasteurisation sucralose is used in beverages of all types, including cider and perry.
14.2.4	~~Concentrates for vegetable juice~~	700	mg/kg			1) New proposal 2) An ML of 700 mg/kg is necessary to achieve the intended technical effect.
Category title 14.2.4 is "wines other than grape"						
14.2.7	Aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low-alcoholic refreshers)	700	mg/kg			1) New proposal 2) Intense sweeteners are used to produce sugar-free beverages of this category. Owing to its good stability in liquids sucralose is used in beverages of all types.

Annex II: MATRIX - INTENSE SWEETENER CATEGORIES

Food Cat. No.	Ace K	Alitame	Aspartame	APM-AC Salt	Cyclamate	Neotame	Saccharin	Sucralose	
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	
1.1.2	350	100	600	800	250	20	80	300	dairy-based drinks,flavor &/or ferment (chocolate milk,cocoa,eggnog, yogurt drink)
1.3.2	3000		6000	4550		65		1000	beverage whiteners
1.4.4.	1000	100	1000	1550		33		580	cream analogues
1.5.2.	3000		2000	3100		65		400	milk and cream powder analogues
1.6.5	500		1000	800		33	100	500	cheese analogues
1.7.	500	100	1000	1150	250	100	100	400	dairy-based desserts(pudding, fruit or flavored yogurt
2.3.	1000		1000	1550		10		500	fat emulsions of oil-in-water type incl. mixed &/or flavor products based on fat emulsions
2.4.	500		1000	1150	250	100	100	400	fat-based desserts excluding food category 01.7
3.0.	800	100	1000	1550	250	100	100	320	edible ices, including sherbet and sorbet
4.1.2.1	500		2000	1150		100		400	frozen fruit
4.1.2.2	500		3000	1150		100		1500	dried fruit
4.1.2.3	200		300	450		100	160	180	fruit in vinegar, oil or brine
4.1.2.4	350		1000	800	1350	33	200	400	canned or bottled (pasteurized) fruit
4.1.2.5	1000	100	1000	550	1000	70	200	450	jams, jellies, marmalades
4.1.2.6	1000		2000	2250	2000	70	200	450	fruit based spreads (chutney) excl. 04.1.2.5
4.1.2.7	500		2000	1150		65	5000	800	candied fruit
4.1.2.8	500		1000	800	250	100	200	450	fruit preparations, pulp, purees, fruit toppings, coconut milk
4.1.2.9	500		1000	800	250	100	100	400	fruit based desserts, including fruit-flavored water-based desserts
4.1.2.10	350		1000	800		65		150	fermented fruit products
4.1.2.11	500		1000	800		100		400	fruit fillings for pastries
4.1.2.12	500		2000	1150		65		150	cooked fruit
4.2.2.1			1000			33	500	150	frozen vegetables, seaweeds, nuts and seeds
4.2.2.2.			1000			33	500	150	dried vegetables, seaweeds. Nuts and seeds

Annex II: MATRIX - INTENSE SWEETENER CATEGORIES

Food Cat. No.	Ace K	Alitame	Aspartame	APM-AC Salt	Cyclamate	Neotame	Saccharin	Sucralose	
4.2.2.3	1000		300	450		10	160	400	vegetables (mushroom,fungi,root,tuber,pulse,legume)seaweed in vinegar,brine,soy
4.2.2.4	350		1000	800		33	500	150	Canned, bottled or retort pouch vegetables
4.2.2.5	1000		3000	4650		33	160	1500	vegetables, seaweed nut, seed purees, spreads (peanut butter)
4.2.2.6	1000		1000	800	250	33	200	400	vegetables, seaweed nut, seed pulps &preps(vegetable desserts,sauces,candied
4.2.2.7	1000		2500	2250		33	500	150	fermented vegetables and seaweed products excluding soybean products 12.10
4.2.2.8			1000			33	500	150	cooked or fried vegetables and seaweeds
5.1		300			500	100	500		cocoa products & chocolate products incl. imitations & chocolate substitutes.
5.1.1	2500	300	3000	4650	—	100	—	1500	cocoa mixes (powders) and cocoa mass/cake
5.1.2	2500	300	1000	1150	—	33	—	1000	cocoa mixes (syrups)
5.1.3	2000	300	3000	4550	—	100	—	700	cocoa-based spreads and fillings
5.1.4	1000	300	2500	2250	—	80	—	800	cocoa and chocolate products
5.1.5	1000	300	3000	2250	—	100	—	800	imitation chocolate and chocolate substitute products
5.2	2500	300	10000	5700	500	1000	500	1000	confectionery incl.hard & soft candy nougats,etc.other than 5.1,5.3,5.4. These levels correspond to those necessary for microsweets & breath freshening mints.
5.3.	5000	300	10000	4550	3000	1000	3000	5000	chewing gum
5.4.	500	300	1000	1150	500	100	500	1000	decorations for fine bakery wares, toppings (non-fruit) and sweet sauces
6.3.	1200		1000	1550		160	100	400	breakfast cereals including rolled oats
6.5.	500		1000	800	250	100	100	400	cereal and starch-based desserts (rice pudding, tapioca pudding)
7.1	1000	200	500	2250		70	15	250	bread and ordinary bakery wares and mixes
7.2.	1000	200	1700	2250	1600	130	170	700	fine bakery wares(sweet, salty, savory) and mixes
9.3.	200		300	450		10	160	120	semi-preserved fish and fish products
9.4.	200		300	450		10	160	120	fully preserved fish and fish products
10.4.	500		1000	800	250	100	100	400	egg-based desserts (custard)
11.4	1000	200	3000	2250	500	100	300	1500	other sugars and syrups(xylose, maple sugar, sugar toppings
11.6.	GMP	GMP	GMP	GMP	GMP	GMP	GMP	GMP	table-top sweeteners including those containing high intensity sweeteners

Annex II: MATRIX - INTENSE SWEETENER CATEGORIES

Food Cat. No.	Ace K	Alitame	Aspartame	APM-AC Salt	Cyclamate	Neotame	Saccharin	Sucralose	
12.2	2000	100				65			herbs, spices, seasonings and condiments
12.2.2	2000		2000	3100		65	1500	700	seasonings and condiments
12.3.	2000		2000	4550		12	300	1000	vinegars
12.4.	350		350	550		12	320	140	mustards
12.5.	110	40	600	250		20	110	600	soups and broth
12.6.	1000		500	750	500	70	160	450	sauces and like products.
12.7.	1000		1000	1550	500	33	200	1250	salads (macaroni,potato) & sandwich spreads excl. cocoa & nut-based spreads
13.3.	450		1000	1000	400	33	400	400	dietetic foods for special medical purposes
13.4.	450		800	1000	400	33	2400	320	dietetic formulae for slimming and weight reduction
13.5.	500	300	1000	1150	400	65	200	400	dietetic foods (supplementary foods for dietary use) excluding 13.1-13.4, 13.6
13.6.	2000		2000	800	400	90	1200	2400	food supplements
14.1.2.2	600		2000	1350		65	300	300	vegetable juice
14.1.2.4	600		2000	3100		65	300	300	concentrates for vegetable juice. Add Note 127 As Consumed
14.1.3.2	500		2000		400	65	300	300	vegetable nectar
14.1.3.4	500		2000	3100	400	65	300	300	vegetable nectar concentrate. Add Note 127 As Consumed
14.1.4.	600	40	600	950	1000	33	500	300	water-based flavored drinks,incl.sport, energy, electrolyte,and particulated.
14.1.5.	600		5000	1350		50	200	300	coffee & substitute/tea/herbal infusions & hot cereal & grain beverage excl. cocoa
14.2.1.	350		600	800		20	80	700	beer and malt beverages.
14.2.2.	350		600	800		20	80	700	cider and perry
14.2.4	350		700	1200		23		700	wines other than grape
14.2.7.	500		600	950	250	33	80	700	aromatized alcoholic beverages, beer, wine, spirit cooler & low alcohol refreshers
15.0.	1000		500	750		32	100	1000	ready-to-eat savories