

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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PROPOSALS FOR ADDITION AND/OR AMENDMENTS TO THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (IN RESPONSE TO CL 2006/40-FA, PART 2)

The following comments have been received from the following Codex Members and observers: Switzerland
and NATCOL

This document contains late submissions of comments received after the deadline, but those were submitted before 12 April 2007.

Switzerland

Switzerland welcomes the opportunity to submit comments on the CL 2006/40-FA “Additional revisions to the Codex International Numbering System (INS) for Food Additives”.

Carotenes

β -Carotene for use as a food colour can be obtained from several natural sources but also synthetically. In the INS currently lists INS 160a Carotenes, INS 160a(i) Beta-Carotene (synthetic) and INS 160a(ii) Carotenes (Algae and vegetable)

There are, however, no physiological or structural differences in β -carotene from all these different sources. They have more or less the same use conditions and can be used as alternatives. There is, therefore, neither a physiological nor a technological basis justifying differences in use levels or use conditions. Accordingly, the EU as well as the USA have the same provisions for use of β -carotene as a food colour independent of its source.

As the group ADI for Beta-Carotenes was established that includes the synthetic and the one of *Blakeslea trispora* we propose not to split the different carotenes under different letters.

However, as each of these substances has a different specification the inconsistency should be resolved.

Therefore, we propose the following changes:

INS 160a	Carotenes
INS 160a(i)	Carotenes, beta (synthetic)
INS 160a(ii)	Carotenes, beta(<i>Blakeslea trispora</i>)
INS 160a(iii)	Carotenes (Vegetable)
INS 160a(iv)	Carotenes (Algae)

The GSFA contains two major listings for the carotenes derivatives. If accepted the above proposal would have the following effect on the listings in the GSFA.

1. The INS number for Carotenes, beta (*Blakeslea trispora*) should be changed from INS 160a to INS 160a(ii)
2. The INS number for Carotenes (Vegetable/Algae) should be changed from INS 160a(ii) to 160a(iii) and 160a (iv) respectively

Tocopherols

We support the proposal made by the US to newly classify the Tocopherols and delete the double entry.

Proposal

- a) delete INS 306 Mixed tocopherol concentrate, and
- b) replace INS 307 Alpha-tocopherol by:

307a	d-alpha-Tocopherol concentrate	antioxidant
307b	Tocopherol concentrate, mixed	antioxidant
307c	dl-alpha-tocopherol	antioxidant

NATCOL

We must keep the principles of the INS system in mind (cited by USA): The INS uses a hierarchical set of numbers, letters, and numerical subscripts (i.e., (i), (ii), etc.) to identify food additives. According to the principles laid out in Section 1 of Class Names and the International Numbering System for Food Additives (CAC/GL 36), the identification number for an additive for labelling purposes usually consists of a three or four digit number and in some cases a letter (e.g., 307a). The additive may be further identified by a numerical subscript (e.g., (i), (ii)), which is used to distinguish additive sub-classes that have different specifications.

Carotenes (INS160a)

β -Carotene for use as a food colour can be obtained from several natural sources. The INS currently lists INS 160a Carotenes, INS 160a(i) Beta-Carotene (synthetic) and INS 160a(ii) Carotenes (Algae and Vegetable)

There are, however, no physiological or structural differences in β -carotene from all these different sources. They have more or less the same use conditions and can be used as alternatives. There is, therefore, neither a physiological nor a technological basis justifying differences in use levels or use conditions. Accordingly, the EU as well as the USA has the same provisions for use of β -carotene as a food colour independent of its source.

As the group ADI for Beta-Carotenes was established that includes the synthetic and the one for *Blakeslea trispora*, we propose not to split the different carotenes under different letters. However, as each of these substances has a different specification the inconsistency should be resolved. We think that in principal it is correct thing to do but would prefer to see it done within the individual suffixes.

Therefore, we propose:

INS 160a	Carotenes
INS 160a(i)	Carotenes, beta (synthetic)
INS 160a(ii)	Carotenes, beta (<i>Blakeslea trispora</i>)
INS 160a(iii)	Carotenes (Vegetable)
INS 160a(iv)	Carotenes (Algae)

Suffix (i), (ii), (iii), (iv), are used to distinguish additive sub-classes that have different specifications.

Lycopene INS160d:

As the main source for Lycopene is tomato and in the EU this is the only approved source - Lycopene derived from tomato source for which there is a specification and manufacturer must be also considered. So it is important to incorporate Lycopene from tomato into INS 160d. Therefore, we propose:

INS 160 d Lycopene

INS 160 d(i) Lycopene (tomato)

INS 160 d(ii) Lycopene (from *Blakeslea trispora*)

INS 160 d(iii) Lycopene (synthetic)

This would be consistent with the US proposal for Lycopene: one only INS number (160d) independently of the specification.

Annatto INS160b:

NATCOL would like to see the INS 160b for Annatto split but only within the INS160b. We think that in principal it is correct thing to do but would prefer to see it done within the individual suffixes.

Therefore, we propose:

INS 160b Annatto Extracts

INS 160b(i) Annatto Extracts Bixin

INS 160b(ii) Annatto Extracts Norbixin

This would be consistent with the previous proposal for Lycopene: only one INS number (160b) independently of the specification.

It would be confusing (from a labelling and customer point of view) to have the Annatto Extracts with 2 different INS numbers! Considering that there is already precedence for several products under one INS #; eg Riboflavin INS101(i) & (ii)

Orthophosphates INS339 (i), (ii), (iii)

Bixin and Norbixin have similar technological functions and are used interchangeably. INS # should reflect when compounds are related and where compounds share a common ADI and the same toxicological database. Splitting compounds which have the same / related chemical structures is confusing to the consumer.

The above proposals are also more consistent with the EC number system.