

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
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Organization

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Agenda 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Thirty-fourth Session

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PROPOSED FOOD ADDITIVE PROVISIONS IN STANDARDS FOR FISH AND FISHERY PRODUCTS

Comments of Brazil, Canada, China, India, Kenya, Nigeria, Senegal, Thailand and African Union

BRAZIL

Standard for Crackers from Marine and Freshwater Fish, Crustaceans and Molluscan Shellfish CODEX STAN 222-2001 (GSFA FC 09.2.5) Even phosphates are recognized as sequestrants, Brazil suggests to change their function to stabilizer.

CANADA

Standard for *Quick Frozen Blocks of Fish Fillets, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* CODEX STAN 165-1989 and Standard for *Quick Frozen Fish Sticks (Fish Fingers) Fish Portions and Fish Fillets – Breaded or in Batter* CODEX STAN 166-1989:

- Provisions for ascorbyl palmitate (GSFA FC 09.2.1 and 09.2.2)

Comments:

The GSFA FCs 09.2.1 and 9.2.2 apply Note 10 "as ascorbyl stearate" to the provision for ascorbyl esters.

- i. If only ascorbyl palmitate is justified for use, the Committee should put forward a recommendation to CCFA for new Notes to be added to the provisions for ascorbyl esters:

In FC 09.2.1: **Except for use in products conforming to CODEX STAN 165-1989 as ascorbyl palmitate (INS 304) only, at 1000 mg/kg.**

In FC 09.2.2: **Except for use in products conforming to CODEX STAN 166-1989 as ascorbyl palmitate (INS 304) only, at 1000 mg/kg".**

- ii. If ascorbyl esters in general are justified, then the standards should be revised accordingly, and the Committee should put forward a recommendation to CCFA for new Notes to be added to the provision for ascorbyl esters:

In FC 09.2.1: **For use in products conforming to CODEX STAN 165-1989 as ascorbyl esters at 1000 mg/kg.**

In FC 09.2.2 **For use in products conforming to CODEX STAN 166-1989 as ascorbyl esters at 1000 mg/kg.**

Standard for *Quick Frozen Fish Sticks (Fish Fingers) Fish Portions and Fish Fillets – Breaded or in Batter* CODEX STAN 166-1989.

- Provisions for annatto extracts

Comments:

Although the eWG has recommended that both bixin- and norbixin-based annatto extracts are justified for use, they should remain listed separately as there is no GSFA group for annatto extracts. In the GSFA there is no listing for annatto extracts in FC 09.2.2 so the Committee should put forward a recommendation to CCFA to include these provisions, including a new Note: **For use in products conforming to CODEX STAN 166-1989 in breaded or batter coatings only, singly or in combination: annatto extracts, bixin-based (INS 160b(i)) and annatto extracts, norbixin-based (INS 160b(ii)).**

- **Provisions for carotenes (GSFA FC 09.2.2)**

Comments:

The current GSFA FC 09.2.2 includes a listing for carotenoids at 100 mg/kg, with Note 95 "for use in surimi and fish roe products only."

- If only carotenes INS 160a(i) and 160e are justified for use in bread and batter then the Committee should put forward a recommendation to CCFA for a new Note to be added to the provision for carotenoids : **Except for use in products conforming to CODEX STAN 166-1989 as beta-carotenes, synthetic (INS 160a(i)) and carotenal, beta-apo-8'- (INS 160e), singly or in combination at 100 mg/kg, for use in breaded or batter coatings only.**
- If carotenoids in general are justified for use, then the standard should be revised accordingly, and the Committee should put forward a recommendation to CCFA for a new Note to be added to the provision for carotenoids in FC 09.2.2 : **For use in products conforming to CODEX STAN 166-1989, in breaded or batter coatings only.**

**Standard for Crackers from Marine and Freshwater Fish, Crustaceans and Molluscan Shellfish
CODEX STAN 222-2001**

- **Provisions for polyphosphates (GSFA FC 09.2.5)**

Comments:

The GSFA FC 09.2.5 does not currently include provisions for phosphates.

- If the provision is limited to polyphosphates, the Committee should put forward a recommendation to CCFA for a new provision for phosphates in FC 09.2.5, with a maximum level of use of 2200 mg/kg, with Note 33 ("as phosphorous"), and a new Note to be added : **For use in products conforming to CODEX STAN 222-2001 only, singly or in combination: sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate (INS 452(iii)), calcium polyphosphate (INS 452(iv)), and ammonium polyphosphate (452(v))"**
- If phosphates in general are justified, then the standard should be revised accordingly, and the Committee should put forward a recommendation to CCFA for a new provision for phosphates in FC 09.2.5, with a maximum level of use of 2200 mg/kg, with Note 33 ("as phosphorous"), and with a new Note : **For use in products conforming to CODEX STAN 222-2001 only.**

Also, the descriptor to FC 09.2.5 does not clearly capture crackers from fish/crustaceans/shellfish. For clarity, the Committee should consider putting forward a recommendation to CCFA to revise the descriptor of FC 09.2.5 to better capture these products.

Standard for Canned Shrimps or Prawns CODEX STAN /37-1981

- **Provisions for phosphoric acid (GSFA FC 09.4)**

Comments:

The GSFA FC 09.4 includes a general provision for phosphates at 2200 mg/kg with Note 33 ("As phosphorus").

- If the provisions are limited to only "phosphoric acid", at 540 mg/kg as phosphorus, the Committee should recommend to CCFA to add a Note to the provision for phosphates in FC 09.4 : **Except for use in products conforming to CODEX STAN 37-1981 as phosphoric acid only, at 540 mg/kg (as phosphorus).**
- If the provisions are limited to "phosphoric acid" but should align with the GSFA at 2200 mg/kg as phosphorus, the standard should be amended accordingly, and the Committee should recommend to CCFA to add a Note to the provision for phosphates in FC 09.4: **Except for use in products conforming to CODEX STAN 37-1981 as phosphoric acid only.**
- If the provisions should align with the GSFA and be expanded to include all "phosphates" but at 540 mg/kg as phosphorus, the standard should be amended accordingly and the Committee should recommend to CCFA to add a Note to the provision for phosphates in FC 09.4: **Except for use in products conforming to CODEX STAN 37-1981 at 540 mg/kg (as phosphorus).**
- If the provisions should fully align with the GSFA and be expanded to include all "phosphates" at 2200 mg/kg as phosphorus, the standard should be amended accordingly.

- v. Also, regarding the proposed change to the listing as put forward by the eWG, it's not clear why "singly or in combination" is needed as there is only one phosphate allowed as per the standard.

Standard for *Canned Shrimps or Prawns* CODEX STAN /37-1981 and Standard for *Canned Crab Meat* CODEX SATN 90-1981

• Provisions for EDTA (GSFA FC 09.4)

- The GSFA FC 09.4 includes a group provision EDTA for 340 mg/kg with Note 21 ("as anhydrous calcium disodium ethylenediaminetetraacetate").
 - i. If the level of use should be 250 mg/kg EDTA as proposed, then the Committee should put forward a recommendation to CCFA for a new Note to be added to the provision for ethylene diamine tetra acetates : **Except for use in products conforming to CODEX STAN 37-1981 or CODEX STAN 90-1981 at 250 mg/kg.**
 - ii. If the level of use should be aligned with the GSFA at 340 mg/kg as anhydrous calcium disodium EDTA, then the standards should be revised accordingly.

CHINA

1. Standard for Sturgeon caviar (CODEX STAN 291-2010)

(1) Ascorbic acid (Vc)

Comment: To increase ascorbic acid, the highest content of final product was suggested by GMP.

Reason: Ascorbic acid can act as antioxidant and extend shelf life of the products.

(2) Isoascorbic acid

Comment: To increase isoascorbic acid, the highest content of final product was suggested by GMP.

Reason: Isoascorbic acid can act as antioxidant and extend shelf life of the products.

(3) Potassium potassium

Comment: To increase potassium potassium, the highest content of final product was suggested to be 1000mg/kg.

Reason: Potassium potassium can act as preservative and extend shelf life of the products.

(4) Nisin

Comment: To increase Nisin, the highest content of final product was suggested to be 500mg/kg.

Reason: Nisin can act as preservative and extend shelf life of the products.

2. Standard for salted Atlantic herring and salted Sprat CODEX STAN 244-2004 (GSFA FC 09.2.5)

(1) Sorbate (INS 200-203)

Comment: The functional category of sorbate was revised from "antioxidant" to "preservative".

Reason: sorbate has antiseptic effects.

(2) Citric acid (INS 330)

Comment: The functional category of citric acid was changed as acidity regulator and antioxidant

Reason: Citric acid can be act as acidity regulator.

3. Standards of crackers from Marine and Freshwater fish, Crustaceans and Molluscan shellfish CODEX STAN 222-2001 (GSFA FC 09.2.5)

(1) L- sodium glutamate (INS 621)

Comment: L- sodium glutamate can be added according to GMP

4. Canned shrimps or prawns CODEX STAN 37-1981 (GSFA FC 09.4)

(1) Phosphate (INS 338)

Comment: Re-Revision and determination the limits of phosphorylation (INS338)

Reason: The limit of total phosphorus of original shrimp (CODEX STAN 92-1981 quick shrimp or prawn) is 2200mg/kg (calculated as P, singly or in combination); When phosphate was used as chelating agent in canned shrimp or prawn, the limit is 540 mg/kg (calculated as P, singly or in combination), then the content of total phosphate will be 2740 mg/kg (calculated as P). However current detection methods cannot distinct between phosphate and other polyphosphates, then total phosphorus in the final product will exceed 540 mg/kg (calculated as P).

5. Canned crab meat CODEX STAN 90-1981 (GSFA FC09.4)

(1) Phosphate (INS 338) and disodium diphosphate (INS 450(i))

Comment: the functional category of Phosphate (INS 338) and disodium diphosphate (INS 450(i)) were changed to Chelating agent (to prevent struvite crystallization), not previously acidity regulator.

Reason: Phosphate is the only acid which has chelating effects.

KENYA

Section 4

Standard for Quick Frozen Blocks of Fish Fillets, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh CODEX STAN 165-1989 (GSFA FC 09.2.1)

Issues identified and eWG comments:

The maximum level for INS 304 was expressed in mg/kg. The names of INS 410 and INS 407 were revised for consistency with the name in JECFA specifications and in CAC/GL 36-1989.

The eWG supported the proposed editorial revisions.

Proposal: to revise the provisions for INS 304, 410 and 407 as outlined below.

304	Ascorbyl palmitate	1000 mg/kg
410	Carob bean (Locust bean)-gum	GMP
407	Carrageenan and its Na, K, NH ₄ salts (including Furcelleran)	GMP

COMMENT:

We accept the modification done by the EWG for the revision on provisions for INS 304, 410 and 407. However, we propose to maintain INS 410 (carob bean (locust bean) gum) because the two names are used interchangeably in different parts of the world.

Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter CODEX STAN 166-1989 (GSFA FC 09.2.2)

Proposal: editorial revisions of INS 304, 410, 407, 621, 622, 160a, 160b, 160e, 465, 471, 1401, 1402, 1412, 1420, 1421 and 1442 and to list all modified starches listed in the standard under the heading "thickeners" as outlined below.

			Kenya comments
304	Ascorbyl palmitate	1000 mg/kg	We accept the replacement g/kg to
Thickeners			
410	Carob bean (Locust bean)-gum	GMP	We do not accept the deletion of locust bean because they are
407	Carrageenan and its Na, K, NH ₄ salts (including)	GMP	We support the deletion
Modified Starches			
1401	Acid treated starches	GMP	We support the deletion for clarity
1402	Alkaline treated starches		We support the deletion for clarity
1404	Oxidized starches		
1410	Monostarch phosphate		
1412	Distarch phosphate esterified with sodium trimetaphosphate; esterified with phosphorus oxychloride		We support the deletion because it was an elaboration
1413	Phosphated distarch phosphate		
1414	Acetylated distarch phosphate		
1420	Starch acetate esterified with acetic		
1421	Starch acetate esterified with vinyl		We support the merging of INS 1420 and INS 1421

1422	Acetylated distarch adipate		
1440	Hydroxypropyl starch		
1442	Hydroxypropyl di starch phosphate		We support the addition of “di”
621	Monosodium L -glutamate	GMP	We support the addition of “L-” to INS 621 and INS 622
622	Monopotassium L -glutamate		
160b(i)	Annatto extracts bixin-based	25 mg/kg expressed	We support the merging of INS 160b(i) and INS 160b(ii) into 160b
160b(ii)	Annatto extract (norbixin-based)		
160a(i)	Carotenes - β -carotene (Synthetic)	100 mg/kg singly or in	We support the deletion
160e	β-apo-carotenol Beta-Apo-8'-		We support the deletion
410	Carob bean (Locust bean) gum	GMP	We do not accept the deletion of locust bean because they are used interchangeably
407	Carrageenan and its Na, K, NH ₄ salts (including Furcelleran)	GMP	We support the deletion
465	Methyl ethyl cellulose	GMP	We support the separation
471	Monoglycerides Mono- and di-glycerides of fatty acids	GMP	We support the addition of “and di”
1412	Distarch phosphate esterified with sodium trimetaphosphate; esterified	GMP	We support the deletion
1420	Starch acetate esterified with acetic	GMP	We support the merging of INS 1420 and INS 1421
1421	Starch acetate esterified with vinyl		
1442	Hydroxypropyl di starch phosphate	GMP	We support the addition of “di”

Standard for Salted Atlantic Herring and Salted Sprat CODEX STAN 244-2004 (GSFA FC 09.2.5)

Proposal: to associate the functional class “antioxidants” in addition to “acidity regulators” with INS 300 and 330; to classify sorbates as preservatives; to exclude the use of INS 201 sodium sorbate; to associate the note “singly or in combination” with benzoates and sorbates as outlined below.

Acidity Regulators, antioxidants		
INS Number	Additive Name	Maximum Level in Product
300	Ascorbic acid	GMP
330	Citric acid	GMP
Antioxidants		
200-203	Sorbates	200 mg/kg (expressed as sorbic acid)
Preservatives		
210-213	Benzoates	200 mg/kg (expressed as benzoic acid), singly or in combination
200-203* 201	Sorbates	200 mg/kg as sorbic acid, singly or in combination

***The use of INS 201 Sodium sorbate is not permitted**

COMMENT:

We propose the deletion of INS 200-203(sorbates) from the table and request for more evaluation by JECFA on risk assessment.

Standard for Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes CODEX STAN 167-1989 (GSFA FC 09.2.5)

Issues identified and eWG comments:

There was a similar discussion on sorbates as per CS 244-2004.

Proposal: to express sorbates as a group and to exclude the use of INS 201 sodium sorbate as outlined below.

Preservatives		
INS Number	Additive Name	Maximum Level in Product
200 200-203	Sorbic acid Sorbates	200 mg/kg -expressed as sorbic acid, singly or in combination
201	Sodium sorbate	
202	Potassium sorbate	

*The use of INS 201 Sodium sorbate is not permitted

COMMENT:

We adopt the proposal to express sorbates as a group and to exclude the use of INS 201 sodium sorbate.

Standard for Crackers from Marine and Freshwater Fish, Crustaceans and Molluscan Shellfish CODEX STAN 222-2001 (GSFA FC 09.2.5)

Proposal: to list phosphates falling under INS 452 and to express the maximum level as phosphorus.

Only the use of the following additives is permitted.

Sequestrants		
INS	Additive Name	Maximum Level in Product
452(i)	Polyphosphates <u>Sodium polyphosphate</u>	<u>2200 mg/kg as phosphorus.</u> 5 g/kg expressed as P ₂ O ₅ , singly or in combination
<u>452(ii)</u>	<u>Potassium polyphosphate</u>	
<u>452(iii)</u>	<u>Sodium calcium polyphosphate</u>	
<u>452(iv)</u>	<u>Calcium polyphosphate</u>	
<u>452(v)</u>	<u>Ammonium polyphosphate</u>	
Flavour enhancers		
621	Monosodium <u>L</u> -glutamate	Limited by GMP

COMMENT

We propose that the INS621 Monosodium **L**-glutamate to be re-evaluated by JECFA for advise on the safe limit due to its safety concern for we do not accept GMP.

Standard for Canned Shrimps or Prawns CODEX STAN 37-1981 (GSFA FC 09.4)

COMMENT

We support the modification stated in the provisions for INS 124, 385 and 338 as outlined in the table.

Standard for Canned Tuna and Bonito CODEX STAN 70-1981 (GSFA FC 09.4)

COMMENT:

We support the modifications mentioned therein except that we would like to propose the following concerning “natural flavours “in the table below

Natural Flavours
Spice oils
Spice extracts
Smoke flavours (Natural smoke solutions and extracts)

The natural flavours should be used under flavor enhancers and should comply with CAC/GL 66-2008. It has been noted that they are neither thickeners nor gelling agents. Acidity regulators(disodium diphosphate) not used in our final product and therefore JECFA to come up with safe limit.

Standard for Canned Crab Meat CODEX STAN 90-1981 (GSFA FC 09.4)

COMMENT:

For the table mentioned in the text under “acidity Regulators”:

Acidity regulators INS 450 (i) disodium diphosphate) not used in Kenya final product and therefore we recommend that JECFA to come up with safe limit on the same.

Standard for Canned Sardines and Sardine-Type Products CODEX STAN 94-1981 (GSFA FC 09.4)

We support the replacement of “thickening with “thickeners and Gelling agents” with as the heading of the table however we would like to propose the following as indicated below:

COMMENT:

Natural Flavours
Spice oils
Spice extracts
Smoke flavours (Natural smoke solutions and extracts)

The natural flavours should be used under flavor enhancers and should comply with CAC/GL 66-2008. It has been noted that they are neither thickeners nor gelling agents. Acidity regulators (disodium diphosphate) not used in our final product and therefore JECFA to come up with safe limit.

Standard for Canned Finfish CODEX STAN 119-1981 (GSFA FC 09.4)

Proposal: to revise the name of the functional class (thickeners); to revise the provisions for INS 407, 466, 1401, 1402, 1412, 1420, 1442 and 260. To remove the provisions for flavourings and to include new text in line with the Procedural Manual and the terminology used in the Guidelines for the Use of Flavourings as outlined below.

COMMENT

We would propose to modify the table as indicated below for the grouping the “thickeners and gelling agents”, and “flavours” separately for ease of clarity

Thickening Thickeners or and Gelling Agents		
(for use in packing media only)		
Thickeners and gelling agents		
407	Carrageenan and its Na, K, and NH₄ salts (including Furcelleran	
466	Sodium carboxymethyl cellulose (cellulose gum)	
1401	Acid treated starches (including white and yellow dextrans)	GMP
1402	Alkaline treated starches	
1412	Distarch phosphate esterified	
1420/1421	Starch acetate	
1442	Hydroxypropyl distarch phosphate	
Flavouring		
260	Acetic acid. glacial	GMP
Natural Flavours		
Spice oils		GMP
Spice extracts		
Smoke flavours (Natural smoke solutions and extracts)		

COMMENT:

We would propose the comments indicated below for “natural flavours”

The natural flavours indicated in the table below should be used under flavor enhancers and should comply with CAC/GL 66-2008. It has been noted that they are neither thickeners nor gelling agents. Acidity regulators (disodium diphosphate) not used in our final product and therefore JECFA to come up with safe limit.

Natural Flavours
Spice oils
Spice extracts
Smoke flavours (Natural smoke solutions and extracts)

INDIA

Standard for Quick Frozen Blocks of Fish Fillets, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh CODEX STAN 165-1989 (GSFA FC 09.2.1)

General Comment:

India agrees to the proposal on revision of provisions for INS 304- Ascorbyl palmitate, 410- Carob bean gum and 407-Carrageenan.

Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter CODEX STAN 166-1989 (GSFA FC 09.2.2)

General Comment:

- i. Agree to the revision of INS 304 as mg/kg
- ii. Agree to the revision of names of INS 410, 407, 621, 622, 160b, 160e, 465, 471, 1401, 1402, 1412, 1420, 1421 and 1442 as per JECFA specifications.
- iii. Agree for revision of INS 160a to Carotene.

Standard for Salted Atlantic Herring and Salted Sprat CODEX STAN 244-2004 (GSFA FC 09.2.5)

Specific Comment:

Sorbates (INS 200–203): India suggests that Sorbates (INS 200-203) should be under the class preservatives with an upper limit of 200mg/kg, singly or in combination. Furthermore, India also agrees with the suggestion of footnote “**the use of INS 201 Sodium Sorbate is not permitted**” due to lack of risk assessment data on Sodium Sorbate.

Ascorbic acid (INS 300), citric acid (INS 330)

Specific Comment:

Dual function of ascorbic acid (INS 300) and citric acid (INS 330) as both acidity regulator and antioxidant can be reflected in the title heading of functional class.

Standard for Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes CODEX STAN 167-1989 (GSFA FC 09.2.5)

Specific Comment:

Agree to the provision of expressing sorbates as group and excluding sodium sorbate till the risk assessment data is available.

Standard for Crackers from Marine and Freshwater Fish, Crustaceans and Molluscan Shellfish CODEX STAN 222-2001 (GSFA FC 09.2.5)

Sequestrates		
INS Number	Additive Name	Maximum Level in Product
452(i)	Polyphosphates Sodium	2200 mg/kg as phosphorus. 5g/kg expressed as P ₂ O ₅ , singly or in combination
452(ii)	Potassium polyphosphate	
452(iii)	Sodium calcium polyphosphate	
452(iv)	Calcium polyphosphate	
452(v)	Ammonium polyphosphate	
Flavour enhancers		
621	Monosodium <u>L</u> -glutamate	Limited by GMP

India suggests that the list of Phosphate listed in the table above should be in line with CODEX STAN 165-1989, Amended 2013-14.

Rationale: The list of phosphate can be common and all that covered under the codex standard 165-1989 Amended 2013-14 could be included.

Standard for Canned Shrimps or Prawns CODEX STAN 37-1981 (GSFA FC 09.4)

124	Ponceau4R (CochinealredA)	
385-386	Calcium disodium EDTA Ethylene diamine tetra	250mg/kg
338	Orthophosphoric Phosphoric acid	850 mg/kg 540 mg/kg as phosphorus. singly or in

India suggests that the list of phosphate listed above could be in line with 165-1989 Amended 2013-14.

Rationale: The list of phosphate can be common and all that covered under the codex standard 165-1989 Amended 2013-14 could be included.

Standard for Canned Tuna and Bonito CODEX STAN 70-1981 (GSFA FC 09.4)

Acidity Regulators		
450(i)	Disodium diphosphate	10mg/kg expressed as P_2O_5 , <u>2 mg/kg as phosphorus</u> , singly or in combination (includes natural phosphate)

India suggests that the limit of phosphates can be increased to “540 mg/kg as Phosphorus”, singly or in combination as given under Codex Standard 37-1981.

Rationale: As phosphate is used in such products as Acidity Regulators & not as sequestrants.

NIGERIA AND AFRICAN UNION**Issue & Rationale: Phosphates used as raising agents for breaded or batter coatings**

POSITION: Nigeria and African Union does not support the request to increase the level of other phosphates used as raising agents (from 440 mg/kg to 5600 mg/kg expressed as phosphorus) to compensate for removal of INS 541.

Issue & Rationale: Standard for Salted Atlantic Herring and Salted Sprat CODEX STAN 244-2004 (GSFA FC 09.2.5)

POSITION: Sorbates (INS 200 – 203): Nigeria and African Union supports the decision to wait for JECFA risk assessment on sodium sorbate to be available and the specifications for INS 201 to be established. In the use of Benzoates and Sorbates in combination or singly, it is necessary to have scientific classification of the effect of any form of combination on the final product. The standard must be clear and retain that the total weight of combination must not exceed 200mg/kg.

Standard for Canned Shrimps or Prawns CODEX STAN 37-1981 (GSFA FC 09.4)

Position: The use of phosphates in this product is not justified technologically. The eWG did not give the scientific information to justify the inclusion and use of phosphates.

Standard for Canned Tuna and Bonito CODEX STAN 70-1981 (GSFA FC 09.4)

Position: The use of phosphates in this product is not justified technologically. The eWG did not give the scientific information to justify the inclusion and use of phosphates.

Standard for Canned Crab Meat CODEX STAN 90-1981 (GSFA FC 09.4)

Position: The use of phosphates in this product is not justified technologically. The eWG did not give the scientific information to justify the inclusion and use of phosphates.

Standard for Canned Sardines and Sardine-Type Products CODEX STAN 94-1981 (GSFA FC 09.4)

POSITION: The use of phosphates in this product is not justified technologically. The eWG did not give the scientific information to justify the inclusion and use of phosphates.

SENEGAL

COMMENTAIRES: Nous ne soutenons pas la demande visant à accroître le niveau des autres phosphates utilisés comme agents levants (de 440 mg/kg à 5600 mg/kg, exprimés en tant que phosphore) pour compenser la suppression du SIN 541.

Norme pour le hareng de l'Atlantique salé et les sprats salés CODEX STAN 244-2004 (NGAA CA 09.2.5)

COMMENTAIRES: Sorbates (SIN 200 – 203): Nous attendrons plutôt que l'évaluation des risques du JECFA sur le sorbate de sodium soit disponible et que les spécifications pour le SIN 201 soient établies. Dans l'utilisation des benzoates et des sorbates seuls ou en combinaison, il est nécessaire d'avoir une classification scientifique de l'effet de toute forme de combinaison sur le produit final. La norme doit être claire et retenir que **le poids total** de la combinaison si elle est autorisée **ne doit pas dépasser 200 mg/kg**.

Norme pour les crevettes en conserve CODEX STAN 37-1981 (NGAA CA 09.4)

Commentaires: Le Sénégal ne soutient pas cette proposition car il estime que l'utilisation des phosphates dans ce produit n'est pas justifiée sur le plan technologique

JUSTIFICATIONS : Lors de la 33eme session, le comité avait retenu que l'utilisation des phosphates n'était pas scientifiquement justifiée pour ces conserves. Le GTe n'a pas donné l'information scientifique pour justifier l'inclusion et l'utilisation des phosphates

Norme pour le thon et la bonite en conserve CODEX STAN 70-1981 (NGAA CA 09.4)

Norme pour la chair de crabe en conserve CODEX STAN 90-1981 (NGAA CA 09.4)

Norme pour les sardines et produits du type sardines en conserve CODES STAN 94-1981 (NGAA CA 09.4)

COMMENTAIRES : Nous ne soutenons pas ces propositions

JUSTIFICATIONS : L'utilisation des phosphates dans ces produits n'est pas justifiée sur le plan scientifique. Le GTe n'a pas donné d'informations scientifiques additionnelles pour justifier l'inclusion et l'utilisation des phosphates pour ces conserves.

THAILAND

General comments

We agree with the document in principle.

Specific comments

However, we would like to propose our comments on specific standards as follows:

- Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter, CODEX STAN 166-1989, (GSFA FC 09.2.2)

We would like to ask for a reconsideration of some functional classes of food additives listed in the document. For examples, functional class of monosodium L-glutamate (INS 621) and monopotassium L-glutamate (INS 622) should be a flavour enhancer instead of a thickener. Therefore, it is recommended that CCFFP should consider the revision of functional classes of the food additives on a basis of the purpose of use and consistency with GSFA.

- Standard for Canned Crab Meat, CODEX STAN 90-1981 (GSFA FC 09.4)

1. There are the needs for the use of phosphoric acid (INS 338) and disodium diphosphate (INS 450(i)) as acidity regulators or sequestrants in canned crab meat products depending on the purpose of use.
2. When phosphoric acid and disodium diphosphate are used as acidity regulators, it is recommended that the maximum level should be 540 mg/kg as phosphorus, singly or in combination.
3. When phosphoric acid and disodium diphosphate are used as sequestrants, it is recommended that the maximum level should be 2,200 mg/kg as phosphorus, singly or in combination

- Standard for Canned Tuna and Bonito, CODEX STAN 70-1981 (GSFA FC 09.4)

It is agreed that the consideration of maximum level for disodium diphosphate (INS 450(i)) for canned tuna and bonito products should take the same approach used for the Standard for Canned Crab Meat (CODEX STAN 90-1981).