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FOOD AND AGRICULTURE
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Agenda Item 5(a)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Forty-first Session

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COMMENTS AND INFORMATION SUBMITTED IN RESPONSE TO CL 2008/10-FA PART B (POINTS 9-12)

The following comments have been received from the following Codex members and observers:

Australia, Malaysia, Japan, United States of America, AIDGUM, CEFS, EFEMA, ICBA, IFAC, IFU, ISA

AUSTRALIA

Australia is pleased to submit the following comments in response to Circular Letter 2008/10-FA. The following comments are in relation to Part B: Request for Comments and Information; points 9, 10, 11 and 12.

Australia is supportive of the proposed provisions as outlined in points 9, 10 and 11. This includes provisions for magnesium sulphate, lycopenes and aluminium containing food additives. These additives are permitted at GMP in the Australia New Zealand Food Standards Code for the particular food categories and technological functions proposed.

In relation to point 12 of CL 2008/10-FA Part B Australia would like to note that following the adoption of the Codex Standard for Fat Spreads and Blended Spreads, provisions for four additives previously permitted no longer exist for category 2.2 Fat emulsions, which now reads:

02.2 Fat Emulsions

02.2.1 Butter

02.2.2 Fat spreads, dairy fats spreads and blended spreads

The four food additives for which provisions no longer exist are: guaiac acid (INS 314), allura red AC (INS 129), indigotine (INS 132) and sunset yellow FCF (INS 110).

Australia would propose that these additives be reinstated to the level previously allowed in the GSFA. Three of the four additives (allura red AC (INS 129), indigotine (INS 132) and sunset yellow FCF (INS 110)) are currently allowed in a food category equivalent to 02.2.2, in the Australia New Zealand Food Standards Code, at 290 mg/kg.

Australia would like to highlight that there are a number of food additive provisions in the Codex Standard for Dairy Fat Spreads (CX STAN 253-2006) and the Codex Standard for Fat Spreads and Blended Spreads (CX STAN 256-2007) that are not included in food category 02.2.2 of the GSFA. Therefore Australia, in consultation with industry, would like to propose the following food additive provisions for category 02.2.2 Fat spreads, dairy fat spreads and blended spreads. The levels stated are based on the existing provisions in the Australia New Zealand Food Standards Code and do not necessarily reflect use levels.

Food Additive	Level permitted in Australia and New Zealand (mg/kg)
Annatto extracts (INS 160b)	20
Sorbic acid (INS 200)	2000
Sodium sorbate (INS 201)	2000
Potassium sorbate (INS 202)	2000
Calcium sorbate (INS 203)	2000
Octyl gallate (INS 311)	100
Dodecyl gallate (INS 312)	100
Sodium acetate (INS 262)	GMP
Sodium propionate (INS 281)	GMP
Calcium propionate (INS 282)	GMP
Tocopherols mixed (INS 306)	GMP
Tocopherols (INS 307)	GMP
Nisin (INS 234)	GMP

MALAYSIA

Point10. Comments at Step 3 on new food additive provisions of the GSFA, including clarification on the basis of maximum levels for lycopenes and for aluminium containing food additives (paras 63-64, 77 and Appendix VI part 1);

Malaysia would like to propose the provision of Sodium Aluminosilicate (INS 554) in food category 01.3 Condensed milk and analogues (plain) with a maximum level of aluminium at 200 mg/kg as anti-caking agent to keep the powdered form of the product free-flowing and prevent clumping.

Food Category No.	Food Category	Max. Level	Comments	Technological need
01.3	Condensed milk and analogues (plain)	200 mg/kg	Note 6: As aluminium	As anti-caking agent to keep powdered form free- flowing and prevent clumping

Point 12. Proposals for new food additive provisions in the relevant sub-categories of 02.2 (with the exception of food category 2.2.1 “Butter”) and in food categories 0.6.8, 12.9 and 12.10 and related subcategories (para. 96);

02.2.2 Fat spreads, dairy fat spreads and blended spreads

Malaysia would like to propose food additive provisions in food category 02.2.2 Fat spreads, dairy fat spreads and blended spreads justified for the technological function as acidity regulators, antioxidants, colours, emulsifiers, preservatives, stabilizers and thickeners in fat spreads and blended spreads and as adopted in the Codex Standard for Fat Spreads and Blended Spreads, CODEX STAN 256-2007 listed as follows:

Additive	INS	Max. Level	Use	Technological Function
Caramel Colour Class II - Caustic Sulphite Process	150b	500 mg/kg		Proposed max level necessary to function as colour for fat spreads and blended spreads. (Current proposed draft provision of max level 20000 mg/kg at Step 4)
Caramel Colour Class III - Ammonia Process	150c	500 mg/kg		Proposed max level necessary to function as colour for fat spreads and blended spreads. (Current proposed draft provision of max level 20000 mg/kg at Step 3)
Caramel Colour Class IV - Sulphite Ammonia Process	150d	500 mg/kg		Proposed max level necessary to function as colour for fat spreads and blended spreads. (Current proposed draft provision of

Additive	INS	Max. Use Level	Technological Function
			max level 20000 mg/kg at Step 3)
Carotene, beta- (synthetic)	160a(i)	35 mg/kg (Singly or in combination)	Proposed max level necessary to function as colour for fat spreads and blended spreads. (New food additive provision)
Carotenal, beta-apo-8'-	160e		
Carotenoic acid, methyl or ethyl ester, beta-apo-8'-	160f		
Curcumin	100(i)	10 mg/kg	Proposed max level necessary to function as colour for fat spreads and blended spreads. (Current proposed draft provision of max level 10 mg/kg at Step 4)
Phosphates	338; 339(i), 339(ii), 339(iii); 340(i), 340(ii), 340 (iii); 341(i), 341(ii), 341(iii); 342(i), 342(ii); 343(i), 343(ii), 343(iii); 450(i), 450(ii), 450(iii), 450(v), 450(vi); 450(vii), 451(i), 451(ii); 452(i), 452(ii), 452(iii), 452(iv), 452(v); 542	1,000 mg/kg (as Phosphorus)	Proposed max level necessary to function as acidity regulator for fat spreads and blended spreads. (Current draft provision of max level 2200 mg/kg at Step 7)
Polyglycerol Esters of Fatty Acids	475	5000 mg/kg	Proposed max level necessary to function as emulsifier for fat spreads and blended spreads. (Current draft provision of max level 20000 mg/kg at Step 7)
Polyglycerol Esters of Interesterified Ricinoleic Acid	476	4000 mg/kg	Proposed max level necessary to function as emulsifier for fat spreads and blended spreads. (Current draft provision of max level 10000 mg/kg at Step 7)
Polysorbates	432, 433, 434, 435, 436	10000 mg/kg	Proposed max level necessary to function as emulsifier for fat spreads and blended spreads. (New food additive provision) (Current

Additive	INS	Max. Use Level	Technological Function
			adopted max level of 5000 mg/kg for use in fat emulsions for baking purposes only)
Propylene Glycol Alginate	405	3000 mg/kg	Proposed max level necessary to function as stabilizer for fat spreads and blended spreads. (Current draft provision of max level 10000 mg/kg at Step 7)
Sorbates	200, 201, 202, 203	2000 mg/kg (singly or in combination (as sorbic acid))	Proposed max level necessary to function as preservative for fat spreads and blended spreads. (Current draft provision of max level 2000 mg/kg at Step 7)
Sorbitan Esters Of Fatty Acids	491-495	10,000 mg/kg (singly or in combination)	Proposed max level necessary to function as emulsifier for fat spreads and blended spreads. (Current draft provision of max level 20000 mg/kg at Step 7)
Sodium Diacetate	262(ii)	1,000 mg/kg	Proposed max level necessary to function as acidity regulator for fat spreads and blended spreads. (Current draft provision of GMP at Step 7)
Stearoyl-2-Lactylates	481(i), 482(i)	10,000 mg/kg (singly or in combination)	Proposed max level necessary to function as emulsifier for fat spreads and blended spreads. (Current draft provision of max level 10000 mg/kg at Step 7)
Stearyl Citrate	484	100 mg/kg (fat or oil basis)	Proposed max level necessary to function as emulsifier for fat spreads and blended spreads. (Current proposed draft provision of max level 100 mg/kg at Step 4)
Sucroglycerides	474	10,000 mg/kg	Proposed max level necessary to function as emulsifier for fat spreads and blended spreads. (Current draft provision of max level 10000 mg/kg at Step 7)
Sucrose Esters Of Fatty Acids	473	10,000 mg/kg	Proposed max level necessary to function as emulsifier for fat spreads and blended spreads. (Current draft provision of max level 10000 mg/kg at Step 7)
Tartrates	334; 335(i), 335(ii); 336(i), 336(ii); 337	100 mg/kg (as tartaric acid)	Proposed max level necessary to function as acidity regulator for fat spreads and blended spreads. (Current proposed draft provision of max level 5000 mg/kg at Step 4)
Tocopherols	307	500 mg/kg	Proposed max level necessary to function as antioxidant for fat spreads and blended spreads. (Current draft provision of max level 500 mg/kg at Step 7)

Malaysia notes that the 40th Session of the CCFA agreed to the electronic Working Group's proposals for consequential revisions to food additive provisions in the Annex to Table 3 and Tables 1 and 2 of the GSFA and in the food additive section of the Codex Standard for Butter (CODEX STAN A-1-1971), as presented in Parts III and IV of document CX/FA 08/40/6 to be maintained.

However, some of the proposed maximum use levels of additives as above may differ with the current adopted, draft (Step 6 or 7), and proposed draft (Step 3 or 4) food additive provisions.

06.8.1 Soybean-based beverages

Malaysia would also like to propose food additive provisions in food category 06.8.1 Soybean-based beverages. The maximum use level is safe and justified for the technological function in soybean-based beverages listed as follows:

Additive	INS	Max Level (mg/kg)	Technological function
Annatto extracts, bixin-based	160b(i)	10	Proposed maximum use level necessary to function as colour for food category 06.8.1 Soybean-based beverages.
Caramel III – ammonia process	150c	1500	Proposed maximum use level necessary to function as colour for food category 06.8.1 Soybean-based beverages.
Carmines	120	40	Proposed maximum use level necessary to function as colour for food category 06.8.1 Soybean-based beverages.
Carrageenan	407	GMP	Proposed use level to function as stabilizer for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Dextrin	1400	GMP	Proposed use level to function as thickener for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Diacetyltartaric and fatty acid esters of glycerol	472e	1000	Proposed maximum use level necessary to function as emulsifier for food category 06.8.1 Soybean-based beverages.
Dipotassium orthophosphate	340(ii)	1300 (as phosphorus)	Proposed maximum use level necessary to function as sequestrant for food category 06.8.1 Soybean-based beverages
Distarch phosphate	1412	GMP	Proposed use level to function as thickener for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Erythrosine	127	10	Proposed maximum use level necessary to function as colour for food category 06.8.1 Soybean-based beverages.
Gellan gum	418	GMP	Proposed use level to function as thickener and stabilizer for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Hydroxypropyl starch	1440	GMP	Proposed use level to function as thickener for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Lecithin	322(i)	GMP	Proposed use level to function as emulsifier for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Microcrystalline cellulose	460(i)	GMP	Proposed use level to function as stabilizer for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA

Mono-and diglycerides of fatty acids	471	GMP	Proposed use level to function as emulsifier for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Pectins	440	GMP	Proposed use level to function as thickener and stabilizer for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Polydimethylsiloxane	900a	10	Proposed maximum use level necessary to function as antifoaming agent for food category 06.8.1 Soybean-based beverages
Ponceau 4R	124	50	Proposed maximum use level necessary to function as colour for food category 06.8.1 Soybean-based beverages
Potassium carbonate	501(i)	GMP	Proposed use level to function as acidity regulator and stabilizer for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Propylene Glycol Esters of Fatty Acids	477	500	Proposed maximum use level necessary to function as emulsifier for food category 06.8.1 Soybean-based beverages
Riboflavin, synthetic	101(i)	10	Proposed maximum use level necessary to function as colour for food category 06.8.1 Soybean-based beverages
Sodium hydrogen carbonate	500(ii)	GMP	Proposed use level to function as acidity regulator for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Sodium carbonate	500(i)	GMP	Proposed use level to function as acidity regulator for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Sodium Carboxymethyl cellulose (Cellulose gum)	466	GMP	Proposed use level necessary to function as stabilizer and thickener for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Sodium polyphosphate	452(i)	1300 (as phosphorus)	Proposed maximum use level necessary to function as sequestrant for food category 06.8.1 Soybean-based beverages
Sucrose esters of fatty acids	473	500	Proposed maximum use level necessary to function as emulsifier for food category 06.8.1 Soybean-based beverages
Tartrazine	102	30	Proposed maximum use level necessary to function as colour for food category 06.8.1 Soybean-based beverages.
Tripotassium citrate	332(ii)	GMP	Proposed use level necessary to function as acidity regulator and sequestrant for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Trisodium citrate	331(iii)	GMP	Proposed use level necessary to function as acidity regulator and sequestrant for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA
Xanthan gum	415	GMP	Proposed use level necessary to function as stabilizer for food category 06.8.1 Soybean-based beverages. Note: Listed in Table 3 of the GSFA

12.9.1 Fermented soybean paste, 12.9.2.1 Fermented soybean sauce, 12.9.2.2 Non-fermented soybean sauces and 12.9.2.3 Other soybean sauce

In addition, Malaysia would also like to propose food additive provisions in food category 12.9.1 Fermented soybean paste, 12.9.2.1 Fermented soybean sauce, 12.9.2.2 Non-fermented soybean sauces and 12.9.2.3 Other soybean sauce. The maximum use level is safe and justified for the technological function in these food categories listed as follows:

12.9.1 Fermented soybean paste

Additive	INS	Max Level (mg/kg)	Technological function
Acetic acid (glacial)	260	GMP	Proposed use level to function as acidity regulator for food category 12.9.1 Fermented soybean paste. Note: Listed in Table 3 of the GSFA
Benzoic acid	210	1000 (Singly or in combination)	Proposed maximum use level necessary to function as preservative for food category 12.9.1 Fermented soybean paste. Note: INS 211 as benzoic acid
Sodium benzoate	211		
Lactic acid (L-, D- and DL-)	270	GMP	Proposed use level to function as acidity regulator for food category 12.9.1 Fermented soybean paste. Note: Listed in Table 3 of the GSFA
Monosodium glutamate	621	GMP	Proposed use level to function as flavour enhancer for food category 12.9.1 Fermented soybean paste. Note: Listed in Table 3 of the GSFA
Orthophosphoric acid	338	GMP	Proposed use level to function as acidity regulator for food category 12.9.1 Fermented soybean paste. Note: Listed in Table 3 of the GSFA
Potassium sorbate	202	1000 (Singly or in combination)	Proposed maximum use level necessary to function as preservative for food category 12.9.1 Fermented soybean paste. Note: INS 202 as sorbic acid
Sorbic acid	200		

12.9.2.1 Fermented soybean sauce

Additive	INS	Max Level (mg/kg)	Technological function
Benzoic acid	210	1000 (Singly or in combination)	Proposed maximum use level necessary to function as preservative for food category 12.9.2.1 Fermented soybean sauce Note: INS 211 as benzoic acid
Sodium benzoate	211		
Caramel III – ammonia process	150c	1500	Proposed maximum use level necessary to function as colour for food category 12.9.2.1 Fermented soybean sauce.
Disodium 5'-guanylate	627	GMP	Proposed use level to function as flavour enhancer for food category 12.9.2.1 Fermented soybean sauce. Note: Listed in Table 3 of the GSFA
Disodium 5'-inosinate	631	GMP	Proposed use level to function as flavour enhancer for food category 12.9.2.1 Fermented soybean sauce. Note: Listed in Table 3 of the GSFA
Potassium sorbate	202	1000 (Singly or in combination)	Proposed maximum use level necessary to function as preservative for food category 12.9.2.1 Fermented soybean sauce. Note: INS 202 as sorbic acid
Sorbic acid	200		

12.9.2.2 Non-fermented soybean sauces

Additive	INS	Max Level (mg/kg)	Technological function
Benzoic acid	210	1000 (Singly or in combination)	Proposed maximum use level necessary to function as preservative for food category 12.9.2.2 Non-fermented soybean sauces. Note: INS 211 as benzoic acid
Sodium benzoate	211		
Caramel III – ammonia process	150c	1500	Proposed maximum use level necessary to function as colour for food category 12.9.2.2 Non-fermented soybean sauces.

12.9.2.3 Other soybean sauce

Additive	INS	Max Level (mg/kg)	Technological function
Acetic acid (glacial)	260	GMP	Proposed use level to function as acidity regulator for food category 12.9.2.3 Other soybean sauce. Note: Listed in Table 3 of the GSFA
Benzoic acid	210	1000 (Singly or in combination)	Proposed maximum use level necessary to function as preservative for food category 12.9.2.3 Other soybean sauce. Note: INS 211 as benzoic acid
Sodium benzoate	211		
Caramel III – ammonia process	150c	7500	Proposed maximum use level necessary to function as colour for food category 12.9.2.3 Other soybean sauce. This
Lactic acid (L-, D- and DL-)	270	GMP	Proposed use level to function as acidity regulator for food category 12.9.2.3 Other soybean sauce. Note: Listed in Table 3 of the GSFA
Monosodium glutamate	621	GMP	Proposed use level to function as flavour enhancer for food category 12.9.2.3 Other soybean sauce. Note: Listed in Table 3 of the GSFA
Orthophosphoric acid	338	GMP	Proposed use level to function as acidity regulator for food category 12.9.2.3 Other soybean sauce. Note: Listed in Table 3 of the GSFA
Potassium sorbate	202	1000 (Singly or in combination)	Proposed maximum use level necessary to function as preservative for food category 12.9.2.3 Other soybean sauce. Note: INS 202 as sorbic acid
Sorbic acid	200		

JAPAN

Codex General Standard for Food Additives: Request for Comments and Information from Japan (Response to CL 2008/10-FA, Part B 9.)

Japan supports to include magnesium sulphate (INS 518) in Table 3 of the GSFA.

-Codex General Standard for Food Additives: Request for Comments and Information from Japan (Response to CL 2008/10-FA, Part B 12.)

Japan pleased to provide the following comments on proposals for new food additives in the related sub-categories of 06.8 and 12.9.

Food Category No. 06.8.1 Soybean-based beverages

Food Additive	INS	Max Level	Justification for the use and technological need
Polydimethylsiloxane	900a	50mg/kg	To antifoam crushed soy liquid or soymilk when heated or stirred it.

Acesulfame potassium	950	500mg/kg	To sweeten Soybean-based beverages. This level is needed to sweeten the products which are consumed as is.
Sucralose (Trichlorogalactosucrose)	955	400mg/kg	To sweeten Soybean-based beverages. This level is needed to sweeten the products which are consumed as is.

Food Category No. 06.8.2 Soybean-based beverages film

Food Additive	INS	Max Level	Justification for the use and technological need
Polydimethylsiloxane	900a	50mg/kg	To antifoam soymilk in processing soybean film when heated or stirred it.

Food Category No. 06.8.3 Soybean curd (tofu)

Food Additive	INS	Max Level	Justification for the use and technological need
Magnesium sulfate	518	GMP	To firm soybean curd by making reaction between soy protein and calcium ion in soymilk
Polydimethylsiloxane	900a	50mg/kg	To antifoam soymilk in processing soybean curd when heated or stirred it.

Food Category No. 06.8.4 Semi-dehydrated soybean curd

Food Additive	INS	Max Level	Justification for the use and technological need
Magnesium sulfate	518	GMP	To firm soybean curd by making reaction between soy protein and calcium ion in soymilk

Food Category No. 06.8.5 Dehydrated soybean curd (kori tofu)

Food Additive	INS	Max Level	Justification for the use and technological need
Magnesium sulfate	518	GMP	To firm soybean curd by making reaction between soy protein and calcium ion in soymilk

Food Category No. 06.8.8 Other soybean protein products

Food Additive	INS	Max Level	Justification for the use and technological need
Caramel III - ammonia process	150c	20000mg/kg	To colour the products brown to adjust the tones of the products.
Caramel IV - sulfite ammonia process	150d	20000mg/kg	To colour the products brown to adjust the tones of the products

Food Category No. 12.9.1 Fermented soybean paste (e.g., miso)

Food Additive	INS	Max Level	Justification for the use and technological need
Riboflavin, synthetic	101i	25mg/kg	To colour the products, especially to adjust the tones of the products
Potassium sorbate	202	1000mg/kg as benzoic acid	To prevent development of expansion gas due to re-fermentation by yeast, that may damage a package.
Acesulfame potassium	950	350mg/kg	To sweeten the products. This level is needed to sweeten the products.
Sodium saccharin	954iv	200mg/kg	To sweeten miso. This level is needed to sweeten the products, especially sugar-reduced products

Food Category No. 12.9.2.1 Fermented soybean sauce

Food Additive	INS	Max Level	Justification for the use and technological need
Caramel III - ammonia process	150c	20000mg/kg	To colour the products to adjust the tones of the products.
Caramel IV - sulfite ammonia process	150d	20000mg/kg	To colour the products to adjust the tones of the products.
Sodium benzoate	211	600mg/kg as benzoic acid	To protect against deterioration caused by microorganisms.
Sodium saccharin	954iv	500mg/kg	To sweeten the products. This level is needed to sweeten the products.

UNITED STATES OF AMERICA

This responds to CL 2008/10-FA (May 2008) which requests comments and information on certain food additive provisions of the GSFA. The United States of America (USA) appreciates the opportunity to provide the following comments for consideration at the forthcoming 41st Session of the Codex Committee on Food Additives (CCFA).

Comments at Step 3 on the provisions for magnesium sulfate (INS 518) in Table 3 of the GSFA and proposals for new uses in food categories listed in the Annex to Table 3

In the USA, magnesium sulfate (INS 518) is affirmed as generally recognized as safe for use in food in general with no limitation other than current good manufacturing practice (GMP). The USA therefore supports advancing the provisions for magnesium sulfate in Table 3 for adoption at Step 8.

Comments at Step 3 on new food additive provisions of the GSFA, including clarification on the basis of maximum levels for lycopenes and for aluminium containing food additives

New food additive provisions at Step 3

Annatto extracts (bixin based) (INS 160b(i)): The USA proposes for inclusion at Step 3 the provisions for the use of annatto extracts (bixin-based) (INS 160b(i)) in food categories 05.1.4 (Cocoa and chocolate products) and 05.1.5 (Imitation chocolate, chocolate substitute products) at levels up to 25 mg/kg food as bixin. The USA notes that these levels are sufficient to provide color in non-standardized centers of food products in these food categories.

Magnesium sulfate (INS 518): The USA proposes the following provisions for the use of magnesium sulfate as a flavor enhancer for inclusion in the GSFA at Step 3:

Food category 12.1.2 (Salt substitutes) at levels up to 25% (250,000 mg/kg). Magnesium sulfate is used to enable sodium removal (salt reduction) in salt substitute products. These products are blends consisting of various non-sodium salts, primarily potassium chloride, potassium sulfate, magnesium chloride and magnesium sulfate. The magnesium sulfate content of the blend may be as high as 25%. These products are manufactured for consumer use.

Food category 14.1.2 (Fruit and vegetable juices) at levels up to 2,000 mg/kg. Magnesium sulfate is used as a replacement for sodium chloride. It imparts a salty taste as well as being a beneficial nutrient.

Lycopenes (INS 160d(i, iii))

The USA has no comments at this time regarding clarification on the basis of maximum levels for new food additive provisions at Step 3 for lycopenes. The USA supports expression of the maximum levels for lycopenes on an “as lycopene” basis.

Aluminium-containing food additives (INS 523, 541, 554, 556, 559)

Sodium aluminosilicate (INS 554): The USA recommends that sodium aluminosilicate be limited to use in food in general at levels up to 550 mg/kg food as aluminium, in accordance with good manufacturing practices.

The USA supports the provisions at Step 3 for sodium aluminosilicate in food categories 01.1.2 (Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)), 01.3.2 (Beverage whiteners), 01.5 (Milk powder and cream powder and powder analogues (plain)) and 12.5.2 (Mixes for soups and broths). However, the USA proposes that the maximum level for the Step 3 provision for sodium aluminosilicate in food category 01.6.2.3 (Cheese powder (for reconstitution; e.g., for cheese sauces)) be increased from 10,000 mg/kg to 25,000 mg/kg on an “as aluminium” basis. The intended function of anticaking agent cannot be achieved at the current maximum level of 10,000 mg/kg. To ensure the flowability of the cheese powder and to prevent clumping, a maximum level of 25,000 mg/kg, as aluminium, is necessary.

The USA also proposes a new provision for sodium aluminosilicate in food category 15.1 (Snacks – potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)) at levels up to 60 mg/kg food as aluminium, for inclusion in the GSFA at Step 3. Sodium aluminosilicate is used at this level as an anticaking agent in seasoning mixtures applied to snacks, where a use level of 60 mg/kg in the finished food product is technically justified.

Calcium aluminium silicate (INS 556): The USA recommends that calcium aluminium silicate be limited to use in food category 12.1.1 (Salt) at levels up to 1960 mg/kg food as aluminium, in accordance with good manufacturing practices.

Sodium aluminium phosphates (INS 541i,ii): The USA recommends that sodium aluminium phosphates be limited to use at levels up to 1240 mg/kg as aluminium in food category 01.6.4 (Processed cheese) and at levels up to 1860 mg/kg as aluminium in food category 06.2 (Flours and starches (including soybean powder)). The USA can also support the provisions for the use of sodium aluminium phosphates in general, provided that such use is consistent with the criteria described in Section 3.3 of the GSFA Preamble.

The USA notes that the Committee requested clarification of the basis of the maximum levels for sodium aluminium phosphates and whether these were on the basis of aluminium or phosphate (ALINORM 08/31/12 para. 64). As sodium aluminium phosphates are included in the JECFA group provisional tolerable weekly intake (PTWI) for aluminium and its salts, the USA urges the Committee to consider reporting the provisions for sodium aluminium phosphates on an “as aluminium” basis only and to include Note 6 (“as aluminium”) accordingly.

General comment: Furthermore, the USA proposes that a horizontal approach be utilized when addressing the safe use of food additives containing aluminium in that limitations be placed on total aluminium from the combined or separate use of these additives. This limitation could be accomplished by incorporating a Note into the “Comments” section of the provisions for these additives, *in combination with* Note 6 (“as aluminium”). The proposed note could take the form: “singly or in combination: Aluminium Ammonium Sulphate (INS 523), Sodium Aluminium Phosphate (INS 541), Sodium Aluminium Silicate (INS 554), Calcium Aluminium (556), and Aluminium Silicate (INS 559).”

Additional comments:

Pullulan (INS 1204)

The USA notes that the report of the 38th Session of the Codex Committee on Food Additives and Contaminants (CCFAC) agreed to include pullulan in Table 3 of the GSFA at Step 4 and to request proposed use levels in the food categories listed in the Annex to Table 3 (ALINORM 06/29/12 para. 36). The 39th Session of the CCFA agreed to include the proposed provisions for pullulan, as contained in CX/FA 07/39/10 Add.1, at Step 4 in Tables 1 and 2 of the GSFA.

The USA requests Committee to advance the provision for pullulan (INS 1204) in Table 3 of the GSFA for adoption at Step 8 during its 41st Session.

Saccharins (INS 954)

The USA notes that the Working Document of the GSFA for the 40th Session of the CCFA (FA/40 INF 01, Appendices I and II) contains two outstanding provisions at Step 6 for the use of saccharins in food category 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) and food category 14.1.3.4 (Concentrates for vegetable nectar).

The USA further notes that saccharins were a priority additive of the 40th Session of the CCFA (ALINORM 08/31/12) and that provisions for the use of other high-intensity sweeteners (e.g., neotame, aspartame, acesulfame potassium) in food categories 12.7 and 14.1.3.4 were adopted by the 30th Session of the Commission (ALINORM 07/30/REP), as proposed by the 39th Session of the CCFA (ALINORM 07/30/12 Rev.).

The USA therefore urges the Committee to discuss these two outstanding provisions for saccharins during its 41st Session and recommends their adoption at Step 8.

AIDGUM

The Codex General Standard for Food Additives (GSFA) is intended to be the specific and authoritative Codex text for the use of food additives in all foods containing additives. Because of its structure and certain Codex decisions, the GSFA falls short of the goal it intends to meet.

The GSFA contains lists of additives allowed in various Codex food standards (Table One), and a cross referenced table with the standards and the additives allowed in them (Table 2). The texts of Table 1 and

Table 2 are continuing to be elaborated by the Codex Committee on Food Additives (CCFA) and the Codex Alimentarius Commission (CAC). Priority in CCFA and CAC discussions related to Tables 1 and 2 is given to additives with a specific acceptable daily intake (ADI) level set by the FAO/WHO Joint Expert Committee on Food Additives (JECFA). While this priority approach is commendable in reaching GSFA goals with regard to additives with a specific ADI, it prevents a number of safer additives assigned a JECFA status of “ADI not specified” to be listed in GSFA Tables 1 and 2.

The GSFA also includes a general table, Table 3, for additives reviewed by JECFA and assigned the JECFA status of “ADI not specified”. Table 3 lists over 180 additives allowed by the GSFA and Codex for use in food in general in accordance with good manufacturing practices (GMP), unless otherwise specified. Table 3 also contains an annex with a list of food categories where specific use of an additive in Table 3 must be covered by the provisions in Tables One and Two. This latter provision of Table 3 prevents Tables 1 and 2 from being as complete as possible with regard to the additives listed in Table 3, since priority setting mechanisms for discussions of additives in CCFA discourage productive discussions about the additives in Table 3.

Table 3 of the GSFA is a very useful table and covers the use of the substances listed in a wide variety of compound food products that are not covered by specific Codex standards. However, since the food categories listed in the annex to Table 3 are broad, they include foods for which Codex standards exist, plus many other food products for which there are no Codex Standards. This severely limits the utility of Table 3. For example, in the April 2008 session of the CCFA limited time was devoted to discussions of some additives in Table 3 and specific approval of many uses of these additives occurred, but only at Step 4 of the 8 step Codex approval process. This means in effect that CCFA will hold these additives as Step 4 indefinitely, preventing the approved usages of the additives from full acceptance in the GSFA, with the reason being that priority discussion of other additives must come first within the limited time available to each CCFA session.

The above problem with regard to Table 3 can present many problems at the national level within Codex Member countries. Many countries follow Codex in their national regulations, and have specific regulations based on the GSFA and its Table 3. CCFA and CAC priority mechanisms that prevent appropriate and safe use of the Table 3 additives in both foods for which there are Codex standards, or in other foods covered by the food categories in the Annex to Table 3 unnecessarily the completeness and usefulness of the GSFA.

AIDGUM proposes that a new mechanism be introduced into CCFA discussions where the GSFA would become more complete by allowing appropriate use of the Table 3 food additives on a safe and suitable in all Codex standards, and in other processed foods listed in the Annex to Table 3. This would require the submission to CCFA by Member Countries or other interested parties of data showing current usage of such additives in different markets so that CCFA could evaluate such information in light of other CCFA and Codex procedures. A mechanism that would move approved Table 3 additives, after CCFA discussion and approval to Step 4, could also include, for these additives only, a post-CCFA request for any additional comments on Step 4 approvals, with immediate movement to Step5/8 approval if subsequent CCFA review of any comments leads to such approval. Since the Table 3 additives are among the safest additives in use, a new mechanism of this type should not be onerous as far as CCFA time is concerned. However, once such a process is complete, the GSFA will have made a giant step towards its goal of being the specific and authoritative Codex text for all food additives.

CEFS

CEFS (Comité Européen des Fabricants de Sucre), on behalf of all sugar manufacturers in the EU and Switzerland, would like to present comments at step 3 on new proposed draft food additive provisions of the General Standard for Food Additives (GSFA) (listed in Appendix VI, Part I of Alinorm 08/31/12), as requested in Codex CL 2008/10-FA.

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 nor

permission for the use of colours by EU legislation. In addition, such coloured 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].

The above was acknowledged by CCFA's Physical Working Group on the GSFA at its 2008 meeting. Category 11.3 (Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3) was deleted from the list of food categories in which the use of colours is technologically justified (please refer to Appendix II of the report of the 2008 meeting of the Physical WG on the GSFA, circulated as CRD 2 at the 40th CCFA Session). Although this list is merely intended to be used as working document during CCFA's discussions of food additive colours, the fact that the Physical WG decided not to include category 11.3 in this list supports the position that GSFA food category 11.3 does not warrant any uses of colours.

According to these principles, CEFS would suggest that **the following draft provisions for 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.	annatto extracts, norbixin-based (INS 160b(ii)) (The 2008 Physical WG decided not to include at step 3 the proposed draft provision for annatto extracts, <u>bixin-based</u> in category 11.3. Proposed draft provisions for annatto extracts, <u>norbixin-based</u> , on the other hand, were not discussed in detail due to time constraints. They were instead adopted in block for inclusion at step 3, including the one relating to category 11.3. However, by reason of consistency, the proposed draft provision for <u>annatto extracts, norbixin-based should be deleted from category 11.3</u>)	100 mg/kg (step 3)
	carotenes, vegetable (INS 160a(ii)) carotenoids (INS 160ai, 160aii, 160e, 160f)	50mg/kg (step 3) 50mg/kg (step 3) - Suppression -

Additionally, due to lack of time, the draft provisions for indigotine (INS 132) and canthaxanthin (INS 161g), which were to be considered for adoption at step 6, were not addressed. CEFS would thus also like to reiterate its comments to delete these two colour provisions from category 11.3.

EFEMA:

EFEMA would like to submit the following comments in response to circular letter 2008/10-FA, particularly as regards the request to provide information on specific foods for the use of polysorbates (INS 432 -436) in category 16.

EFEMA would suggest that no provisions are considered for inclusion in category 16 until there is a clear definition on the scope of this category. EFEMA welcomes the report of the CCFA's electronic working group charged with preparing a discussion paper on the scope of certain food categories in the GSFA and looks forward to further discussion on this to better clarify the definition of a composite food.

ICBA

The International Council of Beverages Associations (ICBA) is a nongovernmental organization that represents the interests of the worldwide nonalcoholic beverage industry. The members of ICBA operate in more than 200 countries and produce, distribute, and sell a variety of water-based beverages, including carbonated soft drinks and noncarbonated beverages such as juice drinks, bottled waters, and ready-to-drink coffees and teas. ICBA is pleased to provide the following comments in response to Circular Letter 2008/10-FA:

-Comments at Step 3 on the provisions for magnesium sulfate (INS 518) in Table 3 of the GSFA and proposals for new uses in food categories listed in the Annex to Table 3

ICBA supports the decision by the 40th CCFA to include magnesium sulfate in Table 3 of the GSFA. We propose adding a new use in food category 14.1.1.2 (Table waters and soda waters) and propose a draft maximum use level of 50 mg/kg. In addition to being used as a nutrient, magnesium sulfate (as heptahydrate) is used in certain bottled water products as a flavour enhancer due to its bitter or saline taste. It is added to bottled water products with other salts to enhance their taste after purification processes that result in a low mineral content, e.g., after desalination or reverse osmosis treatment. We recommend forwarding the proposed draft provision in 14.1.1.2 for adoption at Step 5/8.

-Comments at Step 3 on new food additive provisions of the GSFA, including clarification of the basis of maximum levels for lycopenes and for aluminium containing food additives (Appendix VI part 1)

Aluminium ammonium sulfate - INS 523

14.1.4.1 Carbonated water-based flavoured drinks 40 mg/kg (as aluminium)

ICBA did not request this proposed draft provision and has no information to provide.

Aluminium silicate - INS 559

14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks 10000 mg/kg (as aluminium)

ICBA did not request this proposed draft provision and has no information to provide.

Annatto extracts, bixin-based - INS 160b(i)

14.1.4. Water-based flavoured drinks 50 mg/kg (as bixin)

The type of annatto used in non-alcoholic beverages (14.1.4) generally is water-soluble norbixin but a bixin-type of annatto extract can be used with an emulsifier. All reported use levels are below this level and we recommend forwarding the draft proposed provision at Step 3 level for adoption at Step 5/8.

Annatto extracts, norbixin-based - INS 160b(ii)

14.1.4. Water-based flavoured drinks 50 mg/kg (as norbixin)

All reported use levels are below this level and we recommend forwarding the draft proposed provision at Step 3 level for adoption at Step 5/8.

Calcium aluminium silicate - INS 556

14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks 10000 mg/kg (as aluminium)

ICBA did not request this proposed draft provision and has no information to provide.

Cyclamic acid (and Na, Ca SALTS) - INS 952

14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks 1000 mg/kg (as cyclamic acid)

Cyclamate is used in drink concentrates in countries such as Australia and South Africa. Since cyclamic acid is scheduled for the 71st JECFA meeting, we suggest holding discussion about the proposed draft provision until the JECFA intake assessment is complete.

Lycopenes - INS 160d(i) and 160d(iii)

14.1.4 Water-based flavoured drinks 100 mg/kg (as lycopene)

ICBA supports adoption at Step 5/8. ICBA did not request the proposed draft provisions in categories 14.1.2, 14.1.3.1, 14.1.2.3, 14.2.3.4, and 14.1.5 and has no information to provide on these provisions.

Sodium aluminosilicate - INS 554

14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks 10000 mg/kg (as aluminium)

ICBA did not request this provision and has no information to provide.

-Additional information on food additive provisions of the GSFA, including clarification on the basis of maximum levels for aluminium containing food additives and the reporting basis for sodium aluminium phosphates (INS 541) (Appendix VI part 3)

Sodium aluminium phosphates – INS 541(i) and 541(ii)

14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks 2000 mg/kg (as aluminium)

A clarification was requested on the reporting basis (as aluminium or phosphate?). ICBA did not request this draft provision at Step 7 and has no information to provide.

IFAC

For item number 10, “Comments at Step 3 on new food additive provisions of the GSFA, including clarification on the basis of maximum levels for lycopenes and for aluminium containing food additives (paras 63-64, 77 and Appendix VI part 1),” specific comments on sodium aluminium phosphates (SALP) (INS 541(i), 541(ii)) are provide in table1 of the IFAC comments. table 1 shows specific food categories with maximum levels of use and IFAC’s justification.

Table 2 provides specific food categories with maximum levels of use for sodium aluminosilicate, INS 554. IFAC supports the proposed maximum levels of use referred to in the CL unless otherwise noted in the IFAC comment column (e.g., those categories shown in yellow could deleted; those in green are accompanied by a maximum level of use to replace GMP).

Table 1: SODIUM ALUMINIUM PHOSPHATES (INS 541(i), 541(ii))

Food Cat No.	Food Category	Max	Level	Comments	Comment	IFAC suggestion
01.6.1	Unripened cheese	35000 (2000 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate basic and the level is appropriate for this application. Converted to Al this would yield 2000 mg/kg Al.	
01.6.4	Processed cheese	35000 (2000 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate basic and the level is appropriate for this application. Converted to Al this would yield 2000 mg/kg Al.	
1.7	Dairy Based Deserts	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate basic and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	
2.4	Fat Based Deserts	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate basic and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	
4.1.2.9	Fruit Based Deserts	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate basic and is appropriate for the application. Converted to Al this would yield 120	

Food Cat No.	Food Category	Max	Level	Comments	Comment	IFAC suggestion
					mg/kg Al.	
5.1.1	Cocoa Mix	2000 (120 ppm Al)	mg/kg	Note 6&72	Max level cited is based on sodium aluminum phosphate and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	
05.2	Confectionery including hard and soft candy, nougats, etc	350	mg/kg	Note 6	This could be dropped.	could be dropped with minimal impact on the industry.
06.2.1	Flours	45000 20000 (1200 ppmAl)	mg/kg	Note 6	The proposed level seems high. Typical use is 2% therefore we propose that the level be reduced to 20000 of sodium aluminum phosphate acidic. Converted to Al this would yield 1200 mg/kg Al.	proposed changes to the levels permitted. These proposed levels are based on typical usage patterns and concentration needed for technical effect
6.5	Cereal	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	
06.6	Batters (eg for breading or batters for fish and poultry	1600 20000 (1200 ppm Al)	mg/kg		The proposed level seems to be calculated based on Al and seems high. The typical uses are 1.5 to 2% Sodium Aluminum Phosphate on a dry basis .For consistency in these comments the proposed level is based on sodium aluminum phosphate acid. Converted to Al this would yield 1200 mg/kg Al.	proposed changes to the levels permitted. These proposed levels are based on typical usage patterns and concentration needed for technical effect
07.1	Bread and ordinary bakery wares	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate acidic and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	
07.1	Cakes cookies and pies	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate acidic and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	
07.2.2	Other fine bakery wares	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate acidic and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	

Food Cat No.	Food Category	Max	Level	Comments	Comment	IFAC suggestion
07.2.3	Mixes for fine bakery wares (e.g. cakes, pancakes)	15300 (920 ppm Al)	mg/kg	Note 29	Max level cited is based on sodium aluminum phosphate acidic on a dry basis and is appropriate for the application. Converted to Al this would yield 920 mg/kg Al.	
08.3.3	Frozen processed comminuted meat, poultry and game products	6000 (360 ppm Al)	mg/kg		Typical poultry application can have 20 to 30 % breading. Based on usage patterns the level should be 6000 mg/kg. Converted to Al this would yield 360 mg/kg Al. This should be added to this category, due to a key application, breaded chicken fingers.	new food categories which should be assigned to this food additive. These added categories include significant existing applications and categories tied to other food groups already listed.
09.2.2	Frozen battered fish, fish fillets and fish products, including molluscs, crustaceans, and chinoderms	190 10000 (600 ppm Al)	mg/kg	Notes 6 & 41	Revision of current Step 7 provision overlaps with provision for use in Food Category 06.614, therefore the levels should be the same.	proposed changes to the levels permitted. These proposed levels are based on typical usage patterns and concentration needed for technical effect
9.2.4.3	Fried fish and fish products, including molluscs, crustaceans, and echinoderms	10000 (600 ppm Al)	mg/kg		Typical fish application can have 20 to 50 % breading. Based on usage patterns the level should be increased to 10000 mg/kg. Converted to Al this would yield 600 mg/kg Al. INS 541 missing from this category and should be included due to the inclusion of category 09.2.2. This is the cooked (fried) counter part of 9.2.2.	new food categories which should be assigned to this food additive. These added categories include significant existing applications and categories tied to other food groups already listed.
10.4	Egg based desserts					
12.5.2	Mixes for soups and broths	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	

Food Cat No.	Food Category	Max	Level	Comments	Comment	IFAC suggestion
12.6.3	Mixes for sauces and gravies	2000 (120 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate and is appropriate for the application. Converted to Al this would yield 120 mg/kg Al.	
14.1.4.3	Concentrates (liquid or solid) for water based flavoured drinks	2000	mg/kg	Note 6	This could be dropped.	could be dropped with minimal impact on the industry.
16.0	Mix foods	190 (11 ppm Al)	mg/kg	Note 6	Max level cited is based on sodium aluminum phosphate and is appropriate for the application. Converted to Al this would yield 11 mg/kg Al.	

Appendix 2: Sodium Aluminosilicate

Food Cat. No.	Food Category	Max Level	Comments	Step	IFAC Comments
01.1.2	Dairy-based drinks, flavoured and/or fermented e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	20000 mg/kg	Note 6	3	
01.3	Condensed milk and analogues (plain)	20000 mg/kg	Note 6	3	
01.4.4	Cream analogues	20000 mg/kg	Note 6	3	
01.5	Milk powder and cream powder and powder analogues (plain)	10000 mg/kg	Notes 6 & A3	3	
01.6.2.1	Ripened cheese, includes rind	10000 mg/kg	Notes 6, A3 & b3	3	
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	10000 mg/kg	Notes 6 & A3	3	
01.6.4	Processed cheese	10000 mg/kg	Notes 6, A3 & b3	3	
01.6.5	Cheese analogues	10000 mg/kg	Notes 6, A3 & b3	3	
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	10000 mg/kg	Notes 6 & A3	3	can be eliminated
01.8.1	Liquid whey and whey products, excluding whey cheeses	20000 mg/kg	Note 6	3	
01.8.2	Dried whey and whey products, excluding whey cheeses	10000 mg/kg	Notes 6 & A3	3	
04.2.2.2	Dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	20000 mg/kg	Note 6	3	

Food Cat. No.	Food Category	Max Level	Comments	Step	IFAC Comments
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4	GMP	Notes 3, 6 & A3	3	can be eliminated
05.3	Chewing gum	GMP	Notes 3, 6 & A3	3	A level of 20,000 mg/kg is recommended
05.4	Decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	GMP	Notes 3, 6 & A3	3	A level of 20,000 mg/kg is recommended
06.3	Breakfast cereals, including rolled oats	20000 mg/kg	Note 6	3	
06.4.3	Pre-cooked pastas and noodles and like products	20000 mg/kg	Note 6	3	
06.5	Cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	20000 mg/kg	Note 6	3	
06.6	Batters (e.g., for breading or batters for fish or poultry)	20000 mg/kg	Note 6	3	
07.1.6	Mixes for bread and ordinary bakery wares	10000 mg/kg	Notes 6 & A3	3	
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)	10000 mg/kg	Note 6	3	
08.3	Processed comminuted meat, poultry, and game products	GMP	Notes 6, A3 & C2	3	A level of 20,000 mg/kg is recommended
08.4	Edible casings (e.g., sausage casings)	GMP	Notes 3, 6 & A3	3	can be eliminated
10.2.3	Dried and/or heat coagulated egg products	20000 mg/kg	Note 6	3	
11.1.2	Powdered sugar, powdered dextrose	10000 mg/kg	Notes 6 & A3	3	can be eliminated
12.1.1	Salt	20000 mg/kg	Note 6	3	
12.2.2	Seasonings and condiments	30000 mg/kg	Notes 6 & A3	3	A level of 20,000 mg/kg is recommended
12.5.2	Mixes for soups and broths	10000 mg/kg	Notes 6 & A3	3	
12.6.3	Mixes for sauces and gravies	10000 mg/kg	Notes 6 & A3	3	
13.6	Food supplements	GMP	Notes 6 & A3	3	A level of 20,000 mg/kg is recommended
14.1.4.3	Concentrates (liquid or solid) for water-based flavoured drinks	10000 mg/kg	Notes 6 & A3	3	

The following information is further to item number 10:

Cyclamate, Category 14.1.4.3 (concentrates for drinks)

IFAC supports the use of cyclamates in concentrates for drinks, with the inclusion of the footnote, “as served to the consumer” (footnote 127). The technological need for using an intense sweetener in category 14.1.4.3 is justified, as adopted by CCFA 2008 and CAC 2008 (saccharin).

Sucralose, Category 01.5.2 (milk and cream powder analogues)

Using sucralose, pre-sweetened milk and cream powders can be produced with no added carbohydrates. The addition of carbohydrates to such products may result in browning reactions negatively impacting the appearance of the product and the value of proteins. Sucralose is inert so does not participate in such reactions. The technological need for using an intense sweetener in this category was agreed and adopted by the meetings of CCFA and CAC in 2007 and 2008 (aspartame, acesulfame K).

A maximum level of 400mg/kg for sucralose is needed to achieve the desired technological effect.

For item number 11, “**Additional information on food additive provisions of the GSFA, including clarification on the basis of maximum levels for aluminium containing food additives and the reporting basis for sodium aluminium phosphates (INS541) (para. 64, 77 and Appendix VI part 3),**” IFAC offers the following comments:

Acesulfame K, Category 1.2 (fermented milks - plain)

For consistency and in line with the decision of the 2008 CCFA meeting and the subsequent 2008 CAC meeting regarding the use of intense sweeteners in this category, where it was agreed “there are no sweeteners in a plain category,” this provision should be deleted.

Acesulfame K, Category 16 (composite foods)

IFAC supports the use of Acesulfame K in category 16. Please see the general comment on Category 16 below.

Aspartame, Category 12.5 Soups and Broths

Aspartame, like the other high intensity sweeteners, can be a useful tool in helping individuals limit their total caloric intake while providing an appealing sweet taste and flavor enhancement. In that respect aspartame has significant practical utility in numbers of fruit and vegetable chilled soups, minimally processed refrigerated soups and dried soup products. Such soups containing aspartame are available in Asia and other parts of the world. The amount of sweetener needed in such products depends upon the type of soup, nature of the other ingredients in the soup, degree of ripeness of the ingredients used, etc. A level of 1200 mg/kg is needed to provide the technological effect in some soups and, therefore, IFAC requests that a level of 1200 mg/kg aspartame be allowed in category 12.5.

CCFA has recognized that the technological need for using an intense sweetener in category 12.5 is justified, as agreed and adopted at the meetings of CCFA and CAC in 2007 and 2008 (acesulfame K, alitame, neotame, saccharin, sucralose). For example, a maximum level of 600 mg/kg has been assigned for the use of sucralose in category 12.5. On an equivalent sweetness basis to sucralose (with aspartame having a sweetness of 200 times that of sucrose and sucralose having a sweetness of 600 times that of sucrose) the maximum level of aspartame would be 1800 mg/kg.

For item number 12, “**Proposals for new food additive provisions in the relevant sub-categories of 0.2.2 (with the exception of food category 2.2.1 “Butter”) and in food categories 0.6.8, 12.9, and 12.10 and related sub-categories (para. 96),**” IFAC offers the following recommendations for phosphates and maximum levels of use for the following food categories. The functions of phosphate(s) are provided for each category listed.

02.2.2 Fat Spreads, dairy fat spreads, and blended spreads

Functions: Stabilizer, Nutrient.

Phosphates used in this category: 341 and 451.

Level: 2200 mg/kg

0.6.8 Soy Products

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), and Texturizing Agent (Firming), emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

6.8.1 Soybean based beverage

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Nutrient, Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: 350 mg/kg

6.8.2 Soybean based beverage Film

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: 35000 mg/kg

6.8.3 Soybean curd

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: 35000 mg/kg

6.8.4 Semi-dehydrated soybean curd

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: 35000 mg/kg

6.8.5 Dehydrated soybeans

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: 35000 mg/kg

6.8.6 Fermented Soybean

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: 35000 mg/kg

6.8.7 Fermented Soybean curd

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: 35000 mg/kg

6.8.8 Other

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: GMP

12.9 Soy based seasonings

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Emulsifier.

Phosphates used in this category: 339, 340, 341, 450, and 451.

Level: 35000 mg/kg

12.10 Protein products other

Functions: Acidity Regulator, Sequestrant (Color Stabilizer), Texturizing Agent (Firming), Emulsifier. **Phosphates used in this category:** 339, 340, 341, 450, and 451.

Level: 35000 mg/kg

CATEGORY 16 Composite Foods

Additionally, IFAC would like the opportunity to further comment on Category 16 and have the Committee consider the use of additional intense sweeteners (in addition to acesulfame K discussed above) for this category. Category 16 Composite Foods has been reconsidered since the other intense sweeteners were addressed by the CCFA so it appears that additional comments should be invited under such circumstances (whether for Category 16 or other categories that are redefined). IFAC would welcome the opportunity to provide further comments on category 16 for intense sweeteners (and maximum levels of use) that have already been reviewed and approved in the GSFA, once there is a clear definition on the scope of this category.

IFU

The International Federation of Fruit Juice Producers (IFU) represents the worldwide fruit juice industry and is an accepted Non Governmental Organization (NGO) with Observer status in the Codex Committee on Food Additives (CCFA) and various other Codex Committees.

On the basis of Appendix VI part 1 of Alinorm 08/31/12 we would like to submit the following comments:

LYCOPENES (Synthetic)

INS: 160d(i) Lycopene (*Blakeslea trispora*) INS: 160d (iii)

Function: Colour

Food category number	Food category	Max Level	Comments	Step	IFU comment
14.1.2	Fruit and vegetable juices	1000 mg/kg	Note 127 As served to the consumer	3	Discontinue with work
14.1.3.1	Fruit nectar	1000 mg/kg		3	Discontinue with work
14.1.3.2	Vegetable nectar	1000 mg/kg		3	Discontinue with work
14.1.3.3	Concentrates for fruit nectar	1000 mg/kg	Note 127 As served to the consumer	3	Discontinue with work
14.1.3.4	Concentrates for vegetable nectar	1000 mg/kg	Note 127 As served to the consumer	3	Discontinue with work

The reason for discontinuing with work on the above mentioned substances is that there is no technological need for use in the food categories 14.1.2 (Fruit and vegetable juices), 14.1.3.1 (Fruit nectar), 14.1.3.2 (Vegetable nectar), 14.1.3.3 (Concentrates for fruit nectar) and 14.1.3.4 (Concentrates for vegetable nectar).

ISA

ISA would like to submit the following comments in response to circular letter 2008/10-FA as regards intense sweeteners.

As a general comment, ISA would suggest that no provisions are considered for inclusion in category 16 until there is a clear definition on the scope of this category.

ISA welcomes the report of the CCFA's electronic working group charged with preparing a discussion paper on the scope of certain food categories in the GSFA and looks forward to further discussion on this to better clarify the definition of a composite food.

ISA would like to suggest that in principle when a category descriptor is re-defined or re-visited, delegations be given the opportunity to provide comments on substances to be included in this category and their permitted use levels. ISA would welcome the opportunity to be able to provide further comments on category 16 as regards levels for intense sweeteners that have already been reviewed and approved in the GSFA, once there is a clear definition on the scope of this category.

1. Provisions in Appendix VI (Part 1) regarding new proposed draft food additive provisions for comments at step 3:**-Cyclamate, Cat. 14.1.4.3 (concentrates for drinks)**

ISA supports a listing for the use of cyclamates in concentrates for drinks, with the inclusion of the footnote, “as served to the consumer” (footnote 127).

The technological need for using an intense sweetener in category 14.1.4.3 is justified, as adopted by CCFA 2008 and CAC 2008 (saccharin).

ISA awaits the outcome of JECFA’s dietary exposure assessment on the use of cyclamate in the broader category 14.1.4 (water-based flavoured drinks), following discussions at the CCFA 2008 meeting.

- Sucralose, Cat. 01.5.2 (milk and cream powder analogues)

Sucralose 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 with impaired appearance of the product and impaired value of proteins while sucralose remains inert.

The technological need for using an intense sweetener in this category was agreed and adopted by the meetings of CCFA and CAC in 2007 and 2008 (aspartame, acesulfame K).

A maximum level of 400mg/kg for sucralose is needed to achieve the technological effect.

ISA would request that this provision be listed for adoption at step 8.

2. Provisions in Appendix VI (Part 3) food additive provisions of the GSFA (adopted and in the step process) for which additional information is requested:**- Acesulfame K, Cat. 1.2 (fermented milks - plain)**

For consistency and in line with the decision of the CCFA meeting 2008 and the subsequent CAC meeting 2008 regarding the use of intense sweeteners in this category, where it was agreed “there are no sweeteners in a plain category”, ISA would request that this provision be deleted.

- Acesulfame K, Cat. 16 (composite foods)

ISA would suggest that no provisions are considered for inclusion in category 16 until there is a clear definition on the scope of this category. (See general comment above).

- Aspartame, Cat. 12.5 (soups and broths)

Soups sweetened with intense sweeteners are available on the market in Asia in elsewhere. Examples include low calorie sweet and sour soups.

The technological need for using an intense sweetener in category 12.5 is justified, as agreed and adopted at the meetings of CCFA and CAC in 2007 and 2008 (acesulfame K, alitame, neotame, saccharin, sucralose).

A maximum level of 600 mg/kg of aspartame is needed to achieve the intended technological effect.