



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD ADDITIVES
Forty-Sixth Session

Hong Kong, China, 17-21 March 2014

MATTERS REFERRED BY THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX
COMMITTEES

MATTERS ARISING FROM THE 36TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION (CAC)

Standards and Related Texts adopted by the Commission¹

1. The Commission adopted:
 - Food additive provisions of the *General Standard for Food Additives* (GSFA), as proposed by the CCFA;
 - Amendments to the *International Numbering System (INS) for Food Additives* (CAC/GL 36-1989);
 - *Specifications for the Identity and Purity of Food Additives* arising from the 76th JECFA meeting.²
2. A full record of the discussion of the 36th Session of the Commission on the adoption of the above to texts can be found in REP13/CAC, paras 68-69.

Revocation of existing Codex Standards and Related Texts³

3. The Commission approved the revocation from the Codex Alimentarius of the following texts as proposed by the 45th CCFA:
 - Food additive provisions of the commodity standards;
 - Specifications for mineral oil, medium and low viscosity (INS 905e, f and g)

New work⁴

4. The Commission approved the following new work by the CCFA:
 - Revision of the *Guidelines for the Simple Evaluation of Food Additives Intakes* (CAC/GL 3-1989)
5. The Committee **is invited to note** the above decisions by the Commission.

MATTERS ARISING FROM OTHER COMMITTEES AND TASK FORCES

35th Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) (Bad Soden am Taunus, Germany, 4-11 November 2013)⁵

6. In response to the request from CCFA regarding the recommendations for the provisions in Tables 1 and 2 for food additives listed in Table 3 with "Acidity regulator" function and the horizontal approach for the provisions in Table 1 and 2 for food additives listed in Table 3 with "Emulsifier, Stabilizer and Thickener" function, the 35th CCNFSDU clarified that Note 55 "Singly or in combination, within the limits for sodium, calcium, and potassium specified in the commodity standard" should apply to all relevant provisions, both

¹ REP13/CAC, Appendix III

² REP13/FA, Appendix X

³ REP13/FA para. 101 and Appendix V

⁴ REP13/FA para. 106 and Appendix VI

⁵ REP14/NFSDU para. 106 and Appendix VI

with numerical levels and at GMP, in the *Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants* (CODEX STAN 72-1981).

7. The 35th CCNFSDU further clarified that the limits of sodium that applies to certain food additive provisions in the *Standard for Canned Baby Foods* (CODEX STAN 73-1981) should also apply to the relevant provisions of the *Standard for Processed Cereal-Based Foods for Infants and Young Children* (CODEX STAN 74-1981).

8. The Committee **is invited to consider** the above clarifications during the discussion of Agenda Items 5(a) and (b).

OTHERS

Categories of Notes of the GSFA

9. Currently, the GSFA contains 268 Notes in Table 1 and Table 2, which provide additional information on conditions applicable to the use of additives in different food categories. The Notes cover diverse technical and non-technical conditions, such as: expression of the basis for the maximum use level; exceptions for the maximum use level; limitations on the use of additives; correspondence to applicable Codex standards; and use of additives singly or in combination.

10. Inconsistent language among Notes with the same purpose and a lack of clarity of the intent of some Notes may lead to different interpretations of these Notes, resulting in difficulties in the use of the GSFA. For example, there have been a number of inquiries regarding the correct interpretation of some Notes that describe the use of additives “*singly or in combination*” without defining which group of additives the Notes refer to.

11. The use of harmonized language for Notes with the same purpose or that address a similar issue may clarify the scope of these notes, help the ongoing work on the GSFA and prevent duplication of Notes with the same purpose. To address the above challenges, it is recommended that CCFA undertake a uniform and consistent approach that includes alignment and harmonization of the language of the Notes used in Table 1 and Table 2 of the GSFA, and clarification of the purpose of some of these Notes, where appropriate.

12. In order to facilitate the alignment and harmonization, the Appendix of this document divides the current 268 Notes of Table 1 and Table 2 into five (5) broad groups on the basis of their text and/or underlying principles:

Group I: Notes which further define the listed maximum use level

Group II: Notes which specify exceptions to the listed specified maximum use level

Group III: Notes which specify the permitted use of the food additive

Group IV: Notes which exclude the use of the food additive in specific food products

Group V: Miscellaneous notes

13. It should be noted that several notes could be classified into more than one of the above Groups. However, for convenience each note has been assigned to only one Group.

Group I - Notes which further define the listed maximum use level

14. This Group includes 68 Notes that further define the maximum use level of additives. This group includes:

- a) 37 Notes which provide a specific basis for expressing the maximum level that is consistent with the reporting basis for the JECFA ADI (e.g. as benzoic acid for benzoates; as phosphorus for phosphates), or specify other reporting criteria (e.g. residual level, carryover). In general, it is recommended that the Notes under this category retain, or be revised to take, the form: “As...” (e.g. “As *adipic acid*” in the case of Note 1);
- b) 16 Notes which express the maximum use level on the basis of a food product (e.g. flour basis, ready-to-eat basis). In general, it is recommended that the Notes under this category retain, or be revised to take, the form: “On...basis.” (e.g. “On the *dry ingredient, dry weight, dry mix, or concentrate basis*” in the case of Note 2).
- c) 15 Notes which limit the maximum use level of the additive when used in combination with others additives. In general, it is recommended that the Notes under this category retain, or be revised to

take, the form: *“Singly or in combination.....”* and that they specify the group of additives referred to (e.g. *“Singly or in combination: benzoates and sorbates.”* in the case of Note 91).

Group II - Notes which specify exceptions to the listed maximum use levels

15. This Group includes 53 Notes that specify exceptions to the maximum use level listed for a specific food category. These exceptions include for use specific food products, for specific technological function or use, and/or for specific additives subject to a group ADI. In general, it is recommended that the Notes under this category retain, or be revised to take, the form: *“Except for use in.....at.....mg/kg (or GMP)”* (e.g., *“Except for use in fermented fish products at 1000 mg/kg.”* or *“Except for use in products conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981) at GMP.”* in the case of Notes 228 and 238, respectively).

Group III - Notes which specify the permitted use of food additives.

16. This Group includes 114 Notes related to the permitted use of food additives. This group includes:

- a) 85 Notes that limit the permitted use of the food additive to specific food products within a particular food category. In general, it is recommended that the Notes under this category retain, or be revised to take, the form: *“For use in.....only”* (e.g. *“For use in coffee substitutes only.”* in the case of Note 7).
- b) 4 Notes that limit the permitted use of the food additive to specific standardized food products. In general, it is recommended that the Notes under this category retain, or be revised to take, the form: *“For use in products conforming to (insert Codex Standard title and designation) only”* (e.g. *“For use in products conforming to the Standard for Instant Noodles (CODEX STAN 249-2006) only.”* in the case of Note 194).
- c) 19 Notes that limit the permitted use of the food additive to a specific technological function or use. In general, it is recommended that the Notes under this category retain, or be revised to take, the form: *“For use.....only”* (e.g. *“For use as a packaging gas only.”* or *“For use in dust control only.”* in the case of Note 59 and Note 98 respectively).
- d) 6 Notes that limit the permitted use of the food additive to a specific additive form or to a specific additive within a group ADI. In general, it is recommended that the Notes under this category retain, the form: *“...only”* (e.g. *“L(+)-form only”* in the case of Note 83).

Group IV - Notes which exclude the use of the food additive in specific food products

17. This Group includes 25 Notes related to excluding use of food additives in specific food products. This group includes:

- a) 16 Notes that exclude the use of the food additive in specific food products within a particular food category. In general, it is recommended that the Notes under this category retain, or be revised to take, the form: *“Excluding.....”* (e.g. *“Excluding coconut milk.”* in the case of Note 182).
- b) 9 Notes that exclude the use of the food additive in specific standardized foods. In general, it is recommended that the Notes under this category retain, or be revised to take, the form: *“Excluding products conforming to (insert Codex Standard title and designation)”* (e.g. *“Excluding products conforming to the Standard for Jams, Jellies and Marmalades (CODEX STAN 296-2009)”* in the case of Note 5).

Group V - Miscellaneous notes

18. This group includes 8 Notes that cannot be assigned to Groups I through IV. There are no recommendations for standardized language for the Notes in Group V.

Summary of Recommendations

19. The Committee is invited to consider the specific recommendations for the revision of the Notes (Groups I – IV) as presented in Appendix 1 to this document.

“Exclusions” to Food Categories 01.1.1 (Milk and buttermilk) and 12.2.1 (Herbs and spices) in the Annex To Table 3

20. The text for the exclusions in food categories 01.1.1 (Milk and buttermilk) and 12.2.1 (Herbs and spices) in the Annex to Table 3 are not consistent. The exclusion for food category 01.1.1 is presented as “Excluding Heat-Treated Buttermilk,” whereas the “exclusion” in food category 12.2.1 is actually presented as

an “inclusion” using the phrase “Only Herbs.” It would be clearer to align the text of the two sentences so that they express the exclusion in the same way.

Recommendation:

21. To align the text of the exclusions in the Annex to Table 3 it is recommended to revise the text associated with food category 12.2.1, which currently reads “Only Herbs,” to read: **“Excluding Spices.”**

Cyclotetraglucose (INS 1504(i)) and Cyclotetraglucose Syrup (INS 1504(ii))

22. The 71st JECFA established an ADI “not specified” for cyclotetraglucose (INS 1504(i)) and cyclotetraglucose syrup (INS 1504(ii)). The outcomes of the 71st JECFA evaluation were considered by the 42nd CCFA, which agreed to request comments/proposals on uses and use levels of cyclotetraglucose and cyclotetraglucose syrup for consideration of the 43rd Session of the CCFA.^{6, 7} Due to the fact that the ADI for these additives is “not specified” the 43rd CCFA also should have included these food additives in Table 3 of the GSFA at Step 3 and circulated them for comments, but this was not discussed

Recommendation:

23. It is recommended that the Committee include the provisions for cyclotetraglucose (INS 1504(i)) and cyclotetraglucose syrup (INS 1504(ii)) in Table 3 of the GSFA for circulation for comments at Step 3.

Potassium Hydrogen Sulfate (INS 515(ii))

24. The 71st JECFA established an ADI “not specified” for potassium hydrogen sulfate (INS 515(ii)). The outcomes of the 71st JECFA evaluation were considered by the 42nd CCFA, which agreed to include the food additive in Table 3 of the GSFA at Step 3 and circulate for comments, and to request comments/proposals on uses and use levels for this food additive in the food categories listed in the Annex to Table 3 of the GSFA.⁸ No comments were submitted in response to the request in CL 2010/7-FA, Part B. However the Committee did not take a decision regarding forwarding the provision for potassium hydrogen sulfate in Table 3 of the GSFA to the Commission for adoption at Step 5/8.

Recommendation:

25. It is recommended that the Committee forward the provision for potassium hydrogen sulfate (INS 515(ii)) in Table 3 of the GSFA to the 37th Session of the Commission for adoption at Step 5/8.

Benzoates – Note 301 (“Interim maximum level.”) and Food Category 14.1.4 (Water-based flavoured drinks, including “sport”, “energy”, or “electrolyte” drinks and particulated drinks)

26. The 27th Session of the Commission (2004) considered a recommendation for adoption from the 36th Session of the Committee (at that time the Codex Committee on Food Additives and Contaminants) of a provision for the use of benzoates (INS 210-213) in food category 14.1.4 (Water-based flavoured drinks, including “sport”, “energy”, or “electrolyte” drinks and particulated drinks).⁹ The Commission adopted the maximum level on an interim basis with the understanding that a review be conducted by CCFAC within 3 years and that comprehensive information on the levels of use of benzoates in different types of foods and in different parts of the world and the results of intake studies, particularly in children, and other relevant data should be provided to JECFA to facilitate its further assessment.¹⁰

27. To date no action has been taken by the CCFA on the adopted interim maximum level for benzoates (INS 210-213) in food category 14.1.4 (Water-based flavoured drinks, including “sport”, “energy”, or “electrolyte” drinks and particulated drinks) and data have not been provided to JECFA for the further assessment.

Recommendation:

28. It is recommended that the Committee discuss whether there is still a need for reviewing the maximum level for benzoates in food category 14.1.4 and either (i) revise the provision for benzoates in food category 14.1.4 to remove Note 301 and forward it to the Commission for adoption; or (ii) refer it to the priority working group for further consideration.

⁶ ALINORM 10/33/12, para. 32.

⁷ The 44th CCFA noted that no provisions for cyclotetraglucose and cyclotetraglucose syrup had been put forward in response to the request for information for new uses for these food additives (CL 2010/39-FA), and consequently, there are no provisions for these additives in Tables 1 and 2 of the GSFA (REP 12/FA, para. 84).

⁸ ALINORM 10/33/12, para. 39.

⁹ ALINORM 04/27/12, Appendix VI

¹⁰ ALINORM 04/27/41, para. 27.

Provisions for aluminium-containing food additives

29. The physical Working Group (p-WG) of the 45th CCFA discussed provisions for aluminium containing food additives in the GSFA in the context of reducing the use of these additives based on the recommendations of JECFA and the revised provisional tolerable intake for aluminium.¹¹ As part of this discussion the p-WG provided a recommendation to the Committee on the alignment of provisions for these additives in the GSFA and several commodity standards (Recommendation 3).¹² A portion of Recommendation 3 included revisions to provisions for sodium aluminosilicate (INS 554) and calcium aluminium silicate (INS 556) in specific commodity standards for which there are no active commodity committees, including the *Standard for Milk Powders and Cream Powder* (CODEX STAN 207-1999), the *Standard for Edible Casein Products* (CODEX STAN 290-1995), and the *Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form* (CODEX STAN 251-2006). Although the 45th Session of the CCFA discussed Recommendation 3, the report of the 45th CCFA does not reflect any decision on the revision of the provisions for these additives in these commodity standards.¹³

Recommendation:

30. It is recommended that the Committee forward to the 37th Session of the Commission for adoption the proposed revision of the provisions for sodium aluminosilicate (INS 554) and calcium aluminium silicate (INS 556) in the *Standards for Milk powders and Cream Powder* (CODEX STAN 207-1999), for *Edible Casein Products* (CODEX STAN 290-1995), and for a *Blend of Skimmed Milk and Vegetable Fat in Powdered Form* (CODEX STAN 251-2006) to reflect a maximum use level of 265 mg/kg with the Notes “as aluminium” and “Singly or in combination: sodium aluminosilicate (INS 554) and calcium aluminium silicate (INS 556)”.

Potassium acetates (INS 261):

31. “Potassium acetates (INS 261)” is a “parent” listing in the INS with 2 sub-listings: potassium acetate (INS 261(i)) and potassium diacetate (INS 261(ii)). The 17th JECFA (1973) assigned a group ADI of “not limited” to acetic acid and its potassium and sodium salts. This ADI includes potassium acetate, but it is not clear that it also includes potassium diacetate. Similarly, there is a JECFA specification monograph for potassium acetate (with INS 261, not INS 261(i)), but not for potassium diacetate.

Recommendation:

32. It is recommended that the Committee:

- a) Request that JECFA revise the specifications monograph for potassium acetate to list INS 261(i), not INS 261;
- b) Request JECFA to clarify whether the group ADI also include the potassium diacetate and, if necessary, request Members to submit to JECFA relevant data/information.

¹¹ FA 45/CRD 2

¹² FA 45/CRD 2, Recommendation 3 and Appendix III.

¹³ REP 13/FA para 93-96 and Appendix VII.

Appendix 1**Recommendations for revision of GSFA Notes ¹⁴**

Note: Wording recommended for deletion from the current Note is in ~~strike through~~ font. Wording recommended to be added to the current Note is in **bold** font. Additional information not for inclusion in the text of the Note is in underlined font

Group I: Notes which further define the listed maximum use level		
Subgroup a - Notes which provide a specific basis for expressing the maximum level that is consistent with the reporting basis for the JECFA ADI or other reporting criteria		
Note Number	Current Note Description	Recommended Note Revision
1	As adipic acid.	
6	As aluminium	
8	As bixin.	
10	As ascorbyl stearate.	
12	Carryover from flavouring substances.	As a result of carryover from flavouring substances.
13	As benzoic acid.	
17	As cyclamic acid.	
18	Added level; residue not detected in ready-to-eat food.	As added level; residue not detected in ready-to-eat food.
21	As anhydrous calcium disodium ethylenediaminetetraacetate	
23	As iron.	
24	As anhydrous sodium ferrocyanide	
25	As formic acid.	
26	As steviol equivalents.	
27	As para-hydroxybenzoic acid.	
30	As residual NO ₃ ion.	
32	As residual NO ₂ ion.	
33	As phosphorus.	
37	As weight of nonfat milk solids.	
42	As sorbic acid.	
43	As tin.	
44	As residual SO ₂ .	
45	As tartaric acid.	
46	As thiodipropionic acid.	
57	GMP is 1 part benzoyl peroxide and not more than 6 parts of the subject additive by weight.	
58	As calcium.	
62	As copper.	
65	Carryover from nutrient preparations.	As a result of carryover from nutrient preparations.
66	As formaldehyde. For use in provolone cheese only.	<u>Split into two notes: Note 66 "As formaldehyde" and new Note "For use in provolone cheese only"</u>
70	As the acid.	

¹⁴ Notes for which there is no text included in the "Recommended Note Revision" column are recommended to be maintained in their current form without revision.

Group I: Notes which further define the listed maximum use level		
Subgroup a - Notes which provide a specific basis for expressing the maximum level that is consistent with the reporting basis for the JECFA ADI or other reporting criteria		
Note Number	Current Note Description	Recommended Note Revision
88	Carryover from the ingredient.	As a result of carryover from the ingredient.
113	Use level reported as acesulfame potassium equivalents (the reported maximum level can be converted to an aspartame-acesulfame salt basis by dividing by 0.44). Combined use of aspartame-acesulfame salt with individual acesulfame potassium or aspartame should not exceed the individual maximum levels for acesulfame potassium or aspartame (the reported maximum level can be converted to aspartame equivalents by dividing by 0.68).	Use level reported As acesulfame potassium equivalents (the reported maximum level can be converted to an aspartame-acesulfame salt basis by dividing by 0.44). Combined use of aspartame-acesulfame salt with individual acesulfame potassium or aspartame should not exceed the individual maximum levels for acesulfame potassium or aspartame (the reported maximum level can be converted to aspartame equivalents by dividing by 0.68).
119	Use level reported as aspartame equivalents (the reported maximum level can be converted to an aspartame-acesulfame salt basis by dividing by 0.64). Combined use of aspartame-acesulfame salt with individual aspartame or acesulfame potassium should not exceed the individual maximum levels for aspartame or acesulfame potassium (the reported maximum level can be converted to acesulfame potassium equivalents by multiplying by 0.68). ²	Use level reported As aspartame equivalents (the reported maximum level can be converted to an aspartame-acesulfame salt basis by dividing by 0.64). Combined use of aspartame-acesulfame salt with individual aspartame or acesulfame potassium should not exceed the individual maximum levels for aspartame or acesulfame potassium (the reported maximum level can be converted to acesulfame potassium equivalents by multiplying by 0.68).
178	Expressed as carminic acid.	Expressed As carminic acid.
181	Expressed as anthocyanin.	Expressed As anthocyanin.
185	As norbixin.	
233	As nisin.	
240	Within the limit for sodium listed in the Standard for Canned Baby Foods (CODEX STAN 73-1981). ¹⁵	The use level is within the limit for sodium listed in the Standard for Canned Baby Foods (CODEX STAN 73-1981).

Group I: Notes which further define the listed maximum use level		
Subgroup b - Notes which express the maximum use level on the basis of a food product		
Note Number	Current Note Description	Recommended Note Revision
2	On dry ingredient, dry weight, dry mix or concentrate basis.	On the dry ingredient, dry weight, dry mix or concentrate basis.
11	Flour basis.	On the flour basis.
15	Fat or oil basis.	On the fat or oil basis.
29	Reporting basis not specified.	
31	Of the mash used.	On the mash used basis .
34	Anhydrous basis.	On the anhydrous basis.
36	Residual level.	On the residual level basis .
38	Level in creaming mixture.	On the creaming mixture basis .
47	On egg yolk weight, dry basis.	On the dry egg yolk weight, dry basis.
63	On amount of dairy ingredients.	On the amount of dairy ingredients basis .

¹⁵ Note 240 is only attached to provisions for sodium carbonate (INS 500(i)), and sodium hydrogen carbonate (INS 500(ii)) in food category 13.2 (Complementary foods for infants and young children) at GMP.

Group I: Notes which further define the listed maximum use level		
Subgroup b - Notes which express the maximum use level on the basis of a food product		
Note Number	Current Note Description	Recommended Note Revision
72	Ready-to-eat basis.	On the ready-to-eat basis.
85	Use level in sausage casings; residue in sausage prepared with such casings should not exceed 100 mg/kg.	
87	Treatment level.	On the treatment level basis .
96	On a dried weight basis of the high intensity sweetener.	On the a dried weight basis of the high intensity sweetener.
97	In the finished product/final cocoa and chocolate products.	On the finished product /final cocoa and chocolate product basis .
127	As served to the consumer.	On the served to the consumer basis .

Group I: Notes which further define the listed maximum use level		
Subgroup c - Notes which limit the maximum use level of the additive when used in combination with others additives.		
Note Number	Current Note Description	Recommended Note Revision
20	On total amount of stabilizers, thickeners and/or gums.	Singly or in combination with other On total amount of stabilizers, thickeners and/or gums
55	Singly or in combination, within the limits for sodium, calcium, and potassium specified in the commodity standard.	Singly or in combination, Within the limits for sodium, calcium, and potassium specified in the Standard for Infant Formula and Formula for Special Dietary Purposes Intended for Infants (CODEX STAN 72-1981): singly or in combination with other sodium, calcium, and/or potassium salts.
91	Benzoates and sorbates, singly or in combination.	Singly or in combination: Benzoates and sorbates, singly or in combination.
101	Use level singly, not to exceed 15 000 mg/kg in combination.	Use level singly, When used in combination with other emulsifiers, total combined use level not to exceed 15,000 mg/kg in combination as specified in the Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981).
130	Singly or in combination: butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), tertiary butylated hydroquinone (INS 319), and propyl gallate (INS 310).	
133	Any combination of butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), and propyl gallate (INS 310) at 200 mg/kg, provided that single use limits are not exceeded.	
174	Singly or in combination: sodium aluminosilicate (INS 554), calcium aluminium silicate (INS 556), and aluminium silicate (INS 559).	
180	Singly or in combination: butylated hydroxyanisole (BHA, INS 320) and butylated hydroxytoluene (BHT, INS 321).	

Group I: Notes which further define the listed maximum use level		
Subgroup c - Notes which limit the maximum use level of the additive when used in combination with others additives.		
Note Number	Current Note Description	Recommended Note Revision
188	Not to exceed the maximum use level for acesulfame potassium (INS 950) singly or in combination with aspartame-acesulfame salt (INS 962).	Not to exceed the maximum use level for acesulfame potassium (INS 950) singly or in combination with aspartame-acesulfame salt (INS 962). If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as acesulfame potassium, should not exceed this level. ¹⁶
191	Not to exceed the maximum use level for aspartame (INS 951) singly or in combination with aspartame-acesulfame salt (INS 962).	Not to exceed the maximum use level for aspartame (INS 951) singly or in combination with aspartame-acesulfame salt (INS 962). If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as aspartame, should not exceed this level. ¹⁶
195	Singly or in combination: butylated hydroxyanisole (BHA, INS 320), butylated hydroxytoluene (BHT, INS 321) and tertiary butylhydroquinone (TBHQ, INS 319).	
196	Singly or in combination: butylated hydroxyanisole (BHA, INS 320), butylated hydroxytoluene (BHT, INS 321) and propyl gallate (INS 310).	
197	Singly or in combination: butylated hydroxytoluene (BHT, INS 321) and propyl gallate (INS 310).	
246	Singly or in combination: aluminium ammonium sulphate (INS 523) and sodium aluminium phosphates (acidic and basic; (INS 541(i),(ii)).	
259	Singly or in combination: sodium aluminosilicate (INS 554) and calcium aluminium silicate (INS 556).	

Group II: Notes which specify exceptions to the listed maximum use level		
Note Number	Current Note Description	Recommended Note Revision
9	10 000 mg/kg for use in ready-to-drink coffee products.	Except for use in ready-to-drink coffee products at 10,000 mg/kg.
60	If used as a carbonating agent, the CO ₂ in the finished wine shall not exceed 39.2 mg/kg.	Except for use if used as a carbonating agent: the CO ₂ in the finished wine shall not exceed 39.2 mg/kg.
67	Except for use in liquid egg whites at 8 800 mg/kg as phosphorus, and in liquid whole eggs at 14 700 mg/kg as phosphorus.	
78	50 000 mg/kg for pickling and balsamic vinegars only.	Except for use in 50 000 mg/kg for pickling and balsamic vinegars at 50 000 mg/kg only .
82	For use in shrimp; 6 000 mg/kg for Crangon crangon and Crangon vulgaris.	Except for use in shrimp; 6 000 mg/kg for (Crangon crangon and Crangon vulgaris) at 6 000 mg/kg..
103	Except for use in special white wines at 400 mg/kg.	

¹⁶ Revision as proposed in CX/FA 13/45/13 and FA 45/CRD 2, Appendix VIII

Group II: Notes which specify exceptions to the listed maximum use level		
Note Number	Current Note Description	Recommended Note Revision
104	Maximum 5 000 mg/kg residue in bread and yeast-leavened bakery products.	Except for use Maximum 5 000 mg/kg residue in bread and yeast-leavened bakery products: maximum 5 000 mg/kg residue.
105	Except for use in dried gourd strips (Kampyo) at 5 000 mg/kg.	
106	Except for use in Dijon mustard at 500 mg/kg.	
107	Except for use of sodium ferrocyanide (INS 535) and potassium ferrocyanide (INS 536) in food-grade dendridic salt at 29 mg/kg as anhydrous sodium ferrocyanide.	
111	Excluding dried glucose syrup used in the manufacture of sugar confectionery at 150 mg/kg and glucose syrup used in the manufacture of sugar confectionery at 400 mg/kg.	Except for use in Excluding dried glucose syrup used in the manufacture of sugar confectionery at 150 mg/kg and glucose syrup used in the manufacture of sugar confectionery at 400 mg/kg.
117	Except for use in loganiza (fresh, uncured sausage) at 1 000 mg/kg.	
118	Except for use in tocino (fresh, cured sausage) at 1 000 mg/kg.	
120	Except for use in caviar at 2 500 mg/kg.	
121	Excluding fermented fish products at 1 000 mg/kg.	Except for use in Excluding fermented fish products at 1 000 mg/kg.
123	1 000 mg/kg for beverages with pH greater than 3.5.	Except for use in 1 000 mg/kg for beverages with pH greater than 3.5. at 1 000 mg/kg.
132	Except for use at 130 mg/kg (dried basis) in semi-frozen beverages.	Except for use at 130 mg/kg (dried basis) in semi-frozen beverages at 130 mg/kg on a dried basis.
134	Except for use in cereal-based puddings at 500 mg/kg.	
135	Except for use in dried apricots at 2000 mg/kg, bleached raisins at 1500 mg/kg, desiccated coconut at 200 mg/kg and coconut from which oil has been partially extracted at 50 mg/kg.	
137	Except for use in frozen avocado at 300 mg/kg.	
140	Except for use in canned abalone (PAUA) at 1 000 mg/kg.	
146	Use level for beta-carotene (synthetic) (INS 160ai); 35 mg/kg for beta-apo-8'-carotenal (INS 160e) and beta-apo-8'-carotenoic acid, methyl or ethyl ester (INS 160f).	<u>Split into 2 notes: Note 146: "beta-carotene (synthetic) (INS 160ai) only." New Note "Except for use of beta-apo-8'-carotenal (INS 160e) and beta-apo-8'-carotenoic acid, methyl or ethyl ester (INS 160f) at 35 mg/kg."</u>
148	For use in microsweets and breath freshening mints at 10 000 mg/kg	Except for use in microsweets and breath freshening mints at 10 000 mg/kg
149	Except for use in fish roe at 100 mg/kg.	
150	Use level for soy-based formula; 25 000 mg/kg for hydrolyzed protein and/or amino acid-based formula.	<u>Split into 2 notes: Note 150: "For use in soy-based formula only." New Note: "Except for use in hydrolyzed protein and/or amino acid-based formula at 25 000 mg/kg."</u>
151	Use level for soy-based formula; 1 000 mg/kg for hydrolyzed protein and/or amino acid-based formula.	<u>Split into 2 notes: Note 150: "For use in soy-based formula." Note 151: "Except for use in hydrolyzed protein and/or amino acid-based formula at 1 000 mg/kg."</u>
156	For use in microsweets and breath freshening mints at 2 500 mg/kg.	Except for use in microsweets and breath freshening mints at 2 500 mg/kg.

Group II: Notes which specify exceptions to the listed maximum use level		
Note Number	Current Note Description	Recommended Note Revision
157	For use in microsweets and breath freshening mints at 2 000 mg/kg.	Except for use in microsweets and breath freshening mints at 2 000 mg/kg.
158	For use in microsweets and breath freshening mints at 1 000 mg/kg.	Except for use in microsweets and breath freshening mints at 1 000 mg/kg.
163	For use in microsweets and breath freshening mints at 3 000 mg/kg.	Except for use in microsweets and breath freshening mints at 3 000 mg/kg.
164	For use in microsweets and breath freshening mints at 30 000 mg/kg.	Except for use in microsweets and breath freshening mints at 30 000 mg/kg.
172	Except for use in fruit sauces, fruit toppings, coconut cream, coconut milk and "fruit bars" at 50 mg/kg.	
175	Except for use in jelly-type fruit-based desserts at 200 mg/kg.	
190	Except for use in fermented milk drinks at 500 mg/kg.	
198	Use level for solid products (e.g., energy, meal replacement or fortified bars); 600 mg/kg as steviol equivalents for use in liquid products.	Split into 2 Notes: Note 198: " For use in solid products (e.g., energy, meal replacement or fortified bars) only. " <u>New Note:</u> " Except for use in liquid products at 600 mg/kg as steviol equivalents."
199	For use in microsweets and breath freshening mints at 6000 mg/kg as steviol equivalents.	Except for use in microsweets and breath freshening mints at 6 000 mg/kg as steviol equivalents.
200	Except for use in Japanese style 'lachs ham' of pork loin (cured and non-heat-treated) at 120 mg/kg as steviol equivalents	
204	For use at 50 mg/kg in longan and lichee only.	Except for use at 50 mg/kg in longan and lichee only at 50 mg/kg.
205	For use at 50 mg/kg to prevent browning of certain light colored vegetables.	Except for use at 50 mg/kg to prevent browning of certain light colored vegetables at 50 mg/kg.
206	For use at 30 mg/kg as a bleaching agent only for products conforming to the Standard for Aqueous Coconut Products (CODEX STAN 240-2003).	Except for use at 30 mg/kg as a bleaching agent only for in products conforming to the Standard for Aqueous Coconut Products (CODEX STAN 240-2003) at 30 mg/kg.
207	For use at 50,000 mg/kg in soybean sauce intended for further processing.	Except for use at 50,000 mg/kg in soybean sauce intended for further processing at 50,000 mg/kg.
212	Except for products conforming to the Standard for Bouillon and Consommés (CODEX STAN 117-1981) at 3000 mg/kg.	Except for use in products conforming to the Standard for Bouillon and Consommés (CODEX STAN 117-1981) at 3000 mg/kg.
217	For use at 300 mg/kg in toppings only.	Except for use at 300 mg/kg in toppings only at 300 mg/kg.
219	Except for use at 5,000 mg/kg in non-alcoholic aniseed-based, coconut-based, and almond-based drinks.	Except for use at 5,000 mg/kg in non-alcoholic aniseed-based, coconut-based, and almond-based drinks at 5 000 mg/kg.
223	Except for use at 3,000 mg/kg in products containing added fruits, vegetables, or meats.	Except for use at 3,000 mg/kg in products containing added fruits, vegetables, or meats at 3,000 mg/kg.
225	Except for use in self-raising flour at 12,000 mg/kg.	
226	Except for use as a meat tenderizer at 35,000 mg/kg.	
228	Except for use at 1,320 mg/kg to stabilize higher protein liquid whey used for further processing into whey protein concentrates.	Except for use at 1,320 mg/kg to stabilize higher protein liquid whey used for further processing into whey protein concentrates at 1,320 mg/kg.

Group II: Notes which specify exceptions to the listed maximum use level		
Note Number	Current Note Description	Recommended Note Revision
238	GMP in foods corresponding to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981).	Except for use in products GMP in foods corresponding to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981) at GMP.
245	For use in pickled vegetables, except for use in perilla in brine at 780 mg/kg.	<u>Split into 2 Notes: Note 245</u> "For use in pickled vegetables only " and <u>New Note:</u> "Except for use in perilla in brine at 780 mg/kg."
255	For use at 1,700 mg/kg in seasonings applied to foods in food category 15.1.	Except for use at 1,700 mg/kg in seasonings applied to foods in food category 15.1 at 1 700 mg/kg
263	20,000 mg/kg in pickled fungi.	Except for use 20,000 mg/kg in pickled fungi at 20 000 mg/kg.
264	Citric acid (INS 330) and Lactic acid (INS 270) 5,000 mg/kg singly or in combination in sterilized fungi.	Except for use in sterilized fungi at 5,000 mg/kg: citric acid (INS 330) and lactic acid (INS 270), 5,000 mg/kg singly or in combination in sterilized fungi.

Group III: Notes which limit the permitted use of food additives		
Subgroup a - Notes that limit the permitted use of the food additive to specific food products within a particular food category		
Note Number	Current Note Description	Recommended Note Revision
7	For coffee substitutes only.	For use in coffee substitutes only.
14	For use in hydrolyzed protein liquid formula only.	
16	For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.	For use in glaze, coatings or decorations for fruit, vegetables, meat or fish only.
19	Used in cocoa fat; use level on ready-to-eat basis.	<u>Split into two notes: Note 19</u> For use in cocoa fat only. " and <u>Note 72:</u> " On the ready-to-eat basis."
22	For use in smoked fish products only.	
35	For use in cloudy juices only.	
39	Only when product contains butter or other fats and oils.	For use in Only when products containing butter or other fats and oils only.
41	Use in breading or batter coatings only.	
48	For olives only.	For use in olives only.
49	For use on citrus fruits only.	
50	For use in fish roe only.	
51	For use in herbs only.	
53	For use in coatings only.	
54	For use in cocktail cherries and candied cherries only.	
61	For use in minced fish only.	
64	Level added to dry beans; 200 mg/kg in ready-to-eat food, anhydrous basis.	<u>Split into two notes: Note 64:</u> " For use in dry beans only. " <u>New Note:</u> " The level in the ready-to-eat food shall not exceed 200 mg/kg on the anhydrous basis. "
68	For use in products with no added sugar only.	
75	Use in milk powder for vending machines only.	For use in milk powder for vending machines only.
76	Use in potatoes only.	For use in potatoes only.

Group III: Notes which limit the permitted use of food additives		
Subgroup a - Notes that limit the permitted use of the food additive to specific food products within a particular food category		
Note Number	Current Note Description	Recommended Note Revision
77	For special nutritional uses only.	
79	For use on nuts only.	
86	Use in whipped dessert toppings other than cream only.	For use in whipped dessert toppings other than cream only.
89	For sandwich spreads only.	For use in sandwich spreads only.
90	For use in milk-sucrose mixtures used in the finished product.	For use in milk-sucrose mixtures used in the finished product only .
94	For use in loganiza (fresh, uncured sausage) only.	
95	For use in surimi and fish roe products only.	
99	For use in fish fillets and minced fish only.	
100	Only for crystalline products and sugar toppings.	For use in Only for crystalline products and sugar toppings only .
102	For use in fat emulsions for baking purposes only.	
108	For use on coffee beans only.	
110	For use in frozen French fried potatoes only.	
112	For use in grated cheese only.	
115	For use in pineapple juice only.	
116	For use in doughs only.	
124	Only for products containing less than 7% ethanol.	For use in Only for products containing less than 7% ethanol only .
125	For use as a release agent for baking pans in a mixture with vegetable oil.	For use in a mixture with vegetable oil only , as a release agent for baking pans in a mixture with vegetable oil .
138	For use in energy-reduced products only.	
139	For use in mollusks, crustaceans, and echinoderms only.	
141	For use in white chocolate only.	
143	For use in fruit juice-based drinks and dry ginger ale only.	
144	For use in sweet and sour products only.	
145	Products are energy reduced or with no added sugar.	For use in Products are energy reduced or with no added sugar products only .
153	For use in instant noodles only.	
154	For use in coconut milk only.	
155	For use in frozen, sliced apples only.	
159	For use in pancake syrup and maple syrup only.	
160	For use in ready-to-drink products and pre-mixes for ready-to-drink products only.	
162	For use in dehydrated products and salami-type products only.	

Group III: Notes which limit the permitted use of food additives		
Subgroup a - Notes that limit the permitted use of the food additive to specific food products within a particular food category		
Note Number	Current Note Description	Recommended Note Revision
165	For use in products for special nutritional use only.	
166	For milk-based sandwich spreads only.	For use in milk-based sandwich spreads only.
167	For dehydrated products only.	For use in dehydrated products only.
169	For use in fat-based sandwich spreads only.	
176	For use in canned liquid coffee only.	
177	For use in sliced, cut, shredded, or grated cheese only.	
184	For use in nutrient coated rice grain premixes only.	
186	For use in flours with additives only.	
192	For liquid products only.	
193	For use in crustacean and fish pastes only.	
201	For use in flavoured products only.	
202	For use in brine used in the production of sausage only.	
203	For use in chewable supplements only.	
208	For use in dried and dehydrated products only.	
210	For use in pasta made from Triticum aestivum, and for use in noodles.	For use in pasta made from Triticum aestivum, and for use in noodles only .
211	For use in noodles only.	
213	For use in liquid products containing high intensity sweeteners only.	
216	For use in maize-based products only.	
220	For use in flavoured products heat treated after fermentation only.	
221	For use in potato dough and pre-fried potato slices only.	
222	For use in collagen-based casings with a water activity greater than 0.6 only.	
227	For use in sterilized and UHT treated milks only.	
231	Only for use in flavoured fermented milks and flavoured fermented milks heat treated after fermentation.	Only For use in flavoured fermented milks and flavoured fermented milks heat treated after fermentation only .
235	Use restricted to reconstitution and recombination only.	For use restricted to in reconstituted and recombined products only .
244	For use in biscuit dough.	For use in biscuit dough only .
247	For use in kuzukiri and harusame only.	
250	For use in boiled mollusks and tsukudani only.	
251	For use in processed American cheese only.	
252	For use in self-rising flour and self-rising corn meal only.	

Group III: Notes which limit the permitted use of food additives		
Subgroup a - Notes that limit the permitted use of the food additive to specific food products within a particular food category		
Note Number	Current Note Description	Recommended Note Revision
253	For use in dry mix hot chocolate only.	
254	For use in salt applied to dry salted cheeses during manufacturing only.	
256	For use in noodles, gluten-free pasta and pasta intended for hypoproteic diets only.	
257	For use in shrimps and prawns only.	
260	For use in powdered beverage whiteners only.	
261	For use in heat-treated buttermilk only.	
262	For use in edible fungi and fungus products.	For use in edible fungi and fungus products only .
265	For use in quick frozen French fried potatoes as a sequestrant.	For use in quick frozen French fried potatoes only , as a sequestrant.

Group III: Notes which limit the permitted use of food additives		
Subgroup b - Notes that limit the permitted use of the food additive to specific standardized food products		
Note Number	Current Note Description	Recommended Note Revision
183	Products conforming to the Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981) may only use colours for surface decoration.	
194	Only for use in instant noodles conforming to the Standard for Instant Noodles (CODEX STAN 249-2006).	Only For use in instant noodles conforming to the Standard for Instant Noodles (CODEX STAN 249-2006) only .
232	Only for use in vegetable fats conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981), singly or in combination.	"For use in vegetable fats conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981), singly or in combination only ." ¹⁷
243	For use as a raising agent in products conforming to the Standard for Processed Cereal-based Foods for Infants and Young Children (CODEX STAN 74-1981) and as an acidity regulator in products conforming to the Standard for Canned Baby Foods (CODEX STAN 73-1981).	Split into 2 Note. Note 243: "For use as a raising agent in products conforming to the Standard for Processed Cereal-based Foods for Infants and Young Children (CODEX STAN 74-1981) only, as a raising agent." <u>And New Note: "For use as an acidity regulator in products conforming to the Standard for Canned Baby Foods (CODEX STAN 73-1981) only, as an acidity regulator."</u>

Group III: Notes which limit the permitted use of food additives		
Subgroup c - Notes that limit the permitted use of the food additive to a specific technological function or use		
Note Number	Current Note Description	Recommended Note Revision
3	Surface treatment.	For use in surface treatment only.
4	For decoration, stamping, marking or branding the product.	For use in decoration, stamping, marking or branding the product only .

¹⁷ Note 232 is only attached to the provision for Carotenoids (INS 160a(i),a(iii),e,f) in food category 02.1.2 (Vegetable oils and fats). The "singly or in combination" requirement in CODEX STAN 19-1981 is for INS 160a(i), 160a(iii), 160e, and 160f. Since the provision covers the exact same food additives, there is no reason to include "singly or in combination" in Note 232.

Group III: Notes which limit the permitted use of food additives		
Subgroup c - Notes that limit the permitted use of the food additive to a specific technological function or use		
Note Number	Current Note Description	Recommended Note Revision
59	Use as packaging gas.	For use as a packaging gas only.
69	Use as carbonating agent.	For use as a carbonating agent only.
84	For infants over 1 year of age only.	
98	For dust control.	For use in dust control only.
129	For use as an acidity regulator in grape juice.	For use as an acidity regulator in grape juice only.
126	For releasing dough in dividing or baking only.	For use in releasing dough in dividing or baking only.
131	As a result of use as a flavour carrier.	For As a result of use as a flavour carrier only.
136	To prevent browning of certain light coloured vegetables.	For use to prevent browning of certain light coloured vegetables only.
152	For frying purposes only.	For use in frying only.
179	To restore the natural colour lost in processing only.	For use in restoring the natural colour lost in processing only.
229	For use as a flour treatment agent, raising agent or leavening agent.	For use as a flour treatment agent, raising agent or leavening agent only.
230	For use as an acidity regulator only.	
234	For use as stabilizer or thickener only.	For use as a stabilizer or thickener only.
241	For use as acidity regulator and raising agent.	For use as an acidity regulator and raising agent only.
242	For use as an antioxidant.	For use as an antioxidant only.
248	For use as a raising agent.	For use as a raising agent only.
249	For use as a raising agent in mixes for steamed breads and buns.	For use as a raising agent in mixes for steamed breads and buns only.

Group III: Notes which limit the permitted use of food additives		
Subgroup d - Notes that limit the permitted use of the food additive to a specific additive form or to a specific additive within a group ADI.		
Note Number	Current Note Description	Recommended Note Revision
40	INS 451(i) (Pentasodium triphosphate) only, to enhance the effectiveness of benzoates and sorbates.	Pentasodium triphosphate (INS 451(i)) (Pentasodium triphosphate) only, to enhance the effectiveness of benzoates and sorbates.
71	Calcium, potassium and sodium salts only.	
83	L(+)-form only.	
128	INS 334 (tartaric acid) only.	Tartaric acid (INS 334) (tartaric acid) only.
168	Quillaia extract type 1 (INS 999(i)) only. Acceptable maximum use level is expressed on saponin basis.	<u>Split into 2 Notes: Note 168: "Quillaia extract type 1 (INS 999(i)) only."</u> <u>and new Note: "On the saponin basis."</u>
187	Ascorbyl palmitate (INS 304) only.	

Group IV: Notes which exclude the use of the food additive in specific food products		
Subgroup a - Notes that exclude the use of the food additive in specific food products within a particular food category.		
Note Number	Current Note Description	Recommended Note Revision
52	Excluding chocolate milk.	
56	Provided starch is not present.	Excluding products where Provided starch is not present.
73	Except whole fish	Except Excluding whole fish.
74	Excluding liquid whey and whey products used as ingredients in infant formula.	
92	Excluding tomato-based sauces.	
93	Except natural wine produced from <i>Vitis vinifera</i> grapes.	Except Excluding natural wine produced from <i>Vitis vinifera</i> grapes.
114	Excluding cocoa powder.	
142	Excluding coffee and tea.	
147	Excluding whey powders for infant food.	
171	Excluding anhydrous milkfat.	
173	Excluding instant noodles containing vegetables and eggs.	
182	Except for use in coconut milk.	Except Excluding for use in coconut milk.
189	Excluding rolled oats.	
224	Excluding aromatized beer.	
258	Except for use in maple syrup.	Excluding Except for use in maple syrup.
266	Not for use in salted Atlantic herring and sprat.	Excluding Not for use in salted Atlantic herring and sprat.

Group IV: Notes which exclude the use of the food additive in specific food products		
Subgroup b - Notes that exclude the use of the food additive in specific standardized foods.¹⁸		
Note Number	Current Note Description	
5	Excluding products conforming to the Standard for Jams, Jellies and Marmalades (CODEX STAN 296-2009).	
170	Excluding products conforming to the Standard for Fermented Milks (CODEX STAN 243-2003).	
209	Excluding products conforming to the Standard for Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CODEX STAN 251-2006).	
214	Excluding products conforming to the Standard for Dairy Fat Spreads (CODEX STAN 253-2006).	
215	Excluding products conforming to the Standard for Fat Spreads and Blended Spreads (CODEX STAN 256-2007).	
236	Excluding products conforming to the Standard for Cream and Prepared Creams (reconstituted cream, recombined cream, prepackaged liquid cream) (CODEX STAN 288-1976).	
237	Excluding products conforming to the Standard for Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981).	
239	Excluding products conforming to the Standard for Canned Baby Foods (CODEX STAN 73-1981).	

¹⁸ All Notes belonging to this subgroup currently use the recommended standardized language. As such there are no proposals for revision for these Notes.

Group IV: Notes which exclude the use of the food additive in specific food products	
Subgroup b - Notes that exclude the use of the food additive in specific standardized foods.¹⁸	
Note Number	Current Note Description
267	Excluding products conforming to the Standard for Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes (CODEX STAN 167-1989), the Standard for Dried Shark Fins (CODEX STAN 189-1993), the Standard for Crackers from Marine and Freshwater Fish, Crustaceans and Molluscan Shellfish (CODEX STAN 222-2001), and the Standard for Boiled Dried Salted Anchovies (CODEX STAN 236-2003).

Group V: Notes that cannot be assigned to one of the above-mentioned Groups¹⁹	
Note Number	Current Note Description
28	ADI conversion: if a typical preparation contains 0.025 µg/U, then the ADI of 33 000 U/kg bw becomes: [(33 000 U/kg bw) x (0.025 µg/U) x (1 mg/1 000 µg)] = 0.825 mg/kg bw
80	Equivalent to 2 mg/dm ² surface application to a maximum depth of 5 mm.
81	Equivalent to 1 mg/dm ² surface application to a maximum depth of 5 mm.
109	Use level reported as 25 lbs/1 000 gal x (0.45 kg/lb) x (1 gal/3.75 L) x (1 L/kg) x (10E6 mg/kg) = 3 000 mg/kg
122	Subject to national legislation of the importing country.
161	Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.
218	Only sulfites can be used as preservatives and antioxidants in the products covered by the Standard for Desiccated Coconut (CODEX STAN 177-1991).
301	Interim maximum level.

¹⁹ There are no proposals for revision for these Notes.