

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4a

CX/FA 21/52/5 Add.2

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-second Session

ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS

Replies to CL 2021/23-FA of Chile, Colombia, Dominican Republic, Ecuador, European Union, Indonesia, Japan, Peru, United States of America and IFU

Chile

In view of the complexity of the food additives provisions submitted by CCPFV as well as their close relationship with the alignment work, it is proposed to refer this matter for consideration by the EWG on alignment established by CCFA52.

In order to facilitate the discussion of the virtual Working Group meeting on Endorsement, Codex Members and Observers are invited to provide their comments on the above proposal (see para. 4) and other provisions submitted by various committees as contained in CX/FA 21/52/5.

(i) General comments

Chile appreciates the work carried out by the electronic working group, in general it has no comments on the document.

(ii) Specific comments

For the chili sauce standard, Chile supports the comments only if the corresponding restrictive notes are incorporated or this standard is worked on EWG alignment.

Colombia

Los cambios propuestos se indican con adiciones en **texto subrayado y en negrita** o con supresiones en ~~texto tachado~~.

APARTES	PROPUESTA DE POSICIÓN	OBSERVACIONES O COMENTARIOS	CATEGORÍA DE COMENTARIO ¹			
			E	S	TE	TR
2. DESCRIPCIÓN 2.1 Definición del producto: - Norma regional para los productos a base de yuca fermentada cocinada. - Anteproyecto de norma regional para el zumo (jugo) de noni fermentado. - Anteproyecto de norma regional para los productos a base de kava que	2. DESCRIPCIÓN 2.1 Definición del producto: N.A.	GENERALES Una vez revisado el documento en sesión del subcomité del Codex Alimentarius sobre Aditivos Alimentarios, llevada a cabo el 30 de abril de				

¹ - "Editorial" (Editorial): Este tipo de comentario aclara o simplifica el texto sin cambiar el significado. Incluye correcciones ortográficas o gramaticales, sugerencias de palabras diferentes pero equivalentes y la simplificación de la estructura de la frase.

- "Substantive" (Sustancial): Este tipo de comentario tiene en cuenta cambios conceptuales y la adición de nuevos aspectos o ideas. Incluye adiciones o ampliaciones así como cambios, reorganización del texto o eliminaciones que dan lugar a la alteración del contenido de una frase, párrafo o sección del proyecto de documento.

- "Technical" (Técnico): Este tipo de comentario tiene en cuenta correcciones científicas y ajustes técnicos. Su objetivo es aclarar y mejorar en mayor medida la norma y, en ocasiones, ajustarla a otras normas desde el punto de vista técnico.

- "Translation" (Traducción): Este tipo de comentario corrige puntos cuya traducción a otra versión lingüística del texto se considera inexacta.

APARTES	PROPUESTA DE POSICIÓN	OBSERVACIONES O COMENTARIOS	CATEGORÍA DE COMENTARIO			
			E	S	TE	TR
<p>pueden utilizarse como bebida si se mezclan con agua.</p> <ul style="list-style-type: none"> - Norma regional para la mezcla zaatar. - Anteproyecto de directrices para los alimentos terapéuticos listos para el consumo. - Norma para el gochujang. - Norma para la salsa de ají (chiles). - Norma para la salsa picante de mango. - Norma general para las frutas desecadas. 		2021, en modalidad virtual de la plataforma Teams, se informa que no hay comentarios por parte de Colombia para las normas y anteproyectos de norma enunciados.				

Dominican Republic

República Dominicana, agradece la oportunidad de presentar observaciones a la CL2021/23 FA:

Observaciones específicas :

República Dominicana apoya la ratificación de los niveles máximos de aditivos alimentarios propuestos en las normas aprobadas por la 29ª.-Reunión del Comité del Codex sobre Frutas y Hortalizas Elaboradas (CCPFV29) (Que trabajó por correspondencia), contenidas en el documento CX/FA 21/52/5.

- Norma para el gochujang (conversión de la Norma regional para el gochujang [CXS 294R-2009], aprobada por la CAC, en su 43.º período de sesiones, en el trámite 5/8.
- Norma para la salsa de ají (chiles) (conversión de la Norma regional para la salsa de ají (chiles) [CXS 306R-2011], aprobada por la CAC, en su 43.º período de sesiones, en el trámite 5/8.
- Revisión de la Norma para la salsa picante de mango (CXS 160-1987) (aprobada por la CAC, en su 43.º período de sesiones, en el trámite 5/8.
- Norma general para las frutas desecadas (aprobada por la CAC, en su 43.º período de sesiones, en el trámite 5/8.
 - ANEXO A: ALBARICOQUE DESECADO
 - ANEXO B: DÁTILES
 - ANEXO C: UVAS PASAS
 - ANEXO D: LONGÁN DESECADO
 - ANEXO E: CAQUI DESECADO
- Norma general para las frutas mixtas en conserva (aprobada por la CAC, en su 43.º período de sesiones, en el trámite 5/8.
- NORMA GENERAL PARA MEZCLAS DE FRUTAS EN CONSERVA (aprobada por la CAC, en su 43.º período de sesiones, en el trámite 5/8)

Ecuador

El documento CX/FA21/52/5, que se menciona sobre niveles máximos de aditivos alimentarios en normas del CODEX para productos tales como: a base de yuca fermentada cocinada, zumo (jugo) de NONI fermentado, productos a base de kava, Norma regional para la mezcla ZAATAR y Anteproyecto de directrices para los alimentos terapéuticos listos para el consumo. Como país no tenemos observaciones ni comentarios. Por otro lado para el tema de frutas y hortalizas, sobre la Norma regional para el GOCHUJANG, no tenemos observaciones ni comentarios ya que en nuestro país no tenemos ese tipo de producto. En cuanto a Norma para la salsa de ají, Norma para la salsa picante de mango, Norma general para las frutas desecadas y Norma general para las frutas mixtas en conserva, como país sobre el etiquetado no tenemos observaciones y estaremos atentos a los resultados que se tenga en próxima reunión.

European Union

The European Union and its Member States (EUMS) would like to provide the following comments:

CX/FA 21/52/5

Suggestion to refer the provisions submitted by CCPFV for consideration by the EWG on alignment (see CL 2021/23-FA, para 4)

The EUMS take note that Annex I to CX/FA 21/52/5 includes several CCPFV standards for which the general reference to the GSFA is proposed, while the provisions currently contained in those standards have not been aligned with the GSFA. The provisions in the commodity standards, which differ from the adopted GSFA provisions (i.e. either are not present in the GSFA or are present but at different MLs), are outlined in Annexes II, III and IV to CX/FA 21/52/5 and it is suggested that CCFA considers those provisions and makes corresponding changes to the GSFA.

The EUMS note that the usual sequence of the steps is to first align the commodity standards with the GSFA and then to replace the lists of individual food additive provisions with the general references to the GSFA. The EUMS observe that Notes 13, 15 and 17 in CX/FA 21/52/5 lay down the following: “*The general reference to the General Standard for Food Additives (CXS 192-1995) is applicable only if CCFA has agreed to the proposal presented in annex...(II, III and IV).*”.

The EUMS could support that the inconsistencies between the provisions in the CCPFV standards and the GSFA are addressed by the CCFA EWG on alignment. However, the alignment will not be done before CCFA53². Therefore, it seems appropriate that the new food additive sections of the CCPFV standards, as outlined in CX/FA 21/52/5, are endorsed only at the same CCFA session where the corresponding amendments to the GSFA are discussed. Otherwise, until the alignment is completed, the food additive provisions currently laid down in the CCPFV standards, which are not captured in the GSFA, would disappear from the adopted Codex texts.

CX/FA 21/52/5 Add.1

DRAFT STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBS — DRIED OR DEHYDRATED GINGER

The EUMS take note of the information provided by CCSCH as regards the use of INS 529 calcium oxide and INS 220 sulfur dioxide in dried and dehydrated ginger in para 63, REP21/SCH:

“*Calcium oxide and sulfur dioxide were used as “processing aids” in dried and dehydrated ginger for bleaching purposes, and taking into account the explanation by the Codex Secretariat that in the PM, processing aids were listed under food additives, and thus decided to transfer the substances to Section 4 Food Additives from Annex I;*”.

Whilst in para 36 of REP19/SCH CCSCH clarified that calcium oxide and sulfur dioxide are used as bleaching agents, no further clarification on the rationale why those substances should be considered processing aids is provided in REP21/SCH.

The EUMS note that a ‘bleaching agent’ is one of the recognised functional classes of food additives in Codex defined as “*a food additive (non-flour use) used to decolourize food. Bleaching agents do not include pigments.*”³. There is an adopted food additive provision for sulfites in the corresponding GSFA food category - FC 12.2.1 ‘Herbs and spices’. The GSFA Maximum Level is 150 mg/kg, i.e. the same level, which is reported by CCSCH for sulfur dioxide used as a bleaching agent in dried or dehydrated ginger. In addition, several Codex commodity standards recognise the food additive use of bleaching agents (e.g. CXS 145-1985, 240-2003).

In the EU, the use of sulfur dioxide-sulfites (INS 220-228) in herbs and spices is allowed for cinnamon only.

The EUMS are of the view that these two food additive uses should not be classified as processing aids.

Indonesia

Indonesia would like to provide the following comments:

- Indonesia supports the endorsement of the food additive provisions forwarded by the Committee as mentioned in Annex I.
- Indonesia supports the proposed maximum level of food additives under section 4 of the *standard for chili cause* and *revised standard for mango cutney* as mentioned in Annex III and IV.

PROPOSALS TO CCFA RELATING TO THE FOOD ADDITIVE PROVISIONS UNDER SECTION 4 OF THE STANDARD FOR CHILI SAUCE

Acidity regulators

INS No.	Food Additive	Maximum level	Indonesia Comment
{452(i)}	Sodium polyphosphate	1000 mg/kg (as phosphorus)}	Supports the ML of 1000 mg/kg (as phosphorus)

² CL 2021/23-FA para 4 proposes to refer this matter for consideration by the EWG on alignment established by CCFA52.

³ CXG 36-1989

Antioxidants

INS No.	Food Additive	Maximum level	Indonesia Comment
{320	Butylated hydroxyanisole	100 mg/kg}	Supports the ML of 100 mg/kg

Colours

INS No.	Food Additive	Maximum level	Indonesia Comment
[100(i)	Curcumin	GMP]	Supports the ML of GMP
[102	Tartrazine	100 mg/kg]	Supports the ML of 100 mg/kg
{141(i)	Chlorophylls, copper complexes	30 mg/kg (as Cu)}	Supports the ML of 30 mg/kg (as Cu)
{150c	Caramel III – ammonia process	1500 mg/kg}	Supports the ML of 1500 mg/kg
{150d	Caramel IV – sulphite ammonia process	1500 mg/kg}	Supports the ML of 1500 mg/kg
[155	Brown HT	50 mg/kg]	Supports the ML of 50 mg/kg
[160b(i)	Annatto extracts, bixin based	10 mg/kg]	Supports the ML of 10 mg/kg
{160d(i)} ²⁴	Lycopene (synthetic)	390 mg/kg}	

Sweeteners

INS No.	Food Additive	Maximum level	Indonesia Comment
{954(i)	Saccharin	150 mg/kg(singly or in combination)}	Supports the ML of 150 mg/kg(singly or in combination)
{954(ii)	Calcium saccharin		
{954(iii)	Potassium saccharin		
{954(iv)	Sodium saccharin		

PROPOSALS TO CCFA RELATING TO THE FOOD ADDITIVE PROVISIONS UNDER SECTION 4 OF REVISED STANDARD FOR MANGO CHUTNEY

3.2 Preservatives

INS No.	Additives Name	Maximum Level	Indonesia Comment
233	[3.2.1 Sodium metabisulphite	100 mg/kg singly or in any combination expressed as SO ₂]	Supports the ML of 100 mg/kg singly or in any combination expressed as SO ₂ . Indonesia proposes to replace the INS number from 233 to 223
224	[3.2.2 Potassium metabisulphite	100 mg/kg singly or in any combination expressed as SO ₂ .]	Supports the ML of 100 mg/kg singly or in any combination expressed as SO ₂ .
211	{3.2.3 Sodium benzoate	250 mg/kg singly or in any combination expressed as the acid}	Supports the ML of 250 mg/kg singly or in any combination expressed as the acid

Japan

Japan appreciates the Codex secretariat for the opportunity to submit comment on endorsement and/or revision of maximum levels for food additives and processing aids in codex standards. Japan would like to submit the following comments.

(I) General comments

Japan generally supports the food additive provisions forwarded by the committees except for the following specific comments. Regarding a general reference to the corresponding sections of the GSFA, food additive functional class should be listed in alphabetical order for ensuring consistency with other commodity standards,

(II) Specific comments

Japan proposes following amendments to the food additive section of the commodity standards. New text should read as follows: insertion is in **bold and underlined**, and deletion is in ~~strikethrough~~.

1. Page. 7 Proposed draft standard for Gochujang

4. Food additives

4.1 ~~Acidity regulators, antioxidants, Preservatives,~~ flavor enhancers, ~~preservatives antioxidant, acidity regulators~~ and stabilizers used in accordance with Tables 1 and 2 of the General Standard of Food Additives (CXS 192-1995) in food category 04.2.2.7 (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3) or listed in Table 3 of the *General Standard for Food Additives* are acceptable for use in foods conforming to this standard.

(Rationale)

- The use of additives listed in Table 3 is governed by Tables 1 and 2 since food category 04.2.2.7 is listed in the Annex to Table 3. If the intent of CCPFV is that all Table 3 food additives which have above functional classes are permitted in foods covered by proposed draft standard for Gochujang, those food additive provisions should be added to Table 1 and 2.
- Food category name should be fully described.
- For ensuring consistency with other commodity standards, food additive functions should be listed in alphabetical order.

2. Page. 8 Proposed draft standard for Chili sauce

4. Food additives

4.1 Acidity regulators, antioxidants, colours, emulsifiers, flavour enhancers, preservatives, sweeteners, ~~emulsifier,~~ stabilizer and thickeners used in accordance with Tables 1 and 2 of the General Standard of Food Additives (CXS 192-1995) in food category 12.6.2 (Nonemulsified sauces e.g. ketchup, cheese sauce, cream sauce, brown gravy) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.

(Rationale)

- For ensuring consistency with other commodity standards, food additive functions should be listed in alphabetical order.

3. Page. 8 Proposed draft revisions to the standard for Mango chutney (CXS 160-1987)

4. Food additives

4.1 Acidity regulators, ~~antioxidants,~~ antifoaming agents, antioxidants, colours, firming agents, preservatives and thickeners ~~thickening agents~~ used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 04.1.2.6 (Fruit-based spreads (e.g. chutney) excluding products of food category 04.1.2.5) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.

(Rationale)

- Not “thickening agents” but “thickeners” is listed as one of the food additive functional classes in CXG 36-1989.
- For ensuring consistency with other commodity standards, food additive functions should be listed in alphabetical order.

4. Page. 9 Proposed draft standard for dried fruits

4. Food additives

4.1 Acidity regulators, antioxidants, colours¹⁹ glazing agents, preservatives²⁰, sequestrants and sweeteners¹⁹, and sequestrants used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 04.1.2.2 (Dried fruit) and food category 04.1.2.7 (Candied fruit)²¹ or listed in Table 3 of the *General Standard for Food Additives* are acceptable for use in foods conforming to this Standard.

(Rationale)

- For ensuring consistency with other commodity standards, food additive functions should be listed in alphabetical order.

5. Page. 9 Annex A: Dried Apricots

3. Food additives

3.1 ~~Only p~~ **P**reservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 04.1.2.2 (Dried fruit) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to Annex A of this Standard.

(Rationale)

- For ensuring consistency with general reference in other commodity standards, “only” is not necessary.

6. Page.9 Annex B: Dates

Japan requests clarification of food additives with humectant function since no additives listed in Tables 1 and 2 of the GSFA in food category 04.1.2.2 have technological function of humectants in CXG 36-1989.

3. Food additives

3.1 ~~Only h~~ **H**umectants used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 04.1.2.2 (Dried fruit) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to Annex B of this Standard.

(Rationale)

- For ensuring consistency with general reference in other commodity standards, “only” is not necessary.

7. Page.9 Annex C: Raisins

Japan requests clarification of food additives with humectant function since no additives listed in Tables 1 and 2 of the GSFA in food category 04.1.2.2 have technological function of humectants in CXG 36-1989.

3.2 Sulphur dioxide (INS 220)

The intent of the CCPFV is that only INS 220(except for INS 221-225, 539) is permitted in raisins covered by the proposed draft standard for dried fruits. Note 135* may cover the use of INS 220 in bleached raisins. However, Note 135 does not restrict the use of sulfites except for INS 220. Revision of the food additive provision for INS 220 is necessary to consider the intent of CCPFV. Therefore Japan proposes addition of following table instead of general reference about Sulphur dioxide.

BLEACHING AGENTS

<u>INS No.</u>	<u>Name of food additives</u>	<u>Maximum level</u>
220	Sulphur dioxide	1500 mg/kg

*Note 135 Except for use in dried apricots at 2 000 mg/kg, bleached raisins at 1 500 mg/kg, desiccated coconut at 200 mg/kg and coconut from which oil has been partially extracted at 50 mg/kg.

8. Page.10 Annex D: Dried Longans

3. Food additives

3.2 “Dried longan flesh” and “Freeze dried longan stuffed with fruit paste”

~~Only p~~ **P**reservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 04.1.2.2 (Dried fruit) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in “dried longan flesh” and “Freeze dried longan stuffed with fruit paste” conforming to Annex D of this Standard..

Page.10 Annex E: Dried Persimmons

3. Food additives

~~Only p~~ **P**reservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 04.1.2.2 (Dried fruit) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to Annex E of this Standard.

(Rationale)

- For ensuring consistency with general reference in other commodity standards, “only” is not necessary.

9. Page.12 Proposals to CCFA relating to the food additive provisions under section 4 of the proposed draft standard for chili sauce

INS 100(i) Curcumin

JECFA assigns a numerical ADI (0-3 mg/kg bw) to curcumin. Japan is of the view that numerical maximum level is appropriate for Curcumin.

Peru

NOMBRE DE LA NORMA CODEX EN CONSULTA: Norma Regional para los productos a base de yuca fermentada cocinada (aprobada por la CAC, en su 43° período de sesiones, en el trámite 8 sujeta a la ratificación de sus disposiciones relativas al etiquetado y los aditivos alimentarios)

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Posición/ propuesta de enmienda	Fundamento Técnico /Comentarios
1	REFERENCIA A SECCIÓN O PÁRRAFO Consideraciones para Aditivos Alimentarios señala que <u>no se permite el uso de aditivos en este producto.</u>	-----	COMENTARIO Tener en cuenta las disposiciones sobre aditivos alimentarios para la determinación vida útil del producto.

Nombre de la norma Codex en consulta: Anteproyecto de Norma Regional para el zumo (jugo) de noni fermentado (aprobado por la CAC, en su 43° período de sesiones, en el trámite 8 sujeta a la ratificación de sus disposiciones relativas al etiquetado y los aditivos alimentarios)

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Posición/propuesta de enmienda	Fundamento Técnico /Comentarios
2	REFERENCIA A SECCIÓN O PÁRRAFO Consideraciones de Aditivos Alimentarios <u>indica que no se permite el uso de aditivos</u>	-----	COMENTARIO Tener en cuenta las disposiciones sobre aditivos alimentarios para la determinación de la vida útil del producto.

Nombre de la norma Codex en consulta: Norma para el gochujang (conversión de la Norma regional para el gochujang aprobada por la CAC en su 43° período de sesiones, en el trámite 5/8 sujeta a la ratificación de sus disposiciones relativas al etiquetado y los aditivos alimentarios)

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Posición	Fundamento Técnico /Comentarios
1	REFERENCIA A SECCIÓN O PÁRRAFO: Consideraciones para Aditivos Alimentarios En la NGAA para la categoría 4.2.2.7 permite fosfatos con dosis máxima de 2200 mg/Kg expresados como Fósforo (Nota 33); sin embargo en la Norma para Gochujang señala como permitidos 6 tipos de fosfatos con un nivel máximo de hasta 5000 mg/kg como fósforo sólo o mezclado.	-----	COMENTARIO Se sugiere revisar en el grupo de trabajo electrónico para la armonización de los niveles máximos de aditivos en ambas normas.
2	La Norma para Gochujan incluye en las disposiciones de aditivos a la Goma Arábica - SIN 414, sin embargo la NGAA no la incluye para la categoría de alimentos 4.2.2.7.	Considerarse la inclusión de la Goma arábica Nivel máximo: límite fijado por las BPF.	La Goma arábica es un aditivo de la misma clase funcional que la Goma guar y Goma xantán, y considerando que la Norma Regional para el Gochujang si la contempla.

Nombre de la norma Codex en consulta: Norma para la salsa de ají (chiles) (conversión de la Norma regional para la salsa de ají (chiles), aprobada por la CAC en su 43° período de sesiones, en el trámite 5/8)

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Propuesta de apoyo	Fundamento Técnico /Comentarios
3	<p>REFERENCIA A SECCIÓN O PÁRRAFO</p> <p>La Norma para salsa de ají (chiles) incluye en sus disposiciones de aditivos a aditivos considerados en las disposiciones de la Norma Regional pero que no son considerados en la NGAA.</p> <p>En la Norma para ají para la categoría de alimentos 12.6.2 permite el aditivo SIN 473 y SIN 475 con niveles máximos de 5000 mg/Kg y 10000 mg/Kg respectivamente, mientras que en la NGAA las dosis máximas permitidas son 10000 mg/Kg y 5000 mg/Kg respectivamente.</p> <p>Respecto a los Edulcorantes la norma para la salsa de ají considera a la Sacarina al igual que la Norma regional, sin embargo el código SIN señalado no corresponde a sacarina.</p>	-----	<p>COMENTARIO</p> <p>Se sugiere revisar en el grupo de trabajo electrónico para la armonización de los niveles máximos de aditivos en ambas normas.</p>

Nombre de la norma Codex en consulta: Norma para la salsa picante de mango (CXS 160-1987) (aprobada por la CAC en su 43° período de sesiones, en el trámite 5/8)

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Propuesta de apoyo	Fundamento Técnico /Comentarios
	<p>REFERENCIA A SECCIÓN O PÁRRAFO</p> <p>Las disposiciones sobre aditivos alimentarios de la Norma consignan aditivos que no contempla la NGAA (ácido cítrico, ácido acético, metabisulfito de sodio y metabisulfito de potasio).</p>	-----	<p>COMENTARIO</p> <p>Se sugiere revisar en el grupo de trabajo electrónico a fin de armonizar los niveles máximos de aditivos de las normas.</p>
	<p>La norma para la salsa picante de mango permite el aditivo benzoato de sodio, de potasio, parahidroxibenzoato de metilo, etilo y propilo en cantidades de 250 mg/kg, mientras que en la NGAA para la categoría de alimentos 04.1.2.6 la dosis máxima permitida es 1000 mg/Kg para estos aditivos.</p>	-----	

Nombre de la norma Codex en consulta: Norma general para las frutas desecadas (aprobada por la CAC en su 43° período de sesiones, en el trámite 5/8)

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Propuesta de enmienda	Fundamento Técnico /Comentarios
1	<p>REFERENCIA A SECCIÓN O PÁRRAFO</p> <p>En la norma propuesta, para el Albaricocoque desecado, las consideraciones para Aditivos Alimentarios señalan sólo conservantes utilizados de acuerdo con los cuadros 1 y 2 de la NGAA en la categoría de alimentos 04.1.2.2. o que figuran en el Cuadro 3 de la NGAA, sin embargo el cuadro 3 de la NGAA no considera a esta categoría de alimentos.</p>	-----	<p>COMENTARIOS</p> <p>El cuadro 3 de la NGAA no tiene consideraciones para esta categoría de alimentos</p> <p>Se sugiere revisar en el grupo de trabajo electrónico a fin de armonizar los niveles máximos de aditivos de las normas.</p>

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Propuesta de enmienda	Fundamento Técnico /Comentarios
2	REFERENCIA A SECCIÓN O PÁRRAFO En la norma propuesta, para los Dátiles , las consideraciones para Aditivos Alimentarios señalan sólo humectantes utilizados de acuerdo con los cuadros 1 y 2 de la NGAA en la categoría de alimentos 04.1.2.2. o que figuran en el Cuadro 3 de la NGAA, sin embargo el cuadro 3 de la NGAA no considera a esta categoría de alimentos.	-----	COMENTARIOS El cuadro 3 de la NGAA no tiene consideraciones para esta categoría de alimentos. Se sugiere revisar en el grupo de trabajo electrónico a fin de armonizar los niveles máximos de aditivos de las normas.
3	REFERENCIA A SECCIÓN O PÁRRAFO En la norma propuesta, para las uvas pasas , las disposiciones para Aditivos Alimentarios señalan a humectantes utilizados de acuerdo con los cuadros 1 y 2 de la NGAA en la categoría de alimentos 04.1.2.2 o que figuran en el Cuadro 3 de la NGAA, sin embargo en la NGAA no considera humectantes para esta categoría de alimentos	-----	COMENTARIOS La NGAA no considera humectantes para esta categoría de alimentos Se sugiere revisar en el grupo de trabajo electrónico a fin de armonizar los niveles máximos de aditivos de las normas.
4	REFERENCIA A SECCIÓN O PÁRRAFO En la norma propuesta, para el longán desecado , las consideraciones para Aditivos Alimentarios señalan sólo conservantes utilizados de acuerdo con los cuadros 1 y 2 de la NGAA en la categoría de alimentos 04.1.2.2. o que figuran en el Cuadro 3 de la NGAA, sin embargo el cuadro 3 de la NGAA no considera a esta categoría de alimentos	-----	COMENTARIOS El cuadro 3 de la NGAA no tiene consideraciones para esta categoría de alimentos Se sugiere revisar en el grupo de trabajo electrónico a fin de armonizar los niveles máximos de aditivos de las normas.
5	REFERENCIA A SECCIÓN O PÁRRAFO En la norma propuesta, para el caqui desecado , las consideraciones para Aditivos Alimentarios señalan sólo conservantes utilizados de acuerdo con los cuadros 1 y 2 de la NGAA en la categoría de alimentos 04.1.2.2. o que figuran en el Cuadro 3 de la NGAA, sin embargo el cuadro 3 de la NGAA no considera a esta categoría de alimentos	-----	COMENTARIOS El cuadro 3 de la NGAA no tiene consideraciones para esta categoría de alimentos- Se sugiere revisar en el grupo de trabajo electrónico a fin de armonizar los niveles máximos de aditivos de las normas.

Nombre de la norma Codex en consulta: Norma general para frutas mixtas en conserva

N°	Observaciones Específicas (Referencia a la sección o párrafo)	Propuesta de enmienda	Fundamento Técnico /Comentarios
1	REFERENCIA A SECCIÓN O PÁRRAFO En la norma propuesta, para la mezcla de frutas en conserva , las consideraciones para Aditivos Alimentarios señalan que podrán emplearse reguladores de acidez, antioxidantes y agentes endurecedores conforme utilizados de conformidad con los cuadros 1 y 2 de la NGAA en la categoría de alimentos 04.1.2.4 o incluidos en el Cuadro 3 de la NGAA sin embargo la NGAA no considera agentes endurecedores para esta categoría de alimentos	-----	COMENTARIOS: Se sugiere revisar en el grupo de trabajo electrónico a fin de armonizar los niveles máximos de aditivos de las normas (producto NGAA)

United States of America

This responds to CL 2021/23-FA (April 2021): **Request for comments on endorsement and/or revision of maximum levels for food additives and processing aids in codex standards.** The United States appreciates the opportunity to provide the following comments for consideration at the forthcoming 52nd Session of the Codex Committee on Food Additives (CCFA).

General Comments

Comments pertaining to the Proposed Draft Guidelines for Ready to Use Therapeutic Foods (RUTF) (adopted by CAC43 at Step 5) from the 41st Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses

The United States supports endorsement of the table of food additives forwarded by CCNFSDU as listed in the guideline for RUTF. We note that the table in Annex 1 of CX/FA 21/52/5 pertaining to the RUTF guideline provides notes which makes comparison between the additives in the RUTF table and GSFA provisions in food category 13.3 (Dietetic foods intended for special medical purposes (excluding products of food category 13.1)). We understand that these notes are for information purposes only for CCFA for the purposes of endorsement and will not appear in the RUTF guideline. However, we wish to clarify that there has not been a definitive determination as to which food category RUTF would fall under in the GSFA. Before the RUTF guideline can be considered for alignment with the General Standard for Food Additives (GSFA), CCFA would need to determine the appropriate GSFA food category under which to include the RUTF guideline.

Comments pertaining to the five standards put forward for endorsement by the Codex Committee on Processed Fruits and Vegetables (CCPFV): Standard for gochujang (Conversion of Regional Standard for Gochujang (CXS 294R-2009), adopted by CAC43 at Step 5/8 subject to endorsement of its food labelling and food additive provisions); Standard for chili sauce (Conversion of Regional Standard for Chili Sauce (CXS 306R-2011), adopted by CAC43 at Step 5/8 subject to endorsement of its food labelling and food additive provisions); Revision to the Standard for Mango Chutney (CXS 160-1987) (adopted by CAC43 at Step 5/8 subject to endorsement of its food labelling and food additive provisions); General standard for dried fruits (adopted by CAC43 at Step 5/8 subject to endorsement of its food labelling and food additive provisions); and General standard for canned mixed fruits (adopted by CAC43 at Step 5/8 subject to endorsement of its food labelling and food additive provisions)

The United States supports the endorsement of the food additives provisions submitted to CCFA for the standards from CCPFV.

However, the United States objects to the proposal included in CL 2021/23-FA (Request for comments on endorsement and/or revision of maximum levels for food additives and processing aids in codex standards) pertaining to the endorsement of the food additive provisions in the five standards submitted by CCPFV:

In view of the complexity of the food additives provisions submitted by CCPFV as well as their close relationship with the alignment work, it is proposed to refer this matter for consideration by the EWG on alignment established by CCFA52.

The United States objects to this proposal as it does not conform with historical CCFA procedures on endorsement and does not recognize that endorsement and alignment are two separate exercises with separate considerations.

Historically, requests for endorsement of food additive and processing aid provisions of Codex Commodity standards are sent to the physical working group on endorsement and alignment at the same CCFA session as when the requests are received by CCFA. To our knowledge requests for endorsement have never been sent to the electronic working group (EWG) on alignment, which deals solely with alignment topics and not with endorsement.

Endorsement and alignment are two separate exercises with separate considerations. Endorsement ensures that provisions listed in Commodity Standards do not conflict with the principles and structure of the GSFA (*i.e.*, that there are no safety concerns for the use of the additive, the provision does not refer to an incorrect food category within the GSFA, etc). Endorsement pertains solely to the provision in the commodity standard. In contrast, alignment is a largely mechanistic exercise to ensure that the use of the additive as listed in the GSFA accurately captures the provision in the Commodity Standard. Alignment occurs after CCFA has endorsed the food additive provisions in a commodity standard, not prior to endorsement, and in fact alignment cannot occur until after the provisions in the commodity standard have been endorsed by CCFA and adopted by the Commission.

The proposal in CL 2021/23-FA to refer the endorsement request from CCPFV to an EWG on alignment to be established at CCFA52 will unnecessarily delay endorsement of those provisions in the CCPFV Commodity Standards until at least CCFA53, and will set an inappropriate precedent for alignment as a prerequisite for

endorsement. We note that a Working Group on Endorsement has been established for CCFA52 and will take place virtually on June 25, 2021. Under historical CCFA procedure, the June 25 Working Group on Endorsement should discuss all requests for endorsement listed in CX/FA21/52/5, including those submitted by CCPFV.

IFU (International Fruit and Vegetable Juice Association)

IFU supports the food additive provisions submitted by CCPFV to be referred to the EWG on alignment. We also suggest referral on the use of emulsifiers, stabilisers and thickeners in food categories 14.1.2 and 14.1.3. to this EWG.