



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Fifty-Second Session

#### CONTINUATION OF THE DISCUSSION ON THE RELEVANT PROVISIONS FOR SWEETENERS ASSOCIATED WITH NOTE 161 (REPORT OF THE EWG ON NOTE 161)

Prepared by the European Union (EU) and United States of America (USA) with the assistance of Australia, Brazil, Canada, Chile, China, Columbia, Costa Rica, Ecuador, Egypt, El Salvador, Hungary, India, Indonesia, Iran, Ireland, Japan, Korea, Malaysia, New Zealand, Norway, Paraguay, Peru, Philippines, Poland, Saudi Arabia, Spain, United Kingdom, Yemen, Calorie Control Council (CCC), Comité Européen des Fabricants de Sucre (CEFS), EU Specialty Food Ingredients, FoodDrinkEurope, Food Industry Asia (FIA), International Alliance of Dietary/Food Supplement Associations (IADSA), International Association of Color Manufacturers (IACM), International Confectionery Association (ICA), International Council of Beverages Associations (ICBA), International Chewing Gum Association (ICGA), International Dairy Federation (IDF), International Food Additives Council (IFAC), Institute of Food Technologists (IFT), International Fruit and Vegetable Juice Association (IFU), International Glutamate Technical Committee (IGTC), International Stevia Council (ISC), and International Sweeteners Association (ISA)

#### Introduction

1. The 51<sup>st</sup> Session of the Codex Committee on Food Additives (CCFA51), held in Jinan, China, on 25 – 29 March 2019, agreed to convene an EWG co-chaired by the European Union and the United States of America with the following Terms of Reference (REP 19/FA, para. 119(iii)):

- a) to discuss provisions with Note 161<sup>2</sup> attached to them in the following FCs:
  - Lists V (excluding FC 5.3) and X of document CX/FA 19/51/10 to provide recommendations for a replacement Note for Note 161; and
  - List W and Z of CX/FA 15/47/13 to determine if sweeteners or flavour enhancers are justified in these food categories and provide recommendations either for a replacement Note for “Note 161” or whether such provisions should be revoked/discontinued; and
  - Additional food categories with adopted provisions or provisions in the step process with “Note 161” that may not be listed in document CX/FA 15/47/13; and determine if sweeteners or flavour enhancers are justified in these food categories and provide recommendations either for a “replacement Note” for “Note 161” or whether such provisions should be revoked/discontinued; and
- b) to discuss if sweeteners or flavour enhancers are justified in FCs 07.1 “Bread and ordinary bakery ware and mixes”, 12.2.2 “Seasonings and condiments”, 12.3 “Vinegars” and provide recommendations either for a replacement of Note 161 or whether such provisions should be revoked/discontinued.

2. The 42<sup>nd</sup> Session of the Codex Alimentarius Commission (CAC42), held in Geneva, Switzerland, on 8-12 July 2019, replaced Note 161 in food additive provisions in specific food categories with the following alternative notes. For the purpose of CX/FA 21/52/9, these notes are referred to as “Adopted Alternative Notes”:

For provisions for additives with the function of sweetener but not the function of flavour enhancer: **Note 477**  
- “Some Codex Members allow use of additives with sweetener function in all foods within this Food Category

<sup>1</sup> This document is an updated version of CX/FA 20/52/9

<sup>2</sup> Note 161: “Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.”

while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars.”

For provisions for additives with both sweetener and flavour enhancer function: **Note 478** - “Some Codex Members allow use of additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars. This limitation may not apply to the appropriate use as a flavour enhancer.”

3. In preparation for CCFA52’s original scheduled date of March 2020, the EWG on Note 161 issued two circulars in 2019. These circulars requested comment on replacement Notes for Note 161 in the food categories under discussion or whether provisions for sweeteners or flavor enhancers in those food categories should be revoked/discontinued. After consideration of comments by EWG members, the EWG on Note 161 published a report with consensus recommendations to address the use of Note 161 in the majority of the food categories under discussion.<sup>3</sup>

4. CCFA52 was rescheduled to September 2021 due to the COVID-19 pandemic. To further progress the work of Codex Alimentarius, the Codex Secretariat encouraged all the Codex Committees to explore different ways of maintaining the momentum of the Codex standard setting work and to minimize the impact of the pandemic on Codex work. Specific to CCFA, the Codex Secretariat issued a Circular Letter (CL 2020/34-FA) requesting comment on recommendations that the EWGs to CCFA52 “continue their work as necessary under the terms of reference established by CCFA51.” Under this direction, the co-chairs of the EWG on Note 161 determined that recirculation of food categories listed in CX/FA 20/52/9 with a recommendation of “discuss further” may help CCFA52 reach consensus on the replacement of Note 161 in those food categories or whether provisions for the use of sweeteners or flavor enhancers in those food categories should be revoked/discontinued.

### Working Document

5. The EWG issued two circulars in 2020 (termed the “third” and “fourth” circulars). These circulars requested comment from EWG members on those food categories listed in CX/FA 20/52/9 with a recommendation of “discuss further”. The third circular requested EWG members to provide comment on the technological justification for the use of sweeteners and/or flavor enhancers in the food categories under discussion and to propose recommendations based on the food category descriptor and product examples that had been provided in response to the second circular (see CX/FA 20/52/9). The fourth circular requested comment on specific recommendations for each food category based on information provided by EWG members to the third circular. A compilation of comments submitted to the second, third, and fourth circulars for food categories listed in CX/FA 20/52/9 with a recommendation of “discuss further” is presented as separate document (Click [here](#)<sup>4</sup> of this document).

### Recommendations

6. Based on the discussion in the first, second, third, and fourth circulars, the EWG co-chairs put forward the following recommendations for consideration by CCFA52. For ease of discussion, these recommendations encompass those proposals listed in CX/FA 20/52/9.

**Recommendation 1:** Specific to provisions (both adopted and in the Step Process) in the food categories listed in Appendix 1 of the current document - replace Note 161, move, or revoke/discontinue those provisions as designated in the horizontal approach for that food category.

**Recommendation 2:** The specific adopted provisions proposed for revision under Recommendation 1 are included in Appendix 1 of the current document. These adopted provisions are presented in the format of Table 2 of the GSFA. Appendix 1 differentiates which replacement notes are proposed for each adopted provision, or whether the proposal is that the provision be moved to another food category or revoked.

**Recommendation 3:** The EWG co-chairs observe that there are draft and proposed draft provisions still in the Step Process in the food categories listed in Recommendation 1. The EWG co-chairs recommend that these provisions be revised as per Recommendation 1 and circulated for comment by the EWG on the GSFA to CCFA53.<sup>5</sup>

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<sup>3</sup> CX/FA 20/52/9

<sup>4</sup> [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/fr/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-52%252FLinks%252Ffa52\\_09e\\_compilation\\_of\\_comments.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/fr/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-52%252FLinks%252Ffa52_09e_compilation_of_comments.pdf)

<sup>5</sup> As the draft and proposed draft provisions will be circulated for comment by the EWG on the GSFA to CCFA53, they are not listed in the current document.

**Recommendation 4:** The EWG co-chairs observe that the EWG was not able to reach consensus on an approach to address the use of Note 161 in food categories 07.1 and 12.2 or its subcategories. In addition, there is an adopted provision with Note 161 for a sweetener in food category 05.1.1 that has not been considered by previous EWGs on Note 161. Therefore, the EWG co-chairs recommend that CCFA52 reconvene the current EWG to discuss provisions with Note 161 attached to them in food categories 05.1.1, 07.1, and 12.2 and its subcategories and provide recommendations either for a replacement of Note 161 or whether such provisions should be revoked/discontinued, and whether the descriptors of these food categories should be revised to address the use of food additives, including sweeteners.

## Appendix 1 – Recommended horizontal approach to replace Note 161 for sweeteners in specific food categories and subsequent revision recommendations for adopted provisions

This appendix presents food categories for which the EWG on Note 161 was able to reach consensus recommendations on a horizontal approach to replace Note 161 for provisions for additives with sweetener function. This appendix presents the specific proposed horizontal approach for each food category and reproduces the specific adopted provisions proposed for revision under **Recommendations 1 and 2**. These recommendations encompass those food categories for which CX/FA 20/52/9 listed consensus recommendations as well as food categories for which the EWG reached consensus recommendations in response to the fourth circular.

The food categories and adopted provisions are presented in the format of Table 2 of the GSFA. When a food additive provision is proposed to be moved from one food category to another food category, the existing provision is indicated with ~~strikethrough~~ font in the original food category and is indicated with **bolded** font in the food category to which is it proposed to be moved.

### **Food Category No. 01.3.2 (Beverage whiteners)**

**Horizontal Approach** - Replace Note 161 with Note 477 or 478 as appropriate, add notes XS250, XS252, and Note 201 (For use in flavoured products only).

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	2000	161 & 188	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, add notes XS250, XS252, and Note 201 (For use in flavoured products only).
ASPARTAME	951	6000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, add notes XS250, XS252, and Note 201 (For use in flavoured products only).
NEOTAME	961	65	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, add notes XS250, XS252, and Note 201 (For use in flavoured products only).
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	580	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, add notes XS250, XS252, and Note 201 (For use in flavoured products only).

### **Food Category No. 01.4.4 (Cream analogues)**

**Horizontal Approach** – Revoke Provision. Information provided by EWG members pertains to use in dessert products such as “chantilly cream powder” which are covered in FC 01.7 (if dairy based) or in FC 02.4 (if based on non-dairy fats).

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
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ACESULFAME POTASSIUM	950	1000	161 & 188	2008	Flavour enhancer, Sweetener	Revoke provision
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Revoke provision
NEOTAME	961	33	161	2008	Flavour enhancer, Sweetener	Revoke provision
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	580	161	2008	Flavour enhancer, Sweetener	Revoke provision

**Food Category No. 01.5.2 (Milk and cream powder analogues)**

**Horizontal Approach** - Replace Note 161 with Note 477 or 478 as appropriate, add Note XS251 and New Note "For use in flavoured and/or sweetened milk powder analogues only."

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	1000	161 & 188	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, add Note XS251 and New Note "For use in flavoured and/or sweetened milk powder analogues only."
ASPARTAME	951	2000	161 & 191	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, add Note XS251 and New Note "For use in flavoured and/or sweetened milk powder analogues only."
NEOTAME	961	65	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, add Note XS251 and New Note "For use in flavoured and/or sweetened milk powder analogues only."

**Food Category No. 01.6.1 (Unripened cheese)**

**Horizontal Approach** - Replace Note 161 with Note 477 or 478 as appropriate, add Notes XS221, XS273, XS275, XS262 and Note 201 "For use in flavoured products only".

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, add Notes XS221, XS273, XS275, XS262 and Note 201 (For use in flavoured products only).

**Food Category No. 01.6.5 (Cheese analogues)**

**Horizontal Approach** – Revoke provision. No information provided on use of sweeteners in this food category.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	2008	Flavour enhancer, Sweetener	Revoke provision
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Revoke provision
NEOTAME	961	33	161	2008	Flavour enhancer, Sweetener	Revoke provision
SACCHARINS	954(i)-(iv)	100	161	2008	Sweetener	Revoke provision
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	500	161	2008	Flavour enhancer, Sweetener	Revoke provision

**Food Category No. 02.3 (Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions)**

**Horizontal Approach** – Revoke provision. No information provided on use of sweeteners in this food category.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	1000	161 & 188	2008	Flavour enhancer, Sweetener	Revoke provision
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Revoke provision
NEOTAME	961	10	161	2008	Flavour enhancer, Sweetener	Revoke provision

**Food Category No. 02.4 (Fat-based desserts excluding dairy-based dessert products of food category 01.7)**

**Horizontal Approach** - Replace Note 161 with Note 477 or 478 as appropriate.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478
ASPARTAME	951	1000	161 & 191	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478
ASPARTAME-ACESULFAME SALT	962	350	113 & 161	2009	Sweetener	Replace Note 161 with Note 477
CYCLAMATES	952(i), (ii), (iv)	250	17 & 161	2007	Sweetener	Replace Note 161 with Note 477
NEOTAME	961	100	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478
SACCHARINS	954(i)-(iv)	100	161	2007	Sweetener	Replace Note 161 with Note 477
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478

**Food Category No. 04.1.2.1 (Frozen fruit)**

**Horizontal Approach** - Replace Note 161 with Note 477 or 478 as appropriate, add New Note "For use in products in a syrup or juice only."

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	500	161 & 188	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478 and add New Note "For use in products in a syrup or juice only."
ASPARTAME	951	2000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478 and add New Note "For use in products in a syrup or juice only."
NEOTAME	961	100	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478 and add New Note "For use in products in a syrup or juice only."

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478, and add New Note "For use in products in a syrup or juice only."

**Food Category No. 04.1.2.2 (Dried fruit)**

**Horizontal Approach** – Revoke and consider use in FC 04.1.2.7 – product examples cited by EWG member may be included within FC 04.1.2.7.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	500	161 & 188	2008	Flavour enhancer, Sweetener	Revoke. A provision for INS 950 at 500 mg/kg is already adopted in FC 04.1.2.7
ASPARTAME	951	2000	161 & 191	2008	Flavour enhancer, Sweetener	Revoke. A provision for INS 951 at 2000 mg/kg is already adopted in FC 04.1.2.7
NEOTAME	964	400	161	2008	Flavour enhancer, Sweetener	Revoke. Consider maximum use level in FC 04.1.2.7.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161	2008	Flavour enhancer, Sweetener	Revoke. Consider maximum use level in FC 04.1.2.7.

**Food Category No. 04.1.2.3 (Fruit in vinegar, oil, or brine)**

**Horizontal Approach** – Replace Note 161 with existing Note 144 ("For use in sweet and sour products only").

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	200	161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with existing Note 144 (For use in sweet and sour products only).
NEOTAME	961	100	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with existing Note 144 (For use in sweet and sour products only).

**Food Category No. 04.1.2.4 (Canned or bottled (pasteurized) fruit)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161, 188 & XS319	2018	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	1000	161, 191 & XS319	2018	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME-ACESULFAME SALT	962	350	113, 161 & XS319	2018	Sweetener	Replace Note 161 with Note 477.
CYCLAMATES	952(i), (ii), (iv)	1000	17, 161 & XS319	2018	Sweetener	Replace Note 161 with Note 477.
NEOTAME	961	33	161 & XS319	2018	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SACCHARINS	954(i)-(iv)	200	161 & XS319	2018	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161 & XS319	2018	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 04.1.2.7 (Candied fruit)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	500	161 & 188	2007	Flavour enhancer, Sweetener	See the removal of the provision in FC 04.1.2.2. Replace Note 161 with Note 478.
ASPARTAME	951	2000	161 & 191	2007	Flavour enhancer, Sweetener	See the removal of the provision in FC 04.1.2.2. Replace Note 161 with Note 478.
NEOTAME	961	65	161	2007	Flavour enhancer, Sweetener	Revise ML to 100 mg/kg to align with use level in provision from FC 04.1.2.2. Replace Note 161 with Note 478.
<b>NEOTAME</b>	<b>961</b>	<b>100</b>	<b>161</b>		<b>Flavour enhancer, Sweetener</b>	<b>Provision from FC 04.1.2.2.</b> Replace Note 161 with Note 478.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	800	161	2007	Flavour enhancer, Sweetener	Revise ML to 1500 mg/kg to align with use level in provision from FC 04.1.2.2.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
						Replace Note 161 with Note 478.
<b>SUCRALOSE (TRICHLOROGALACTOSUCROSE)</b>	<b>955</b>	<b>1500</b>	<b>161</b>		<b>Flavour enhancer, Sweetener</b>	<b>Provision from FC 04.1.2.2.</b> Replace Note 161 with Note 478.

**Food Category No. 04.1.2.11 (Fruit fillings for pastries)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	1000	161 & 191	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
NEOTAME	961	100	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 04.2.2.1 (Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)**

**Horizontal Approach** – Revoke provision. No information provided on use of sweeteners in this food category.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Revoke provision
NEOTAME	961	33	161	2008	Flavour enhancer, Sweetener	Revoke provision
SACCHARINS	954(i)-(iv)	500	161	2008	Sweetener	Revoke provision
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	150	161	2008	Flavour enhancer, Sweetener	Revoke provision

**Food Category No. 04.2.2.2 (Dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds)**

**Horizontal Approach** – Replace Note 161 with Note 144 (“For use in sweet and sour products only”) and new Note "For general use in dried seaweed only."

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only) and New Note "For general use in dried seaweed only."
NEOTAME	961	33	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only) and New Note "For general use in dried seaweed only."
SACCHARINS	954(i)-(iv)	500	161	2008	Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only) and New Note "For general use in dried seaweed only."
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	580	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only) and New Note "For general use in dried seaweed only."

**Food Category No. 04.2.2.3 (Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce)**

**Horizontal Approach** – Replace Note 161 with Note 144 (“For use in sweet and sour products only”)

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ASPARTAME-ACESULFAME SALT	962	200	113 & 161	2009	Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only).

**Food Category No. 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
NEOTAME	961	33	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SACCHARINS	954(i)-(iv)	160	144 & 161	2008	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	580	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 04.2.2.5 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter))**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
NEOTAME	961	33	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SACCHARINS	954(i)-(iv)	160	161	2008	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161 & 169	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 04.2.2.6 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g. vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME-ACESULFAME SALT	962	350	113 & 161	2009	Sweetener	Replace Note 161 with Note 477.
CYCLAMATES	952(i), (ii), (iv)	250	17 & 161	2008	Sweetener	Replace Note 161 with Note 477.
NEOTAME	961	33	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SACCHARINS	954(i)-(iv)	200	161	2008	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 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)**

**Horizontal Approach** – Replace Note 161 with Note 144 (“For use in sweet and sour products only”).

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ASPARTAME	951	2500	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only).
NEOTAME	961	33	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only).
SACCHARINS	954(i)-(iv)	200	161	2008	Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only).
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	580	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only).

**Food Category No. 04.2.2.8 (Cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds)**

**Horizontal Approach** – Revoke provision. No information provided on use of sweeteners in this food category

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ASPARTAME	951	1000	161 & 191	2008	Flavour enhancer, Sweetener	Revoke
NEOTAME	961	33	161	2008	Flavour enhancer, Sweetener	Revoke
SACCHARINS	954(i)-(iv)	160	144 & 161	2008	Sweetener	Revoke
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	150	144 & 161	2008	Flavour enhancer, Sweetener	Revoke

**Food Category No. 05.1.2 (Cocoa mixes (syrops))**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	97, 161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	1000	161 & 191	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
CYCLAMATES	952(i), (ii), (iv)	250	17, 127 & 161	2007	Sweetener	Replace Note 161 with Note 477.
NEOTAME	961	33	97 & 161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SACCHARINS	954(i)-(iv)	80	161	2007	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	97 & 161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 05.1.5 (Imitation chocolate, chocolate substitute products)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	500	161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	3000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME-ACESULFAME SALT	962	500	113 & 161	2009	Sweetener	Replace Note 161 with Note 477.
CYCLAMATES	952(i), (ii), (iv)	500	17 & 161	2007	Sweetener	Replace Note 161 with Note 477.
NEOTAME	961	100	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SACCHARINS	954(i)-(iv)	500	161	2007	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	800	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 06.5 (Cereal and starch based desserts (e.g. rice pudding, tapioca pudding))**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	1000	161 & 191	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
CYCLAMATES	952(i), (ii), (iv)	250	17 & 161	2007	Sweetener	Replace Note 161 with Note 477.
NEOTAME	961	33	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
SACCHARINS	954(i)-(iv)	100	161	2007	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 07.2 (Fine bakery wares (sweet, salty, savoury) and mixes)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
NEOTAME	961	80	161 & 165	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	700	161 & 165	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 08.2.2 (Heat-treated processed meat, poultry, and game products in whole pieces or cuts)**

**Horizontal Approach** – Discontinue/revoke provisions for additives without the technological function of flavour enhancer. For provisions for additives with the technological function of flavour enhancer add Notes XS88, XS89, XS98, and new note “For use as flavour enhancer only”.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
SACCHARINS	954(i)-(iv)	500	161, XS96 & XS97	2014	Sweetener	Revoke

**Food Category No. 08.3.2 (Heat-treated processed comminuted meat, poultry, and game products)**

**Horizontal Approach** – Discontinue/revoke provisions for additives without the technological function of flavour enhancer. For provisions for additives with the technological function of flavour enhancer add Notes XS88, XS89, XS98, and new note “For use as flavour enhancer only”.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
SACCHARINS	954(i)-(iv)	500	161, XS96 & XS97	2014	Sweetener	Revoke

**Food Category No. 09.2.4.1 (Cooked fish and fish products)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate and new note “For use in cooked products boiled with soy sauce only.”

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
SACCHARINS	954(i)-(iv)	500	161	2008	Sweetener	Replace Note 161 with Note 477, and new note “For use in cooked products boiled with soy sauce only.”

**Food Category No. 09.3 (Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms)**

**Horizontal Approach** – Replace Note 161 with Note 144 (“For use in sweet and sour products only”).

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
NEOTAME	961	10	161 & XS291	2018	Flavour enhancer, Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only).

**Food Category No. 09.4 (Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms)**

**Horizontal Approach** – Replace Note 161 with Note 144 (“For use in sweet and sour products only”).

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
NEOTAME	961	10	161, XS3, XS37, XS70, XS90, XS94 & XS119	2018	Flavour enhancer, Sweetener	Replace Note 161 with Note 144 (For use in sweet and sour products only).

**Food Category No. 11.4 (Other sugars and syrups (e.g. xylose, maple syrup, sugar toppings))**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	1500	159 & 161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 12.3 (Vinegars)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate and new note “For use in flavoured vinegar and in rice vinegar only”.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	2000	161 & 188	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478 and new note "For use in flavoured vinegar and in rice vinegar only".
ASPARTAME	951	3000	161 & 191	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478 and new note "For use in flavoured vinegar and in rice vinegar only".
NEOTAME	961	12	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478 and new note "For use in flavoured vinegar and in rice vinegar only".
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	400	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478 and new note "For use in flavoured vinegar and in rice vinegar only".

**Food Category No. 12.6.1 (Emulsified sauces and dips (e.g. mayonnaise, salad dressing, onion dip))**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
CYCLAMATES	952(i), (ii), (iv)	500	17 & 161	2008	Sweetener	Replace Note 161 with Note 477.

**Food Category No. 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)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ASPARTAME	951	350	161 & 166	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
CYCLAMATES	952(i), (ii), (iv)	500	17 & 161	2008	Sweetener	Replace Note 161 with Note 477.
NEOTAME	961	33	161 & 166	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SACCHARINS	954(i)-(iv)	200	161 & 166	2010	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	1250	161 & 169	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 14.1.3.2 (Vegetable nectar)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	161 & 188	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	600	161 & 191	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
CYCLAMATES	952(i), (ii), (iv)	400	17 & 161	2007	Sweetener	Replace Note 161 with Note 477.
NEOTAME	961	65	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SACCHARINS	954(i)-(iv)	80	161	2008	Sweetener	Replace Note 161 with Note 477.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	300	161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 14.1.3.4 (Concentrates for vegetable nectar)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
ACESULFAME POTASSIUM	950	350	127, 161 & 188	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
ASPARTAME	951	600	127 & 161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
CYCLAMATES	952(i), (ii), (iv)	400	17, 127 & 161	2007	Sweetener	Replace Note 161 with Note 477.
NEOTAME	961	65	127 & 161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	300	127 & 161	2007	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 14.2.7 (Aromatized alcoholic beverages (e.g. beer, wine and spirituous cooler-type beverages, low alcoholic refreshers))**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	700	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.

**Food Category No. 15.0 (Ready-to-eat savouries)**

**Horizontal Approach** – Replace Note 161 with Note 477 or 478 as appropriate

Additive	INS	Max Level (mg/kg)	Notes	Year Adopted	INS Functional Class	Proposal
SUCRALOSE (TRICHLOROGALACTOSUCROSE)	955	1000	161	2008	Flavour enhancer, Sweetener	Replace Note 161 with Note 478.