



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEx COMMITTEE ON FOOD ADDITIVES

#### Fifty-First Session

#### GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS (REPLIES TO CI 2018/27-FA)

Comments of Canada, Ghana, Indonesia, Kenya, Russian Federation, Senegal and South Africa

#### Canada

Canada would suggest adding notes to the proposal for mono- and diglycerides (INS 471), submitted by EFEMA:

- (1) Note 356 (Excluding virgin or cold pressed oils) as food additives are not permitted in virgin or cold pressed oils as per the Codex *Standard for Named Vegetable Oils* (CXS 210-1999).
- (2) Notes XS33 and XS325R would also be needed as no additives are permitted in products conforming to CXS 33-1981 and CXS 325R-2017, with the exception of tocopherols in refined olive oil, olive oil, refined olive-pomace oil and olive-pomace oil (as per CXS 33-1981).

Finally, Canada notes that the functional class of 'anti-foaming agents (oils for deepfrying)' is already permitted for use in products conforming to CXS 210-1999.

#### Ghana

**Position:** Ghana supports the proposal to include BMC in the GSFA but in table 3 under GMP with no corresponding food category or commodity standards.

**Rationale:** The use of BMC as a glazing agent/carrier especially for vitamins and minerals in food fortification processes prevents degradation of the nutrients. This will ensure that fortified products retain and deliver the nutrients in sufficient amount to address the challenge of malnutrition. JECFA86 established an ADI of "not specified" for BMC copolymer and concluded that the use of BMC that complies with the current specifications is not of safety concern when the food additive is used as a coating or glazing agent for solid food supplements and for foods for special medical purposes and micronutrient encapsulation for food fortification. JECFA86 further concluded that the toxicological data on the residual monomers do not give rise to concerns when taking into account the low dietary exposures.

#### Indonesia

- China proposes new provision for Nisin (INS 234) with functional class as preservative.

##### Indonesia Comment:

Indonesia does not support the proposal for Nisin in food category 12.6.1, 12.6.2, 12.6.4 since the use of Nisin is ineffective for the products in those food categories. Most deterioration of products in those food categories are caused by mold and yeast.

- Senegal proposes new provision for Methacrylate copolymer, basic (INS 1205) with functional class as Glazing agent, Carrier (request is pending decision by the INS working group).

##### Indonesia Comment:

Indonesia does not support the proposal and considers that this additive is not technologically justified.

- EFEMA, the European Food Emulsifier Manufacturers Association proposes new provision for Mono- and diglycerides (INS 471) with functional class as Antifoaming agent, Emulsifier, Stabilizer

##### Indonesia Comment:

Indonesia supports proposal for Mono- and diglycerides Fatty Acid at 10000 mg/kg for use in frying oils and fats only.

- EU Specialty Food Ingredients proposes new provision for  $\beta$ -Carotene-rich extract from *Dunaliella salina* (New INS 160a(v) or replacement of INS 160a(iv) with functional class as food colouring

**Indonesia Comment:**

Indonesia does not support the proposal because lack of chemical composition information of this food additive.

**Kenya**

Requesting country	Name of additive and Request	Comment	Rationale
Brazil	Annatto extracts, bixin-based: To be included in FC 12.2.2 (Seasonings and condiments) for colour	Kenya proposes that this request be send to CCSCCH to confirm the technological need for the colour	Technological justification should be provided by the commodity committee except where the committee are adjourned.
Japan	Tamarind seed polysaccharide in FC 14.1.3.1 to 14.1.3.4 as proposed	There is need for the committee on fresh fruits and vegetables to provide the technological justification of the use of these food additives.	To be in compliance to the procedure.
Senegal	Methacrylate copolymer, basic as a glazing agent for use in FC 06.2.1 (Flours), 12.5.2 (Soups) and 12.1.1 (Salt)	We support inclusion of BMC as a glazing agent within GSFA but without the proposed food category	BMC is not directly used in the proposed food category as there is no technological justification in the category. However, we appreciate the important role BMC can play in the encapsulation of vitamins and mineral premixes used in food fortification
EFEMA (European Food Emulsifier Manufacturers' Association)	Mono- and diglyceride as Antifoaming agent Emulsifier and Stabilizer in FC 02.1.2 vegetable oils and fats	There is need for the committee on Fats and Oils to provide the technological justification of the use of these food additives.	To be in compliance to the procedure.

**Russian Federation**

General Standard for Food Additives (GSFA): Proposals for new and/or revision of food additive provisions (replies to CL 2018/27-FA)

Concerning the proposal by Japan to use Tamarind seed polysaccharide INS 437 in food categories:

- 14.1.3.1 Fruit nectar GMP
- 14.1.3.2 Vegetable nectar GMP
- 14.1.3.3 Concentrates for fruit nectar GMP
- 14.1.3.4 Concentrates for vegetable nectar GMP

The use of Thickener, Stabilizer, Emulsifier, Gelling agent (except pectin) in these food categories is not allowed, as this will mislead consumers about the quality of these food products. It will also reduce their nutritional value. The use of pectin as food additive is allowed, since it is a naturally present ingredient of these foods.

## Senegal

### Réponses à la CL 2018/27-FA soumise par le Sénégal : norme pour le BMC

Le Sénégal a proposé l'utilisation du BMC pour trois catégories d'aliments à savoir les farines, les bouillons et le sel.

**Position :** Le Sénégal propose que le BMC soit adopté à l'étape 5/8.

#### Justification :

- . aucun problème de santé n'a été identifié par le JECFA,
- . l'utilisation du BMC en tant qu'agent d'enrobage présente de nombreux avantages humanitaires et sanitaires
- . l'utilisation du BMC augmentera l'apport en vitamine A et en fer, en particulier chez les femmes enceintes et les enfants.

Un CRD a été établi pour cette proposition de norme.

#### English

### **BMC, the GSFA, and Protecting the Health of Consumers in Developing Countries Submission from Senegal**

Senegal is pleased to submit the proposal for adoption of Basic Methacrylate Copolymer (BMC; INS 1205), in Food Categories (FC) 6.2.1, Flours; 12.1.1, Salt; and 12.5.2, Mixes for Soups and Broths, in the General Standard for Food Additives (GSFA). While BMC satisfies all the requirements in the Preamble of the GSFA, Senegal notes that the adoption of BMC by the CCFA will provide the Committee with an exceptional opportunity to benefit public health.

Malnutrition is a global concern, and is particularly prevalent in developing countries which frequently lack the resources to combat this complex problem.

As a reminder, during the 1992 FAO/WHO Conference, 159 countries adopted the world Declaration on Nutrition according to which member countries should make efforts to reduce iodine, vitamin A and iron deficiencies, as well as other important micronutrients deficiencies.

While some efforts at micronutrient fortification are currently being used, they have not been successful in overcoming the problems of significant degradation of the micronutrients that occur (1) during cooking and storage, (2) with exposure to light or (3) as a result of oxidation. Thus, even though some populations are consuming fortified food, they are not consuming adequate levels of the micronutrients because the nutrients have been destroyed during storage or cooking.

BMC is effective in encapsulating a wide range of micronutrients in a protective coating that safeguards them against degradation that occurs during cooking and storage. BMC also prevents micronutrients from interacting with **each** other, which also diminishes their effectiveness.

People have safely consumed BMC for approximately 50 years. Initially, it was used as an approved coating for drugs taken orally, and more recently, as a glazing agent for food supplements. JECFA has evaluated BMC (86<sup>th</sup> JECFA, June 2018) and assigned it an ADI of "Not Specified."

Similar to many other countries in Africa, Latin America, and Southeast Asia, deficiencies in Vitamin A and iron are widely prevalent in the Senegalese population. Senegal has proposed that BMC be adopted for use in FC 6.2.1, wheat flour, for example, because wheat flour is a staple of the Senegalese diet and encapsulated Vitamin A and iron can easily be blended in wheat flour. BMC encapsulation stabilizes Vitamin A during storage and cooking, and enables consistent blending throughout the flour. It also prevents interactions between iron and Vitamin A and enables increased level of iron fortification because it helps with taste masking and color.

Senegal believes that the adoption of BMC into the proposed FCs in the GSFA will enable malnourished people, especially children and pregnant women most susceptible to Vitamin A and iron deficiencies, to significantly increase their consumption of these micronutrients. We encourage countries to support our proposal, thereby contributing to the improvement of public health in developing countries whose people are at greatest risk of malnutrition in general and on micronutrients deficiencies in particular.

#### French

### **Le BMC, la NGAA et la protection de la santé des consommateurs dans les pays en développement**

#### **Document présenté par le Sénégal**

Le Sénégal est heureux de présenter la proposition d'adoption du copolymère de méthacrylate de base (BMC); INS 1205), dans les catégories d'aliments (FC) 6.2.1, Farines ; 12.1.1, Sel; et 12.5.2, Mélanges pour soupes

et bouillons, de la Norme générale pour les additifs alimentaires (NGAA). Bien que le BMC réponde à toutes les exigences du préambule de la NGAA, le Sénégal note que l'adoption de ce produit par le CCFA donnera au Comité une occasion unique d'améliorer la santé publique.

La malnutrition est une préoccupation mondiale, particulièrement répandue dans les pays en développement, qui ont souvent des ressources limitées pour lutter contre ce problème complexe.

Pour rappel, la conférence FAO/OMS de 1992, 159 pays ont adopté la déclaration mondiale sur la nutrition selon laquelle, les pays membres devaient faire des efforts pour réduire les carences en iode, en vitamine A et en fer, ainsi que les autres carences importantes en micronutriments.

La fortification des aliments au moyen de micronutriments est actuellement utilisée, mais elle n'a pas permis de surmonter les problèmes liés à la forte dégradation des micronutriments (1) pendant la cuisson et le stockage, (2) sous l'effet de la lumière ou (3) par suite de l'oxydation. Ainsi, même si certaines populations consomment des aliments enrichis, elles ne consomment pas suffisamment de micronutriments parce que ceux-ci sont souvent détruits pendant le stockage ou la cuisson.

Le BMC agit efficacement pour encapsuler un large éventail de micronutriments dans un revêtement protecteur qui les protège contre la dégradation pendant la cuisson et le stockage. Le BMC empêche également les micronutriments d'interagir les uns avec les autres, cette interaction pouvant réduire leur efficacité.

Le BMC est consommé en toute sécurité depuis environ 50 ans. Au début, il était utilisé comme revêtement approuvé pour les médicaments pris par voie orale et, plus récemment, comme agent d'enrobage pour les compléments alimentaires. Le JECFA a évalué le BMC (86<sup>e</sup> JECFA, juin 2018) et lui a attribué la DJA « Non spécifié ».

Comme dans beaucoup d'autres pays d'Afrique, d'Amérique latine et d'Asie du Sud-Est, les carences en vitamine A et en fer sont largement répandues dans la population du Sénégal. Le Sénégal a proposé que le BMC soit adopté pour une utilisation dans la catégorie d'aliments FC 6.2.1, Farine de blé, par exemple, parce que cette denrée est un aliment de base du régime sénégalais et que la vitamine A et le fer encapsulé peuvent facilement être mélangés à la farine de blé. L'encapsulation du BMC stabilise la vitamine A pendant le stockage et la cuisson et permet d'obtenir un mélange uniforme dans la masse de farine. Elle empêche également les interactions entre le fer et la vitamine A et permet d'augmenter le niveau d'enrichissement en fer car elle aide à masquer sa saveur et sa couleur.

Le Sénégal estime que l'adoption du BMC dans les catégories d'aliments proposées de la NGAA permettra aux personnes souffrant de malnutrition, en particulier les enfants et les femmes enceintes les plus vulnérables aux carences en vitamine A et en fer, d'augmenter considérablement leur ingestion de ces micronutriments. Nous encourageons les pays à appuyer notre proposition, pour contribuer à l'amélioration de la santé publique dans les pays en développement, dont la population est la plus exposée à la malnutrition en général et aux carences en micronutriments en particulier.

## **Spanish**

### **EL BMC, la GSFA, y la protección de la salud de los consumidores en los países en desarrollo**

#### **Presentación de Senegal**

Senegal se complace en presentar la propuesta para la adopción del copolímero de metacrilato básico (BMC; INS 1205) en categorías de alimentos (FC, por sus siglas en inglés) 6.2.1 para Harinas; 12.1.1 para Sal y 12.5.2 para Mezclas para sopas y caldos, en la Norma General para Aditivos Alimentarios (GSFA, por sus siglas en inglés). Si bien el BMC cumple con los requisitos del Preámbulo de la GSFA, Senegal nota que la adopción de BMC por parte del Comité del Codex para los Aditivos Alimentarios (CCFA, por sus siglas en inglés), le brindará al Comité una oportunidad excepcional para beneficiar la salud pública.

La desnutrición es una preocupación mundial y es particularmente frecuente en los países en desarrollo, los cuales con frecuencia tienen recursos limitados para combatir este complicado problema.

Como recordatorio, en la Conferencia FAO/OMS de 1992, 159 países adoptaron la Declaración Mundial sobre Nutrición, según la cual los países miembros deberían hacer esfuerzos para reducir las carencias de yodo, vitamina A y hierro, así como otras deficiencias importantes de micronutrientes.

Si bien se han hecho esfuerzos por utilizar el enriquecimiento de micronutrientes, en la actualidad, estos no han logrado superar los problemas de degradación significativa de los micronutrientes que se producen (1) durante la cocción y almacenamiento y (2) con la exposición a la luz o (3) como resultado de la oxidación. Por consiguiente, incluso si algunas poblaciones están consumiendo alimentos enriquecidos, no están consumiendo niveles de micronutrientes adecuados debido a que los nutrientes han sido destruidos a menudo, durante el almacenamiento o la cocción.

EL BMC es eficaz para encapsular una gama variada de microcuentos en una capa protectora que los protege efectivamente en contra de la degradación que se produce durante la cocción y el almacenamiento. EL BMC también evita que los micronutrientes interactúen entre ellos; lo cual también disminuye su eficacia.

EL BCM ha sido consumido en forma segura por 50 años aproximadamente. Al principio, era utilizado como una capa protectora para los medicamentos tomados de forma oral y más recientemente como agente de glaseado para los suplementos alimenticios. EL Comité Mixto FAO/OMS de Expertos en Aditivos Alimentarios (JEFCA, por sus siglas en inglés) ha evaluado el BMC (86ª JEFCA, junio de 2018) y le ha asignado una Ingesta Diaria Aceptada (IDA) como “No Especificada”

En la población senegalesa al igual que en muchos países de África, América Latina y el sudeste asiático, las deficiencias en la vitamina A y el hierro son ampliamente prevalentes. Senegal ha propuesto que se adopte el BMC para su uso en FC 6.2.1, harina de trigo, por ejemplo, ya que la harina de trigo es un elemento básico en la dieta senegalesa y la vitamina A encapsulada y el hierro se pueden mezclar fácilmente con la harina de trigo. La encapsulación de BMC estabiliza la vitamina A durante el almacenamiento y la cocción, y permite una mezcla constante en toda la harina. También evita las interacciones entre el hierro y la vitamina A y permite un mayor nivel de fortificación del hierro porque ayuda a enmascarar el sabor y el color.

Senegal cree que la adopción de la BMC en las categorías de alimentos (FC) propuesta en la Norma General para los aditivos Alimentarios (NGAA, por sus siglas en inglés) permitirá que las personas que sufren de desnutrición, especialmente los niños y las mujeres embarazadas, que son los más susceptibles a las deficiencias de la Vitamina A y el hierro, aumenten significativamente su consumo de estos micronutrientes. Alentamos a los países a apoyar esta propuesta, y contribuir de esta manera al mejoramiento de la salud pública en los países en desarrollo, cuyas personas están en mayor riesgo de desnutrición en general y de deficiencias en micronutrientes en particular.

## **Chinese**

### **碱式甲基丙烯酸酯共聚物、《食品添加剂通用标准》以及保护发展中国家消费者的健康状况**

#### **由塞内加尔提交**

塞内加尔政府很高兴提交这一提案，建议在《食品添加剂通用标准》（英文缩写“GSFA”）之面粉（代号6.2.1）、食盐（代号12.1.1）以及汤和肉汤混合物（代号12.5.2）的食品分类（英文缩写“FC”）中采用碱式甲基丙烯酸酯共聚物（英文缩写“BMC”；INS 1205）。虽然碱式甲基丙烯酸酯共聚物可以满足《食品添加剂通用标准》序言中提出的所有要求，但塞内加尔政府指出，国际食品添加剂法典委员会（英文缩写“CCFA”）对碱式甲基丙烯酸酯共聚物的采用将为该委员会提供一个有利于公众健康的良机。

营养不良是一个全球关注的问题，这在那些应对这一复杂问题方面经常是资源有限的发展中国家尤为普遍。

需要提醒的是，在1992年举行的“联合国粮食及农业组织（英文缩写“FAO”）和世界卫生组织（英文缩写“WHO”）会议”上，与会的159个国家正式通过了《世界营养宣言》。根据这一宣言，成员国应努力降低碘、维生素A、铁缺乏症以及其它重要微量营养素缺乏症的发病率。

虽然目前人们在利用在强化微量营养素方面做出的一些尝试，但这些尝试并未能够成功地解决微量营养素在下列过程中所发生的显著降解问题：（1）在烹饪和储存时；（2）暴露在光线下；或（3）氧化作用的结果。因此，尽管有些人口群体食用强化食品，但他们并未吸取足够的微量营养素，因为这些营养素常常在储存或烹饪过程中遭到破坏。

碱式甲基丙烯酸酯共聚物可以有效地将许多微量营养素包封在一种保护性涂层中，以保护这些微量营养素不会在烹饪和储存过程中被降解。碱式甲基丙烯酸酯共聚物还可以防止微量营养素之间发生相互作用，这种相互作用也会降低其有效性。

人们安全使用碱式甲基丙烯酸酯共聚物已有大约50年的历史。它最初被批准用作一些口服药物的涂层，而最近则被用于食品补充剂的上光剂。食品添加剂联合专家委员会（英文缩写“JECFA”）已对碱式甲基丙烯酸

酯共聚物做出了评估（第86届食品添加剂联合专家委员会会议在2018年6月举行），并为其指定了“尚未标明”的每日允许摄入量（英文缩写“ADI”）。

与非洲、拉丁美洲和东南亚地区的许多其他国家相似，塞内加尔人口普遍缺乏维生素A和铁。例如，塞内加尔政府已提议将碱式甲基丙烯酸酯共聚物用于作为食品分类 6.2.1的小麦面粉，因为小麦面粉是塞内加尔食谱中的主食；并且，包封的维生素A和铁可以很容易地混合在小麦面粉中。碱式甲基丙烯酸酯共聚物的包封作用可以在储存和烹饪过程中起到稳定维生素A的作用，并能使面粉充分均匀地混合。它还可以防止铁与维生素A之间的相互作用，并因其有助于掩饰味道和颜色从而可以提高铁营养强化剂的水平。

塞内加尔政府认为，将碱式甲基丙烯酸酯共聚物纳入拟议中的《食品添加剂通用标准》食品类别将会大大增加营养不良者（尤其是最易患维生素A和铁缺乏症的儿童和孕妇）对这些微量营养素的吸收。我们鼓励各国支持我们的提案，从而有助于改善发展中国家的公众健康，这些国家的人民在一般营养不良方面面临着最大的风险，而对微量营养素的缺乏则更甚。

## **PORTUGUESE**

### **O BMC, a GSFA, e a Proteção da Saúde dos Consumidores em Países em Desenvolvimento**

#### **Proposta do Senegal**

O Senegal tem o prazer de apresentar a proposta de adoção do Copolímero de Metacrilato Básico (BMC; INS 1205) nas Categorias de Alimentos (CA) 6.2.1 para Farinhas; 12.1.1 para Sal; e 12.5.2 para Misturas para Sopas e Caldos, da Norma Geral para Aditivos em Alimentos (GSFA, sigla em inglês). Além do BMC satisfazer todos os requisitos do Preâmbulo da Norma GSFA, o Senegal assinala que a adoção do BMC pelo Comitê Codex de Aditivos Alimentares (CCFA, em inglês) oferecerá ao Comitê uma oportunidade excepcional de beneficiar a saúde pública.

A desnutrição é uma preocupação mundial, sendo particularmente prevalente nos países em desenvolvimento cujos recursos são às vezes limitados para combater este problema complexo.

Lembre-se que na conferência FAO / OMS de 1992, 159 países adotaram a Declaração Mundial sobre Nutrição, segundo a qual os países membros devem agir para reduzir as deficiências de iodo, vitamina A e ferro, bem como outras importantes deficiências de micronutrientes.

Apesar dos esforços atuais de fortificação dos alimentos com micronutrientes, não foi possível ainda resolver o problema da degradação significativa dos micronutrientes, degradação esta que ocorre: (1) durante o cozimento e a armazenagem, (2) devido à exposição à luz, ou (3) como resultado da oxidação. Portanto, apesar de algumas populações estarem consumindo alimentos fortificados, elas não consomem níveis adequados de micronutrientes porque os nutrientes são frequentemente destruídos durante o armazenamento ou cozimento dos alimentos.

O BMC revela-se eficaz ao encapsular uma ampla gama de micronutrientes dentro de uma capa protetora que os protege contra a degradação que ocorre durante o cozimento e armazenagem. O BMC também impede que os micronutrientes interajam entre si, o que também diminui sua eficácia.

As pessoas consomem BMC com segurança há cerca de 50 anos. Inicialmente, seu uso foi aprovado como revestimento de medicamentos tomados por via oral e, mais recentemente, como agente de cobertura de suplementos alimentares. Em sua 86ª reunião de junho de 2018, o JECFA (Comitê Internacional de Especialistas em Aditivos Alimentares da FAO/OMS) avaliou o BMC e designou como “Não Especificada” sua Estimativa Diária de Ingestão (EDI).

De forma similar a muitos outros países da África, América Latina e Sudeste da Ásia, as deficiências de Vitamina A e ferro demonstram alta prevalência na população senegalesa. O Senegal já propôs que o uso do BMC fosse adotado na Categoria de Alimentos 6.2.1 (farinha de trigo), por exemplo, porque a farinha de trigo constitui um alimento essencial na dieta da população senegalesa, sendo que, pelo encapsulamento, a Vitamina A e o ferro podem ser misturados facilmente com a farinha de trigo. O encapsulamento do BMC estabiliza a Vitamina A durante o armazenamento e cozimento e propicia uma mistura uniforme e integral na farinha. Também impede as interações entre o ferro e a Vitamina A e permite um nível mais elevado de fortificação do ferro porque ajuda no mascaramento do gosto e na coloração.

O Senegal acredita que a adoção do BMC nas Categorias de Alimentos propostas na Norma Geral GSFA permitirão à população desnutrida – especialmente crianças e grávidas que são mais suscetíveis às deficiências de Vitamina A e ferro – aumentarem significativamente o seu consumo desses micronutrientes. Queremos encorajar os países a apoiarem a nossa proposta e, assim, contribuir à melhoria da saúde pública

dos países em desenvolvimento, cuja população corre o risco mais elevado de desnutrição em geral e de deficiências de micronutrientes em particular.

#### **South Africa**

Additive: Basic Methacrylate Copolymer

Comment: South Africa supports the proposal submitted by Senegal for the adoption of Basic Methacrylate Copolymer (BMC; INS 1205), in Food Categories (FC) 6.2.1, Flours; 12.1.1, Salt; and 12.5.2, Mixes for Soups and Broths, in the General Standard for Food Additives (GSFA)