

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5(a)

CRD20

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-First Session

GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): REPORT OF THE EWG ON THE GSFA

Comments of India, Malaysia and Peru

India

Comments:

1) Appendix 1

Draft and proposed draft provisions for colours in the Step process in food categories 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)

Annex 1:

1. Food Category No. 05.2.1 (Hard candy):

Additive	Comment
a. ANNATTO EXTRACTS, BIXIN-BASED, INS 160b(i)	India supports adoption at 200 mg/Kg.
b. ANNATTO EXTRACTS, NORBIXIN-BASED, INS 160b(ii)	India supports adoption at 200 mg/Kg across the food category, as India allows it at GMP levels in this food category and actual use levels by industry have been reported as 200 mg/Kg.
c. Azorubine (Carmoisine) INS 122	India support adoption at 100 mg/Kg, as India allows it at 100 mg/kg in this food category.
d. Curcumin, INS 100(i)	India supports adoption at 300 mg/Kg as India allows it at GMP levels in this food category and actual use levels by industry have been reported as 300 mg/Kg.
e. Lycopene INS 160d(i)	India supports discontinuation of this additive from this food category in Table 1 & 2 as it is listed in Table 3.
f. Tartrazine INS 102	India supports adoption at 100 mg/kg as India allows it at 100mg/kg levels in this food category.

2. Food Category No. 05.2.2 (Soft candy)

Additive	Comment
a. ANNATTO EXTRACTS, BIXIN-BASED, INS 160b(i)	India supports adoption at 200 mg/Kg.
b. ANNATTO EXTRACTS, NORBIXIN-BASED, INS 160b(ii)	India supports adoption at 200 mg/Kg across the food category, as India allows it at GMP levels in this food category and actual use levels by industry have been reported as 200 mg/Kg.
c. Azorubine (Carmoisine) INS 122	India support adoption at 100 mg/Kg, as India allows it at 100 mg/kg in this food category.
d. Curcumin, INS 100(i)	India supports adoption at 300 mg/Kg as India allows it at GMP levels in this food category and actual use levels by industry have been reported as 300 mg/Kg.
e. Lycopene INS 160d(i)	India supports discontinuation of this additive from this food category in Table 1 & 2 as it is listed in Table 3.
f. Tartrazine, INS 102	India supports adoption at 100 mg/Kg, as India allows it at 100 mg/kg in this food category.

3. Food Category No. 05.2.3 (Nougats and marzipans)

Additive	Comment
a. ANNATTO EXTRACTS, BIXIN-BASED, INS 160b(i)	India supports adoption at 200 mg/Kg.
b. ANNATTO EXTRACTS, NORBIXIN-BASED, INS 160b(ii)	India supports adoption at 200 mg/Kg across the food category, as India allows it at GMP levels in this food category and actual use levels by industry have been reported as 200 mg/Kg.
c. Azorubine (Carmoisine) INS 122	India support adoption at 100 mg/Kg, as India allows the it at 100 mg/kg in this food category.
d. Curcumin, INS 100(i)	India supports adoption at 300 mg/Kg. India allows the it at GMP levels in this food category and actual use levels by industry have been reported as 300 mg/Kg.
e. Tartrazine, INS 102	India supports adoption at 100 mg/Kg, as India allows it at 100 mg/Kg in this food category.

4. Food Category No. 05.3 (Chewing gum)

Additive	Comment
a. ANNATTO EXTRACTS, BIXIN-BASED, INS 160b(i)	India supports adoption at 300 mg/Kg, as India allows the it at GMP levels in this food category. Actual use levels have been reported as 300 mg/Kg by industry.
b. ANNATTO EXTRACTS, NORBIXIN-BASED, INS 160b(ii)	India supports adoption at 300 mg/Kg, as India allows the it at GMP levels in this food category. Actual use levels have been reported as 300 mg/Kg by industry.
c. Azorubine (Carmoisine) INS 122	India support adoption at 100 mg/Kg, as India allows the it at 100 mg/kg in this food category.
d. Curcumin, INS 100(i)	India supports adoption at 500 mg/Kg. India allows the it at GMP levels in this food category and actual use levels by industry have been reported as 500 mg/Kg.
e. Tartrazine, INS 102	India supports adoption at 100 mg/Kg, as India allows the it at 100 mg/Kg in this food category.

2) Appendix 2:

Provision for trisodium citrate in FC 01.1.1

Comment: India does not support use of trisodium citrate in FC 01.1.1 as the additive use is not technologically justified.

3) Appendix 3

Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

1. Food Category No. Food Category No. 01.1.2 (Other fluid milks (plain))

General Comments:

- In India fortified milk, recombined/ reconstituted milk etc. are manufactured without food additives with exception of phosphates (only in UHT and sterilized milk to prevent curdling). Therefore, there is no technological need and justification for use of additives with emulsifier, stabilizer or thickener function in such products. However, some food additives having emulsifier and stabilizer function are already adopted in CCFA50 session for use in such products.
- India as largest producer and consumer of milk and milk products doesn't support use of additives with thickener function, which carry potential to mislead consumers and may be used as economic adulterant.

Therefore, India does not support use of additive with thickener function as there is no technological justification for use of emulsifiers/stabilizers with additional function of thickeners.

Specific Comments:

a. Carob Bean Gum, 410	India doesn't agree with eWG proposal to adopt Carob bean gum, as India doesn't allow use of this additive, due to lack of technological justification.
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b. Carrageenan, INS 407	India doesn't agree with eWG proposal to adopt Carrageenan, as India doesn't allow use of this additive, due to lack of technological justification.
c. Gellan Gum, INS 418	India doesn't agree with eWG proposal to adopt Gellan gum, as India doesn't allow use of this additive, due to lack of technological justification.
d. Guar Gum, INS 412	India doesn't agree with eWG proposal to adopt Guar gum, as India doesn't allow use of this additive, due to lack of technological justification.
e. Gum Arabic, INS 414	India doesn't agree with eWG proposal to adopt Gum arabic, as India doesn't allow use of this additive, due to lack of technological justification.
f. Hydroxypropyl Starch, INS 1440	India doesn't agree with eWG proposal to adopt Hydroxypropyl starch, as India doesn't allow use of this additive, due to lack of technological justification.
g. Microcrystalline Cellulose (Cellulose Gel), INS 460(i)	India doesn't agree with eWG proposal to adopt Microcrystalline Cellulose, as India doesn't allow use of this additive, due to lack of technological justification.
h. Pectins, INS 440	India doesn't agree with eWG proposal to adopt Pectins, as India doesn't allow use of this additive, due to lack of technological justification.
i. Polydextrose, INS 1200	India doesn't agree with eWG proposal to adopt Polydextrose, as India doesn't allow use of this additive, due to lack of technological justification.
j. Potassium Carbonate INS 501(i)	India doesn't agree with eWG proposal to adopt Potassium Carbonate, as India doesn't allow use of this additive, due to lack of technological justification.
k. Propylene Glycol Alginate, INS 405	India doesn't agree with eWG proposal to adopt Propylene Glycol Alginate, as India doesn't allow use of this additive, due to lack of technological justification.
l. Sodium Carboxymethyl Cellulose (Cellulose Gum), INS 466	India doesn't agree with eWG proposal to adopt Sodium Carboxymethyl Cellulose, as India doesn't allow use of this additive, due to lack of technological justification.
m. Xanthan Gum, INS 415	India doesn't agree with eWG proposal to adopt Xanthan gum, as India doesn't allow use of this additive, due to lack of technological justification.

4) Appendix 4

Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0, with the exception of those additives with technological functions of colour (excluding those provisions discussed in point (i)) or sweetener, adipates, nitrites and nitrates, the provisions in food category 14.2.3 and its subcategories, and provisions awaiting a reply from CCSC, CCPFV or CCFO

1. Food category No. 5.1.4 (Cocoa and chocolate products)

Additive	Comments
a. Sucroglycerides, INS 474	India supports adoption at 6000 mg/Kg, as India allows this additive at 6000 mg/Kg in this food category.
b. Sucrose Esters of Fatty Acids, INS 373	India supports adoption at 6000 mg/Kg, as India allows this additive at 6000 mg/Kg in this food category.
c. Sucrose Oligoesters, Type I and II, INS 473 a	India supports adoption at 6000 mg/Kg, as India allows this additive at 6000 mg/Kg in this food category.

2. Food category No. 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4).

Additive	Comments:
a. Tartrates, INS 334, 335(ii), 337	India supports adoption.

3. Food category No. 14.1.4.1 Carbonated water-based flavoured drinks

Additive	Comments:
a. Propylene Glycol, INS 1520	India supports discontinuation of provisions for Propylene Glycol in this food category. Propylene glycol is contained in products of Food category 14.1.4.1 as of carry-over from flavourings and does not serve a technological function in the final products. It does not meet the definitions of food additive as defined in GSFA.
b. SUCROSE ESTERS OF FATTY ACIDS	India supports discontinuation.

4. Food category No. 14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades

Additive	Comments:
a. Propylene Glycol, INS 1520	India supports discontinuation of provisions for Propylene Glycol in this food category. Propylene glycol is contained in products of Food category 14.1.4.1 as of carry-over from flavourings and does not serve a technological function in the final products. It does not meet the definitions of food additive as defined in GSFA.
b. SUCROSE ESTERS OF FATTY ACIDS	India supports discontinuation.

5. Food category No. 14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks

Additive	Comments:
a. Propylene Glycol, INS 1520	India supports discontinuation of provisions for Propylene Glycol in this food category. Propylene glycol is contained in products of Food category 14.1.4.1 because of carry-over from flavourings and does not serve a technological function in the final products. It does not meet the definitions of food additive as defined in GSFA.
b. SUCROSE ESTERS OF FATTY ACIDS	India supports discontinuation.

5) Appendix 6: Standard for Mozzarella (CXS 262-2006)

Comments: India supports eWG proposal:

- to allow use of anti-caking agents in the surface treatment of high-moisture mozzarella only when that mozzarella is in a shredded or diced format.
- Use of preservatives in surface treatment of high-moisture mozzarella is technologically justified when that mozzarella is not packaged in liquid.
- To revise the table on justified uses in Codex standard (CXS 262).

6) Appendix 7: Provisions in Table 1 and 2 of the GSFA in food categories 14.1.4 and 14.1.5

1. Food Category No. 14.1.4: Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks

Additive	Comments
a. Dioctyl Sodium Sulfosuccinate, INS 480	India supports adoption of the proposal of Dioctyl Sodium Sulfosuccinate in food category 14.1.4 at proposed ML of 10mg/kg with a new note "For use in fruit-flavoured beverages only" and Note 127 "On the served to the consumer basis". The use of Dioctyl Sodium Sulfosuccinate is technologically justified in stabilizing flavouring emulsions in fruit flavoured beverages.

2. Food Category No. 14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades

STEAROYL LACTYLATES, INS 481(i), 482(i)

Comment: India supports adoption at 2000mg/kg in this Food Category as use of stearyl lactylates is technologically justified in non-carbonated water based beverages containing milk &/or cocoa as ingredients.

3. Food Category No. 14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks

STEAROYL LACTYLATES, INS 481(i), 482(i)

Comment: India supports proposal at 2000mg/kg in this Food Category as use of stearyl lactylates is technologically justified in concentrates (liquid or solid) for water based flavoured drinks containing milk &/or cocoa as ingredients.

4. Food Category No. 14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

POLYGLYCEROL ESTERS OF FATTY ACIDS, INS 475

Comment: India supports proposal at 5000mg/kg in this Food Category as use of Polyglycerol Esters of Fatty Acids is technologically justified in Coffee, tea, herbal and other hot cereal and grain beverages.

5. Food Category No. 14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa

STEAROYL LACTYLATES, INS 481(i), 482(i)

Comment: India supports proposal at 2000mg/kg in this Food Category as use of stearyl lactylates is technologically justified in Coffee, tea, herbal and other hot cereal and grain beverages.

Malaysia

Appendix 1: Provision for Curcumin in FC 05.2.2

Food Cat No	Additive	ML (mg/kg)	eWG proposal	Malaysia's Position
05.2.2 Soft candy	CURCUMI N(100(i))	300	Adopt at 150 mg/kg.	Adopt at 150 mg/kg with New Note: "Except for use at 300 mg/kg in candies with yellow fruit flavour". This proposal also supported by the majority of members on the 3 rd circular and no safety concern.

Appendix 2: Provision for Trisodium citrate in FC 01.1.1

Food Cat No	Additive	ML (mg/kg)	Notes	eWG proposal	Malaysia's Position
01.1.1 Fluid milk (plain)	Trisodium citrate	GMP	438, 439	Adopt with Note 438 "Only for use as emulsifier or stabilizer" and Note 227 "for use in sterilized and UHT treated milks only". Remove Note 439 "For use in sterilized and UHT treated milks from non-bovine species only".	Supports Proposal to adopt with Note 438 and Note 227 and remove Note 439.

Appendix 3: Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer

Malaysia's comment: Malaysia is on the view that Carob bean gum (INS 410), Carrageenan (INS 407), Guar gum (INS 412) and Gum Arabic (INS 414) should be permitted at GMP because technological justification has already been provided by many member's state and there are no safety concerns for its use at GMP. Stabilizer is widely used in FC 01.1.2 including fortified, reconstituted, recombined and composite milk products and traded globally. Use levels are varied as the additive is often used in combination with other stabilizers and emulsifiers. As such, this additive should be permitted at GMP rather than be limited to a specific Maximum Use Level.

Appendix 4: Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0, with the exception of those additives with technological functions of colour (excluding those provisions

discussed in point (i) or sweetener, adipates, nitrites and nitrates, the provisions in food category 14.2.3 and its subcategories, and provisions awaiting a reply from CCSCH, CCPFV or CCFO

Food Cat No	Additive	I N S	M L (m g/ k g)	Malaysia's Position
14.1.4.1 Carbonated water-based flavoured drinks	PROPYLENE GLYCOL	1520	3000	Support discontinuation due to propylene glycol does not serve a technological function in the finished product.
14.1.4.2 Non-carbonated water-based flavoured drinks, including punches and ades	PROPYLENE GLYCOL	1520	3000	Support discontinuation due to propylene glycol does not serve a technological function in the finished product.
14.1.4.3 Concentrates (liquid or solid) for water-based flavoured drinks	PROPYLENE GLYCOL	1520	200000	Support discontinuation due to propylene glycol does not serve a technological function in the finished product.

Peru

Programa de la 51.^a Reunión del Comité del Codex sobre Aditivos Alimentarios Tema 5 (a) NORMA GENERAL PARA LOS ADITIVOS ALIMENTARIOS (NGAA): DISPOSICIONES SOBRE COLORANTES EN EL PROCEDIMIENTO DE TRÁMITES EN LAS CATEGORÍAS DE ALIMENTOS 05.2, 05.3 Y 05.4; DISPOSICIONES DE LOS CUADROS 1 Y 2 DE LA NGAA EN LAS CATEGORÍAS DE ALIMENTOS 01.0 A 16.0; ANTEPROYECTO DE DISPOSICIONES EN EL CUADRO 3 PARA GOMA GHATTI (SIN 419) Y POLISACÁRIDO DE SEMILLAS DE TAMARINDO; LA JUSTIFICACIÓN TECNOLÓGICA PARA EL USO DE SUSTANCIAS CONSERVADORAS Y ANTIAGLUTINANTES PARA EL TRATAMIENTO DE SUPERFICIE DE LA MOZZARELLA CON ALTO CONTENIDO DE HUMEDAD; SOLICITUD Y RECOPILACIÓN DE DATOS DISPONIBLES PERTINENTES SOBRE LA EXPOSICIÓN ALIMENTARIA, Y LA DOSIS DE USO REAL Y JUSTIFICACIÓN TECNOLÓGICA DE DETERMINADOS ADITIVOS ALIMENTARIOS EN LAS CATEGORÍAS DE ALIMENTOS 14.1.4 Y 14.1.5 (INFORME DEL GTE SOBRE LA NGAA)

INTRODUCCIÓN

El Comité del Codex sobre Aditivos Alimentarios (CCFA51) considerará aprobar el uso del SIN 471 y varios otros aditivos, en las Categorías de Alimentos (CA) "Frutas frescas tratadas en su superficie" (04.1.1.2) y "hortalizas frescas tratadas en su superficie" (04.2.1.2).

El Grupo de Trabajo Electrónico (GTE) del GSFA estudió el tema y en su informe, de fecha 12 de febrero de 2019, el GTE ha recomendado lo siguiente:

- Para la CA 04.1.1.2, agregar el SIN 471 con la Nota "Para uso en ceras, recubrimientos o glaseados aplicados a la superficie de fruta fresca solamente".
- Para la CA 4.2.1.2, agregar el SIN 471 con la Nota "Para uso en ceras, recubrimientos o esmaltes **donde estos tratamientos superficiales están permitidos** para su aplicación a la superficie de verduras frescas, algas, y nueces y semillas".

OBSERVACIONES GENERALES:

En relación con la CA 04.2.1.2, algunos países indicaron que los revestimientos no son permitidos para hortalizas frescas. Por lo tanto, en un esfuerzo para lograr un consenso, el informe del GTE recomienda que el SIN 471 sea agregado a la CA 04.2.1.2 con la Nota nueva "Para uso en ceras, revestimientos o glaseados donde se permitan estos tratamientos para aplicación en la superficie de hortalizas frescas, algas, nueces y semillas".

Perú entiende que la nueva Nota propuesta por el GTE para la aprobación del SIN 471, y los demás aditivos que aparecen en el cuadro del informe en la CA 04.2.1.2, es problemática y debe ser modificada en base a los siguientes fundamentos:

- a) La Nota tal como está redactada obliga a generar normativas legales en cada país para permitir el uso del SIN 471 para la categoría 04.2.1.2.

- b) No es necesario especificar que el uso es restringido a los países que permiten los tratamientos en la superficie de hortalizas frescas.
- c) Las normas del Codex, tienen un carácter supletorio frente a las normas legales de cada país, en ese sentido, si la NGAA permite el uso de un aditivo en una CA, pero las leyes internas de un país miembro lo prohíben, la ley interna necesariamente se aplica.

Por lo tanto, entendemos que la nueva Nota para la CA 04.2.1.2 debe ser igual a, y tan amplia como, la nueva Nota para la CA 04.1.1.2.

Asimismo, la redacción de la NOTA para permitir el uso de los aditivos en revestimientos en la CA 04.2.1.2, impone a los países una obligación onerosa e indebida de promulgar legislación para permitir el uso de dicho aditivo. Es preciso señalar que, la restricción de uso sería necesaria únicamente si el país no permite el uso del SIN 147, ya que si está prohibido por una norma de un país a pesar del hecho que la NGAA apruebe el uso del aditivo no podría utilizarse.

En consecuencia, se considera que la responsabilidad de promulgar normativas sobre el uso del aditivo sin 147 para los tratamientos en la superficie, debe caer sobre los países que no permiten el uso de los mismos. Por lo tanto, si no se logra consenso en el CCFA51 para la Nueva nota sugerida arriba, entendemos que una alternativa pudiera ser una Nueva nota los siguientes términos: *"Para uso en ceras, recubrimientos o glaseados donde no son expresamente prohibidos estos tratamientos para aplicación en la superficie de hortalizas frescas, algas, nueces y semillas"*.

POSICIÓN PAÍS:

Perú expresa su apoyo para agregar el SIN 471, Monoglicéridos y Diglicéridos de Ácidos Grasos, para uso en las categorías de alimentos a continuación:

1. FC 04.1.1.2 - Frutas frescas tratadas en la superficie, con la Nueva nota "Para uso en ceras, recubrimientos o glaseados aplicados a la superficie de fruta fresca solamente".
2. FC 04.2.1.2 - Hortalizas (incluidos hongos y setas, raíces y tubérculos, legumbres y leguminosas y áloe vera), algas marinas y nueces y semillas frescas tratadas en la superficie, con la Nueva nota "Para uso en ceras, recubrimientos o glaseados aplicados a la superficie de verduras frescas, algas, y nueces y semillas frescas".

En la alternativa, si no se logra consenso en el Comité del Codex sobre Aditivos Alimentarios para la Nueva nota indicada en el párrafo anterior, el Gobierno de Perú propone que la Nueva nota lea "Para uso en ceras, recubrimientos o glaseados donde no son expresamente prohibidos estos tratamientos para aplicación en la superficie de hortalizas frescas, algas, nueces y semillas".

Programa de la 51.ª Reunión del Comité del Codex sobre Aditivos Alimentarios

Tema 5 (a)

Solicitud de comentarios en el trámite 7 del propilenglicol (INS 1520), para uso en las categorías: 14.1.4.1 (Bebidas a base de agua aromatizadas con gas), 14.1.4.2 (Bebidas a base de agua aromatizadas, sin gas, incluidos los ponches de fruta y las limonadas y bebidas similares), 14.1.4.3 (Concentrados (líquidos o sólidos) para bebidas a base de agua aromatizadas)

INTRODUCCIÓN

La CCFA50 acordó que el GTE sobre la NGAA en la CCFA51 preparara propuestas para el resto de los proyectos y anteproyectos de disposiciones sobre aditivos alimentarios de las categorías de alimentos 01.0 a 16.0, con excepción de las disposiciones sobre aditivos alimentarios con funciones tecnológicas de colorantes (excluidas las disposiciones examinadas en el punto (i)) o edulcorantes, adipatos, nitritos y nitratos, las disposiciones de la categoría de alimentos 14.2.3 y sus subcategorías, y las disposiciones que están esperando respuesta del CCPFV, CCSCH o CCFO.

OBSERVACIONES GENERALES:

En base al trabajo realizado por el GTE, se tiene que el propilenglicol está contenido en los productos de la CA 14.1.4.1 por transferencia de los aromas y no tiene una función tecnológica en el producto final. No se ajusta a las definiciones de aditivo alimentario de la NGAA (véase el Preámbulo de la NGAA), por lo que no es conveniente adoptar la disposición. Los ingredientes no aromatizantes en los aromatizantes están adecuadamente cubiertos en las Directrices del Codex para el uso de los aromatizantes (Sección 3.5 en CAC/GL 66-2008).

Además, el Comité de Expertos en Aditivos Alimentarios (FAO/OMS) (JECFA) examinó el uso de propilenglicol como un aromatizante adyuvante en 2001 (2002, JECFA). No se presentaron problemas de inocuidad de la exposición alimentaria diaria de 2 400 mg per cápita.

POSICIÓN PAÍS:

El Perú manifiesta lo siguiente:

Apoyamos sus anteriores presentaciones del GTE (Grupo de Trabajo Electrónico) en favor de la interrupción de todas las disposiciones en materia de bebidas con propilenglicol (INS 1520) de la GSFA para las bebidas en base de agua (categorías de alimentos 14.1.4.1, 14.1.4.2., 14.1.4.3).

El propilenglicol no cumple ninguna función tecnológica en la bebida terminada. Los ingredientes que no son aromatizantes que no tienen una función tecnológica en la bebida terminada están cubiertos en las Directrices para el Uso de Aromatizantes del Codex (ver la Sección 3.5 en CAC/GL 66-200