



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Fifty-First Session

#### ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS;

#### REPORT OF THE EWG ON ALIGNMENT

Comments of Canada, European Union, Ghana, Indonesia, Kenya, Philippines, Russian Federation, Senegal and United States of America

#### Canada

#### (a) Appendix 1 – Explanatory Document – Questions, Comments and Chair’s Proposal for the eWG

##### (i) With respect to Point no. 14 [Related to Appendix 5 (Consideration of the addition of a footnote in Table 3 of the GSFA)]:

The Chair is proposing to add to the original amendment in order to provide clarity:

“This Section only lists Commodity Standards where the corresponding GSFA Food Category is not listed in the Annex to Table 3. Provisions for the use of specific Table 3 additives in Commodity Standards where the corresponding GSFA Food Category is listed in the Annex to Table 3 can be found in the corresponding Food Categories in Tables 1 and 2. Be aware that the process to align food additive permissions in commodity standards with the GSFA is a work in progress, and as a result not all commodity standards are yet listed in this Section.”

Canada would like to suggest the word ‘permissions’ (underlined above) be replaced by ‘provisions’ as the word ‘provision’ is used in the *General Standard for Food Additives* (CXS 192-1995) while the word ‘permission’ is not.

##### (ii) With respect to Point no. 20 [Appropriateness of considering propionates (INS 280, 281 and 282) as Table 3 food additives]:

The Chair of the eWG has proposed the following for consideration by the pWG:

“Does the PWG agree that the issue raised by Canada (amending the MLs of specific food additives when JECFA has re-evaluated the ADI to “not limited” and so an argument can be made for the ML to be GMP and so added to Table 3) is best addressed by the GSFA WG compared to the alignment WG?”

Canada believes that this issue needs to be discussed by the pWG as it has implication not only for the propionates (INS 280, 281 and 282), and we are of the opinion that it should be addressed by the eWG on the GSFA rather than on Alignment.

Canada would ask the Committee if there is value in referring any provision to the eWG on the GSFA or active commodity committee whenever JECFA has revised the ADI for an additive, because the provisions in the commodity standard may no longer be valid.

##### (iii) With respect to Point no. 25 [Addition of Notes 178 and 62 to entries for carmines (INS 120) and chlorophylls and chlorophyllins, copper complexes (INS 141 (i), (ii)) in Tables 1-2 of the GSFA]:

The Chair of the eWG is proposing to add Notes 178 and 62 to the appropriate entries to Tables 1 and 2 of the GSFA that are under consideration in Appendix 2 of this agenda item.

Canada notes that Note 178 and Note 62 are only associated with a limited number of entries to Tables 1 and 2 of the GSFA of carmines (INS 120) or chlorophylls and chlorophyllins, copper complexes (INS 141 (i), (ii)), respectively. Canada is seeking clarification if the addition of these two notes to the entries under consideration in Appendix 2 (i.e., FC 01.6.2.1) is necessary. Consequently, Canada would ask if all existing provisions in the GSFA for ‘carmines’ and ‘chlorophylls and chlorophyllins, copper complexes’ should be associated with Notes 178 and 62, respectively.

**(b) Appendix 2 – Proposed Amendments to the Food Additive Provisions of the Codex Commodity Standards for Milk and Milk Products (Ripened Cheeses) and Tables 1, 2 and 3 of the GSFA Relating to Ripened Cheeses**

**(i) With respect to food additive provisions in FC 01.6.2.1:**

- a. Annatto extracts – norbixin-based (INS 160b(ii)):** For this additive and all other additives with the functional class of colour that are permitted in cheese products conforming to the Codex standards<sup>1</sup> under the current alignment exercise, Note GG is added (*For use in cheeses mass only.*).

Canada would suggest a minor revision, i.e., to remove the 's' at the end of 'cheeses'.

- b. Carmines (INS 120):** Note 178 (As carminic acid) was added to this provision. Canada inquires whether the addition of this note is needed, as it is not systematically associated with all current entries of Tables 1-2 of the GSFA.

- c. Carotenes, beta-, vegetables (INS 160a(ii)):** As this food additive is included in the thirteen Codex cheese standards of interest, Canada recommends adding a table for this food additive under this food category:

<b>Carotenes, beta-, vegetables</b>					
<b>INS 160a(ii): Functional class: Colour</b>					
<b>Food No.</b>	<b>Category</b>	<b>Food Category</b>	<b>Max Level</b>	<b>Notes</b>	<b>Recommendations</b>
01.6.2.1		Ripened Cheese, includes rind	600 mg/kg	GG	Adopt

Note GG is added (For use in cheese mass only.)

- d. Chlorophylls and chlorophyllins, copper complexes (INS 141(i),(ii)):** Note 62 (As copper) was added to this provision. Canada inquires whether the addition of this note is needed, as it is not systematically associated with all current entries of Tables 1-2 of the GSFA.

**(c) Appendix 4 – Proposed Amendments to the Food Additive Provisions of the Codex Commodity Standards for Cereals, Pulses and Legumes (CCCPL); and Vegetable Proteins (CCVP) and Tables 1, 2 and 3 of the GSFA Relating to CCCPL and CCVP**

**(i) Amendments of Tables 1 and 2 of the GSFA – Standard for Wheat Flour (CXS 152-1985)**

**a. Lecithin (INS 322(i)):**

In response to the first circular, Canada had noted that the functional class of “flour treatment agent” is not associated with INS 322(i) and had recommended that the provision not be aligned at this time until the matter has been referred to and considered by the INS eWG. The final eWG recommendation for INS 322(i) has been updated accordingly.

In addition, Canada had suggested that Note 28 (Except for use in wheat flour conforming to the *Standard for Wheat Flour* (CODEX STAN 152-1985) at 2 000 mg/kg) be removed from the provision at this time in Tables 1-2 of the GSFA. However, according to CXS 192-1995, the provision for lecithin in FC 06.2.1 was adopted in 2014 (related to CCFA46; see Appendix 1 of [CX/FA 14/46/8](#)). The *Standard for Wheat Flour* was adopted in 1985 and amended in 2016. Lecithin is listed as a permitted flour treatment agent at 2,000 mg/kg. Canada believes that the use of lecithin was adopted as an emulsifier in 2014 and not as a flour treatment agent, in products conforming to FC 06.2.1 and to CXS 152-1985.

Canada would like to request that the alignment pWG reconsider the need to refer this matter to the INS eWG if indeed the use of lecithin was adopted as an emulsifier in 2014 in FC 06.2.1.

**(ii) Amendments of Tables 1 and 2 of the GSFA – Standard for Instant Noodles (CXS 249-2006):**

**a. Phosphates (several INS #):**

<sup>1</sup> Cheddar (CXS 263-1966); Danbo (CXS 264-1966); Edam (CXS 265-1966); Gouda (CXS 266-1966); Havarti (CXS 267-1966); Samsø (CXS 268-1966); Emmental (CXS 269-1967); Tilsiter (CXS 270-1968); Saint-Paulin (CXS 271-1968); Provolone (CXS 272-1968); Coulommiers (CXS 274-1969); Camembert (CXS 276-1973); Brie (CXS 277-1973)

As explained under Point no. 8 of Appendix 1 of CX/FA 19/51/6, the Chair of the eWG proposed that all 16 phosphates currently listed as humectants in CXS249-2006 be associated with the maximum level of 2,000 mg/kg, singly or in combination, as phosphorous as part of this alignment exercise. Canada agrees with this proposal.

Canada notes that the New Note C-CXS249 is listing 'calcium dihydrogen phosphate INS 450(vii)' while this particular substance is not listed in CXS249-2006. However, as 'dicalcium diphosphate (INS 450(vi))' is listed in CXS 249-2006, Canada believes it should be listed in the Note C-CXS249 instead of INS 450(vii).

Canada also notes that the New Note C-CXS249 lists 6 additional phosphates that are not currently included in the *Standard for Instant Noodles*: INS 341(i), 341(ii), 450(ii), 450(iv), 451(ii) and 452(iii). Canada is not necessarily opposed to the inclusion of these phosphates to New Note C-CXS249 but requests confirmation that these specific phosphates also have the function of a humectant.

Below are the proposed revisions to the New Note C-CXS249:

Note C-CXS249: "Except in products conforming to the *Standard for Instant Noodles* (CXS 249-2006): sodium dihydrogen phosphate (INS 339(i)), disodium hydrogen phosphate (INS 339(ii)), trisodium phosphate (INS 339(iii)), potassium dihydrogen phosphate (INS 340(i)), dipotassium hydrogen phosphate (INS 340(ii)), tripotassium phosphate (INS 340(iii)), calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), disodium diphosphate (INS 450(i)), trisodium phosphate INS 450(ii), tetrasodium diphosphate (INS 450(iii)), dipotassium diphosphate INS 450(iv), tetrapotassium diphosphate (INS 450(v)), ~~calcium dihydrogen phosphate INS 450(vii)~~, **dicalcium diphosphate (INS 450(vi))**, pentasodium triphosphate (INS 451(i)), pentapotassium triphosphate INS 451(ii), sodium polyphosphate (INS 452(i)), potassium polyphosphate (INS 452(ii)), sodium calcium polyphosphate INS 452(iii), calcium polyphosphate (INS 452(iv)), and ammonium polyphosphate (INS 452(v)) for use only as humectants at 2,000 mg/kg, singly or in combination, as phosphorus."

#### **b. Sulfites (INS 220-225, 539):**

New Note E-CXS249 is associated with the provision of sulfites in Tables 1-2 of the GSFA for FC 06.4.3:

Note E-CXS249: For products conforming to the *Standard for Instant Noodles* (CXS 249-2006): sulfur dioxide (INS 220), sodium sulfite (INS 221), sodium metabisulfite (INS 223) and potassium metabisulfite (INS 224) for use as flour treatment agents only.

The New Note is missing two additives that are currently allowed in CXS 249-2006: INS 225 and INS 539. Canada suggests the following revision to New Note E-CXS249 (note: text to be deleted is ~~strikethrough~~):

Note E-CXS249: For products conforming to the *Standard for Instant Noodles* (CXS 249-2006): ~~sulfur dioxide (INS 220), sodium sulfite (INS 221), sodium metabisulfite (INS 223) and potassium metabisulfite (INS 224)~~ for use as flour treatment agents only.

### **Ghana**

**Proposed amendments to the food additive provisions of the standard for cheddar (CXS 263-1966), Danbo (CXS 264-1966), Edam (CXS 265-1966), Gouda (CXS 266-1966), Havarti (CXS 267-1966), Samsø (CXS 268-1966), Emmental (CXS 269-1967), Tilsiter (CXS 270-1968), Saint-paulin (CXS 271-1968), Provolone (CXS 272-1968), Coulommiers (CXS 274-1969), Camembert (CXS 276-1973), Brie (CXS 277-1973) by introducing a text making reference to GSFA**

**Position:** Ghana agrees with the recommendation of the eWG to ensure full alignment of the commodity standards and GSFA. However, we propose amendment to the recommendation by deleting the words, '**only certain**' in the proposed text to the food additive provisions for each of the standard as indicated in appendix 2 CX/FA 19/51/6, to read:

*'Only those additives classes indicated as justified in the table below may be used for the product categories specified. Anticaking agents, colors and preservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 01.6.2.1 (Ripened cheese, includes rind) and ~~only certain~~ acidity regulators, anticaking agents and colors in Table 3 are acceptable for use in foods conforming to this standard'*

**Rationale:** The GSFA provides a corresponding standard to which the acidity regulators, anticaking agents, and colors in food categories may be used and therefore the words proposed for deletion adds no value to the commodity standards rather may introduce ambiguity in the standards.

**Proposed amendments to Table 1, 2 and 3 of the GSFA related to ripened cheeses, standards for sugars (CCS) and Natural Mineral Waters (CCNMW)**

**Position:** Ghana supports the proposed amendment

**Rationale:** The proposed amendments to table 1, 2 and 3 for the products have accurately ensured full alignment of the commodity standards to the GSFA as guided by the Codex Procedural Manual.

**Consideration of the addition of a footnote in table 3 of the GSFA: A request was made that the EWG on Alignment consider adding a footnote to make it clear to users of this portion of Table 3 that only commodity standards that fall under GSFA food categories that are not in the Annex to Table 3 will be listed. A proposed text of the footnote was done.**

**Position:** Ghana proposes the following amendment to the footnote:

*“This Section only lists Commodity Standards where the corresponding GSFA Food Category is not listed in the Annex to Table 3. Provisions for the use of specific Table 3 additives in Commodity Standards where the corresponding GSFA Food Category is listed in the Annex to Table 3 can be found in the corresponding Food Categories in Tables 1 and 2. ~~Be aware that the process to align food additive permissions in commodity standards with the GSFA is a work in progress, and as a result not all commodity standards are yet listed in this Section.~~”*

**Rationale:** The text proposed for deletion is ambiguous and information does not add value to the users of the GSFA. The content of the information is obvious as it is the case of pending food additives to which the GSFA does not indicate more additives are to be included in it.

**Proposed revisions to the adopted provisions contained in CRD 2 annex 4 part c, i.e. ascorbyl esters in food categories 13.1.1, 13.1.2 and 13.1.3 of the GSFA**

**Position:** We do not support the deletion of note 10 (As ascorbyl stearate) in food category 13.1.3 and recommend including the note in categories 13.1.1 and 13.1.2.

**Rationale:** Both forms of Ascorbyl Esters (Ascorbyl palmitate - INS 304 and Ascorbyl Stearate -INS 305) are approved for use in food categories 13.1.1, 13.1.2 and 13.1.3 and hence the need to retain and add the notes so as to provide specific expression of results depending on the compound used in the product.

## European Union

### *European Union Competence*

### *European Union Vote*

The European Union (EU) would like to thank Australia, the United States of America and Japan for chairing the electronic Working Group and preparing the report.

The EU appreciates the work on the alignment and recognises the complexity and extent of this work. The EU is generally supportive of the approach being taken and the chair's proposals as outlined in the report.

The EU would like to make the following comments which are related to two particular issues identified in the report:

#### Safety concerns on Azodicarbonamide (INS 927a)

Azodicarbonamide is not authorised as a food additive in the EU. The EU takes note of comments made by New Zealand noticing that a number of countries have discontinued the use of azodicarbonamide due to safety concerns. Semicarbazide can be formed as a decomposition product of azodicarbonamide in food products made using flour in which azodicarbonamide has been added as a dough improver. The EU strongly supports further discussion on this matter and approaching JECFA to re-evaluate safety of this food additive with a high priority due to existing safety concerns.

#### Enzymes listed in CXS 152-1985 and in the GSFA category 06.2 and 06.2.1

As a general comment the EU notes that the alignment exercise should respect the intentions of the commodity standard and the scope of the provisions listed therein.

CXS 152-1985 currently lists four enzymes under the Section 4 'Food additives' and sub-section 4.1 'Enzymes'. At the same time there are adopted provisions for two of those enzymes in the GSFA FC 06.2 and 06.2.1 (INS 1100(i) and INS 1101(i)). It can be assumed that those provisions were entered into the GSFA for use as flour treatment agents.

Taking the above considerations into account the EU is of the view that enzymes listed in CXS 152-1985 also act as flour treatment agents and for consistency shall be captured in the GSFA.

Therefore, the EU does not support addition of XS152 note to the provision for alpha amylase from *Aspergillus oryzae* var. INS 1100(i) in FC 06.2 and protease from *Aspergillus oryzae* var. INS 1101(i) in FC 06.2.1.

Similarly, the EU does not support the proposed amendments for section 4 in CXS 152-1985 suggesting the inclusion of sub-section 4.2 'Processing Aids – Enzyme preparations' and the reference to the Guidelines on Substances used as Processing Aids (CAC/GL 75-2010).

## Indonesia

### APPENDIX 1

#### Paragraph 1

Chair's proposal: Make the changes as proposed, noting subsequent re-numbering will be required.

#### Indonesia comment:

Indonesia supports chair's proposal to add new sections to make it clear that no food additives are permitted to be added to products sold as 'natural mineral water' and 'bottle/package drinking water'.

#### Paragraph 4

Chair's proposal: Since the GSFA maximum level (ML) (2006) is more recent than the CXS 212-1999 (latest amendment 2001) it is proposed to stay with it and not make any changes as part of alignment.

#### Indonesia comment:

Indonesia supports chair's proposal to stay with the GSFA maximum level of 6.600 mg/kg.

#### Paragraph 5

Chair's proposal: Support the IDF request to keep the food additive functional class table in the Codex commodity standards after the alignment work has been completed. It is not proposed to remove the entries for functional classes that are not allowed to ensure there is no room for ambiguity. A new note has been added to provisions for colours and acidity regulators in Tables 1 and 2 for ripened cheese alignment in Appendix 2, picking up Canada's suggestion being: "GG For use in cheese mass only."

#### Indonesia comment:

Indonesia considers that list of food additives functional class which are not allowed in either cheese mass and surface/rind treatment should be deleted in order to avoid ambiguity. If in the future, these food additives are considered to be necessary and technologically functional, then these functional classes could be added in the list.

#### Paragraph 6

Chair's proposal: Make the changes to the GSFA reflecting the provisions in the commodity standards for nitrates (at 35 mg/kg in the commodity standards and not 40 mg/kg which is the draft provision) and annatto extracts – norbixin-based in the first circular as per the decision tree. It is also proposed to remove the earlier note CC since it is believed not to be required.

#### Indonesia comment:

Indonesia supports maximum level for Nitrate at 35 mg/kg as proposed.

#### Paragraph 8

Chair's proposal: All 16 phosphates should be associated with the maximum level of 2000 mg/kg, singly or in combination, as phosphorous. The issue regarding the four colours (amaranth, caramel II, curcumin and tartrazine) for the alignment of Instant Noodles (CXS 249-2006) has been addressed by adding new entries. Sodium sorbate has been removed from additional entries.

#### Indonesia comment:

Indonesia supports Chair's proposal that all 16 phosphates should be associated with the maximum level of 2000 mg/kg, as phosphorous.

#### Paragraph 10

Chair's proposal: Section 4.1 and 4.2 of the standard should be renamed as recommended by the ETA and AMFEP above. However, no mention will be made of the IPA since it is not a Codex Standard but is an inventory list. The entry is made more general by referring to enzyme preparations rather than just the couple of currently listed enzymes since this is likely to be out of date and too restrictive.

No new entries for L-cysteine hydrochloride and potassium ascorbate will be added as L-cysteine hydrochloride has not been reviewed by JECFA, and potassium ascorbate does not have a JECFA specification.

The alignment of lecithin and sodium ascorbate should be deferred until the INS EWG has considered whether they have the functional class of flour treatment agent. Therefore, replacement words for section 4.2 (Flour treatment agents) of CXS 152-1985 would need to be deferred to finalise the alignment.

It was separately proposed by one EWG member to request that JECFA be asked to provide guidance on the safety of azodicarbonamide.

**Indonesia comment:**

Indonesia supports Chair's proposal to rename section 4.1 and 4.2 of the Commodity Standard for Wheat Flour (CXS 152-1985).

**Paragraph 11**

Chair's proposal: Make the provisions of enzymes used as processing aids general to enzyme preparations rather than limit it to the current list which is not likely to represent current practice for CXS 152-1985.

**Indonesia comment:**

Indonesia supports Chair's proposal for make the provisions of enzymes used as processing aids general to enzyme preparations.

**Paragraph 12**

Chair's proposal: Amendments to the GSFA as part of the alignment work relating to CXS 174-1989 will remain as proposed. Amendments to CXS 174 have been made to remove reference to the IPA.

**Indonesia comment:**

- Indonesia supports Chair's proposal but suggests that the list of functional class for processing aids should be reviewed.
- Indonesia proposes that acidity regulator, antifoam agent, antidusting agents, flour treatment agents and viscosity control agent should be listed as food additives because additives in these functional groups are still have function in the final product.

**Paragraph 13**

Chair's proposal: Amendments to the GSFA as part of the alignment work relating to CXS 175-1989 will remain as proposed. Amendments to CXS 175 have been made to remove reference to the IPA.

**Indonesia comment:**

- Indonesia supports Chair's proposal but suggests that the list of functional class for processing aids should be reviewed.
- Indonesia proposes that acidity regulator, firming agents, anti-dusting agents, flour treatment agents, and viscosity control agent should be listed as food additives because additives in these functional groups are still have function in the final product. The list for processing aids should be limited for antifoam agents, enzyme preparations and extraction solvents

**Paragraph 14**

Chair's proposal: Add to the original amendment as proposed by providing additional clarity that the section only includes commodity standards that have been aligned with the GSFA as below, or amended as appropriate.

"This Section only lists Commodity Standards where the corresponding GSFA Food Category is not listed in the Annex to Table 3. Provisions for the use of specific Table 3 additives in Commodity Standards where the corresponding GSFA Food Category is listed in the Annex to Table 3 can be found in the corresponding Food Categories in Tables 1 and 2. Be aware that the process to align food additive permissions in commodity standards with the GSFA is a work in progress, and as a result not all commodity standards are yet listed in this Section."

**Indonesia comment:**

Indonesia supports Chair's proposal.

**Paragraph 15**

Chair's proposal: In addition to making the proposed amendments in Appendix 6, to also remove note 10 and add note 187 to food category 13.1.3.

**Indonesia comment:**

Indonesia would like to reconsider the support for deletion of note 10. The committee should consider the exposure of this additive before deleting note 10.

#### Paragraph 25

Chair's proposal: Add the additional notes as suggested, being note 178 for carmines (INS 120) and note 62 for CHLOROPHYLLS AND CHLOROPHYLLINS, COPPER COMPLEXES (INS 141(i),(ii)).

#### Indonesia comment:

Indonesia supports chair proposal.

#### Paragraph 26

Chair's proposal: not make the change for the above reason.

#### Indonesia comment:

Indonesia supports chair proposal.

### Kenya

**Issue 1:** Does the PWG agree that the issue raised by Canada (amending the MLs of specific food additives when JECFA has re-evaluated the ADI to "not limited" and so an argument can be made for the ML to be GMP and so added to Table 3) is best addressed by the GSFA WG compared to the alignment WG?

**Comment:** All updates to the standard should be done by GSFA PWG and not the Alignment WG

**Justification:** This will avoid duplication of work between the two working groups. Instead, the alignment WG should whenever they find such scenarios recommend to the GSFA WG to take the appropriate action.

**Issue 2:** Proposed text for alignment of various commodity standards '*Anticaking agents, colours and preservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 01.6.2.1 (Ripened cheese, includes rind) and only certain acidity regulators, anticaking agents and colours in Table 3 are acceptable for use in foods conforming to this standard*'

**Comment:** We propose the text to be amended to read as, '*Anticaking agents, colours and preservatives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food category 01.6.2.1 (Ripened cheese, includes rind) and ~~only certain~~ acidity regulators, anticaking agents and colours in Table 3 are acceptable for use in foods conforming to this standard*'.

**Justification:** The GSFA as published provides for the specific acidity regulators, anticaking agents and colours to be used in these products. Inclusion of the words, 'only certain' gives the impression there may be further limitation on the approved list.

**Issue 3:** Deletion of Note 10 (As ascorbyl stearate) in the proposed amendments to Table 1 and 2 of the GSFA on Ascorbyl esters INS 304 and 304

**Comment:** Kenya does not support deletion of this note

**Justification:** The GSFA allows the use of Ascorbyl palmitate (304) and Ascorbyl stearate (INS 305) and therefore the note allows expression of results where INS 305 is used.

### Philippines

#### Comments:

The Philippines supports the proposed amendments to the food additive provisions of the following Codex commodity standards:

#### CCMMP: 13 Standards

Cheddar (CXS 263-1966);  
 Danbo (CXS 264-1966);  
 Edam (CXS 265-1966);  
 Gouda (CXS 266-1966);  
 Havarti (CXS 267-1966);  
 Samsø (CXS 268-1966);  
 Emmental (CXS 269-1967);  
 Tilsiter (CXS 270-1968);  
 Saint-Paulin (CXS 271-1968);  
 Provolone (CXS 272-1968);  
 Coulommiers (CXS 274-1969);

Camembert (CXS 276-1973); and  
Brie (CXS 277-1973).

**CCS: 2 Standards**

Honey (CXS 12-1981); and  
Sugars (CXS 212-1999).

**CCNMW: 2 Standards**

Natural mineral waters (CXS 108-1981); and  
Bottled/package drinking waters (other than natural mineral waters) (CXS 227-2001).

**CCCPL: 3 Standards**

Wheat flour (CXS 152-1985); Couscous (CXS 202-1995); and Instant noodles (CXS 249-2006).

**CCVP: 3 Standards**

Wheat protein products including wheat gluten (CXS 163-1987); Vegetable protein products (VPP) (CXS 174-1989); and Soy protein products (CXS 175-1989)

**Rationale:**

The proposed amendments to include a general reference to the GSFA in Section 4 of the commodity standards for the above Codex commodity standards, recognizes the GSFA as the single reference for food additives within CODEX.

## Russian Federation

Appendix 1

EXPLANATORY DOCUMENT – QUESTIONS, COMMENTS AND CHAIR’S PROPOSALS FOR THE EWG

under a.i.1. THE RUSSIAN FEDERATION agrees that in line with the fact that no food additive permitted in food categories Honey, Natural mineral waters and Bottled/package drinking water (other than natural mineral waters), in Codex commodity standards CXS 12-1981 (Honey), CXS 108-1981 (Natural mineral waters) and CXS 227-2001 (Bottled/package drinking water (other than natural mineral waters)) a special provision needs to be added with the wording: “NO FOOD ADDITIVES PERMITTED”.

under a.i.2. THE RUSSIAN FEDERATION supports Chair’s proposal: Leave the GSFA entry of magnesium silicate, synthetic (553(i)) since it is the most recent and so assumed to be the most appropriate entry.

under a.i.3-4. THE RUSSIAN FEDERATION considers that the proposal of eWG on the use of anti-tracking agents in sugars can be approved in a revised version:

Note NN: For products in **dried powdered forms** conforming to the Standard for Sugars (CXS 212-1999), as anticaking agents only: calcium dihydrogen phosphate (INS 341(i)), calcium hydrogen phosphate (INS 341(ii)), tricalcium phosphate (INS 341(iii)), magnesium dihydrogen phosphate (INS 343(i)), magnesium hydrogen phosphate (INS 343(ii)), trimagnesium phosphate (INS 343(iii)), magnesium carbonate (INS 504(i)), bone phosphate (INS 542), silicon dioxide, amorphous (INS 551), Calcium silicate (INS 552), and magnesium silicate, synthetic (INS 553(i)) at **10,000 mg/kg singly or in combination.**

under a.i.5-7. The Codex commodity standards for cheese:

THE RUSSIAN FEDERATION considers it appropriate to remove all food additive provisions in all commodity standards for cheese after the work on alignment is completed. The following wording may be added in the commodity standards for food categories 01.6.1, 01.6.2, 01.6.3, 01.6.4.

Food additives can be used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995). Only certain food additives are acceptable for use in foods conforming to this Standard in accordance with Table 3 of CODEX STAN 192-1995.

The Russian Federation supports the proposal to make changes in the GSFA reflecting the provisions in the commodity standards for nitrates (at 35 mg/kg) and annatto extracts – norbixin-based.

THE RUSSIAN FEDERATION strongly opposes the use of preservatives for treatment of the cheese mass. We note that natamycin and nisin are antibiotics, and their use in cheese mass could contribute to the antibiotic resistance, pathogenicity of bacterial food pollutants, while reducing the immune status of people. At the same time, it should be noted that in the process of cheese production (that adheres to good manufacturing practices) a sufficient amount of biologically active substances that contribute to the long-term storage of the final product is produced naturally, not requiring the use of additional preservatives.

under a.i.10-11. Standard for Wheat Flour (CXS 152-1985)



According to the legislation of the Russian Federation and the Eurasian Economy Union, enzymes can be used in the food industry, including in the processing of flour, only as processing aids. Their activity in the finished product should cease completely.

In accordance with GUIDELINE FOR THE CONDUCT OF FOOD SAFETY ASSESSMENT OF FOODS PRODUCED USING RECOMBINANT-DNA MICROORGANISMS (CAC/GL 46-2003), only strains of microorganisms with unique No., which was assigned to them after their risk assessment, can be used in food production.

THE RUSSIAN FEDERATION offer a new footnote with the following wording " not allowed for the use in flour for retail sale (except for special types: pancake flour, flour for cupcakes, etc.)";

We cannot agree with eWG Chair's proposal: "Make the provisions of enzymes used as processing aids general to enzyme preparations rather than limit it to the current list which is not likely to representative current practice for CSS 152-1985". The scope of use should be determined separately for each enzyme, as in the case of food additives.

under a.i.17. Standard for whey cheeses (CXS 284-1971), Codex General Standard for Cheese (CXS 283-1976)

Chair's proposal: "Stay with the proposed entry for calcium propionate (INS 282) for the alignment work for specific ripened cheese standards - calcium propionate (INS 282), but does not mention potassium propionate (INS 283)" could not be accepted because calcium propionate (INS 282) and potassium propionate (INS 283) used only for surface treatment of cheeses.

under a.i.20. Issue for the PWG

THE RUSSIAN FEDERATION agrees with proposal that the issue raised by Canada (amending the MLs of specific food additives when JECFA has re-evaluated the ADI to "not limited" and so an argument can be made for the ML to be GMP and so added to Table 3) is best addressed by the GSFA WG, not the alignment WG.

under Appendix 4 Proposed amendments to the food additive provisions of the Codex Commodity Standards for cereals, pulses and legumes (ccCPL); and vegetable proteins (ccVP) and tables 1, 2 and 3 of the GSFA relating to CCCPL and CCVP

A. PROPOSED AMENDMENTS TO THE FOOD ADDITIVE PROVISIONS OF THE STANDARD FOR WHEAT FLOUR (CXS152-1985)

Submit a line to the editor:

Processing Aids (Enzymes)	<del>Maximum level</del> Residual quantity in finished product
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*In the case of Processing Aids is regulated "Residual quantity in finished product". For enzymes residual activity in finished product are prohibited.*

F. PROPOSED AMENDMENTS TO THE STANDARD FOR COUSCOUS (CXS 202-1995)

Mineral oil, high viscosity: Functional Class: Antifoaming agent, Glazing agent INS 905d					
Food category No	Food category	Max level	Step/Year Adopted	Notes	Recommendation
06.1	Whole, broken, or flaked grain, including rice	800	2004	98 &XS202	<del>Adopt</del> THE RUSSIAN FEDERATION : There is no technological justification

STANDARD FOR INSTANT NOODLES (CXS 249-2006)

Benzoates: Functional class: Preservative INS 210-213					
Food category No	Food category	Max level	Step/Year Adopted	Notes	Recommendation
06.4.3	Pre-cooked pastas and noodles and like products	1000 mg/kg	2004	13&XS249	<del>Adopt</del> THE RUSSIAN FEDERATION <u>does</u>

Benzoates: Functional class: Preservative INS 210-213					
Food category No	Food category	Max level	Step/Year Adopted	Notes	Recommendation
					not agrees with proposal. ML is too high

Sorbates: Functional class: Preservative INS 200-203, 200, 202, 203					
Food category No	Food category	Max level	Step/Year Adopted	Notes	Recommendation
06.4.3	Pre-cooked pastas and noodles and like products	2000 mg/kg	2012	42 & 211	Adopt <del>THE</del> THE RUSSIAN FEDERATION : does not agree with proposal. ML is too high.

### Senegal

**Contexte** : le CCFA travaille à réaliser un alignement complet entre la NGAA et les dispositions relatives aux additifs alimentaires contenues dans les normes de produits du Codex.

Le CCFA51 doit examiner les propositions du groupe de travail électronique (EWG) pour aligner les dispositions relatives aux additifs alimentaires

Le Sénégal s'intéresse aux questions suivantes :

**Question 1**: le EWG a demandé si le groupe de travail devrait accepter de modifier les limites maximales d'additifs alimentaires spécifiques lorsque le JECFA a réévalué la DJA en indiquant «non limité» pour que le niveau maximal soit un BPF et ajouté de la sorte au tableau 3 par le GT sur la NGAA ou le GT sur l'alignement

**Position**: le Sénégal pense que cette mission est du ressort du groupe de travail sur la NGAA

**Question 2** : Amendements proposés aux Tableaux 1, 2 et 3 de la NGAA concernant les fromages affinés, les normes pour les sucres (CCS) et les eaux minérales naturelles (CCNMW)

**Position** : le Sénégal approuve l'amendement proposé

**Justification** : les modifications proposées aux tableaux 1, 2 et 3 pour les produits ont permis de garantir avec exactitude l'alignement complet des normes de produits sur la NGAA, conformément au Manuel de procédure du Codex.

**Question 3** : Révisions proposées aux dispositions adoptées figurant dans le CRD 2 (CCFA50), annexe 4, partie C, c'est-à-dire les esters d'ascorbyle dans les catégories d'aliments 13.1.1, 13.1.2 et 13.1.3 de la NGAA

**Position**: le Sénégal n'appuie pas la suppression de la note 10 (en tant que stéarate d'ascorbyle) dans la catégorie d'aliments 13.1.3 et recommande d'inclure la note dans les catégories 13.1.1 et 13.1.2.

**Justification**: Les deux formes d'esters d'ascorbyle (palmitate d'ascorbyle - SIN 304 et stéarate d'ascorbyle - INS 305) sont approuvées pour une utilisation dans les catégories d'aliments 13.1.1, 13.1.2 et 13.1.3, d'où la nécessité de conserver et d'ajouter les notes afin de fournir une expression spécifique des résultats en fonction du composé utilisé dans le produit.

### United States of America

#### **Comments Pertaining to the Proposed Amendments to Tables 1 and 2 of the GSFA in Food Category 01.6.2.1 (Ripened Cheese, Includes Rind) as a result of the Alignment of 13 Commodity Standards for Cheese**

The Alignment exercise of the 13 cheese standards by the EWG resulted in a proposal to adopt new provisions in Tables 1 and 2 of the General Standard for Food Additives (GSFA) in Food Category 01.6.2.1 (Ripened cheese, includes rind) for seven Table 3 additives (Calcium propionate (INS 282), Calcium silicate (INS 552)), Magnesium silicate, synthetic (INS 553(i)), Propionic acid (INS 280), Silicon Dioxide, amorphous (INS 551), Sodium propionate (INS 281), and Talc (INS 553(iii)). We note that Food Category 01.6.2.1 is not contained

in the Annex to Table 3 of the GSFA, and therefore it is technically not appropriate to include provisions for these additives in Tables 1 and 2 of the GSFA. We are concerned that the inclusion of these provisions could be very confusing to users of the GSFA. However, we understand that the provisions for the seven Table 3 additives were included in Tables 1 and 2 of the GSFA in order that the numerical maximum limits included in the cheese commodity standards were not lost by the alignment process.

As a compromise, we propose that the numerical maximum limits listed for these provisions in Food Category 01.6.2.1 be replaced with “GMP” levels, and that the numerical maximum levels from the commodity standards be captured in notes for the individual provisions. This can be accomplished by making minor revisions to the notes proposed by the EWG (Note DD and EE). In this way, we are not conflicting with the Table 3 use of any of these additives at GMP in FC 01.6.2.1 (for any non-standardized foods), but are still capturing the numerical use levels and “singly or in combination” requirement as listed in the commodity standards. The proposal is outlined, below, in Table 1 and the modified list of Notes. Proposed changes are shown in the Max Level column with ~~crossout~~ text for the removed numerical maximum level and **bold underlined** text for the addition of GMP. Additions to Notes DD and EE are shown with **bold underlined** text.

Table 1. Proposed revisions to new Table 1 and 2 provisions for 7 Table 3 additives in FC 01.6.2.1 resulting from the alignment of 13 cheese standards with the GSFA.

<b>Food category 01.6.2.1 Ripened cheese, includes rind</b>				
<b>Additive</b>	<b>INS</b>	<b>Max Level</b>	<b>Notes</b>	<b>Recommendations</b>
<b><u>Calcium propionate</u></b>	<b><u>282</u></b>	<del>3000 mg/kg</del> <b><u>GMP</u></b>	<del>3, EE, XS269, XS274, XS276, XS277</del>	Adopt EWG comments sought
<b><u>Calcium silicate</u></b>	<b><u>552</u></b>	<del>10000 mg/kg</del> <b><u>GMP</u></b>	<del>DD, FF, XS274, XS276, XS277</del>	Adopt EWG comments sought
<b><u>Magnesium silicate, synthetic</u></b>	<b><u>553(i)</u></b>	<del>10000 mg/kg</del> <b><u>GMP</u></b>	<del>DD, FF, XS274, XS276, XS277</del>	Adopt EWG comments sought
<b><u>Propionic acid</u></b>	<b><u>280</u></b>	<del>3000 mg/kg</del> <b><u>GMP</u></b>	<del>3, EE, XS269, XS274, XS276, XS277</del>	Adopt EWG comments sought
<b><u>Silicon dioxide, amorphous</u></b>	<b><u>551</u></b>	<del>10000 mg/kg</del> <b><u>GMP</u></b>	<del>DD, FF, XS274, XS276, XS277</del>	Adopt EWG comments sought
<b><u>Sodium propionate</u></b>	<b><u>281</u></b>	<del>3000 mg/kg</del> <b><u>GMP</u></b>	<del>3, EE, XS269, XS274, XS276, XS277</del>	Adopt EWG comments sought
<b><u>Talc</u></b>	<b><u>553(iii)</u></b>	<del>10000 mg/kg</del> <b><u>GMP</u></b>	<del>DD, FF, XS274, XS276, XS277</del>	Adopt EWG comments sought

#### NOTES

**DD** **Except for use at 10,000 mg/kg**, singly or in combination: silicon dioxide, amorphous (INS 551), calcium silicate (INS 552), magnesium silicate, synthetic (INS 553(i)) and talc (INS 553(iii)) in products conforming to the Standards for Cheddar (CXS 263-1966), Danbo (CXS 264-1966) Edam (CXS 265-1966), Gouda (CXS 266-1966), Havarti (CXS 267-1966), Samsø (CXS 268-1966), Emmental (CXS 269-1967), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968): silicates calculated as silicon dioxide.

**EE** **Except for use at 3,000 mg/kg**, singly or in combination: propionic acid (INS 280), sodium propionate (INS 281) and calcium propionate (INS 282) in products conforming to the Standards for Cheddar (CXS 263-1966), Danbo (CXS 264-1966) Edam (CXS 265-1966), Gouda (CXS 266-1966), Havarti (CXS 267-1966), Samsø (CXS 268-1966), Tilsiter (CXS 270-1968), Saint-Paulin (CXS 271-1968) and Provolone (CXS 272-1968).