

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

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June 2021

TO: Codex Contact Points
Contact Points of international organizations having observer status with Codex

FROM: Secretariat, Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme

SUBJECT: Request for Comments on the alignment of food additive provisions and alignment plan for regional standards developed by CCLAC

DEADLINE: 30 September 2021

COMMENTS: To:
Secretariat
Codex Alimentarius Commission
Joint FAO/WHO Food Standards Programme
E-mail: codex@fao.org

BACKGROUND

1. The 51st Session of the Codex Committee on Food Additives (CCFA51) endorsed an updated forward work plan for alignment of food-additive provisions in commodity standards, including three regional standards developed by the FAO/WHO Coordinating Committee for Latin America and the Caribbean (CCLAC).
2. CCLAC21 discussed alignment of food additive provisions in its standards in line with the request from CCFA. As Members needed to review this issue with their technical experts before they could take any decisions on alignment of the regional standards with the [General Standard for Food Additives \(GSFA\) \(CXS 192-1995\)](#), CCLAC21 agreed to request the Codex Secretariat to issue a Circular Letter (CL) with detailed information on the background and the potential options for alignment of the food additive provisions in order to facilitate decision-making at CCLAC22.
3. The regional standards that need to be aligned with GSFA (CXS 192-1995) are listed below together with the options to be considered for alignment. In order to proceed with the alignment task, clarifications on the food additives provisions in the current regional standards are required. Further details are included in Appendix I.
4. Following a decision on the revision of the food additive provisions in the regional standards, CCLAC should request CCFA for endorsement of food additive provisions in each regional standard.
5. Alignment of the food additive provisions in the regional standards and in the GSFA can only be started once the food additive provisions in the regional standards have been decided.

Regional Standard for Culantro Coyote (CXS 304R-2011)

6. The [Regional Standard for Culantro Coyote \(CXS 304R-2011\)](#) does not include any reference to food additive provisions. CCLAC may consider developing the appropriate food additive provision for inclusion in the standard. In light of GSFA (CXS 192-1995), *Culantro coyote* belongs to "Food Category No. 04.2.1.1 (Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds)" in which some food additives are permitted with the condition of "for use in edible fungi and fungus products only" (Note 262) (see Appendix II). In light of this there is a need to revise the standard to ensure alignment with the GSFA (CXS 192-1995).

- **Option 1:** Confirm that no food additives are allowed in this commodity and insert text to this effect within the regional standard for *Culantro coyote*. This could be achieved by a revision of the standard to include a provision indicating that "No food additives are permitted in foods conforming to this standard." to stipulate that no food additives are allowed for the commodity.
- **Option 2:** Confirm that food additives permitted in Food Category 04.2.1.1 of the GSFA are allowed for use in this commodity and revise the standard to include a food additive provision

stating that “*Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard*” to stipulate that food additives are permitted for use in accordance with the GSFA (CXS 192-1995). This could be achieved by requesting CCFA to revise Note 262 to permit these food additives for use in culantro coyote. In this case, technical justification for the use of food additives should be submitted to CCFA.

- **Option 3:** Develop a list of food additives which are permitted in this commodity and revise the standard accordingly. Technical justification for the use of food additives should be submitted to CCFA.

Regional Standard for Lucuma (CXS 305R-2011)

7. [Regional Standard for Lucuma \(CXS 305R-2011\)](#) does not include any reference to food additive provisions. CCLAC may consider developing the appropriate food additive provision for inclusion in the standard. In the GSFA (CXS 192-1995), lucuma belongs to “Food Category No. 04.1.1.1 Untreated fresh fruit” that does not have any food additive provisions as of now.

- **Option 1:** Confirm that no food additives are allowed in this commodity and insert text to this effect within the regional standard for lucuma. This could be achieved by a revision of the standard to include a provision indicating that “*No food additives are permitted in foods conforming to this standard.*” to stipulate that no food additives are allowed for the commodity.
- **Option 2:** Develop a list of food additives which are permitted in this commodity and revise the standard accordingly. In this case, technical justification for the use of food additives should be submitted to CCFA.

Regional Standard for Yacon (CXS 324R-2017)

8. The [Regional Standard for Yacon \(CXS 324R-2017\)](#) includes a food additive provision, which states that no food additives are allowed in accordance with CXS 192-1995. The latest version of CXS 192-1995 allows some food additives for “Food Category No. 04.2.1.1” which yacon belongs to with the condition of “for use in edible fungi and fungus products only”.

- **Option 1:** Confirm that no food additives are allowed in this commodity. In this case, no changes for the standard are needed.
- **Option 2:** Confirm that food additives in Food Category 04.2.1.1 of the GSFA are permitted for use in this commodity and revise the food additive provision as “*Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard*”. This could be achieved by requesting CCFA to revise Note 262 to permit these food additives for use in yacon. In this case, technical justification for the use of food additives should be submitted to CCFA.
- **Option 3:** Develop a list of food additives which are permitted in this commodity. Technical justification for the use of food additives should be submitted to CCFA.

REQUEST FOR COMMENTS

9. Codex Members and Observers are invited to review the options for each of the regional standards with regards to the alignment of food additive provisions therein with the GSFA ([CXS 192-1995](#)).
10. Comments should address which option should be taken for each standard, and if needed, a technical justification should be provided to clarify the need for the use of food additives.

GUIDANCE ON THE PROVISION OF COMMENTS

11. Comments should be submitted through the Codex Contact Points of Codex members and observers in writing, in conformity with the Procedure for the Elaboration of Codex Standards and Related Texts (Part 3 – Uniform Procedure for the Elaboration of Codex Standards and Related Texts, Procedural Manual of the Codex Alimentarius Commission) to the address and by the deadline indicated on the cover page. Comments must be submitted in word file to facilitate their compilation and translation.

Appendix I

Relationship of Regional Standards Developed by CCLAC and the General Standard for Food Additives (CXS 192-1995; GSFA)

Standard	Current food additive provisions	Food additives permitted in GSFA	Options
CXS304R-2011 Regional Standard for Culantro Coyote	No reference to Food Additive Provisions.	Culantro coyote belongs to “Food category No. 04.2.1.1 Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds”, in which some food additives are permitted with the condition of “for use in edible fungi and fungus products only” (see Appendix II).	<p>Option 1: No food additives are permitted in culantro coyote.</p> <ul style="list-style-type: none"> Revise the standard to indicate that “<i>No food additives are permitted in foods conforming to this standard.</i>” <p>Option 2: Food additives are acceptable for use in accordance with GSFA in <i>Culantro coyote</i>.</p> <ul style="list-style-type: none"> Revise the standard to indicate that “<i>Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard</i>” Request CCFA to revise Note 262 to permit the food additives in Food Category 04.2.1.1 for use in culantro coyote. In this case, technical justification for the use of food additives should be submitted to CCFA. <p>Option 3: Develop a list of food additives which are permitted in this commodity.</p> <ul style="list-style-type: none"> Revise the standard to include the food additives. Technical justification for the use of food additives should be submitted to CCFA.
CXS305R-2011 Regional Standard for Lucuma	No reference to Food Additive Provisions.	Lucuma belongs to “Food category No. 04.1.1.1 Untreated fresh fruit”, in which no food additives are provided as of now.	<p>Option 1: No food additives are permitted in lucuma.</p> <ul style="list-style-type: none"> Revise the standard to indicate that “<i>No food additives are permitted in foods conforming to this standard.</i>” <p>Option 2: Develop a list of food additives which are permitted in this commodity.</p> <ul style="list-style-type: none"> Revise the standard to include food additives. Technical justification for the use of food additives should be submitted to CCFA.

<p>CXS324R-2017</p> <p>Regional Standard for Yacon</p>	<p>“8. FOOD ADDITIVES.</p> <p>This Standard applies to yacon as identified in Food Category 04.2.1.1 Untreated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed and nuts and seeds, and therefore <u>no food additives is allowed in accordance with the provisions of the General Standard for Food Additives (CXS 192-1995).</u>”</p>	<p>Yacon belongs to “Food category No. 04.2.1.1 Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds”, in which some food additives are permitted with the condition of “for use in edible fungi and fungus products only” (see Appendix II).</p>	<p>Option 1: No food additives are permitted in yacon.</p> <p>Option 2: Food additives are acceptable in accordance with GSFA for use in yacon.</p> <ul style="list-style-type: none"> • Revise the standard to indicate that <i>“Food additives used in accordance with Tables 1 and 2 the General Standard for Food Additives (CXS 192-1995) in Food Category 04.2.1.1 are acceptable for use in foods conforming to this standard”</i> • Request CCFA to revise Note 262 to permit the food additives in Food Category 04.2.1.1 for use in yacon. In this case, technical justification for the use of food additives should be submitted to CCFA. <p>Option 3: Develop a list of food additives which are permitted in this commodity.</p> <ul style="list-style-type: none"> • Revise the standard to include the food additives. • Technical justification for the use of food additives should be submitted to CCFA.
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Food Additives Permitted for Food Category No. 04.2.1.1 in the General Standard for Food Additives (CXS 192-1995)

Food Category No. 04.2.1.1		Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds and nuts and seeds		
Additive	INS	Year Adopted	Max Level	Notes
ACETIC ACID, GLACIAL	260	2013	GMP	262 & 263
ASCORBIC ACID, L-	300	2013	500 mg/kg	262
CITRIC ACID	330	2013	GMP	262 & 264
LACTIC ACID, L-, D- and DL-	270	2013	GMP	262 & 264
SODIUM DIHYDROGEN CITRATE	331 (i)	2015	GMP	262
TRISODIUM CITRATE	331 (iii)	2015	GMP	262