

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

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Agenda Item 6(a)

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

Thirty-ninth Session

Beijing, China, 24-28 April 2007

#### COMMENTS ON THE REPORT OF THE ELECTRONIC WORKING GROUP ON THE INCLUSION OF THE FOOD ADDITIVE PROVISIONS OF THE COMMODITY STANDARDS INTO THE GSFA

The following comments have been received from the following Codex Members and observers:  
European Community and Norway

This document contains late submissions of comments received after the deadline, but those were submitted before 12 April 2007.

#### European Community

The European Community would like to thank the United States for the elaboration of this comprehensive report. The European Community agrees in general with the need for a systematic approach for the integration of the food additive provisions in the commodity standards into the GSFA, agrees to establish principles for revising the GSFA and the commodity standards, and welcomes a prioritised work plan based on the schedule of the commodity committee's sessions. Finally the European Community would like to offer the following specific comments:

#### Recommendations to CCFA

**Recommendation 1, para. 25, 3<sup>rd</sup> bullet point:** The maximum use levels applicable to a standardised food may be increased if the highest maximum level is to be applied among a group of commodity standards. There are cases where a particular standardised food needs a higher maximum use level than the foods of other commodity standards covered by the same food category. In this case, this use level should be restricted to the particular standardised food only. The technological need for the use of the food additive may be different among the different standardised foods covered by the same food category and therefore the levels considered necessary by the Codex commodity committees should be respected. Such cases could be dealt with appropriate footnotes. We therefore suggest adding a sentence at the end of the paragraph to read: *“When this level, or the use of the food additive, is technologically justified for a commodity standard only, it should be restricted to the relevant standardised food only.”*

**Recommendation 1, para. 25, 6th bullet point:** The EC considers that Draft (Step 6/7) and proposed draft (Step 3/4) food additive provisions that differ from those in the commodity standards should be also referred to the Codex commodity committee for comments before further consideration by the CCFA. We therefore suggest the following wording: *“Draft (Step 6/7) and proposed draft (Step 3/4) food additive provisions that differ from those in the commodity standards would be maintained in the GSFA and considered further by the CCFA after they have been referred to the relevant Codex Commodity Committee for comments”*.

**Recommendation 1, para. 25, 7th bullet point:** The EC considers that the Codex commodity committees should be consulted even on the adopted food additive provisions in the GSFA with the view to assess the technological need for the additive in the standardised food under question. If the commodity committee would not agree with the provision for the use of an additive or group of additives they should provide justification for the exception. The following wording is proposed to this end: “

*“Adopted (Step 8) food additive provisions in the GSFA would be referred to the relevant Codex commodity committee(s) to review if the technological need for the additive is justified in the relevant standardised food(s). If the Codex commodity committee would not agree with the provision for the use of an additive or group of additives they should provide justification for the exception”.*

**Recommendation 1, para. 26:** Food additives are often assigned more than one functional class (e.g. antioxidant, preservative). To control if a food additive is used for the technological function identified in the relevant standard and not for another function would be difficult. A thorough procedure for the assignment of functional classes to food additives by CCFA would be necessary. The ongoing work for the harmonisation of the Codex class names and INS is a first step but further work will be needed.

### **Norway**

Norway would like to thank the Working Group and especially the US delegation of for the work on the proposal for options to include the food additive provisions of the Commodity Standards into the GSFA.

Norway agrees with the principles used for development of the GSFA and proposed CCFA work plan.

With regard to the principles for revising the GSFA and affected Codex Commodity Standards, Norway agrees to those seen isolated. However, we refer to the working paper CX/FA 07/39/7 which proposed amendments to the procedural manual with regard to the relationship between commodity standards and the GSFA.

The proposed text in proposal CX/FA 07/97/7 will in our opinion facilitate the relationship between food additives in commodity standards and the General Standard for Food Additives (GSFA). The text ensures that the GSFA is the single authoritative reference points for food additives, but will also provide for the distinctive character of standardised food as they reference which functional classes of food additives that are authorised in those standardised foodstuffs. We believe this clarification contributes to accelerate the development of the GSFA. It also provides for that the principles for use of food additives given in the preamble of the GSFA apply to commodity standards.

If the same principles were to be used with regard to the existing standards as well, amending them to only refer to food category in the GSFA and the relevant functional class, this might speed up the process of including the commodity standards into the GSFA.