

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of  
the United Nations



World Health  
Organization

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Agenda Item 6

CX/FA 14/46/16 Add.2

March 2014

(Original language only)

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEx COMMITTEE ON FOOD ADDITIVES

#### Forty-Sixth Session

Hong Kong, China, 17-21 March 2014

### PROPOSED DRAFT AMENDMENTS TO THE INTERNATIONAL NUMBERING SYSTEM (INS) FOR FOOD ADDITIVES

#### Comments at Step 3

#### Comments of European Union and ICA

#### EUROPEAN UNION

The European Union and its Member States (EUMS) would like to thank Iran for chairing the electronic Working Group and developing the discussion paper.

#### **The EUMS would like to provide the following comments:**

The EUMS regard CAC/GL 36-1989 to be a useful reference for identifying food additives traded internationally. The EUMS see no concerns with the addition of most of the INS numbers as proposed.

#### **Specific comments**

#### Potassium aluminium silicate-based pearlescent pigments - Table 1

As regards Potassium aluminium silicate-based pearlescent pigments the EUMS take note that the Committee agreed to postpone their inclusion in the INS, awaiting its evaluation by the 77th JECFA meeting (para 107, REP 13/FA). The 77<sup>th</sup> JECFA meeting designed the specifications for Potassium aluminium silicate-based pearlescent pigments as full and the document CX/FA 14/46/17 is asking the CCFA committee to review the specifications with a view to recommending their adoption by the Commission.

The EUMS would like to highlight that as expressed in their previous comments (see CRD 13 of the 45<sup>th</sup> CCFA Session) they consider Potassium aluminium silicate-based pearlescent pigments as a mixture of two (respectively three) food additives (INS 555 Potassium aluminium silicate used as a carrier, i.e. secondary additive, for INS 171 Titanium dioxide and/or INS 172 Iron oxide) and therefore do not support their addition to CAC/GL 36-1989.

In this regard the EUMS are asking JECFA for explanation of certain issues (see the EUMS comments on CX/FA 14/46/17) to clarify whether Potassium aluminium silicate-based pearlescent pigments are food additives on their own.

However, if the Committee decides to adopt the proposed specifications and to include Potassium aluminium silicate-based pearlescent pigments in CAC/GL 36-1989 the EUMS would like that the divergence between the INS numbering system and the E number system which may create misunderstandings and have implications for the labelling of foods is noted by the Codex Members.

#### Polyvinyl alcohol (PVA)-polyethylene glycol (PEG) graft co-polymer

The EUMS would like to point out that the paper CX/FA 14/46/16 does not contain any proposal to address the inclusion of PVA-PEG graft co-polymer in the International Numbering System for Food Additives.

In this regards the EUMS would like to refer to paragraph 128 of REP 13/FA which informs that the Committee noted that the new substance polyvinyl alcohol (PVA)-polyethylene glycol (PEG) graft co-polymer proposed for safety evaluation by JECFA did not have INS number and agreed to refer it to the e-WG on INS. It seems that this issue has been omitted.

At the same time the EUMS would like to inform that a request for authorisation of the use of this substance as a glazing agent in solid food supplements was considered in the European Union and it was proposed to

assign E 1209 as E-number to that additive. The EUMS would be able to provide further details (e.g. on the technological effect), if needed.

### **INTERNATIONAL CONFECTIONERY ASSOCIATION (ICA)**

The International Confectionery Association (ICA) is a nongovernmental organization that brings together the interests of the global confectionery industry, representing and promoting these interests internationally. ICA facilitates, coordinates and communicates international scientific, regulatory and public affairs information while promoting and representing the interests of the confectionery industry in a collaborative and responsible manner.

ICA promotes the harmonization of confectionery standards and policies based on science and is a strong supporter of Codex Alimentarius. ICA also works to facilitate international trade of confectionery products by eliminating or preventing artificial barriers to trade and believes that global harmonization of food additive standards is important to achieve that goal.

ICA thanks the Iranian delegation for its work on the Codex International Numbering System (INS). ICA welcomes this opportunity to review the current discussion draft (CX/FA 14/46/16) and is pleased to provide the following comments with suggested additions in **bold** font:

- Proposals for changes/additions to the INS list for inclusion into the INS.

#### **ICA recommendations**

**Recommendations 1 – 4:** The following additional functions are suggested for the listed additives in Sections 3 and 4 of the INS as reflected in existing commodity standards.

<b>INS #</b>	<b>Food Additive</b>	<b>INS Functional Class (CAC/GL 36-1989, Version 9-2013)</b>	<b>ICA recommendations</b>
422	Glycerol	Humectant, Thickener, <b>Emulsifier</b>	<b>Recommendation 1:</b> Add emulsifier as a functional class for glycerol to Sections 3 and 4 of the INS (per Codex Standard for Chocolate and Chocolate Products - Codex Standard 87-1981)
440	Pectins	Emulsifier, Gelling Agent, Stabilizer, Thickener, <b>Glazing Agent</b>	<b>Recommendation 2:</b> Add “Glazing Agent” as a functional class for pectins to Sections 3 and 4 of the INS (per Codex Standard for Chocolate and Chocolate Products - Codex Standard 87-1981)
530	Magnesium Oxide	Anticaking agent, <b>Acidity Regulator</b>	<b>Recommendation 3:</b> Add “Acidity Regulator” as a functional class for magnesium oxide to Sections 3 and 4 of the INS (per Codex Standards for Cocoa Powders (Cocoa) and Dry Mixtures of Cocoa and Sugars – Codex Standard 105-1981; Cocoa (Cacao) Mass (Cocoa/Chocolate Liquor) and Cocoa Cake – Codex Standard 141-1983; Chocolate and Chocolate Products – Codex Standard 87-1981)
120	Tartarazine	Colour	Recommendation 4: Revise the spelling of “Tartarazine” to “Tartrazine” as per the JECFA monograph ( <a href="http://www.fao.org/ag/agn/jecfaadditives/specs/Monograph1/Additive-458.pdf">http://www.fao.org/ag/agn/jecfaadditives/specs/Monograph1/Additive-458.pdf</a> ).

#### **FORM ON WHICH INFORMATION ON CHANGES TO INS IS PROVIDED (Annex 2, CL 2010/9-FA)**

The change is requested by: ICA

The requested INS change concerns (*only select the appropriate option and provide justification in the space below*)

- Change in Section 1, i.e. introductory text of CAC/GL 36-1989
- Change in Section 2, i.e. Table of functional classes, definitions and technological purposes
- X Change in Sections 3 and 4, i.e. the INS for food additives (names and technological purposes)

**Justification:**

Glycerol (INS 422) serves as an emulsifier in standardized chocolate products (per Codex Standard 87-1981)

Pectins (INS 440) serves as glazing agent in standardized chocolate products (per Codex Standard 87-1981)

Magnesium Oxide (INS 530) serves as an acidity regulator in standardized products (per Codex Standards 105-1981; 141-1983; 87-1981).

**Justification for the requested INS change in Section 3: new or additional technological purpose (only select the appropriate option and provide details in the space below)**

Evidence that the compound has been or is capable of being used effectively for the technological purpose proposed

A Codex Commodity standard has provisions for the use of the compound

The JECFA specification monograph lists the technological purpose under the heading "Functional Uses"

A national food authority has permitted such a use

The food industry is currently using a substance for the technological purpose proposed

Other justification, what?

ICA thanks Iran for its work on the INS and for taking these comments into consideration. ICA will look forward to actively participating in the INS electronic working group following the 2014 CCFA session. Additional input will be forthcoming in response to future iterations of the draft discussion paper as it pertains to the confectionery categories.