



ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 54th SESSION OF THE CODEX COMMITTEE ON FOOD ADDITIVES (CCFA54)

22 - 26 April 2024 • Chengdu, Sichuan Province, China

Objectives

This document offers an analysis of agenda items to support participation in the 54th session of the Codex Committee on Food Additives (CCFA54), taking place in Chengdu, Sichuan Province, China, from 22 to 26 April 2024.

The document is intended for possible use by the Codex communities of practice promoted by the Global Food Regulatory Science Society (GFORSS) as part of their contribution to enhancing awareness and supporting effective participation in international standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of key agenda items of CCFA54, pertaining to:

- A. **Agenda Item 3.11: Matters related to Azodicarbonamide (INS 927a)**
- B. **Agenda Item 4.1: Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards**
- C. **Agenda Item 4.2: Alignment of the food additive provisions of commodity standards: Report of the Electronic Working Group on Alignment**
- D. **Agenda Item 5.1: General Standard for Food Additives (GSFA): Report of the Electronic Working Group on the GSFA**
- E. **Agenda Item 5.2: General Standard for Food Additives (GSFA): Proposals for new and/or revision of food additive provisions (replies to CL 2023/46-FA)**
- F. **Agenda Items 6.1 and 6.2: Proposed draft revision to the class names and the international numbering system (ins) for food additives**
- G. **Agenda Item 7: Proposals for additions and changes to the priority list of substances proposed for evaluation by JECFA (replies to CL 2023/47-FA)**
- H. **Agenda Item 8: Discussion paper on divergence between the General Standard for Food Additives (GSFA), Codex commodity standards and other texts – Identification of outstanding issues**
- I. **Agenda Item 9: Discussion paper on the development of a standard for baker's yeast**

This document will offer an analysis of select key agenda items to support the development of positions at the national and regional level.

This analysis is indicative in nature and does not represent an official position of the organization, its membership or its management.

**It is important to note that experts – members of the Expert Working Group – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the Expert Working Group proceedings is based on each expert's own credentials and experience, which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

A. Agenda Item 3.11: Matters related to Azodicarbonamide (INS 927a)

Document Number: CX/FA 24/54/3 Add.1

Azodicarbonamide (ADA) (figure 1) is used by wheat flour manufacturers for its beneficial technological effects, in particular as a whitening agent, for better gas retention (increase loaf volume), elasticity and toughness of baked products.

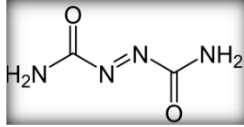


Figure.1: Chemical Structure of Azodicarbonamide.

However, ADA has long been a controversial additive, which is currently approved by the Codex and FDA, but not permitted at the European Union level, Food Standards Australia New Zealand and some other authorities.

When processing flour-based foods, ADA will degrade to form biurea under humid and acidic conditions, and biurea can then be transformed into a known carcinogen “semicarbazone” after high temperature treatment¹.

Background

At CCFA51 (2019), the Physical Working Group on Alignment noted the safety concern on azodicarbonamide (INS 927a) and requested the re-evaluation of this food additive. CCFA51 agreed to include azodicarbonamide (INS 927a) in the JECFA Priority list for safety re-assessment as a flour treatment agent.

At CCFA52 (2021), the priority list was reviewed, and the request for the re-evaluation of this food additive was affirmed for consideration at CCFA53.

- ❖ A Circular Letter (CL) requesting information and comments on the priority list of substances proposed for evaluation by JECFA was issued in November 2021;
- ❖ The responses to the CL were reviewed and discussed at the In-session Working Group on Priorities for Evaluation by JECFA.

At CCFA53 (2023), the Working Group recommended the removal of azodicarbonamide (INS 927a) from the JECFA priority list due to the absence of a sponsor and relevant data.

- ❖ CCFA agreed to forward the revised Priority List of Substances Proposed for Evaluation by JECFA, which excluded azodicarbonamide, for approval by CAC46 (2023);
- ❖ CAC46 subsequently approved the Priority List of substances proposed for evaluation by JECFA;
- ❖ Due to safety concerns regarding the safe use of azodicarbonamide (INS 927a) and a lack of support in providing data for re-evaluation, the acceptable daily intake (ADI) for azodicarbonamide (INS 927a) has been withdrawn.

At CCFA54 (2024), Codex secretariat will recommend considering the withdrawal of the ADI for azodicarbonamide (INS 927a), and the deletion of the provision for azodicarbonamide (INS 927a) from the GSFA.

According to the General Standard for Food Additives (GSFA, CXS 192-1995), azodicarbonamide (INS 927a) is permitted for use in Food Category 06.2.1, with a maximum usage level of 45 mg/kg and associated with Note 4676 (*For flours for leavened bread only in products conforming to the Standard for Wheat Flour (CXS 152-1985)*). Azodicarbonamide (INS 927a) is not permitted in any commodity standards.

The amendments proposed to the General Standard for Food Additives (CXS 192-1995) are the deletion of the provision for azodicarbonamide (INS 927a) presented below:

¹ Quantitative detection of azodicarbonamide in wheat flour by near-infrared spectroscopy based on two-step feature selection; Chemometrics and Intelligent Laboratory Systems Volume 219, 15 December 2021, 10444.

A Table 1 of the GSFA:

Azodicarbonamide: Functional class: Flour treatment agent INS 927a				
Food category No	Food category	Max level	Notes	Year adopted
06.2.1	Flours	45 mg/kg	467	2019

Note 467: For flours for leavened bread only in products conforming to the *Standard for Wheat Flour (CXS 152-1985)*.

B Table 2 of the GSFA:

Food category No. 06.2.1 Flours				
Additive	INS	Year Adopted	Max Level	Notes
Azodicarbonamide	927a	2019	45 mg/kg	467

Note 467: For flours for leavened bread only in products conforming to the *Standard for Wheat Flour (CXS 152-1985)*.

Conclusion and Recommendations

After the JECFA decision to withdraw the ADI of azodicarbonamide (INS 927a), Codex delegations may support the deletion of the provision for azodicarbonamide (INS 927a) from the GSFA, which constitutes a procedural action at this level.

B. Agenda Item 4.1: Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards

Document Number: CX/FA 24/54/5

The CCCFA is invited to consider the endorsement of the food additive provisions received from the 7th Session of the Codex Committee on Spices and Culinary Herbs (REP24/SCH) related to Standard for dried or dehydrated roots, rhizomes and bulbs – turmeric (for adoption by CAC47).

Background

- ❖ At CCFA52(2021) the committee agreed to establish a Physical Working Group (PWG), chaired by Australia to meet prior to CCFA53. The PWG was to consider and prepare recommendations for the plenary on the report of the Electronic Working Group (EWG) on Alignment; and **the endorsement of food additive provisions referred by commodity committees.**
- ❖ CCSC5 (2021), had agreed to:
 - (i) Elaborate draft standard for dried roots, rhizomes and bulbs - turmeric as new work and tasked the EWG to develop a proposed draft standard.
 - (ii) Establish an electronic working group (EWG) chaired by Iran and co-chaired by India, working in English, to elaborate the specific requirements for turmeric based on the concept of group standards i.e., category of “Dried roots, rhizomes and bulbs”.
- ❖ CCSC6(2022) agreed to:
 - (iii) Return the proposed draft standard for dried roots, rhizomes and bulbs - turmeric to Step 2/3 noting that there was only one round of consultation conducted in the EWG and some provisions and associated values needed further verification; and
 - (iv) Establish an EWG, chaired by Iran (Islamic Republic of) and co-Chaired by India, working in English only, to redraft the document taking into comments submitted at the session.

❖ At CCSC7(2024) the committee agreed to:

- (v) Use the term "dried or dehydrated turmeric" consistently throughout the document and to ensure alignment with the Standard for Dried Roots, Rhizomes, and Bulbs: Dried or Dehydrated Ginger (CXS 343- 2021).
- (vi) Forward the proposed draft standard for dried or dehydrated roots, rhizomes and bulbs - turmeric to CAC47 **for adoption at Step 5/8**; and
- (vii) **Forward the provisions for food additives**, labelling, and methods of analysis to **CCFA**, CCFL and CCMAS, respectively, for endorsement.

Analysis

The Proposed Draft Standard for Dried Roots, Rhizomes, and Bulbs – Turmeric (*Curcuma longa* L. of the Zingiberaceae family), developed by the EWG led by Iran and co-led by India, features three tables designed to establish uniform quality benchmarks for turmeric. These benchmarks cover aspects such as moisture content, ash content, and curcuminoids levels for its chemical properties, along with criteria for physical properties like insect damage and extraneous materials.

Comments and Considerations

Fifteen Codex delegations (Brazil, Canada, Chile, Egypt, Indonesia, Iraq, Jamaica, Madagascar, Malaysia, Peru, Saudi Arabia, Thailand, Uganda, USA, and the American Herbal Products Association) responded to CL 2023/56/OCS-SCH regarding the proposed draft standard for Turmeric. This feedback encompassed both general and specific comments.

General Comments:

- The USA supports Codex's work, emphasizing that standards should reflect global trade practices, the unique characteristics of the food item, and avoid unnecessary restrictions.
- Indonesia appreciates the draft preparation by Iran and India, supporting the standard development and the use of standard templates for group standards.
- Brazil and Iraq agree with the proposed modifications, especially regarding the inclusion of volatile oil content in the chemical characteristics for Turmeric to reflect international trade parameters.

Specific Comments:

- **Title Corrections:** Minor formatting and spelling corrections were suggested by the USA, Canada, and the American Herbal Products Association to standardize the title.
- **Product Definition:** Egypt proposes including primary or secondary rhizomes in the definition, aligning with Indian standards. Canada and Thailand also suggested amendments to include scientific names more accurately.
- **Styles:** The USA recommends aligning the text with the Standard for dried and dehydrated ginger, including the addition of "Sliced" as a style by Indonesia and Thailand.
- **Composition and Quality Factors:** Egypt suggests removing Annex II from the composition, aligning with Thailand and Canada's input that dried Turmeric should conform to specified requirements in Annex I.
- **Food Additives:** The USA states anticaking agents listed in the General Standard for Food Additives are acceptable for use.
- **Contaminants:** Jamaica proposes including specifications for mycotoxins, aligning with the General Standard for Contaminants and Toxins.
- **Hygiene:** Recommendations align with the General Principles of Food Hygiene and the Code of Hygienic Practice for Low Moisture Foods, with additional microbiological criteria consideration.
- **Labelling:** Uganda suggests including net weight and company name, with Canada and the USA emphasizing the country of origin and harvest labeling. Saudi Arabia specifically emphasizes the importance of declaring the country of harvest for transparency and consumer trust.

- **Methods of Analysis and Sampling:** Jamaica and Egypt call for alignment with existing standards and correct table numbering, while the USA suggests methodological updates.

CCSCH7 agreed to consider the revised proposed draft standard and endorsed most of the proposed revisions. It was decided to forward the proposed draft standard for dried or dehydrated roots, rhizomes and bulbs - turmeric to CAC47 for adoption at Step 5/8 and to forward the provisions for food additives, labelling, and methods of analysis to CCFA, CCFL and CCMAS, respectively, for endorsement.

Conclusion and Recommendations

Codex delegations might endorse the provisions forwarded by the CCSCH7, where only the use of anticaking agents found in Table 3 was endorsed (Table 3: additives permitted for general use in foods under conditions of good manufacturing practice (GMP) of the General Standard for Food Additives (CXS 192-1995).

C. Agenda item 4.2: Alignment of the food additive provisions of commodity standards: Report of the Electronic Working Group on Alignment

Document Number: CX/FA 24/54/6

The CCCFA54 is invited to consider the proposed amendments to the food additive provisions of commodity standards prepared by the EWG on alignment.

Background

Prior to CCFA43, preliminary alignment technical work had been undertaken by the International Dairy Federation (IDF). This preliminary work had been checked and validated by Australia (as the former chair to the working group) to ensure that the alignment proposals had been conducted appropriately in accordance with the Alignment procedures, including the CCFA Decision Tree and the working principles.

CCFA53 (2023) endorsed the recommendation to defer the alignment of these standards until CCFA54 and agreed to:

- establish an EWG, chaired by Canada and cochaired by the USA and Japan, and working in English only, to:
 - re-circulate the alignment of the following milk and milk products commodity standards: CXS 243- 2003; CXS 288-1976;
 - initiate development and maintenance of Table 3 notes in the General Standard for Food Additives (GSFA), in consultation with the Codex Secretariat, until their implementation into the GSFA database is achieved;
 - verify if the Standard for Processed Tomato Concentrates (CXS 57-1981) has been aligned, and if so, to verify that the provisions in the corresponding FCs in Table 1 & 2 accurately reflect the alignment (Recommendation 21 from CCFA53 CRD2 Rev.2);
 - align the following commodity standards: CXS 66-1981, CXS 260-2007, CXS 320-2015 (ref. Brought forward from Workplan) for the Codex Committee on Processed Fruits and Vegetables (CCPFV); and
 - Align the five regional standards: CXS 308R-2011, CXS 313R-2013, CXS 314R-2013, CXS 323R2017, CXS 324R-2017; (ref. Brought forward from Workplan).
- Update the work plan for future alignment of the food additive provisions of commodity Committees contained in the Information Document titled Guidance to Commodity Committees on the Alignment of Food Additive Provisions.

Analysis

Work Undertaken in 2023

1. **Aligning milk and milk product standards:** Undertaken revisions and alignment for standards such as CXS 243-2003 (Fermented Milks) and CXS 288-1976 (Cream and Prepared Creams), focusing on resolving discrepancies and ensuring consistency with GSFA categories.

2. **Initiating development and maintenance of Table 3 notes in the GSFA:** Introduction and refinement of Table 3 notes in the GSFA to better clarify the use and restrictions of food additives across different food categories, enhancing the interpretability and application of the GSFA.
3. **Verifying of Alignment for Processed Tomato Concentrates:** Specific alignment actions for the Standard for Processed Tomato Concentrates (CXS 57-1981) and ensuring accurate reflection in GSFA food categories.
4. **Alignment of Regional Standards:** Efforts to align food additive provisions for five regional standards with the GSFA guidelines including:
 - 1) Regional standard for Harissa (CXS 308R-2011);
 - 2) Regional Standard for Tempeh (CXS 313R-2013);
 - 3) Regional standard for date paste (CXS 314R-2013);
 - 4) Regional standard for laver products (CXS 323R2017);
 - 5) Regional standard for Yacon (CXS 324R-2017).

Key updates

Several key updates aimed at aligning food additive provisions in Codex standards with the General Standard for Food Additives (GSFA). The main updates include:

- **Additions/Revisions:** revisions to previously proposed Notes for CXS 243-2003 and CXS 288-1976 and Introduction or significant updates to the existing text, focusing on the incorporation of the latest scientific insights and regulatory practices.
- **Refining Food Additive Lists:** Modifications to lists of permitted food additives for specific food items or categories, ensuring they are scientifically justified and safe for consumption.
- **New Additive Provisions:** Inclusion of new food additives and significant updates to existing provisions.
- **Adjusting Maximum Levels:** Revisions of maximum levels of use for specific additives in various food products ensuring alignment with recent risk assessments and dietary exposure analyses.
- **Harmonizing with International Standards:** Efforts to ensure that Codex standards are harmonized with international guidelines and practices to facilitate global trade while maintaining a high level of consumer safety.
- **Removing Outdated Provisions:** Elimination of provisions that are outdated or no longer applicable, redundant specifications, or provisions that no longer align with international food safety guidelines.
- **Clarifying Use Conditions:** Detailed clarification on the use conditions for additives, specifying their technological functions and application boundaries.

The table 1 below outlines issues and questions that have emerged during the alignment process, along with proposed approaches for consideration by the committee.

Table 1: Key issues and questions requiring consideration by the Committee.			
Issues Identified	Background	Comments and considerations	Key Proposals
Issues related to Standard for Fermented Milks (CXS 243-2003)			
Issue 1 – Specific eligibility of certain functional classes for additives in Table 3	- Prior to CCFA43, preliminary alignment technical work had been undertaken by the International Dairy Federation (IDF). This preliminary work had been checked and	- Only some Table 3 additives are listed in the commodity standard under specific functional class headings, while others were not listed at all. - The International Dairy Federation (IDF) suggests that only the functions specified in the table to Section 4 of the standard should be permitted for those Table 3	1) It is proposed to restrict Table 3 functional classes to cases where the Table 3 additive is listed in the Table to section 4 of the commodity standard for a specific functional class.

Table 1: Key issues and questions requiring consideration by the Committee.			
Issues Identified	Background	Comments and considerations	Key Proposals
Issue 2 – Updated associations between flavoured products in the commodity standard and FCs 01.1.4 and 01.7	validated by Australia (as the former chair to the working group) to ensure that the alignment proposals had been conducted appropriately in accordance with the Alignment procedures, including the CCFA Decision Tree and the working principles.	additives. It recommends removing the emulsifier function as allowed for those Table 3 provisions listed in the standard as stabilizers and thickener	It is proposed to: <ol style="list-style-type: none"> 1) Revise the food categories that were associated with the commodity categories in the table of functional classes in CXS 243-2003. 2) Make adjustments to the affected provisions for preservatives permitted by CXS 243-2003 (BENZOATES, Nisin and SORBATES) to enable their use in both FCs 01.1.4 and 01.7, though only in heat-treated products. 3) Revise the general reference to Tables 1 and 2 of the GSFA in CXS 243-2003.
	- CXS 243-2003 and CXS 288-1976 proved to be particularly complex and the Committee agreed that further consideration should be given to their alignment during the EWG in preparation for CCFA54.	- Associations between the GSFA food categories and the commodity standard in CXS 243- 2003: <ul style="list-style-type: none"> o FC 01.1.4 and 01.7 could contain heat-treated and non-treated products; therefore, the distinction between the two is not the heat-treatment but rather the type of product: a beverage (“drink”) or a dairy-based dessert. Both FC 01.1.4 and 01.7 could therefore be associated with either flavoured commodity group in the commodity standard. 	
Issue 3 – Reference to Table 3 additives in the Annex to Table 3 of the GSFA		- The Function Class table and the footnote below it have taken precedence over the footnote linked to food category 01.2 in the annex to Table 3 in the GSFA <ul style="list-style-type: none"> - The entry of FC 01.2 in the annex to Table 3 of the GSFA captures FC 01.2.1.1 and 01.2.1.2 so those FCs food additive provisions need to be captured within Tables 1 and 2 and not Table 3. - The footnote linked to FC 1.2 does not take precedence to the requirements of CXS 243-2003 	1) Proposed amendments for a clearer general reference to permitted additives: <ul style="list-style-type: none"> - Enable food additives with a preservative function in FC 01.1.4, but restrict their use to heat-treated products, similar to FC 01.7. - Adjust provisions for BENZOATES (INS 210-213), nisin (INS 234), and SORBATES (INS 200, 202, 203) accordingly. - Delete the footnote to Table 3 in the GSFA aligning with the authoritative reference to permitted food additives provisions in CXS 243-2003.
Issue 4 – Annatto extracts, bixin based (INS 160b(i)) in FC 01.2.1	- During CCFA53 The Chair suspects that the provision for INS 160b(i) has been added to food category 01.2.1,	- The Chair suspects that: <ul style="list-style-type: none"> o the provision for INS 160b(i) has been added to food category 01.2.1, “Fermented milks (plain)” in error, as: it is unusual for plain products to have colours permitted. 	1) It is proposed to forward the provision for Annatto extracts, bixin-based (INS 160b(i)) in FC 01.2.1 to the EWG of the GSFA for revocation.

Table 1: Key issues and questions requiring consideration by the Committee.			
Issues Identified	Background	Comments and considerations	Key Proposals
	“Fermented milks (plain)” in error	<ul style="list-style-type: none"> ○ the presence of the XS notes 33 and 210 are relevant to fats and oils and suggests the provision is misplaced. 	
Issue 5 – General reference to carbonating agents and packaging gases in Tables 1&2 of the GSFA, in CXS243-2003, for food categories 01.1.4 and 01.7	New Zealand has proposed adding a reference to carbonating agents and packaging gases in Tables 1&2 of the GSFA for the flavoured product food categories 01.1.4 and 01.7. This suggestion is in keeping with the functional class table in CXS 243-2007, that acknowledges that carbonating agents and packaging gases are permitted in flavoured products.	<ol style="list-style-type: none"> 1) Option1: adding a reference to carbonating agents and packaging gases in Tables 1&2 of the GSFA for food categories 01.1.4 and 01.7. 2) Option 2: the general reference to carbonating agents and packaging gases in Table 3 is sufficient. 	1) Given the support by Australia, New Zealand and IDF, it is proposed to maintain omission of a general reference to Tables 1&2 for carbonating agents and packaging gases for food categories 01.1.4 and 01.7.
Issues related to the Standard for Cream and Prepared Creams (CXS 288-1976)			
Issue 6 – Names and descriptors of FC 01.4 and its subcategories (CXS 288-1976)	CCFA43 agreed that further alignment discussions were needed during the EWG to prepare for CCFA54 and consider that CXS 288- 1976 suffered from an apparent incompatibility between the food categories of the GSFA and the foods captured in the commodity standard.	<p>Option 1 – Restructuring of the GSFA FCs and descriptors</p> <p>Option 2: Maintain current categorizations with amendments to GSFA descriptor in Annex C to include missing product types.</p> <ul style="list-style-type: none"> • Australia and New Zealand prefer Option 2 for its simplicity. • USA does not support either option, suggesting a separate working group for category analysis and reorganization. • IDF generally supports Option 2 due to its minimal disruption to the GSFA. 	1) It is proposed to continue the Alignment exercise.
Issues related to the Standard for Processed Tomato Concentrates (CXS 57-1981)			
Issue 7 – Verification of Alignment of the Standard for Processed Tomato Concentrates (CXS 57-1981)	CCFA53 (2023) requested that the WG on Alignment verify if the Standard for Processed Tomato Concentrates (CXS 57-1981) had been aligned, and if so to verify that the provisions in the corresponding FCs in Table	The Chair has confirmed that the food additive provisions listed in CXS 57-1981 have been reflected in Table 3 of the GSFA and so the alignment work has been completed in this regard.	1) Tables 1 and 2 of the corresponding food categories of the GSFA should be revised, to insert Note XS 57 “Excluding products conforming to the Standard for Processed Tomato Concentrates (CXS 57- 1981)” to all food additive provisions in the

Table 1: Key issues and questions requiring consideration by the Committee.

Issues Identified	Background	Comments and considerations	Key Proposals
	1 and 2 accurately reflect alignment		food categories 04.2.2.4, 04.2.2.5 and 04.2.2.6 of GSFA. This also applies to food additive provisions currently under the Step procedure.
Issue related to the Standard for Table Olives (CXS 66-1981)			
Issue 8 – Food additive provision for INS 423 in Table 3	CCFA50 (2018) agreed to the food additive provision for octenyl succinic acid (OSA) modified gum arabic (INS 423) in Table 3 and also agreed to insert CS 66-1981 in the fifth column of Table 3.	<ul style="list-style-type: none"> ○ There is a discrepancy between the GSFA Table 3 and REP18/FA regarding the functional class of INS 423. While the GSFA lists it as an emulsifier only, REP18/FA includes both emulsifier and firming agent in the functional class of INS 423. ○ New Zealand and Russia emphasize the need to clarify the technological justification of INS 423 as a firming agent in this FC. ○ EU consider that the Class Names and the International Numbering System for Food Additives (CXG 36-1989) associated INS 423 with the functions of emulsifier and firming agent, proposing to refer the matter to the EWG of the GSFA for correction. ○ The Chair reviewed CXG36 and confirmed the function of INS 423 as an emulsifier only. Therefore, the Chair’s proposal remains unchanged. 	It is proposed: <ol style="list-style-type: none"> 1) to delete CS 66-1981 from the fifth column of Table 3 corresponding with INS 423 due to the food additive provisions with general reference in CXS 66-1981. 2) To notify the EWG on INS about the need for technological justification of the use of INS 423 along with the recommendation of consideration on whether to add firming agent in INS 423.
Issue 9 – Food additive provisions for colour retention agents and thickeners in Tables 1 and 2	CCPFV26 agreed: <ul style="list-style-type: none"> ○ To incorporate a general reference to the GSFA in food additive section of CXS 66-1981. ○ That a general reference would limit the food additives in the agreed FC to the food categories to which table olives belong. ○ That colour retention agents and thickeners should be 	<ul style="list-style-type: none"> - New notes should be added to restrict the use of thickeners and colour retention agents to certain types of table olives. - New Zealand considers that there is a lack of consistency in the description of notes in the GSFA and they support work to improve consistency to minimise confusion or misinterpretation of a note. 	<ol style="list-style-type: none"> 1) Proposal for Note A66: Specifies the permitted functions of INS 385 and 386 in table olives, including antioxidant, preservative, and colour retention agent functions. 2) Proposal for Note A66a: Specifies the permitted function of INS 578 and 585 as a colour retention agent in table olives darkened with oxidation. 3) Proposal to update Note B66: Recommends adding XS66 and deleting the previous note B66 for INS 405, as it may not be

Table 1: Key issues and questions requiring consideration by the Committee.

Issues Identified	Background	Comments and considerations	Key Proposals
	available only for table olives darkened with oxidation and for table olives with stuffing respectively.		justified as a thickener in stuffed table olives. 4) Proposal for a new note P66: Addresses certain PHOSPHATES, which will be detailed in the miscellaneous issues section.
Issue 10 – General reference to certain functional classes of food additives in Standard CXS 66-1981	It was proposed within EWG to add note XS66 to the Draft proposal for ADIPATES in the Step process and also to the listing for propylene glycol alginate.	<ul style="list-style-type: none"> The Chair considered that there is a question of whether this general reference that allows acidity regulators in Table olives in general and thickeners in olives with stuffing, should be taken to supersede the original content. 	It is proposed to add Note XS66 to ADIPATES and propylene glycol alginate in FC 04.2.2.3, as currently appears in Table 1 and 2 provisions of Annex 3.
Issues related to the Standard for Quick Frozen Vegetables (CXS 320-2015)			
Issue 11 – New note for Food additive (sequestrant) provisions in FC 04.2.2.1 (Frozen vegetables)	The Standard for Quick Frozen Vegetables (CXS 320-2015) allows sequestrants in French fried potatoes but lacks clarity regarding their use in other products covered by the standard.	<ul style="list-style-type: none"> CXS 320-2015 permits sequestrants in French fried potatoes but lacks clarity on their use in other covered products. The proposal includes adding Note XS320 and Note A320 for clarity on sequestrant use. Proposal to permit INS539 (sodium thiosulfate) in French fried potatoes under CXS 320-2015. Contradiction with Note 29 in GSFA FC 04.2.2.1 regarding sequestrant use. Interaction with Notes 110 and 265 specific to frozen French fried potatoes. 	<p>It is proposed to:</p> <ul style="list-style-type: none"> Revise Note 29 for clarity and allow additional notes as necessary. A new note should be inserted to permit the use of INS539 in French fried potatoes to ensure alignment between GSFA and CXS 320-2015 on sequestrant use. <p>New note A320: "For use in French fried potatoes conforming to the Standard for Quick Frozen Vegetables (CXS 320-2015) as sequestrant only".</p>
Issue 12 – Additives with Note 29 (For use in non-standardized foods only) and other sequestrants in FC 04.2.2.1		<ul style="list-style-type: none"> Contradiction between the text in Annex IV of CXS 320-2015 and the use of Note 29 (For non-standardized food only) in GSFA FC 04.2.2.1. It is unclear if the presence of Note 29 suggests that any provisions with this Note should include an XS320 note, despite CXS 320-2015 permitting sequestrants in quick frozen French fried potatoes, in accordance with the general reference to Tables 1 and 2 of the GSFA. 	<p>It was proposed:</p> <ul style="list-style-type: none"> To remove the term "only" in order to allow for other uses (via additional notes) in certain standardized products as necessary. To add "use in" to Note 29. <p>Revised Note 29: "For use in non-standardized food."</p>

Table 1: Key issues and questions requiring consideration by the Committee.

Issues Identified	Background	Comments and considerations	Key Proposals
		<ul style="list-style-type: none"> ○ New note A320 (For use in French fried potatoes conforming to the Standard for Quick Frozen Vegetables (CXS 320-2015) as a sequestrant) should be inserted for sequestrants in FC 04.2.2.1 to indicate that they are permitted for French fried potatoes only among products covered by CXS 320-2015. 	
Issue 13 – Notes 110 and 265 vs Note A320 in FC 04.2.2.1		<ul style="list-style-type: none"> ○ Note 110 (For use in frozen French fried potatoes only) and Note 265 (For use in quick frozen French fried potatoes only, as a sequestrant) are similar to the new note A320. 	It was proposed to replace Notes 110 and 265 in FC 04.2.2.1 with Note A320 for consistency.
Issues related to the Regional Standards Regional Standard			
Issue 14 – Alignment of the Regional Standard for Laver Products (CXS 323R-2017) and cross-reference to GSFA food categories.	Comments were sought within the EWG on whether it is appropriate for the EWG on Alignment to recommend additional food categories be considered in the Alignment process or whether this question should be directed to the CCASIA working group for consideration.	<ul style="list-style-type: none"> ○ Seaweed is mentioned in a number of additional processed vegetable food categories. ○ Part of the issue is that certain processed vegetable food categories appear to be “further processed” products but are included in the GSFA at the same hierarchical level as other processed products 	It was proposed to proceed with <ol style="list-style-type: none"> 1) the Alignment of food categories 04.2.2.2 and 04.2.2.8; and 2) request CCASIA to consider whether additional processed vegetable food categories may apply to 323R-2017.
Issue 15 – Alignment of the Regional Standard for Yacon (CXS 324R-2017) and reference to food category 04.2.1.1	CXS 324-2017 specifies that no food additives are allowed for yacon as it falls under the food category 04.2.1.1 "Fresh Unprocessed Vegetables."	<ul style="list-style-type: none"> ○ This type of text is atypical for product standards, and yacon is not specifically identified in the description of food category 04.2.1.1 according to the descriptors of food categories in the General Standard for Food Additives (CXS 192-1995). ○ The reference to food category 04.2.1.1 may inadvertently allow any future food additive added to this category to be permitted in yacon. ○ The intention behind the standard text is unclear regarding whether yacon should always reflect the provisions related to the food category or if the statement was made solely to indicate the current status, i.e., since no food additives are allowed in fresh unprocessed vegetables, none are allowed in yacon. 	It was proposed to proceed with <ol style="list-style-type: none"> 1) Alignment of food category 04.2.1.1. 2) Request the CCLAC to review the text in Section 8 of CXS 324R-2017. 3) Inquire if the CCLAC would find it acceptable to replace the standard's text with a more typical statement. Such as “No food additives are permitted”.

Table 1: Key issues and questions requiring consideration by the Committee.

Issues Identified	Background	Comments and considerations	Key Proposals
Issue 16 – Use of XS Notes in the GSFA to exclude a commodity standard from a provision when other notes are already present suggesting the additives are only permitted for use in certain foods.	The Chair sought comments from the EWG regarding the necessity of XS Notes when existing Notes already restrict the use of additives to specific foods.	<ul style="list-style-type: none"> ○ Four existing Notes (Note 262, Note 76, Note 154, and Note 221) attached to certain food additive provisions were considered. ○ These Notes restrict the use of additives to specific foods, ○ The question arises whether additional XS Notes are needed for clarity and alignment with relevant food categories. 	It was proposed to proceed with adding the XS Notes to relevant food additive provisions.
Issue 17 – Use of proposed Note B-323R to limit food additive use to seasoned laver products within CXS323R when other notes are already present suggesting the additives are only permitted for use in certain other foods.	<p>The Regional Commodity Standard for Laver Products (CXS 323R-2017) specifies the acceptable use of certain food additives in seasoned laver products.</p> <p>However, some additives permitted in related food categories (FC 04.2.2.2 and FC 04.2.2.8) have Notes associated with them that restrict their use to specific foods not generally including seasoned laver products.</p>	<ul style="list-style-type: none"> ○ The proposed Note B-323R aims to clarify whether these additives should be permitted in seasoned laver products despite the existing limiting Notes. ○ The affected provisions include Notes 64, 76, 144, 345, and 348 attached to various food additive provisions in FC 04.2.2.2 and FC 04.2.2.8. ○ Note B-323R is intended to complement Note 348 for dried seaweed products. ○ New Zealand, USA, FIA: Supports the inclusion of Note B-323R. 	Proceed with adding Note B-323R instead of an XS323R note to relevant food additive provisions in Tables 1 and 2 of the Regional Standards in Annex 4.

Conclusion and recommendations

- ❖ The review of standard texts revealed various inconsistencies and ambiguities, particularly concerning conflicting references. Codex delegations may support all proposed updates made by the EWG to prevent confusion and ensure the accurate interpretation of standard requirements. To address these issues effectively, the following suggestions are recommended:
 - (i) Further review of standard texts is advisable to ensure clarity and consistency in conveying information regarding permitted additives.
 - (ii) Continuing the alignment process exercise, considering possible changes in food categories and additive provisions, is essential.
 - (iii) Addressing contradictions between existing notes is necessary to avoid confusion and achieve coherence within the standards.
- ❖ It should be noted that Codex delegations can contribute to improving the clarity, coherence, and effectiveness of regional commodity standards.

D. Agenda Item 5a: General Standard For Food Additives (GSFA): Report Of The EWG On The GSFA

Document Number: CX/FA 24/54/7

Background

CCFA53 (2023) agreed to establish an EWG to provide recommendations to **CCFA54 (2024)** on the following topics:

- i. All remaining draft and proposed draft provisions for sweeteners in the GSFA as well as adopted provisions for sweeteners with Note 161 in the GSFA.
 - *Note 161: Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble (justification for the use of additives).*
- ii. Draft and proposed draft provisions for colours in Food Categories (FCs) 07.0 (*Bakery wares*), 12.0 (*Salts, spices, soups, sauces, salads and protein products*), 13.0 (*Foodstuffs intended for particular nutritional uses*) and 15.0 (*Ready-to-eat savouries*) and their subcategories as well as adopted provisions for colours with Note 161 in FCs 07.0, 12.0, 13.0 and 15.0 and their subcategories.
- iii. Draft and proposed draft provisions in FCs 14.2 (*Alcoholic beverages, including alcohol-free and low-alcoholic counterparts*) and its subcategories.
- iv. Provisions entered at Step 2 of the GSFA at CCFA53; and
- v. All remaining draft and proposed draft provisions in the GSFA with the exception of: colours not addressed in parts ii and iii, and provisions for which CCFA is awaiting guidance from other Codex Alimentarius Committees or JECFA.

Analysis

The documents for the report of the EWG on the GSFA are presented as appendices to the working document (CX/FA 24/54/7). The appendices provide background on the topic under discussion, collate comments on the topic from the EWG, and provide recommendations for each topic.

[Appendix 1: proposals for provisions related to sweeteners that pertain to topic i.](#)

Table 1 summarizes the sweeteners discussed under this provision as well as the recommendations of the Electronic Working Group (EWG) to be considered by CCFA54.

Table 1: Summary of the sweeteners under discussion during CCFA54.

Category	Additive	INS	Max Level (mg/kg)	Codex Step/Year of Adoption	Recommendation
05.1.2 (Cocoa mixes (syrops))	Steviol glycosides	960a 960b 960c 960d	350	3	Adopt at 350 mg/kg with Note 26 and Note 477
07.1 (Bread and ordinary bakery wares)	Acesulfame potassium	950	1000	2008	Remove Note 161; Adopt with Note 188 and Add New Alternative Note*
	Advantame	969	10	3	Adopt with New Alternative Note*
	Aspartame	951	4000	2008	Remove Note 161, Adopt with Note 191 and Add New Alternative Note*
	Aspartame-acesulfame salt	962	2270	3	Adopt at 1000 mg/kg with Note 113 and New "Alternative Note"
	Neotame	961	70	2008	Remove Note 161; Adopt with New "Alternative Note"
	Steviol glycosides	960a, 960b, 960c, 960d	50	3	Adopt at 165 mg/kg; Add New "Alternative Note"
	Sucralose (trichlorogalactosucrose)	955	650	2008	Remove Note 161. Adopt with New "Alternative Note"

Category	Additive	INS	Max Level (mg/kg)	Codex Step/Year of Adoption	Recommendation
12.2.2 (Seasonings and condiments)	Saccharins	954 (i)-(iv)	1500	2008	Revise adopted provision; Replace Note 161 with Note 477

*Discussion by EWG Members on the Horizontal Approach for the use of sweeteners in FC 07.1 / Recommended Alternative Note for Consideration by GSFA Physical WG: “Some Codex Members allow use of additives with sweetener and colour function in this Food Category while others consider that this Food Category includes only “plain products”. For the purpose of this Food Category, “plain” refers to products without additives that have sweetener or colour functions.”

Notes

Note 26: As steviol equivalents.

Note 113: As acesulfame potassium equivalents (the reported maximum level can be converted to an aspartame-acesulfame salt basis by dividing by 0.44). Combined use of aspartame-acesulfame salt with individual acesulfame potassium or aspartame should not exceed the individual maximum levels for acesulfame potassium or aspartame (the reported maximum level can be converted to aspartame equivalents by dividing by 0.68).

Note 161: Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.

Note 188: If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as acesulfame potassium, should not exceed this level.

Note 191: If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as aspartame, should not exceed this level.

Note 477: Some Codex Members allow use of additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars.

Note 478: Some Codex Members allow use of additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars. This limitation may not apply to the appropriate use as a flavour enhancer.

Appendix 2: Draft and proposed draft provisions for colours in FCs 07.0, 12.0, 13.0 and 15.0 and their subcategories as well as adopted provisions for colours with Note 161 in FCs 07.0, 12.0, 13.0 and 15.0 and their subcategories.

Discussion by EWG Members on the Horizontal Approach for the use of colours in subcategories of FC 07.1.

Recommended Alternative Note for Consideration by GSFA PWG: “Some Codex Members allow use of additives with sweetener and colour function in this Food Category while others consider that this Food Category includes only “plain products”. For the purpose of this Food Category, “plain” refers to products without additives that have sweetener or colour functions.”

Table 2 summarizes the colours discussed under this provision and the corresponding food categories, to be considered by CCFA54.

Table 2: Summary of the colour additives under discussion during CCFA54.

Category	Additive Under Discussion
07.0 (Bakery wares)	Amaranth Caramel II - Sulfite Caramel Fast Green FCF Tartrazine
07.1 (Bread and ordinary bakery wares)	Brilliant Blue FCF
07.1.1 (Breads and rolls)	Annatto Extracts, Norbixin-based Curcumin

Category	Additive Under Discussion
07.1.1.1 (Yeast-leavened breads and specialty breads)	Amaranth Annatto Extracts, Norbixin-based Brilliant Blue FCF Caramel II - Sulfite Caramel Curcumin Fast Green FCF Tartrazine
07.1.1.2 (Soda breads)	Amaranth Brilliant Blue FCF Caramel II - Sulfite Caramel Fast Green FCF Tartrazine
07.1.2 (Crackers, excluding sweet crackers)	Allura Red AC Amaranth Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Azorubine (Carmoisine) Brilliant Blue FCF Caramel II - Sulfite Caramel Caramel III – Ammonia Caramel Caramel IV - Sulfite Ammonia Caramel Curcumin Fast Green FCF Paprika Extract Tartrazine Zeaxanthin, synthetic
07.1.3 (Other ordinary bakery products (e.g. bagels, pita, English muffins))	Allura Red AC Amaranth Azorubine (Carmoisine) Brilliant Blue FCF Caramel II - Sulfite Caramel Caramel III – Ammonia Caramel Caramel IV - Sulfite Ammonia caramel Curcumin Fast Green FCF Tartrazine
07.1.4 (Bread-type products, including bread stuffing and bread crumbs)	Amaranth Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Brilliant Blue FCF Caramel II - Sulfite Caramel Caramel III - Ammonia Caramel Chlorophylls and Chlorophyllins, copper complexes Curcumin Fast Green FCF Paprika Extract Tartrazine
07.1.5 (Steamed breads and buns)	Amaranth Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Brilliant Blue FCF Caramel II - Sulfite Caramel Caramel III – Ammonia Caramel Curcumin

Category	Additive Under Discussion
	Fast Green FCF Tartrazine
07.1.6 (Mixes for bread and ordinary bakery wares)	Amaranth Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Brilliant Blue FCF Caramel II - Sulfite Caramel Caramel III - Ammonia Caramel Curcumin Fast Green FCF Tartrazine
07.2 (Fine bakery wares (sweet, salty, savoury) and mixes)	Amaranth Allura Red AC Azorubine (Carmoisine) Brilliant Black (black PN) Brilliant Blue FCF Brown HT Caramel II - Sulfite Caramel Caramel III – Ammonia Caramel Curcumin Fast Green FCF Indigotine (Indigo Carmine) Lutein from Tagetes Erecta Paprika Extract Quinoline Yellow Tartrazine Zeaxanthin, Synthetic
07.2.1 (Cakes, cookies and pies (e.g. fruit-filled or custard types)) 07.2.2 (Other fine bakery products (e.g. doughnuts, sweet rolls, scones, and muffins)) 07.2.3 (Mixes for fine bakery wares (e.g. cakes, pancakes))	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Paprika Extract
12.1.2 (Salt Substitutes)	Caramel I – Plain Caramel
12.2 (Herbs, spices, seasonings and condiments (e.g. seasoning for instant noodles))	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Caramel II - Sulfite Caramel Caramel IV - Sulfite Ammonia caramel
12.2.1 (Herbs and spices)	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Caramel I – Plain caramel Caramel II - Sulfite caramel Caramel IV - Sulfite Ammonia caramel Lycopene, tomato Paprika Extract Tartrazine
12.2.2 (Seasonings and condiments)	Amaranth Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Azorubine (Carmoisine) Brilliant Black (Black PN) Brown HT Caramel II - Sulfite caramel Caramel IV - Sulfite Ammonia Caramel Curcumin Jagua (Genipunglycine) Blue

Category	Additive Under Discussion
	Lutein from Tagetes Erecta Lycopene, Tomato Paprika Extract Quinoline Yellow Tartrazine Zeaxanthin, Synthetic
12.3 (Vinegars)	Caramel II - Sulfite caramel
12.4 (Mustards)	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Azorubine (Carmoisine) Brilliant Black (Black PN) Brown HT Caramel II - Sulfite Caramel Curcumin Lutein from Tagetes Erecta Paprika Extract Quinoline Yellow Tartrazine
12.5 (Soups and broths)	Allura Red AC Amaranth Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Brilliant Black (Black PN) Brown HT Caramel II - Sulfite Caramel Lutein from Tagetes Erecta Paprika Extract Zeaxanthin, Synthetic
12.5.1 (Ready-to-eat soups and broths, including canned, bottled, and frozen)	Paprika Extract
12.5.2 (Mixes for soups and broths)	
12.6 (Sauces and like products)	Azorubine (carmoisine) Brilliant Black (Black PN) Brown HT Caramel II - Sulfite Caramel Curcumin Lutein from Tagetes Erecta Quinoline Yellow Tartrazine
12.6.1 (Emulsified sauces and dips (e.g. mayonnaise, salad dressing, onion dip))	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Paprika Extract Zeaxanthin, Synthetic
12.6.2 (Non-emulsified sauces (e.g. ketchup, cheese sauce, cream sauce, brown gravy))	Amaranth Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Paprika Extract Zeaxanthin, Synthetic
12.6.3 (Mixes for sauces and gravies)	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Paprika Extract Lycopene, Tomato
12.6.4 (Clear sauces (e.g. fish sauce))	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based

Category	Additive Under Discussion
12.7 (Salads (e.g. macaroni salad, potato salad) and sandwich spreads excluding cocoa-and nutbased spreads of food categories 04.2.2.5 and 05.1.3)	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Paprika Extract Caramel II - Sulfite Caramel
13.3 (Dietetic foods intended for special medical purposes (excluding products of food category 13.1))	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Azorubine (carmoisine) Brilliant black (black PN) Brown HT Caramel II - sulfite caramel Curcumin Lutein from tagetes erecta Quinoline yellow Tartrazine Zeaxanthin, synthetic
13.4 (Dietetic formulae for slimming purposes and weight reduction)	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Azorubine (Carmoisine) Brilliant black (Black PN) Brown HT Caramel II - sulfite caramel Curcumin Jagua (genipinglycine) Blue Lutein from Tagetes Erecta Quinoline yellow Tartrazine Zeaxanthin, synthetic
13.5 (Dietetic foods (e.g. supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6)	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Azorubine (Carmoisine) Brilliant Black (Black PN) Brown HT Caramel II - sulfite caramel Chlorophylls Curcumin Jagua (genipinglycine) blue Lutein from Tagetes erecta Quinoline Yellow Tartrazine Zeaxanthin, Synthetic
13.6 (Food supplements)	Azorubine (Carmoisine)
15.0 (Ready-to-eat savouries)	Caramel II - sulfite caramel Zeaxanthin, synthetic
15.1 (Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes))	Allura Red AC Amaranth Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Brilliant Black (Black PN) Azorubine (Carmoisine) Curcumin Jagua (genipinglycine) blue Brown HT Lutein from Tagetes erecta Quinoline Yellow

Category	Additive Under Discussion
	Tartrazine Paprika Extracts
15.2 (Processed nuts, including coated nuts and nut mixtures (with e.g. dried fruit))	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Brilliant Black (Black PN) Azorubine (Carmoisine) Curcumin Brown HT Jagua (genipin-glycine) blue Lutein from Tagetes erecta Quinoline Yellow Tartrazine Paprika Extracts
15.3 (Snacks - fish based)	Annatto Extracts, Bixin-based Annatto Extracts, Norbixin-based Paprika Extracts

For all listed food colours above, the working document presented the maximum Levels (MLs) (mg/kg) under discussion, the step in the Codex procedure or the year the colour was adopted, and a recommendation following the EWG's comments and consultations.

Recommendations went from adoption, through considering a revision of the provisions (addition of new or revised note), to a complete discontinuation of the work on some specific colour additives.

Appendix 3: Draft and proposed draft provisions in FC 14.2 and its subcategories.

This appendix presents the technological function of the food additives under discussion in FC 14.2.3 and its subcategories (14.2.3 Grape wines / 14.2.3.1 Still grape wine / 14.2.3.2 Sparkling and semi-sparkling grape wines / 14.2.3.3 Fortified grape wine, grape liquor wine, and sweet grape wine). Targeted additives are emulsifiers, stabilizers, thickeners, antioxidants, colours, packaging gases, and flavour enhancers (**table 3**).

Table 3: summary of the main additives discussed under appendix 3 & the main recommendations proposed by the EWG

Category	Additives	Technological Function	Recommendation
14.2.3 (Grape Wines)	Polyglycerol Esters of fatty Acids / Polyglycerol Esters of Interesterified Ricinoleic acid / Polyoxyethylene Stearates /Potassium Polyaspartate / Protease from Aspergillus Oryzae var./ Sorbitan esters of Fatty acids	Emulsifiers/ Stabilizers/ Thickeners	Mostly discontinue except Potassium Polyaspartate
14.2.3 (Grape Wines)	Calcium ascorbate Glucose oxidase Sodium ascorbate Sodium erythorbate (sodium isoascorbate)	Antioxidant	Discontinue
14.2.3 (Grape wines)	Caramel I – plain Caramel Caramel II- Sulfite caramel Ethyl maltol Maltol Papain Nitrogen	Colour, Flavour enhancer, Packaging gas	Mostly discontinue except Nitrogen as packaging gas.
14.2.3.1 (Still grape wines)	Annatto extracts, Norbixin-based Curcumin	Colour	Discontinue
14.2.3.2 (Sparkling and semi-sparkling grape wines)	Annatto extracts, Norbixin-based Beet red	Colour	Discontinue

Category	Additives	Technological Function	Recommendation
	Bromelain Chlorophylls Curcumin Titanium dioxide		
14.2.3.3 (Fortified grape wine, grape liquor wine, and sweet grape wine)	Annatto extracts, bixin-based Annatto extracts, norbixin-based Beet red Caramel I – plain caramel Caramel II - sulfite caramel Chlorophylls Curcumin	Colour	Discontinue except Caramels

As noticed, the main recommendation of the EWG is to discontinue the work in most of the discussed additive groups, under the food categories related to wines. As reported in the summary of comments, this would be mainly due to the lack of information and support regarding the use of these additives in this FC.

Appendix 4: New and revised provisions in the GSFA entered into the step process at Step 2 as a result of CX/FA 23/53/9.

This appendix presents discussions and recommendations on proposed new and revised provisions entered into the step process at Step 2.

These proposals are based upon a consensus approach taking into account the following information:

- ❖ Information on corresponding Codex commodity standards and the use of food additives in those commodity standards is provided for each food category; and
- ❖ Comments provided by EWG members.

These recommendations are based on the “weight of evidence”; that is, comments containing justifications were given more weight than comments with no supporting justification.

Table 3 summarizes the food additives discussed under this provision and the corresponding food categories, to be considered by CCFA54.

Table 3: Summary of the additives under discussion during CCFA54 at step 2.

Category	Additive Under Discussion	Technological Function
01.1.4 (Flavoured fluid milk drinks)	Jagua (Genipinglycine) Blue	Colour
01.6.1 (Unripened cheese)	Lauric Arginate Ethyl Ester Sorbates	Preservative
01.6.2 (Ripened Cheese)	Sorbates	Preservative
01.6.2.1 (Ripened Cheese, including rind)	Lauric Arginate Ethyl Ester	Preservative
01.6.4.2 (Flavoured processed cheese, including containing fruit, vegetables, meat, etc.)	Jagua (Genipinglycine) Blue	Colour
01.7 (Dairy-based desserts (e.g. pudding, fruit or flavored yoghurt))	Jagua (Genipinglycine) Blue	Colour
02.2.2 (Fat spreads, dairy fat spreads and blended spreads)	Lauric Arginate Ethyl Ester	Preservative
02.3 (Fat emulsions mainly of type oil-in water, including mixed and/or flavoured products based on fat emulsions)	Jagua (Genipinglycine) Blue	Colour
02.4 (Fat-based desserts excluding dairy based dessert products of food category 01.7)	Jagua (Genipinglycine) Blue	Colour
03.0 (Edible ices, including sherbet and sorbet)	Jagua (Genipinglycine) Blue	Colour
04.1.1.2 (Surface-treated fresh fruit)	Riboflavins	Colour
04.1.2.5 (Jams, jellies, marmelades)	Jagua (Genipin-glycine) Blue Polydimethylsiloxanes	Colour
04.1.2.8 (Fruit preparations, including pulp, purees, fruit toppings and coconut milk)	Jagua (Genipin-glycine) Blue	Colour

Category	Additive Under Discussion	Technological Function
04.1.2.9 (Fruit-based desserts, incl. fruit flavoured water-based desserts)	Jagua (Genipin-glycine) Blue	Colour
04.1.2.11 (Fruit fillings for pastries)	Jagua (Genipin-glycine) Blue	Colour
04.2.1.2 (Surface-treated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds and nuts and seeds)	Riboflavins	Colour
04.2.2.7 (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3)	Riboflavins	Colour
05.1.4 (Cocoa and chocolate products)	Jagua (Genipin-glycine) Blue	Colour
05.2 (Confectionary including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4)	Jagua (Genipin-glycine) Blue	Colour
05.3 (Chewing gum)	Jagua (Genipin-glycine) Blue	Colour
05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauces)	Jagua (Genipin-glycine) Blue	Colour
06.1 (Whole, Broken or Flaked Grain Including Rice)	Methacrylate Copolymer, Basic (BMC)	Carrier, Glazing agent
06.3 (Breakfast cereals, including rolled oats)	Jagua (Genipin-glycine) Blue	Colour
06.5 (Cereal and starch based desserts (e.g. rice pudding, tapioca pudding))	Jagua (Genipin-glycine) Blue	Colour
09.2.1 (Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)	Riboflavins	Colour
09.2.2 (Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms)	Riboflavins	Colour
09.2.3 (Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms)	Riboflavins	Colour
09.2.4.1 (Cooked fish and fish products)	Riboflavins	Colour
09.2.4.2 (Cooked mollusks, crustaceans, and echinoderms)	Riboflavins	Colour
09.2.4.3 (Fried fish and fish products, including mollusks, crustaceans, and echinoderms)	Riboflavins	Colour
09.2.5 (Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms)	Riboflavins	Colour
10.1 (Fresh eggs)	Riboflavins	Colour
11.1.1 (White sugar)	Methacrylate Copolymer, Basic (BMC)	Carrier, Glazing agent
11.1.2 (Powdered sugar, powdered dextrose)	Methacrylate Copolymer, Basic (BMC)	Carrier, Glazing agent
11.2 (Brown sugar excluding products of food category 11.1.3)	Methacrylate Copolymer, Basic (BMC)	Carrier, Glazing agent
11.3 (Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3)	Riboflavins	Colour
11.4 (Other sugars and syrups (e.g. xylose, maple syrup, and sugar toppings))	Jagua (Genipin-glycine) Blue Riboflavins	Colours
12.6.1 (Emulsified sauces and dips (e.g. mayonnaise, salad dressing, onion dip))	Polyglycerol Esters of Interesterifiedricinoleic Acid	Emulsifier
14.1.2 (Fruit and vegetables juices)	Dimethyl Dicarbonate	Preservative
14.1.3 (Fruit and vegetable nectars)	Dimethyl Dicarbonate	Preservative
14.1.4 (Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks)	Jagua (Genipin-glycine) Blue	Colour

It shows clearly in table 3 that most new provisions are related to colour additives, mainly to Jagua (Genipin-glycine) Blue and Riboflavins. The recommendations suggested by the EWG are mainly to adopt at GMP or at a certain proposed ML.

Appendix 5: All remaining draft and proposed draft provisions in the GSFA with the exception of: colours not addressed in parts ii and iii, and provisions for which CCFA is awaiting guidance from other Codex Alimentarius Committees or JECFA.

All remaining draft and proposed draft provisions in the GSFA were discussed in this appendix, particularly trisodium citrate (Acidity regulator, Emulsifier, Sequestrant and Stabilizer), benzoates (preservative) and propylene glycol (Carrier, Emulsifier, Glazing agent and Humectant).

Conclusion and Recommendations

Codex delegations may offer general support to all provisions discussed in this agenda item.

Appendix 1: Codex delegations might generally support all recommendations regarding sweeteners in the GSFA, as well as for the alternative note to note 161, while some reformulation might convey the meaning in a clearer way.

Appendix 2: Codex delegations might generally support all recommendations regarding colours in the GSFA, as well as for the alternative note to note 161, while some reformulation might convey the meaning in a clearer way.

Appendix 3: Codex delegations might offer general support to all recommendations regarding FC 14.2.3 grape wines and its subcategories in the GSFA.

Appendix 4: Codex delegations might offer general support to all recommendations regarding additives at step 2, which are mainly colours: Jagua (Genipin-glycine) Blue and Riboflavins.

Appendix 5: Codex delegations might offer general support to all recommendations regarding remaining proposals to the GSFA.

E. Agenda Item 5b: GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS (REPLIES TO CL 2023/46-FA)

Document Number: CX/FA 24/54/8

The CCFA is invited to consider the proposals of member countries and observers to new and/or revision of food additive provisions.

Replies to CL 2023/46-FA were submitted from the following countries: Peru, Republic of Korea, Senegal, United Kingdom, Fédération Internationale des Vins et Spiritueux (FIVS), International Special Dietary Foods Industries (ISDI), Oenological Products and Practices International Association (OENOPPIA) and Organisation Internationale de la Vigne et du Vin (OIV) (table 1).

Table 1: Summary of proposals submitted from member countries and observer organizations to revise the GSFA.

Member Country/Observer	Target Additives	Proposal
Peru	<ol style="list-style-type: none"> 1. Quinoline yellow INS 104 2. Sulfites: <ul style="list-style-type: none"> • Sulphur dioxide INS 220 • Potassium sulfite INS 225 • Sodium thiosulfate INS 539 3. Curcumin INS 100 i 4. Caramels: <ul style="list-style-type: none"> • Caramel II (sulfite caramel) • Caramel III (ammonia caramel) 5. Carotenes: <ul style="list-style-type: none"> • Carotenes, beta-, synthetic INS 160 a(i) • Carotenes, beta-, Blakeslea trispora INS 160 a(iii) • Carotenal, beta-apo-8'- INS 160e • Carotenoic acid, ethyl ester, beta-apo-8'- INS 160 f 	The main proposed changes target revising existing provisions in GSFA Tables One and Two, related mainly to Maximum Levels (MLs).

Member Country/Observer	Target Additives	Proposal
Republic of Korea	Acetic acid, glacial Calcium lactate Citric acid Disodium 5'-guanylate Disodium 5'-inosinate Disodium 5'-ribonucleotides Lactic acid, L-, D- and DL-	The main proposed changes target revising existing provisions in GSFA Tables One and Two, related mainly to remove Notes.
Senegal	Basic Methacrylate Copolymer (BMC)	Proposal of new provision
United Kingdom (UK)	4-Hexylresorcinol	Proposal of new provision
Fédération internationale des vins et spiritueux (FIVS)	Mannoproteins from yeast cell walls Metatartaric acid	Proposal of new provision
International Special Dietary Foods Industries (ISDI)	All additives in Food Categories 13.1 Infant formulae Follow-up formulae Formulae for special medical purposes for infants	Proposal to remove Note 381 "As consumed" from all provisions within these food categories, unless otherwise specified
OENOPPIA (Oenological Products and Practices International Association)	Metatartaric acid Mannoproteins from yeast cell walls	Proposal of new provision
OIV (Organisation internationale de la vigne et du vin)	Metatartaric acid Mannoproteins from yeast cell walls	Proposal of new provision

Conclusion and Recommendations

Codex delegations may offer a general support to the proposals presented in CX/FA 24/54/8 i.e. their introduction to the Step process, which will eventually enable further discussions in the future.

F. Agenda Items 6.1 and 6.2: Proposed draft revision to the class names and the international numbering system (ins) for food additives

Document Number: CX/FA 24/54/9 and CX/FA 24/54/9 Add.1

CCFA53 (2023) agreed to establish an Electronic Working Group (EWG), chaired by Belgium, to consider the following tasks:

- ❖ Replies to a CL requesting proposals for change and/or addition to Section 3 of the Class Names and International Numbering System for Food Additives (CXG 36-1989); and preparing a proposal for circulation for comments at Step 3;
- ❖ Proposals for the addition of new additives in the CXG 36- 1989:
 - glycolipids (INS 246) as a preservative,
 - oat lecithin (INS 322a) as an emulsifier and
 - carbomer (INS 1210) as a bulking agent, stabilizer, thickener
- ❖ The addition of the functional classes of "stabilizer" and "thickener" for sodium sesquicarbonate (INS 500(iii)) (CX/FA 23/53/6);
- ❖ The appropriateness of including the functional class of "preservative" for sodium thiosulfate (INS 539) (CX/FA 23/53/6);
- ❖ The appropriateness of including the functional class of "carrier" and the technological purpose of "nutrient carrier" for mannitol (INS 421), starch sodium octenyl succinate (INS 1450), and sodium ascorbate (INS 301) (CX/FA 23/53/6); and
- ❖ Assigning an INS number to low acyl clarified gellan gum (CX/FA 23/FA 23/53/2 Add.2).

The Codex Secretariat distributed CL 2023/45-FA. All Members and Observers were invited to respond by 15 September 2023 (proposals for change and/or addition to the INS list).

At the CCFA54 (2024), delegates will discuss the EWG's proposals related to revision of the class names and the international numbering system for food additives as requested by CCFA53.

The EWG recommends CCFA54:

- ❖ to consider the additions to the Class Names and International Numbering System for Food Additives (CXG 36-1989) as presented in **table 1 below**;
- ❖ not to include the function of carrier for sodium ascorbate (INS 301) as INS 301 already contains the function of antioxidant and this seems to fit the use in nutrient preparations; and
- ❖ not to include phycocyanin produced by bacteria for use as a blue colour until proper authorization, including an official name, is substantiated in a country.

Table 1: Proposed changes and/or additions to the INS (at Step 3)²

INS No.	Name of food additive	Functional class	Technological purpose
246	Glycolipids	Preservative	preservative
267	Buffered vinegar	Acidity regulator	acidity regulator
		Preservative	preservative
322a	Oat lecithin	Emulsifier	emulsifier
410	Carob bean gum	Emulsifier	emulsifier
		Gelling agent	gelling agent
		Stabilizer	stabilizer
		Thickener	thickener
418	Gellan		
418 (i)	Gellan gum	Gelling agent	gelling agent
		Stabilizer	stabilizer
		Thickener	thickener
418(ii)	Low-acyl clarified gellan gum	Gelling agent	gelling agent
		Stabilizer	stabilizer
		Thickener	thickener
418(ii)	Low-acyl clarified gellan gum	Gelling agent	gelling agent
		Stabilizer	stabilizer
		Thickener	thickener
421	Mannitol	Anticaking agent	anticaking agent
		Bulking agent	bulking agent
		Carrier	nutrient carrier
		Humectant	humectant
		Stabilizer	stabilizer
		Sweetener	sweetener
		Thickener	texturizing agent
500(iii)	Sodium sesquicarbonate	Acidity regulator	acidity regulator
		Anticaking agent	anticaking agent
		Raising agent	raising agent
		Stabilizer	stabilizer
		Thickener	thickener

² The INS list in numerical order is proposed to be updated for some food additives as listed. The additions are highlighted with bold/underlined font.

516	Calcium sulfate	Acidity regulator	<i>acidity regulator</i>
		Colour	<i>colour</i>
		Firming agent	<i>firming agent</i>
		Flour treatment agent	<i>flour treatment agent</i>
		Sequestrant	<i>sequestrant</i>
		Stabilizer	<i>stabilizer</i>
539	Sodium thiosulfate	Antioxidant	<i>antibrowning agent</i> <i>antioxidant</i>
		Preservative	<i>preservative</i>
		Sequestrant	<i>sequestrant</i>
1210	Carbomer	Bulking agent	<i>bulking agent</i>
		Stabilizer	<i>stabilizer</i>
		Thickener	<i>thickener</i>
1450	Starch sodium octenyl succinate	Carrier	<i>nutrient carrier</i>
		Emulsifier	<i>emulsifier</i>
		Stabilizer	<i>stabilizer</i>
		Thickener	<i>binder</i> <i>thickener</i>

Analysis

15 countries and 8 observers contributed to the EWG including: Australia, Austria, Brazil, China, India, Japan, Kenya, Morocco, Republic of Korea, Russian Federation, Saudi Arabia, Senegal, Türkiye, USA, European Union, EUSFI, FIA, IACM, ICBA, ICGA, IFAC, ISDI and NATCOL.

The EWG used the online platform. The replies to the CL were posted on the platform and the draft was circulated for comments twice. Contributions were sent by EU Specialty Food Ingredients, FIA, IACM, IFAC, ISDI and NATCOL.

Three countries and one organization replied to the CL 2023/45-FA sent by The Codex Secretariat. The comments were sent by **Chile, European Union, Philippines, and International Food Additives Council (IFAC)**.

The Philippines stood in support of the proposed changes and/or additions to the INS at Step 3, as reflected in CX/FA 24/54/9, which will update the identified food additives in relation to their functional class and/or technological purpose.

The synthesis of the conclusion made by the EWG regarding the proposals and the important comments made by countries related to it are summarized in table 2 below.

Table 2: Summary of the conclusion made by the EWG regarding the proposals and the important comments made by countries related to it.

A- Replies to the circular letter on addition and changes to INS	
Proposition	EWG's conclusion and replies submitted by countries to the CL
<p>Addition of phycocyanin produced by bacteria, used as a blue colour.</p> <p>Request made by Chile</p>	<p>EWG's decision: To not include Phycocyanin produced by bacteria, for use as a blue colour:</p> <ul style="list-style-type: none"> ✓ There is a lack of proof of authorization, including an official name, in a country. <i>The text of CL 2023/45- FA (requests for the inclusion of new additives may be made by Codex members that authorize the additive for use in that country).</i> ✓ The name" Phycocyanin" is not specific enough. <i>Without scientific assessment, it can't be estimated if the colour is similar to that in spirulina extract (INS 134). The question whether the additive should be listed in a subcategory or not is therefore not possible to answer at this point in time.</i>

	<p><u>Replies to the CL 2024/23-FA made by Chile:</u></p> <ul style="list-style-type: none"> – will evaluate the initially proposed name of "phycocyanin" addressing the comment that it needs to be more specific; – will provide the scientific information requested by the EWG regarding the color of pure phycocyanin produced by bacteria, and of purified phycocyanin from spirulina extract (INS 134); – has doubts about the authorization in a country for the inclusion of phycocyanin to be accepted, since Chilean regulations accept an additive if it has been previously authorized by Codex. <p><u>Replies to the CL 2024/23-FA made par The European Union and its Member States (EUMS):</u> The EUMS also supports not to include phycocyanin produced by bacteria for use as a blue colour until proper authorization, including an official name, is substantiated by a Codex Member.</p>
<p>Addition of INS 267 buffered vinegar used as a preservative and acidity regulator.</p> <p><i>Request made by the European Union</i></p>	<p>EWG's decision: To support the proposal:</p> <ul style="list-style-type: none"> ✓ This additive is included in the European Union list of food additives 2023. ✓ The technological need and function were scrutinised. ✓ It is used as an alternative to other authorised preservatives or acidity regulators, in particular to acetic acid and its salts (E / INS 260-263). ✓ Buffering increases pH and allows the use as a preservative or acidity regulator in many food categories without impacting the quality of foods. ✓ Regulation (EU) 2023/2086 as regards the use of buffered vinegar as a preservative and acidity regulator, includes not only the authorization and conditions of use but also specifications and a reference to the risk assessment. <p><u>Replies to the CL 2024/23-FA made by the European Union and its Member States (EUMS):</u> Support the changes to the INS list as presented in the Annex to CX/FA 24/54/9.</p> <p><u>Replies to the CL 2024/23-FA made by the Philippines.</u> Support the proposal as these additives pose no safety concerns when used at their proposed levels; comprehensive evaluation was by the EFSA Panel on Food Additives and Flavourings (FAF) based on scientific opinions.</p>
<p>Inclusion of the functional class "gelling agent" for carob bean gum (INS 410).</p> <p><i>Request made by Peru.</i></p>	<p>EWG's decision: To support the proposal:</p> <ul style="list-style-type: none"> ✓ Request based on the JECFA specifications monograph 19 of 2016 of JECFA82.
<p>Inclusion of the functional class "colour" for calcium sulfate (INS 516)</p> <p><i>Request made by NATCOL</i></p>	<p>EWG's decision: To support the proposal:</p> <ul style="list-style-type: none"> ✓ Calcium sulfate has gained approval for use as a colour in Brazil and approval is pending for the Mercosur region. Industry has begun to use it for this purpose; ✓ It is a largely insoluble mineral which, when milled to the appropriate particle size, exhibits a strong and stable whitening and opacifying effect; ✓ The food industry has started to use anhydrous calcium sulphate as colour in Europe since the ban of TiO₂ on August 7 2022 in various applications where calcium carbonate or starches do not work due to their technological limitations; ✓ Turkey and Saudi Arabia have in the meanwhile forbidden the use of TiO₂ and calcium sulphate has been introduced by the food industry for its whitening and opacifying ability since. <p><u>Replies to the CL 2024/23-FA made by the Philippines.</u></p> <ul style="list-style-type: none"> ✓ Support the proposal as it offers an alternative to Titanium Dioxide (TiO₂) as a white food colorant, considering its physical and chemical properties, as discussed in CX/FA 24/54/9.

B- Proposals for the addition of the new additives: glycolipids (INS 246) as a preservative, oat lecithin (INS 322a) as an emulsifier and carbomer (INS 1210) as a bulking agent, stabilizer, thickener in the CXG 36-1989) (as mentioned in CX/FA 23/53/13 Add.1)

Proposition	EWG's conclusion and comment
<p>Glycolipids (INS 246) as a preservative.</p> <p>Request made by EU (In CX/FA 23/53/13 Add.1)</p>	<p>EWG's decision: To support the proposal for assigning INS numbers along with their corresponding functional classes and technological purposes:</p> <ul style="list-style-type: none"> ✓ Glycolipids acts as a preservative in flavoured drinks, some other non-alcoholic beverages and alcohol, free beer and malt beverages. ✓ Regulation (EU) 2022/1037, includes the authorization and conditions of use, specifications and a reference to the risk assessment. <p>Replies to the CL 2024/23-FA made by Philippine Support the proposal as these additives pose no safety concerns when used at their proposed levels; comprehensive evaluation was made by the EFSA Panel on Food Additives and Flavourings (FAF) based on scientific opinions.</p> <p>Replies to the CL 2024/23-FA made by IFAC Strongly supports the addition of glycolipids (INS 246) with the functional class and technological purpose of preservative.</p> <ul style="list-style-type: none"> ✓ IFAC requested the addition of glycolipids to the JECFA Priority List at the 53rd Session of the Codex Committee on Food Additives and also requested its addition to the INS List in response to CL 2023/45- FA.
<p>Oat lecithin (INS 322a) as an emulsifier</p> <p>Request made by EU (In CX/FA 23/53/13 Add.1)</p>	<p>EWG's decision: To support the proposal for assigning INS numbers along with their corresponding functional classes and technological purposes:</p> <ul style="list-style-type: none"> ✓ Oat lecithin has been authorized as an emulsifier in the EU. ✓ Oat lecithin acts as an emulsifier and facilitates the manufacturing of cocoa and chocolate products by reducing the viscosity and yield value of chocolate products. ✓ Regulation (EU) 2023/440, includes the authorization and conditions of use, specifications and reference of risk assessment. <p>Replies to the CL 2024/23-FA made by the Philippines. Support the proposal as these additives pose no safety concerns when used at their proposed levels; comprehensive evaluation was made by the EFSA Panel on Food Additives and Flavourings (FAF), based on scientific opinions.</p>
<p>Carbomer (INS 1210) as a bulking agent stabilizer, thickener</p> <p>Request made by EU (In CX/FA 23/53/13 Add.1)</p>	<p>To support the proposal for assigning INS numbers along with their corresponding functional classes and technological purposes:</p> <ul style="list-style-type: none"> ✓ Carbomer acts as a bulking agent and stabiliser in solid food supplements and as stabiliser and thickener in liquid food supplements. ✓ Regulation (EU) 2023/440, includes the authorization and conditions of use, specifications and reference of risk assessment. <p>Replies to the CL 2024/23-FA made by the Philippines. Support the proposal as these additives pose no safety concerns when used at their proposed levels; comprehensive evaluation was made by the EFSA Panel on Food Additives and Flavourings (FAF) based on scientific opinions.</p>

C- The addition of the functional classes of “stabilizer” and “thickener” for sodium sesquicarbonate (INS 500(iii)) (CX/FA 23/53/6)	
Decision of the EWG	<p>EWG’s decision: To add the functional classes of “stabilizer” and “thickener” for sodium sesquicarbonate (INS 500(iii)) although no more information was available:</p> <ul style="list-style-type: none"> ➤ Other sodium carbonates INS 500 (i) and INS 500 (ii), already have the functional class and technological purpose of stabilizer and thickener in CXG 36-1989. <p>Replies to the CL 2024/23-FA made by the Philippines. Support the proposal as additional functional classes and/or technological purposes for Sodium sesquicarbonate (INS 500(iii)), have been included to be consistent with relevant Codex texts and Commodity standards as discussed and proposed by the EWG.</p>
D- The appropriateness of including the functional class of “preservative” for Sodium thiosulfate (INS 539) (CX/FA 23/53/6)	
Decision of the EWG	<p>EWG’s decision: To include the functional class of “preservative” for Sodium thiosulfate (INS 539):</p> <ul style="list-style-type: none"> ➤ CXS 306R-2011 as well as the GSFA and JECFA include sodium thiosulfate in the group of sulfites. <p>Replies to the CL 2024/23-FA made by the Philippines. Support the proposal as the functional class "preservative" was reflected for Sodium thiosulfate (INS 539) in the JECFA database, justifying its proposed inclusion to the INS.</p>
E- The appropriateness of including the functional class of “carrier” and the technological purpose of "nutrient carrier" for mannitol (INS 421), starch sodium octenyl succinate (INS 1450), and sodium ascorbate (INS 301) (CX/FA 23/53/6)	
Decision of the EWG and comment of countries	<p>EWG’s decision:</p> <ul style="list-style-type: none"> ➤ To include the functional class of “carrier” and the technological purpose of "nutrient carrier" for mannitol (INS 421) and starch sodium octenyl succinate (INS 1450): <ul style="list-style-type: none"> ○ The Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses Intended for Infants and Young Children (CXG 10-1979) permits among other substances mannitol (INS 421) and starch sodium octenyl succinate (INS1450) as nutrient carriers; ○ INS 421 Mannitol, which already has the functional classes of anticaking agent and bulking agent, easily fits in a function as nutrient carrier; ➤ The EWG did not take a strong position on sodium ascorbate (INS 301). <p>Replies to the CL 2024/23-FA made by The European Union and its Member States (EUMS): The EUMS does not support the inclusion of the function of “carrier” for sodium ascorbate (INS 301) as INS 301 already contains the function of antioxidant that fits the use in nutrient preparations. The use of INS 301 as a carrier in nutrient preparations is not recognised in the EU.</p> <p>Replies to the CL 2024/23-FA made by the Philippines. Support the proposal as additional functional classes and/or technological purposes for Mannitol (INS 421), and Starch sodium octenyl succinate (INS 1450) have been included to be consistent with relevant Codex texts and Commodity standards as discussed and proposed by the EWG.</p>
F- Assigning an INS number to low acyl clarified gellan gum (CX/FA 23/FA 23/53/2 Add.2)	
Decision of the EWG and comment of countries	<p>EWG’s decision: to assign the following INS numbers to: INS 418 Gellan; INS 418 (i) gellan gum and INS 418 (ii) Low-acyl clarified gellan gum:</p> <ul style="list-style-type: none"> ✓ The use of low-acyl clarified gellan gum as a thickener and stabilizer in formulas for special medical purposes intended for infants at 5 mg/100 mL limited to hydrolysed protein and/or amino acid-based liquid formula was technologically justified; ✓ The alternative proposal can be helpful for the link with specifications; ✓ A need was mentioned to have a different name for the parent and the specific additive;

	<p>✓ It creates a new parent additive.</p> <p>Replies to the CL 2024/23-FA made by the Philippines.</p> <p>The Philippines support the proposal as:</p> <p>✓ The product has been assessed by the Joint FAO/WHO Expert Committee on Food Additives (JECFA), specifically regarding its functional classes as a Gelling agent, Stabilizer, and Thickener. The 87th JECFA report confirmed the safety of its proposed use in Formulas for Special Medical Purposes for Infants (FSMP).</p> <p>✓ the functional class "gelling agent" has been identified as one of the technological functions of Carob bean gum (INS 410) based on the 82nd JECFA - Chemical and Technical Assessment (CTA) 2016.</p>
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Conclusion and Recommendations

Codex delegations might give their support for the EWG's proposals, supporting further development of the INS system.

G. Agenda Item 7: PROPOSALS FOR ADDITIONS AND CHANGES TO THE PRIORITY LIST OF SUBSTANCES PROPOSED FOR EVALUATION BY JECFA (REPLIES TO CL 2023/47-FA)

Document Number: CX/FA 24/54/10

The CCFA is invited to consider the proposals of member countries and observers to add or change some provisions to the priority list of substances proposed for evaluation by JECFA (**table 1**).

Table 1: Summary of proposals submitted from member countries and observer organizations to revise the priority list of substances.

Member Country/Observer	Target Additives	Request to JECFA
Japan	Acylglycerol lipase from <i>Penicillium crustosum</i> expressed in <i>Penicillium crustosum</i>	Safety evaluation when used as processing aid and establishment of specifications.
	Triacylglycerol lipase from <i>Limtongozyma cylindracea</i>	Safety evaluation when used as processing aid and establishment of specifications.
IOFI (International Organization of the Flavor Industry)	<p>6 new flavorings</p> <ul style="list-style-type: none"> • Sucrose octaacetate • Neohesperidin dihydrochalcon • (E)-6-Nonenal • Decanedioic acid • trans-2-Dodecenedioic acid • cis-8-Decenal 	<ul style="list-style-type: none"> • Are the proposed substances of no safety concern at the current levels of exposure? • Do the published specifications for the flavouring represent what is in global commerce?

Conclusion and Recommendations

Codex delegations may offer a general support to the new proposals i.e. two new requests for enzymes from Japan and 6 flavours from the International Organization of the Flavour Industry, as for their consideration in the priority list of substances to be evaluated by JECFA.

H. Agenda Item 8: Discussion paper on divergence between the General Standard for Food Additives (GSFA), Codex commodity standards and other texts – Identification of outstanding issues

Document Number: CX/FA 24/54/11

The CCCFA is invited to consider the discussion paper on divergence between the general standard for food additives (GSFA), codex commodity standards and other texts – identification of outstanding issues prepared by China, Canada, and the European Union.

Background

- ❖ Since CCFA42, the committee has worked to achieve full alignment between the General Standard for Food Additives (CXS 192-1995) herein referred to as GSFA; and the food additive provisions contained in the Codex commodity standards.
- ❖ CCFA52 (2021) agreed to establish an Electronic Working Group (EWG) on Alignment to consider, as one of its terms of reference: Whether the information in the Procedural Manual is sufficient or if amendments are required to ensure future divergence does not occur, taking into account the Guideline Document on Avoiding Future Divergence of Food Additive Provisions in the GSFA with Commodity Standards.
- ❖ During CCFA53, the Chair of (PWG) on Alignment raised concerns about divergence in food additive provisions between the GSFA and commodity standards. Despite efforts outlined in the CCFA guideline on this matter, new provisions were still emerging, indicating potential inadequacies in existing approaches.
- ❖ CCFA53 has agreed that the GSFA needs to be the single source of Codex food additive provisions. This requires the food additive provisions in commodity standards to be 'aligned'; that is removed from the commodity standards and added to the GSFA with any relevant amendments or notes as required.
- ❖ CCFA53 agreed to request China as author, Canada and the European Union (EU) as co-authors to prepare a discussion paper to identify the outstanding issues with respect to avoiding future divergence between the GSFA, commodity standards and other texts, specifically the discussion paper will identify the outstanding issues with respect to avoiding future divergence between the GSFA, commodity standards and other texts.

Analysis

- ❖ The aim of the alignment work is to align the food additive provisions of the commodity standards with those of the GSFA, with the overarching principle that the GSFA be the single reference point for food additives in the Codex Alimentarius and should therefore take account of any food additive provisions in the commodity standards.
- ❖ An analysis was conducted by China, in collaboration with Canada and the EU, to assess the current steps and documents related to the alignment of food additive provisions in commodity standards with the GSFA.
- ❖ The analysis focused on specific paragraphs (Paragraphs 59-65) of the Procedural Manual (PM), the "Guidance to commodity committees on the alignment of food additive provisions," and the "Guideline on avoiding future divergence of food additive provisions in the GSFA with commodity standards."
- ❖ The categorization of commodity standards based on their alignment status with the GSFA is as follows:
 - Including new standards: These are standards that are newly developed and do not yet have their food additive provisions aligned with the GSFA.
 - Aligned standards: These standards already have their food additive provisions aligned with the GSFA.
 - Commodity Standards Requiring Alignment: These standards have food additive provisions that need to be aligned with the GSFA.
- ❖ The examination of PM paragraphs focused on their alignment with the principles of harmonization, highlighting potential sources of divergence between commodity standards and the GSFA:
 - Paragraph 59: GSFA as a reference, not single point
 - Paragraph 60: Potential source of divergence
 - Paragraphs 61-65: Align with alignment principles
- ❖ Procedures for endorsement and alignment were discussed, emphasizing the need for consistency to prevent divergence. Additionally, the importance of cross-checking updates to the GSFA with commodity standards was emphasized to avoid unintended broadening of food additive provisions.
- ❖ The Guidance document to commodity committees on the alignment of food additive provisions defines the Role of Commodity Committees in Alignment, classified as outlined in the table 1 below.

Table 1: The classification of the Role of Commodity Committees.

Committee	Roles and responsibilities
CCFA	<ul style="list-style-type: none"> (i) Consideration of the new provision(s) by the CCFA leading to proposed amendment to the GSFA, as appropriate; (ii) Consideration of technological justification for the proposed new or amended food additive use(s). (iii) Consideration of other aspects of the new provision(s) leading to amendment to the GSFA, as appropriate
Active commodity committees (with physical meetings): Commodity Committees working by correspondence currently only work on a specific task (e.g. development of a standard).	<ul style="list-style-type: none"> (i) should make any request for the addition, removal or change to be introduced to the GSFA, for a food additive provision applicable to the commodity standard, directly to CCFA after considering the technological need and justification for use for each food additive. (ii) consider that there is a technological justification for the proposed new or amended food additive use(s): <ul style="list-style-type: none"> ○ to decide on whether the use of a particular food additive is technologically justified in the commodities standards under their purview. ○ to confirm the need, and where necessary, clarify the technological function(s) undertaken by each food additive(s) (iii) Include a list of specific functional classes in the general reference to the GSFA within the commodity standards, as part of the alignment work.
Abolished commodity committee	Responsible for new or changed food additive provisions rests with CCFA.
Adjourned commodity committees (The EWG on Alignment)	Provides recommendations to CCFA for the alignment of food additive provisions in the commodity standards of adjourned Commodity Committees.

Outstanding Issues Identified

Based on the analysis, the outstanding issues include:

- (i) Lack of statement that the GSFA is the single reference point for food additives in the Procedural Manual.
- (ii) Having food additive provisions beyond the general reference to the GSFA in the commodity standards is not consistent with the goals of the principles of Alignment, and this is also considered as a major potential source of divergence to occur between commodity standards and the GSFA.
- (iii) Once the current work plan of Alignment WG is completed, the procedures to guide on endorsing commodity standards and inclusion in the GSFA accordingly may not be fully sufficient to prevent the introduction of new divergences.

Possible ways to avoid future divergence:

- ✓ Option 1_ Procedural Manual is not amended at present, while certain changes to the Procedural Manual will be required once the current work plan of Alignment WG is completed.
- ✓ Option 2 _ The Procedural Manual undergoes minor amendments, including:
 - (i) To strengthen reference to the GSFA as the single reference point for food additives in the Procedural Manual;
 - (ii) To remove paragraph 60, which is counter to the premise of Alignment; and
 - (iii) To add the reference to the “Guideline on avoiding future divergence of food additive provisions in the GSFA with commodity standards” and the “Guidance to commodity committee on the alignment of food additive provisions”.

- ✓ Option 3 _ The Procedural Manual undergoes a holistic revision, including:
 - (iv) Strengthening reference to the GSFA as the single reference point for food additives in the Procedural CX/FA 24/54/11 4 Manual.
 - (v) The section of food additive in commodity standard should ONLY contain a general reference to the GSFA. Accordingly, the format for Codex commodity standards (Section of Food Additives) should be amended to prevent commodity standards from having specific food additive provisions.
 - (vi) CCFA should endorse the general reference to the GSFA in commodity standard and include in the GSFA accordingly (when necessary) at the same time. This implies that sort of simple alignment tasks, such as inserting XS Note, should be carried out simultaneously.
 - (vii) Should the commodity committee consider that a general reference to the GSFA does not serve its purpose, a proposal should be prepared and forwarded to the CCFA for consideration and follow the procedures of the entry and review of food additive provisions in the GSFA. Meanwhile, the guidance and the guideline could be referred to as appropriate.

Conclusion and Recommendations

- ❖ The discussion paper on divergence between the General Standard for Food Additives (GSFA), Codex commodity standards, and other related texts proposes three options to address the outstanding issues in alignment. Codex delegations may recommend supporting the advancement of this work to the next step.
- ❖ Based on the analysis, Codex delegations may recommend choosing Option 3 as it presents the most suitable choice for ensuring harmonization and consistency in the long term for several reasons:
 - ✓ Option 3 offers a holistic approach to addressing future divergence by extensively revising the Procedural Manual, clearly stating the exclusivity of general references to the GSFA in commodity standards. This provides a robust framework for maintaining alignment and minimizing discrepancies.
 - ✓ Unlike Options 1 and 2, which provide immediate solutions, Option 3 ensures long-term sustainability by establishing clear guidelines and procedures for both new commodity standards and revisions of existing ones. This proactive approach mitigates the need for frequent revisions in the future.
 - ✓ Emphasizing the restriction of commodity standards to general references to the GSFA, Option 3 minimizes the potential for divergence.
 - ✓ Option 3 closely aligns with the overarching goal of harmonizing food standards globally while accommodating the unique needs of commodity committees.
 - ✓ By enforcing strict adherence to the GSFA and streamlining the process for proposing revisions, Option 3 promotes transparency, efficiency, and consistency within the Codex framework.

H. Agenda Item 9: Discussion paper on the development of a standard for baker's yeast

Document Number: CX/FA 24/54/12

Background

At the 44th Session of CAC (2021), China introduced the new work proposal for the development of a Codex standard for yeast for discussion.

China requested guidance from CAC44 regarding the Codex committee that could undertake new work on yeast, a product that has a wide application globally, noting that this product fell outside of the Terms of Reference (ToRs) of the existing committees.

CAC44 agreed that the discussion paper on the development of a standard for yeast should be presented at the 53rd Codex Committee on Food Additives (CCFA53) in 2023.

At the CCFA53 (2023), China presented the discussion paper (CCFA53/CRD6), emphasizing the need to establish a standard for yeast; the purpose would be to protect consumer health, and promote fair international trade by removing trade barriers in line with the Codex Strategic Plan 2020-2025.

China further clarified that yeast was not a food additive, but a food ingredient as identified in Food Category System (FC 12.8), and that CCFA was the most suitable Codex Committee to undertake this work.

Members and Observers expressed the following different views:

- ❖ The scope and proposal needed to be further refined with a focus on baker's yeast, its use in fermentation processes should not be considered as a food additive and this work being considered by CCFA may create some confusion on this issue;
- ❖ Edible yeast should be excluded from the scope and some edible yeast products could potentially overlap with the ongoing discussions on the work on new food sources and food production systems;
- ❖ The need to consider restricting the scope to live baker's yeast only and not including a gassing power as it may create trade barriers;
- ❖ The International Organisation for Standardisation (ISO) was in the process of initiating work on a standard for yeast, and Codex and ISO should coordinate in this regard to avoid duplication.

In response to feedback received, China proposed excluding edible yeast from the scope and suggested further discussion on the scope during the standard's development.

CCFA agreed to request China, France, and other interested Members, to prepare a discussion paper which would be included for discussion on the agenda of CCFA54.

At the CCFA54 (2024), delegates will discuss the EWG's proposals related to the establishment of the revised project document, to make amendments as it considers appropriate, and recommend new work on development of a standard for baker's yeast for approval by CAC47.

Analysis

Following CCFA53, China has collaborated with France, Japan, Turkey, and the Confederation of European Yeast Producers to conduct a comprehensive review of the project document, taking into consideration the comments received at CCFA53.

The EWG lead by China has revised the new work proposal document, considering:

- The discussion and recommendations of the CAC44, about the revision of the General Standard for Food Additives (GSFA Category 12.8) on yeast and yeast products to include yeast containing cultures for kefir in the Standard for Fermented milks (CXS 243-2003);
- The information that ISO has begun their work on microbial food cultures including yeast and that such work be considered by Codex moving forward, as well as a suggestion to exclude yeast used to produce alcoholic beverages;
- The new information provided by members; and
- Comments received at CCFA53.

The main modifications made par the EWG to the draft presented at CCFA53 are presented bellow:

1. The Purposes and Scope of the Standard: exclusion of "brewing and other purposes" from the scope

This standard applies to yeast products for baking, ~~brewing and other purposes~~. Currently, there is no harmonized international standard for yeast. The regulations and standards for yeast are various among countries, and there are still many countries which do not have standard for yeast. The purpose of this standard is to protect the health of consumers and promote fair practices in food trade in accordance with the purpose of the Codex.

2- Product definition: presentation of a new product definition (changing the name of product at concern "baker's yeast" instead of yeast in all the document and replacing the examples of sold product by general presentation of Baker's yeast).

*"Baker's yeast refers to a type of unicellular fungus belonging to the species of *Saccharomyces cerevisiae* as example. It is produced by the multiplication of pure strains and is used as biological leavening agents in bakery applications, with the main function of producing carbon dioxide with flavors".*

Products can be classified into **liquid baker's yeast, fresh baker's yeast and dry baker's yeast according to their moisture content.**

3. Relevance and timelines: update of the Data and statistics (yeast import and export trade) including those reported on 2020 and 2021.

4. Main aspects to be covered: reformulation of the text

*"The main aspects to be covered by the Codex standard for **baker's** yeast include scope, description, types, essential composition and quality factors, packaging, transportation and storage as well as methods of analysis and sampling. The sections related to food additives, contaminants, food hygiene and labeling will follow the requirements of the existing Codex texts."*

5. Assessment against the Criteria for the Establishment of Work Priorities: update of the data (Volume of production and consumption) and information mentioned in this section

e) Coverage of the main consumer protection and trade issues by existing or proposed general standards: the mention of the current international standards for baker's yeast

The preceding text mentioned in the first draft (There are no existing commodity standards covering yeast, it won't be conflict with any existing standards) was replaced by the following proposition:

There are several national regulations for baker's yeast in the world, but some countries do not have any specific regulation for baker's yeast, this standard should be harmonized with other standards.

f) Number of commodities which would need separate standards indicating whether raw, semi processed or processed: Reformulation of the section (exclusion of part of the preceding text)

At present, apart from this proposed standard, there is no need to formulate other standards, because the proposed standard will cover all finished products, including raw materials of yeast and the production sanitary conditions for processed products. There is no semi-processed product or unprocessed product sold as a commodity in this product.

g) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies): mention of the new work undertaking by Germany.

A new work item proposal was submitted by Germany to International Organization for Standardization (ISO) in August 2023 in order to initiate new work on baker's yeast characteristics (ISO/NP 23983).

6. Relevance to the Codex Strategic Objectives: New reformulation of the section

The proposed new standard project is in line with the Codex Strategic Plan 2020-2025, and the development of global standard for baker's yeast is closely related to Goal 1 (Address current, emerging and critical issues in a timely manner). As a global standard of baker's yeast, it will help to improve the food safety for global consumers and promote fair international trade practices for this product.

10. The Proposed Time-Line for Completion of the New Work. New proposition for the accomplishment of the work.

*It is expected that the development of this standard would be conducted in **three CCFA sessions** or less, depending on the agreement reached by the Committee.*

Conclusion and Recommendations

Yeast is an essential ingredient, widely used in daily food preparation given its beneficial effects in food technology (preparation of bread and its derived products which are highly consumed in several regions worldwide).

The new work proposed for the development of a standard for yeast is needed to harmonize the production approaches, to protect consumer health, and promote fair international trade by removing trade barriers.

Codex delegations might give their support for advancing the work on the adoption of the new work on the establishment of a standard for baker's yeast. Nevertheless, knowing that this standard must include all the instructions and guidelines related to safety and technology, the establishment of this standard must involve all relevant technical committees, e.g. CCCF, CCFH, etc. The modalities for developing the standard must be discussed during the CCFA, with even the possibility of creating a joint working group