ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE FIFTY-FIFTH SESSION OF THE CODEX COMMITTEE ON FOOD ADDITIVES (CCFA55)

Prepared to Support the Participation of Codex Communities of Practice Supported by GFoRSS

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Disclaimer and Disclosure of Interest

It is important to note that the proposed analysis and associated conclusions and recommendations stem from the work of independent food regulatory experts. The analysis and associated recommendations or positions are presented as mere suggestions and should not be considered as a direction or final recommendation to the competent authority empowered to develop and endorse Codex positions.

Disclosure of Interest: *Experts involved in the development of this analysis contribute to various food safety and nutrition regulatory capacity building initiatives funded by other Governments, aid agencies, industry and international organizations.*

OBJECTIVES

This document offers an analysis of agenda items to support participation in the 55th**session of the Codex Committee on Food Additives (CCFA55)**, taking place in **Seoul, Republic of Korea**, from **24 to 28 March 2025**.

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 member countries and observers.

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.

The analysis provided in this document offers a factual review of key agenda items of CCFA55, pertaining to:

A. **Agenda Item 4(a): Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards**

B. **Agenda Item 4(b): Alignment of the food additive provisions of commodity standards: Report of the Electronic Working Group on Alignment**

C. **Agenda Item 5(a): General Standard for Food Additives (GSFA): Report of the Electronic Working Group on the GSFA**

D. **Agenda Item 5(b): GSFA: Proposals for new and/or revision of food additive provisions (replies to CL2024/58-FA)**

E. **Agenda Item 6: Agenda item 6: Proposed draft revision to the Class names and the international numbering system for food additives (CXG36-1989)**

F. **Agenda Item 8: Standard for baker's yeast (step 4)**

G. **Agenda Item 9: Discussion paper on the working practices and the engagement plan to avoid divergence between the GSFA, commodity standards and other related Codex texts**

A. Agenda Item 4(a): Endorsement and/or revision of maximum levels for food additives and processing aids in Codex standards

Document: CX/FA 25/55/5 Rev.1

Status in Codex Process: Step 5/8

- **REGIONAL STANDARD FOR CASTILLA LULO (NARANJILLA) (Latin America and the Caribbean) (for adoption by CAC48 at Step 5/8)**

Background

At CCFFV22 (2022), the proposal for the development for new work was Submitted by Colombia (REPLIES TO CL 2021/79-FFV) and presented to codex members. The committee agreed: (i) to recommend approval of new work on Castilla lulo by CAC45 and to request Colombia to revise the proposal by providing more trade information from other producing countries, and submit it directly to CCEXEC through the Codex Secretariat; (ii) to establish an EWG chaired by Colombia and co-chaired by Mexico and working in English and Spanish, to prepare, subject to the approval of the new work, a proposed draft standard for Castilla lulo for circulation for comments at Step 3 and consideration at CCFFV23.

At CAC47 (2024), the draft standard for Castilla lulo (naranjilla) was submitted by CCLAC23 for adoption at Step 5/8. Provisions on food additives and labeling were referred to CCFA and CCFL for endorsement. Due to the ongoing endorsement process, especially concerning food additives, the standard's adoption was deferred until the next CAC session, after CCFA's review. Members highlighted the standard's importance for the Latin America and Caribbean region and stressed the need to complete the endorsement before CCEXEC's final review and adoption.

CCEXEC87(2024) highlighted that the endorsement requirements for the food additive provisions in the draft standard had not yet been fulfilled. Consequently, CCEXEC87 decided to withhold any recommendation to CAC regarding the adoption of the regional standard for Castilla lulo (naranjilla) until the Codex Committee on Food Additives (CCFA) completed the endorsement process.

At CCFA55 (2025), delegates will be invited to consider the endorsement of the food additive provisions forwarded by CCLAC23, as outlined in the REP24/LAC document, for the regional standard for Castilla lulo (naranjilla).

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REGIONAL STANDARD FOR CASTILLA LULO (NARANJILLA) (Latin America and the Caribbean) (for adoption by CAC48 at Step 5/8)[4]

Food additive provision	Note
8 FOOD ADDITIVES No food additives are permitted.	For information only.

Analysis

Castilla lulo (Solanum quitoense Lam.) is a tropical fruit belonging to the Solanaceae family. Native to the Andean region of South America, particularly Colombia. Castilla lulo is now cultivated in Central America and Mexico. Known for its citrus-like flavor and aroma, it is rich in vitamins A and C, antioxidants, fiber, and potassium, which support immune health, skin, digestion, and heart function. These nutritional benefits make it a popular choice for fresh consumption, juices, smoothies, and various dishes.

The development and adoption of the regional standard for Castilla lulo (naranjilla) is important for ensuring food safety, quality, and trade facilitation in the Latin America and Caribbean region (This commodity is also produced in Egypt (15 million tons), *reference: CCFFV22 (agenda item 7) CX/FFV 22/22/8*).

The Castilla lulo standard outlines key consumer protection aspects related to commercial and safety concerns. It specifies the minimum quality requirements for the fruit, acceptable defects, required labeling information for consumers, and references Codex provisions on contaminants and hygiene practices for packaging and marketing. However, the process has encountered delays due to the need for endorsement of the food additive provisions by CCFA.

The decision by CCEXEC87 to withhold recommendations until the endorsement process is completed underscores the importance of adhering to Codex procedures and ensuring that all technical aspects, particularly those related to food additives, are thoroughly reviewed and validated.

❖ **STANDARD FOR FRESH CURRY LEAVES (for adoption by CAC at Step 5/8)**

Background

At CCFFV22 (2022), in response to the CL 2021/79-FFV issued on November 2021, India presented a proposal for a new work related to the establishment of a specific standard for fresh curry leaves.

There was broad support for the proposal and the committee agreed to recommend the approval of the new work on fresh curry leaves by CAC45 and to establish an Electronic Working Group (EWG), chaired by India, to prepare a proposed draft standard for fresh curry leaves and to be circulated for comments at Step 3 and considered at CCFFV23.

CCEXEC83 (2022) recommended that CAC45 approves the proposal for new work on the development of a standard for fresh curry leaves.

CAC45 (2022) approved new work on developing a standard for fresh curry leaves.

At CCFA23 (2025) delegates will consider the endorsement of the food additive provisions forwarded by CCFFV23, as outlined in the (REP25/FFV) document, for the standard for fresh curry leaves (for adoption by CAC at step 5/8).

STANDARD FOR FRESH CURRY LEAVES (for adoption by CAC at Step 5/8)[5]

Food additive provision	Note
8 FOOD ADDITIVES No food additives are permitted in foods conforming to this standard.	For information only.

Analysis

The proposed standard for fresh curry leaves aims to establish a globally recognized set of guidelines to facilitate international trade and ensure consumer protection. The standard focuses on fresh curry leaves from the *Murraya koenigii* species, which are commonly used for their aromatic value in vegetable cooking and will cover all varieties traded worldwide.

This standard specifically covers fresh curry leaves, excluding forms such as dried, powdered, or dehydrated curry leaves. The key objectives of the standard include ensuring the safety and quality of the product, addressing aspects like freshness, leaf size, contaminants, residues from agrochemicals, packaging, and labeling. It sets minimum requirements for quality, provides a framework for classifying curry leaves based on their characteristics, and establishes tolerance levels for variations in quality and size. The standard also includes provisions for hygiene and handling in line with Codex principles and establishes guidelines for labeling to ensure transparency for consumers.

Currently, curry leaves are traded as part of assorted vegetable consignments, and detailed production and trade data are unavailable. The absence of clear standards has led to concerns about food safety, particularly around contamination and consistency, making it difficult to gain trust in international markets. This lack of standardization has created barriers to trade, particularly for major producers and exporters like India, Sri Lanka, and Bangladesh.

Despite current trade challenges, the previous export value indicates that there is significant market demand, particularly in regions like the Middle East and Europe, suggesting potential for future growth if standards are established.

By establishing a Codex standard, the proposal aims to address these issues and promote fair trade practices while safeguarding consumer health. This standard would allow producers to meet consistent quality and safety

expectations and enhance the international trade of fresh curry leaves. India has already developed grading and marking standards for curry leaves to comply with food safety requirements from importing countries like those in the Middle East and the European Union.

The creation of this standard is in line with Codex's strategic objectives for 2020-2025, which focus on promoting international trade and consumer health. This proposal is also in harmony with existing Codex texts related to safety and quality standards, ensuring that the new standard complements broader food safety guidelines.

No external scientific or technical advice is expected, as the necessary information for formulating the standard is already available. No food additives are permitted in fresh curry leaves.

Conclusion and Considerations

The ongoing endorsement process by CCFA is essential to ensure that the standard is scientifically sound, aligned with GSFA, harmonized with international guidelines, and acceptable to all stakeholders.

CCFA55 may endorse the food additive provisions in the draft standards, as the current drafts does not allow any food additives.

B. Agenda item 4(b): Alignment of the food additive provisions of commodity standards: Report of the Electronic Working Group on Alignment

Document Number**: CX/FA 25/55/6**

Status in Codex Process: N/A

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.
- At **CCFA53 (2023)**, a Physical Working Group (PWG), chaired by Canada, was established to review the alignment report from the **Electronic Working Group (EWG) on Alignment** and endorse food additive provisions from commodity committees.

  An EWG, co-chaired by the USA and Japan, was tasked with:

  - Aligning provisions for milk, tomato concentrate, and processed fruit standards.
  - Developing and maintaining Table 3 notes in the GSFA.
  - Updating regional standards and verifying alignment with the GSFA database.

  The alignment efforts were supported by the Codex Secretariat and technical input from the International Dairy Federation (IDF), with contributions from multiple member countries and observer organizations. The work aimed to ensure consistency across Codex food additive standards.
- At **CCFA54 (2024)**, the committee advanced efforts to align food additive provisions across Codex standards by forwarding revised sections for adoption by **CAC47**. This included updates to standards for fermented milks, cream, table olives, and regional products like Laver and Yacon. The committee agreed to establish an **Electronic Working Group (EWG)**, chaired by **Canada** and co-chaired by the **USA** and **Japan**, to align regional standards, verify GSFA color provisions for vegetable oils, and address the use of methacrylate copolymer (INS 1205) in fortified rice.

  A **Physical Working Group (PWG)** will meet ahead of **CCFA55** to finalize recommendations, ensuring continued alignment and consistent application of food additive provisions across Codex texts.

Analysis

The Report on the Alignment of Food Additive Provisions in Commodity Standards (CX/FA 25/55/6) highlights key challenges in aligning food additive provisions across Codex standards, particularly in terms of categorization, usage restrictions, and consistency with the General Standard for Food Additives (GSFA). The Electronic Working Group

(EWG) has proposed several measures to harmonize international food safety regulations while addressing regional needs and technical considerations.

❖ OVERVIEW OF KEY ISSUES AND PROPOSALS

This section provides a comprehensive overview of key issues identified in the alignment of food additive provisions across Codex standards, as discussed in the EWG Report on Alignment (CX/FA 25/55/6).

Table 1 below provides a summary **of key issues and the Chair's proposals** from **Annex Part I: Key Issues and Questions Requiring Consideration by the PWG**.

Table 1: Key Issues and Chair's Proposals (Part I: Key Issues and Questions Requiring Consideration by the PWG).

Issue Title	Key Issues	Chair's Proposal
ISSUES RELATED TO CCASIA REGIONAL STANDARDS		
1. Restrictive Notes for Additives in Edible Sago Flour (CXS 301R-2011)	Additives with multiple functions, including flour treatment agents, require clearer restrictions in FC 06.2 and 06.2.1.	Add notes to limit the use of specific additives to flour treatment functions only in FC 06.2 and 06.2.1.
2. Wording of New Note A355R for Cooked Rice Wrapped in Plant Leaves (CXS 355R-2023)	Clarification needed for the use of sucrose esters and oligoesters as stabilizers.	Add Note A355R specifying permitted use of sucrose esters and oligoesters as stabilizers exclusively for products conforming to CXS 355R-2023.
ISSUES RELATED TO CCNE REGIONAL STANDARDS		
3. Food Category Clarification for Mixed Zaatar (CXS 341R-2020)	Confusion over whether mixed zaatar should be categorized as herbs (FC 12.2.1) or seasonings (FC 12.2.2).	Seek clarification from CCNE regarding the appropriate GSFA food category for mixed zaatar.
ISSUES RELATED TO CCSCH STANDARDS		
4. Sulfites Use in Dried Ginger (CXS 343-2021)	Whether to expand the use of sulfites as bleaching agents beyond sulfur dioxide.	Consult CCSCH on the expansion of sulfite usage beyond sulfur dioxide; initially limit use to sulfur dioxide only in GSFA Tables 1 and 2.
5. Differential Treatment of Herbs and Spices in Table 3	Herbs are in the Annex to Table 3, while spices are not, leading to inconsistencies in additive permissions.	Proceed with alignment assuming herbs are in the Annex to Table 3 and spices are not; consult CCSCH on updating standards templates accordingly.
6. Uniform Treatment of Herbs and Spices	Proposal to treat herbs and spices the same regarding Table 3 additives.	Consult CCSCH on treating herbs and spices equally by including both in the Annex to Table 3 of the GSFA.
ISSUES RELATED TO PROVISIONS IN GSFA FOOD CATEGORY 02.1.2		
7. Revision of Note 508 for Edible Fats and Oils (CXS 19-1981)	Confusion over color additive permissions in vegetable oils and other edible fats.	Revise Note 508 to exclude vegetable oils, virgin, and cold-pressed oils; delete Note 509, and consider replacing both with Note XS19 for better clarity.

Table 2 below summarizes the consensus issues agreed upon in **Part II: Key Issues for Information** of the Explanatory Document (Annex 1) in the EWG Report (CX/FA 25/55/6). These issues have been resolved within the Electronic Working Group (EWG) and generally do not require further input.

Table 2: Key Issues and Chair's Proposals (Part II: Key Issues for Information)

Issue Title	Key Issues	Chair's Proposal
ISSUES RELATED TO CCASIA REGIONAL STANDARDS		
8. Addition of Tartrates and Sulfites in Fermented Soybean Pastes (CXS 298R-2009)	Need to align tartrates and sulfites provisions with GSFA under FC 12.9.1, pending CCASIA's response on riboflavins.	Add tartrates and sulfites as permitted additives with specific notes. Await CCASIA's response on riboflavins before finalizing alignment in GSFA Tables 1 and 2.
9. Inclusion of Flavour Enhancers and Stabilizers (CXS 298R-2009)	Discrepancy over whether flavour enhancers and stabilizers should be permitted under GSFA Tables 1 and 2.	Exclude flavour enhancers and stabilizers from Tables 1 and 2, limiting their permissions to Table 3 additives in line with CCASIA's guidelines.
10. Carotenoid-Related Additives in Soybean Products (CXS 322R-2015)	Lack of justification for maximum use levels of carotenoid-related additives like INS 160a(i), (ii), (iii), and 160e.	Await CCASIA's response before deciding on inclusion. If no justification is provided, remove these additives from the GSFA.
11. Fermented Soybean Products (CXS 354R-2023)	Current standard does not permit food additives, but potential misinterpretation exists due to lack of clear reference.	Add an entry in the GSFA Table 3 to explicitly state that food additives are not permitted in products conforming to this standard.
ISSUES RELATED TO CCSCH STANDARDS		
12. Clarification in Table 3 References for Herbs and Spices (FC 12.2.1)	Misleading text excludes herbs but not spices, creating inconsistency in permissions for Table 3 additives.	Amend the wording to clearly reflect that only spices are excluded from the Annex to Table 3.
13. Amendment of Notes 532 and 534 for Preservatives and Anticaking Agents	Lack of clarity in current notes for permitted uses of preservatives and anticaking agents, particularly for herbs and spices.	Amend Note 532 to specify sulfur dioxide use as a preservative for green peppers. Clarify Note 534 to reflect anticaking agent use exclusively for herbs.
14. Consistency in Aligning Herbs and Spices Across Standards (CXS 326-2017)	Inconsistencies in applying XS Notes for Table 3 anticaking agents in black, white, and green pepper standards.	Add XS326 Notes for anticaking agents to Tables 1 and 2 for Food Category 12.2.1 to ensure consistency across herb and spice standards.

❖ KEY FINDINGS AND OBSERVATIONS

▶ Regional Standards Alignment

- **CCASIA and CCNE standards** were adjusted to ensure consistent application of additives across food categories.
- Amendments were made to **fermented soybean products, edible sago flour, and non-fermented soybean products**.

▶ Technical Revisions & GSFA Adjustments

- **Updates to GSFA Tables 1, 2, and 3 to reflect new additive permissions, exclusions, and maximum limits.**
- **Addition of alignment notes (e.g., A298R, B322R) to clarify additive use and restrictions.**

- **Challenges Identified**
  - **Inconsistent Classification: Misalignment between food categories required consultation with multiple committees.**
  - **Complex Procedures: Prolonged review and approval cycles delayed final decisions.**
  - **Resource Constraints: Coordination among multiple international committees proved administratively demanding.**

❖ **Key Amendments in Annexes**

- **Annex 1:** Explanatory Document
  - **Presents questions, comments, and Chair's proposals for EWG alignment discussions.**
  - **Outlines key issues requiring Physical Working Group (PWG) consideration**.
- **Annex 2:** Amendments to CCASIA Regional Standards
  - Updates to food additive provisions in:
    - **Fermented Soybean Paste (CXS 298R-2009)**
    - **Edible Sago Flour (CXS 301R-2011)**
    - **Non-Fermented Soybean Products (CXS 322R-2015)**
    - **Soybean Products Fermented with Bacillus Species (CXS 354R-2023)**
    - **Cooked Rice Wrapped in Plant Leaves (CXS 355R-2023)**
- **Annex 3: CCNE Regional Commodity Standards**
  - **Proposed Amendments to the Food Additive Provisions** of CCNE standards (CXS 257R-2007, CXS 258R-2007, CXS 259R-2007).
- **Annex 4: CCSCH Commodity Standards**
  - **Proposed Amendments to the Food Additive Provisions of Commodity standards for herbs, spices, and dried seeds (CXS 342-2021 to CXS 353-2022).**
- **Annex 5:** Amendments to Food Category 02.1.2 (Edible Fats & Oils)
  - **Proposed Amendments to Food Additive Provisions in** CXS 19-1981
- **Annex 6: Amendments to the Commodity Standard for Rice (CXS 198-1995)**
- **Annex 7: Table 3 Notes Development**

❖ **Key Updates to Food Additive Provisions and GSFA Alignment**

1. Inclusion of Food Additives & Maximum Levels (MLs) Adjustments

- Tartrates (INS 334, 335(ii), 337): 1000 mg/kg
- Sulfites (INS 220-225, 539): 30 mg/kg
- Acesulfame potassium (INS 950): 350 mg/kg
- Benzoates (INS 210-213): 1000 mg/kg
- Sorbates (INS 200, 202, 203): 1000 mg/kg
- Saccharins (INS 954(i)-(iv)): 200 mg/kg

2. Alignment with GSFA Standards

- Adjustments to ensure conformity with GSFA Tables 1 and 2
- Modifications to provisions for specific food categories
- Added exclusions and permissions for food additives in select products

3. Clarification and Restriction of Additive Use

- Addition of a note to Table 3 of the GSFA specifying non-permissibility of certain additives
- Explicit restrictions on specific food categories (e.g., canned vegetables, herbs, spices)
- Updated Food Additive Provisions ensuring consistency across regional standards

4. Refinement & Introduction of New Alignment Notes

- Introduction of new alignment notes for clarity
- Removal or modification of outdated additive provisions
- Revised language to enhance consistency and transparency

Recommendations

The EWG Report on Alignment establishes a robust framework for harmonizing food additive provisions across Codex standards, ensuring consistency with the General Standard for Food Additives (GSFA). While substantial progress has been achieved, continued efforts are essential to address outstanding issues, particularly regional variations, technical ambiguities, and gaps in GSFA alignment.

To ensure the long-term effectiveness and adaptability of the alignment process, the following key actions are recommended:

1. Finalization of unresolved matters should focus on refining additive categorization and resolving alignment inconsistencies, including:

- Clarification of Mixed Zaatar Categorization (CXS 341R-2020): CCNE must confirm whether mixed zaatar falls under herbs (FC 12.2.1) or seasonings (FC 12.2.2) for correct GSFA alignment.
- Expansion of Sulfite Use in Dried or Dehydrated Ginger (CXS 343-2021): CCSCH must determine if additional sulfites beyond sulfur dioxide should be permitted as bleaching agents.
- Harmonization of Herbs and Spices in GSFA Table 3: A decision is needed on whether both herbs and spices should be included in the Annex or if the differential treatment should continue.
- Justification for Carotenoid Additives in Non-Fermented Soybean Products (CXS 322R-2015): If CCASIA does not provide maximum use level justifications, these additives should be removed from the GSFA.
- Explicit Exclusion of Table 3 Additives in Soybean Fermented with Bacillus (CXS 354R-2023): A clear GSFA entry is needed to prevent misinterpretation regarding additive use.
- Revision of GSFA Note 508 for Edible Fats & Oils (CXS 19-1981): The note must explicitly exclude vegetable oils to avoid regulatory inconsistencies.

2. Continuous Review and Adaptation of Table 3 Notes

- Table 3 notes must undergo regular reviews and updates to reflect future GSFA revisions and evolving Codex recommendations.
- Further harmonization efforts should be undertaken to ensure alignment with regional and international food safety frameworks.

Conclusion

The report of the electronic working group on alignment offers a comprehensive strategy to ensure alignment of food additive provisions across all codex standards. While significant progress has been made, continued efforts are required to address unresolved issues, particularly in harmonizing regional variations and ensuring technical clarity in the GSFA.

The proposed recommendations aim to streamline the alignment process, improve efficiency, and maintain global food safety standards.

C. Agenda item 5(a): General Standard for Food Additives (GSFA): Report of the Electronic Working Group on the GSFA

Document Number: **CX/FA 25/55/7**

Background

- CCFA54 agreed to establish an EWG to provide recommendations to CCFA55 on the following topics:
  - (i) Replies from CCFO28 on the technological justification for the use of paprika extract (INS 160c (ii) in FC 02.2.2 of the GSFA;
  - (ii) Revocation of the adopted provision for annatto extracts, bixin based (INS 160b(i)) in FC 01.2.1;
  - (iii) The adopted provision for aspartame (INS 951) in FC 07.1 for comment on the actual use level and application of the alternative Note;
  - (iv) The draft, and proposed draft provisions, respectively, for colors in FCs 01.0 through to 08.0 and their subcategories as well as adopted provisions for colors with Note 161 in FCs 01.0 through to 08.0 and their subcategories with the exception of colors addressed in bullet points i and ii above; and
  - (v) Provisions entered at Step 2 of the GSFA contained in CRD02 Annex 5 (also presented in REP24/FA (Appendix IX)
- Working Documents:

  The documents for the report of the EWG on the General standard for food additives (GSFA, CXS 192-1995) are presented as appendices to the document CX/FA 25/55/7. The appendices provide background on the topic under discussion, collate comments on the topic from the EWG, and provide recommendations for each topic.

  - proposals for provisions related to replies from CCFO28 that pertain to **topic I** are presented in **Appendix 1**.
  - proposals for provisions related to revocation of the adopted provision for annatto extracts, bixin based (INS 160b(i)) that pertain to **topic II** are presented in **Appendix 1**.
  - proposals for provisions related to colours that pertain to **topic IV** are presented in **Appendix 1**.
  - proposal for the adopted provision for aspartame (INS 951) in FC 07.1 related to **topic III** are presented in **Appendix 2**.
  - proposals for provisions entered into the step process by CCFA54 that pertain to **topic V** are presented in **Appendix 3**.

Analysis

The Report of the Electronic Working Group on the GSFA (CX/FA 25/55/7) highlights key proposals for provisions related to provisions of food additives across Codex standards, particularly in terms of categorization, usage maximum levels and restrictions, and consistency with the General Standard for Food Additives (GSFA). The Electronic Working Group (EWG) has proposed several decisions to the topics under discussion.

Appendix 1: Colors in FCS 01.0 through to 08.0 and their Subcategories

This section provides an overview of key topics under discussion by the EWG Report (CX/FA 25/55/7). Among several topics, the 54th CCFA requested the EWG on the GSFA to CCFA55 to consider:

- Replies of the Codex Committee on Fats and Oils (CCFO);
- Revocation of the adopted provision for Annatto extracts, bixin based (INS 160b(i)) in FC 01.2.1;
- Draft and proposed draft provisions for colors in FCs 01.0 through 08.0 and their subcategories; and
- Adopted provisions for colors with Note 161 in FCs 01.0 through 08.0 and their subcategories.

1- Replies of the Codex Committee of Fats and Oils (CCFO)

The electronic working group on the GSFA to CCFA53 compiled provisions in food categories 01.0 (Dairy products and analogues, excluding products of food category 02.0). 02.0 (Fats and oils, and fat emulsions), and 03.0 (Edible ices, including sherbet and sorbet) and their subcategories. When discussing the provision for Paprika Extract (INS 160c(ii)) in food category 02.2.2, it was noted that, while the commodity standards which correspond to this food category (Standard for Dairy Fat Spreads (CXS 253-2006) and the Standard for Fat Spreads and Blended Spreads

(CXS 256-1999)) list specific food additives for use as colors, INS 160c(ii) is not included in these commodity standards.

It was noted that the JECFA evaluation for INS 160c(ii) was only recently completed, and therefore Paprika extract was not eligible for inclusion in these commodity standards when they were finalized, and it was also determined that the standards for food category 02.2.2 fell under the purview of the Codex Committee on Fats and Oils (CCFO) which is an active commodity committee.

CCFO replied to CCFA that there is no technological justification for the use of paprika extract (INS 160c(ii)) in products conforming to CXS 256-1999.

Food Category 02.2.2 (Fat spreads, dairy fat spreads and blended spreads)

Additive	INS	Max Level (mg/kg)	Step / Adopted	Final EWG Proposal
Paprika Extract	160c(ii)	40	3	Adopt at 40 mg/kg with Note 39 and Note XS256

2- Revocation of the adopted provision for Annatto extracts, bixin based (INS 160b(i)) in FC 01.2.1:

The PWG for Alignment at CCFA54 noted that the provision for Annatto extracts, bixin-based (INS 160b(i)) was likely included in the GSFA by error as food category 01.2.1 (Fermented milks (plain)) is a "**plain**" food category, and plain food categories do not typically contain colors and the **CODEX STAN 243-2003** does not permit colors in plain products.

The provision was forwarded to the GSFA EWG for CCFA55 for consideration of revocation. EWG members were encouraged to provide comments on the proposal to revoke the provision for Annatto extracts, bixin-based (INS 160b(i)) in food category 01.2.1.

Food Category 01.2.1 (Fermented milks (plain))

Additive	INS	Max Level (mg/kg)	Step / Adopted	Final EWG Proposal
Annatto Extracts, BIXIN-BASED	160b(i)	10	2021	Revoke Provision

3- Draft and proposed draft provisions for colors and adopted provisions for colors with Note 161 in food categories 01.0 through 08.0 and their subcategories

The EWG was invited to provide comments on the draft and proposed draft provisions with the functional class of colors and adopted provisions for colors with Note161, the EWG on the GSFA issued three circulars for this Appendix requesting comments. The related Document (CX/FA 25/55/7) presents proposals for each provision under discussion (**adopt, adopt with revision, discontinue**) in the format of the food categories listed in Table 2 of the GSFA.

List of Colors under provision through FC 01.0 to 08.0	
Amaranth	Fast Green FCF
Annatto Extracts, Bixin-based / Annatto Extracts, Norbixin-based	Grape Skin Extract
Azorubine (Carmoisine)	Indigotine (Indigo Carmine)
Allura Red AC	Iron Oxides
Beet Red	Lycopene, Tomato / Lycopene, Synthetic / Lycopene, Blakesleatrispora
Brilliant Black (Black PN)	Lutein from Tagetes Erecta
Brilliant Blue FCF	Titanium Dioxide
Brown HT	Paprika Extract
Calcium Carbonate	Ponceau 4R (Cochineal Red A)
Caramel I – Plain Caramel / Caramel II – Sulfite Caramel / Caramel III – Ammonia Caramel / Caramel IV – Sulfite Ammonia Caramel	Quinoline Yellow
Carmines	Tartrazine
Chlorophylls / Chlorophyllins, Copper Complexes	Sunset Yellow FCF
Curcumin	Zeaxanthin, Synthetic
Erythrosine	

❖ Appendix 2: Adopted Provision for Aspartame (INS 951) in FC 07.1 For Comment on The Actual Use Level and Application of The Alternative Note

- Based on the CCFA54 request for EWG to conclude the advancement of provisions for sweeteners through the step process and to address the remaining use of Note 161 in the GSFA associated with sweeteners.
- During the GSFA physical working group at the 54th CCFA, it was noted that the use level for Aspartame (INS 951) in food category 07.1 and its subcategories was higher than the use level for additives in food category 07.2 (Fine bakery wares (sweet, salty, savoury) and mixes), which specifically includes sweetened products.
- The EWG on the GSFA issued two circulars for this Appendix requesting comments on the adopted provision for aspartame (INS 951) in FC 07.1 to provide comments on the Actual Use Level.

Food Category 07.1 (Bread and ordinary bakery wares)

Additive	INS	Max Level (mg/kg)	Step / Adopted	Final EWG Proposal
Aspartame	951	4000	2008	Revise adopted provision by adopting at 1700 mg/kg, removing Note 161, retaining Note 191, and adding the alternative note (Note 398) from CCFA54 "Some Codex members allow the use of additives with sweetener and color functions in this FC while others limit this FC to products without these additives."

❖ Appendix 3: New and Revised Provisions in the GSFA Entered into the Step Process at Step 2 as a Result of CX/FA 24/54/8

- The PWG on the GSFA to CCFA54 considered submissions received in reply to the Circular Letter requesting proposals for new and/or revision of food additive provisions of the GSFA (CL 2023/46-FA) and made recommendations as to which proposals to revise adopted provisions in the GSFA should be included in the GSFA at **Step 2**.
- The EWG on the GSFA issued three circulars for this Appendix requesting comments on the proposed new and revised provisions entered into the step process at Step 2 as a result of CX/FA 24/54/8.
- The current document presents proposals for each provision under discussion (adopt, adopt with revision, discontinue) in the format of the food categories listed in Table 2 of the GSFA.

Category No.	Additive	INS	Max Level (mg/kg)	Step / Adopted	Final EWG Proposal
04.2.2.7	ACETIC ACID, GLACIAL	260	GMP	2 2023	Revise adopted provision removing Note XS294; Discontinue
	CALCIUM LACTATE	327	10000	2 2023	Revise adopted provision removing Note XS294; Discontinue
	CITRIC ACID	330	GMP	2 2023	Revise adopted provision removing Note XS294; Discontinue
	DISODIUM 5'-GUANYLATE	627	GMP	2 2023	Revise adopted provision removing Note XS294; Discontinue
	DISODIUM 5'-INOSINATE	631	GMP	2 2023	Revise adopted provision removing Note XS294; Discontinue
	DISODIUM5'-RIBONUCLEOTIDES	635	GMP	2 2023	Revise adopted provision removing Note XS294; Discontinue
	LACTIC ACID, L-, D-, and DL-	270	GMP	2 2023	Revise adopted provision removing Note XS294; Discontinue

Category No.	Additive	INS	Max Level (mg/kg)	Step / Adopted	Final EWG Proposal
06.4.2 & 12.2.1	METHACRYLATECOPOLYMER, BASIC (BMC)	1205	GMP	2	Adopt provision at GMP with notes: -Note 606: "For use in accordance with general principles for the addition of essential nutrients to foods (CAC/GL9-1987)" -Note 608: "For use only in nutrient-fortified products"; and -Note 256 ("For use in noodles, gluten-free pasta and pasta intended for hypoproteic diets only."
09.1.2 & 09.2.1	4-HEXYLRESORCINOL	586	50	2	Adopt at 50 mg/kg with the following notes: -Note640: "For use in crustaceans only" -Note641: "Residue levels in crustaceans <1 mg/kg"-XS292, XS312 and XS315
09.2.4.2& 09.2.5 & 09.4	4-HEXYLRESORCINOL	586	50	2	Discontinue provision as 4-hexylresorcinol is only present due to carryover. Chair's note: Most comments suggest the provision is only present as a result of carryover from other food categories
13.2	METHACRYLATE COPOLYMER, BASIC (BMC)	1205	GMP	2	Hold provision pending determination of technological justification by CCNFSDU for use of BMC in FC 13.2.
14.2.3	MANNOPROTEINS FROM YEAST CELL WALLS	455	400	2	Adopt at 400 mg/kg
	METATARTARIC ACID	353	100	2	Adopt at 100 mg/kg

❖ **Removal of Note 381 for all adopted provisions in food categories 13.1.1, 13.1.2 and 13.1.3**

- Replace Note 381 (**"As consumed"**) in provisions in food categories 13.1.1., 13.1.2, and 13.1.3 with the new note " **"Formulae products in food categories 13.1.1 (Infant formulae)**, **13.1.2 (Follow-up formulae)**, and **13.1.3 (Formulae for special medical purposes for infants)** are available in powder form (which requires mixture with water before consumption), concentrated liquid form (which requires dilution with water before consumption), and ready to drink form. In all cases, consistent with the language in Section 6 of the Preamble to the GSFA, **the maximum level listed in the GSFA is for the final product as consumed**."
- This action is proposed to be undertaken by revising the adopted provisions in FCs 13.1.1, 13.1.2 and 13.1.3 by deleting Note381 and replacing it with the new proposed note. The provisions at Step 2 in the same food categories would be discontinued.
- While it is likely appropriate for the committee to consider the use of Note 381 in **all subcategories of FC 13.0 at a future time**, the current exercise of the GSFA EWG was only to consider the provisions put forward at Step 2 with regard to the removal of Note 381 in FCs 13.1.1, 13.1.2 and 13.1.3.

Recommendations

The EWG Report on GSFA shows variable proposals for various Food additives in multiple Food Categories including Adoption, Adoption with revision or Discontinue.

Conclusion

The report of the electronic working group GSFA offers a valuable insertions and provisions for food additives to maintain the suitability of food additives used in Food Categories and maintain food safety.

The proposed recommendations aim to improve and maintain the food safety and to adapt to industrial advancements and inquiries.

D. Agenda item 5(b): GSFA: Proposals for new and/or revision of food additive provisions (replies to CL2024/58-FA)

Document Number**: CX/FA 25/55/8**

Background

- The **CCFA** is invited to consider the proposals of member countries and observers to **new and/or revision of food additive provisions**.
- In response to the Circular letter issued from CCFA54 to gather replies from member countries and observers, only a few parties have submitted requests for new and/or revision of food additives provisions. These Responses were submitted by **China, South Africa, International Food Additives Council (IFAC) and International Special Dietary Food Industries (ISDI).**

Analysis

- Each submission must be filled according to a form that ensures providing certain and specific information about the requested provision from each participant member. These forms require the answer on a few inquiries such as Name of the Additive, INS Number, Functional Class, Proposed use, whether the food additive was evaluated by JEFCA or not, and the Justification of use, …etc.
- **Members Submissions:**
- **China**
  - **Glycerol**
    - INS Number: 422
    - Functional Class: Humectant, Thickener
    - Proposal for: **Revising an existing provision in Table 3 of the GSFA**

      "Proposed to add the Codex Standard Number 249-2006 "Standard for Instant Noodles" (CXS 249-2006) into Column 5 of Table 3 for the food additive."

    Justification for use: Glycerol could interact with emulsifiers added into instant noodles, thereby enhancing the emulsifying function. Additionally, Glycerol could improve the water retention and anti-aging properties of flour-based products, enhances their resistance to freezing. And also, glycerol has the capability to reduce the water activity of the emulsion oil products which could avoid microbial contamination and eventually protect instant noodle products.

  - **Propose to amend the explanatory note to Table 3 of the GSFA as following:**
    - If the text indicates that "only certain Table 3 food additives (as indicated in Table 3) **with or without specific functional classes**" are permitted for use in foods covered by the commodity standard, then the user may refer to column 5 of Table 3 where the commodity standard number will be listed for the particular Table 3 food additives that are permitted for use in the commodity standard.

❖ South Africa

1- Potassium Sorbate

- INS Number: 202
- Functional Class: Preservative
- Proposal for: **New Provision for FC 04.1.1.2 (Surface-treated fresh fruit) with Max. Use level equals to 20 mg/kg and to add Note 42 (as sorbic acid).**
- Justification for Use: Potassium sorbate is widely used for food preservatives known for its fungicidal or fungi static properties. It is also used in the post-harvest treatment of citrus fruits to act against spoilage fungi and molds.

❖ International Food Additives Council (IFAC)

1- Sucrose Esters

- INS Number: 473 (Sucrose easters of fatty acids), 473a (Sucrose oligoesters, Type I and II), 474 (Sucroglycerides).
- Functional Class: Glazing agent
- Proposal for: **New Provision for FC 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), Revising an existing provision for FC 04.1.1.2 (Surface-treated fresh fruit) in Table 1 and 2 of the GSFA.**
- Justification of Use: as Sucrose Easters are already allowed for use as food additives in Food Category 4.1.1.2, the health and safety of this group of additives has already been evaluated by **JECFA** and found to be **Safe** for these FC at the Current maximum use levels (**1500 mg/kg**). As well as the fact that several markets allow the use of INS 473 as a glazing agent on fresh fruits, this proposal to change the Note associated (**Note 454**) with the **Note 453 for FC 4.1.1.2** and **Note 455 for FC 4.2.1.2.** In addition to the justification that vegetables face the same Challenges as fruits with respect to Moisture loss and oxidation. INS 473 can be used in FC 4.2.1.2 to extend the shelf life and quality of fresh vegetables as a glazing agent.

❖ International Special Dietary Food Industries (ISDI)

1- All Additives in Food Categories 13.2, 13.3, 13.4, 13.5 and 13.6

- Proposed for: **Revising an existing provision in Table 1 and 2 of the GSFA**
- Justification of Use: Considering the ongoing discussion to replace Note 381 (“As consumed”) in food categories 13.1.1., 13.1.2, and 13.1.3 with a new note indicating that the maximum levels set in the GSFA is for the final product as consumed, it is appropriate to consider the addition of a similar note in all other subcategories of FC 13.0 too, as currently they do not include this Note.

Recommendation

The submitted requests for replies on the CL 2024/58-FA are in consideration for better alignment with Codex Standards for certain Food Categories as well as the revision for some provisions for more market suitability and improving the Trade Facilitation, also to provide more clarification and better understanding of the notes stated in the GSFA.

Conclusion

The requested submissions would require further verification from the Committee and the member countries regarding the new provision requested to evaluate the impact of the use of these food additives for these Food Categories taking in consideration the enhancement of the alignment with Codex Standards. Furthermore, the submitted requests for revision of existing provision for certain food additives used in Food Categories may help in more understanding of the explanation of the permitted usage of these Food Additives.

E. Agenda item 6: Proposed draft revision to the Class names and the international numbering system for food additives (CXG36-1989)

Document Number: **CX/FA 25/55/9**

Background

TERMS OF REFERENCE

❖ CCFA54 agreed to establish an EWG, chaired by Belgium and co-chaired by Iran, to consider:

i. 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 prepare a proposal for circulation for comments at Step 3;

ii. Deleting azodicarbonamide (INS 927a); and

iii. Assessing the information provided by Chile on phycocyanin produced by bacteria for use as a blue color, including the authorization in other countries.

Analysis

The Electronic Working Group prepares proposals for updating the guidance, based on the terms of reference and the replies of the yearly Circular Letter (CL) requesting proposals for amendments. the Codex Secretariat distributed CL 2024/57-FA. All Members and Observers were invited to respond in case of requests for proposals for changes and/or additions to the INS list.

❖ Summary of Discussion

This section provides a comprehensive overview of key issues discussed and the proposals as discussed in the EWG Report (CX/FA 25/55/9).

A) Replies to CL 2024/57-FA on addition and changes to INS.

1- Addition of 'Jagua blue' as a synonym of name of INS 183 Jagua (genipin-glycine) blue:

- Colombia requests a change of name of INS 183 Jagua (genipin-glycine) blue in order to add "Jagua blue" as a synonym.
- The Codex Secretariat proposes to: i) add a footnote to clarify the exact name and synonym of INS 183; and ii) include an explanation in the Explanatory Notes on the layout of the INS (page 2) to clarify the use of parentheses.
- The EWG **supports** the addition of the synonym without changing the current name. The EWG is in favor of adding a clarification such as 8(ii).

2- Deletion ortho-phenylphenol (INS 231) and sodium ortho-phenylphenol (INS 232).

- The European Union requests the deletion of ortho-phenylphenol (INS 231) and sodium orthophenylphenol (INS 232).
- At CCFA53, based on the comments received, the Codex Secretariat informed that ortho-phenylphenol (INS 231) and sodium orthophenylphenol (INS 232) were not in use as food additives.
- CCFA53 agreed to remove ORTHOPHENYLPHENOLS from the GSFA and inform CCPR of this decision (REP23/FA, paras 114-116).
- The EWG supported the request for deletion.

3- Inclusion of oxidised polyethylene wax used as a glazing agent

- The European Union requests inclusion of oxidised polyethylene wax used as a glazing agent.
- The EUMS propose that oxidised polyethylene wax is included in CXG 36-1989 and that INS 914 is assigned to it.
- The proposed functional class is "Glazing agent" and the proposed technological purpose is "glazing agent" and "coating agent".
- The EWG supported the request for **addition**.

4- Inclusion of the functional class "Gelling agent" for carob bean gum (INS 410)

- Peru requests the inclusion of the functional class "Gelling agent" for carob bean gum (INS 410)
- CCFA54 discussed the proposal, CAC47 adopted the change in November 2024.
- This addition is already decided. No follow up to this request is needed.

5- Inclusion of the additional technological function "Flour treatment agents" for lecithin INS 322(i)

- Peru requests the inclusion of the additional technological function "Flour treatment agents" for lecithin (INS 322(i)).
- INS 322(i) already has the functional class and technical purpose of flour treatment agent in CXG 36-1989. No follow up to this request is needed.

B) Deleting azodicarbonamide (INS 927a):

- Information included in CX/FA 24/54/3 Add.1 was presented in CCFA54 and discussed (REP 24/FA para.39-44).
- CAC47 deleted this additive from the GSFA because of issues with the safety assessment.
- The EWG noted that there is still national authorization of azodicarbonamide, and the deletion was hence not supported by everyone.
- Inclusion in the INS does not imply approval by Codex for use as food additives. The list may include those additives that have not been evaluated by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) or are not included in the General Standard for Food Additives (CXS 192-1995). The INS should not exclude additives that are still permitted for use in Codex countries.
- The EWG recommended adding this point in e.g. 5 years again to the mandate of the EWG on INS to investigate whether the time has come to delete this additive from INS.

C) Assessing the information provided by Chile on phycocyanin produced by bacteria for use as a blue color, including the authorization in other countries. (REP 24/FA para. 124)

- Earlier discussion took place in the former EWG and is to be found in CX/FA 24/54/9.
- Chile specified that they requested to include two food additives: i) phycocyanin from Bacillus subtilis, ii) phycocyanin from Escherichia coli.
- The EWG did not have the information needed (e.g. on authorizations in countries) and hence cannot (yet) recommend addition in the INS of i) Phycocyanin from Bacillus subtilis, ii) Phycocyanin from Escherichia coli.

Recommendations

- ❖ The EWG recommends CCFA55 to consider the additions and deletions to the Class Names and International Numbering System for Food Additives (CXG 36-1989) as presented in the Annex, including adding a clarification for INS 183.
- ❖ Update the Information document/table on INS for deleted and re-used numbers with the deletion of INS 231 and INS 232.
- ❖ Find out why ortho-phenylpenol is listed as 2-phenylphenol in the list of flavorings in the List of Codex specifications for food additives (CXA 6-2023) and decide whether this entry needs to be deleted.
- ❖ Add the point on deletion of azodicarbonamide (INS 927a) again in the mandate of the EWG on INS in a few years' time, e.g. in 2030, to investigate whether it still needs to remain included in the INS because of national authorization(s).

Conclusion

The proposed recommendations aim to update the guidance based on the terms of references and to propose amendments to keep the Class Names and International Numbering System (INS) up to date with the new functional class and technological purposes for the Food Additives.

F. Agenda Item 8: Standard for baker's yeast (step 4)

Document: CX/FA 25/55/11

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.

In response to the 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 from China, France, and other interested Members, to prepare a discussion paper which would be included for discussion on the agenda of CCFA54.

At CCFA54 (2024), delegates discussed the proposals from the Electronic Working Group (EWG) regarding the revised project document. The key discussion points raised during the session were:

- Members questioned the necessity of the proposed standard, as no current issues were identified.
- An observer raised concerns about potential duplication with ISO's voluntary standard.
- China clarified that Codex standards are recognized by the WTO and have different objectives than ISO.
- China highlighted that the responsibility for the task was given to the Codex Committee on Food Additives (CCFA) due to their expertise.

CCFA54 agreed to submit the project document to CAC47 for approval to move forward with developing the baker's yeast standard and an (EWG) was established, with China as the chair and France and Turkey as co-chairs, to draft the proposed standard, subject to CAC's approval.

At CAC47 (2024), the proposal to initiate new work on the baker's yeast standard was approved.

In July 2024, the Codex Secretariat invited all Codex Members and Observers to join the EWG for developing a standard for baker's yeast.

At CCFA55 (2025), delegates will discuss the proposal from the Electronic Working Group (EWG) regarding the proposed draft standard for baker's yeast at step 4 with a view to progress it through the Codex step procedure.

ORGANISATION AND KEY DISCUSSION POINTS

23 Members and 4 Observers participated in the EWG among 4 Arab countries (Egypt, Iraq, Saudi Arabia and United Arab Emirates).

Two rounds of comments were conducted within the EWG. The first draft was circulated in November 2024, with comments due by December 2024. Feedback was received from 3 Members (Canada, Japan, Turkey) and 1 Observer (COFALEC). The draft was revised and recirculated in January 2025, with comments due by February 2025. This second round received feedback from 5 Members (European Union, France, Japan, Russian Federation, Turkey) and 2 Observers (COFALEC, FIA).

The Chair and co-Chairs of the EWG reviewed all feedback from both rounds and incorporated the main comments into the revised draft.

The EWG discussed various aspects of the proposed draft standard for baker's yeast, with general agreement on most provisions. However, further discussion is needed on the following points, which remain in square brackets in the proposed standard:

- Use of the word [typically] in the product definition to include other yeast species besides *Saccharomyces cerevisiae*.
- The maximum moisture content of crumbled yeast.
- The nitrogen content indicator and its detection method.
- Exclusion of genetically modified microorganisms (GMO) strains in section 6 (food hygiene).

Food additives provisions were also discussed which aligns with GSFA provisions. However, a member noted that Tables 1 and 2 additives are justified only for dried yeast, suggesting that the use of Table 3 additives be limited to certain functional classes and that information on their technological aspects need to be provided.

Analysis

The proposal seeks to establish an international Codex standard for baker's yeast, aiming to ensure consumer health, food safety, and fair-trade practices.

Currently, there is no harmonized standard, leading to discrepancies between national regulations. The standard will cover aspects such as product definition, classification, composition, quality factors, packaging, transportation, storage, and methods of analysis.

The discussion on food additives highlights the need for clarity and specificity in the proposed standard for baker's yeast. While the standard generally aligns with existing Codex provisions (GSFA), the concern raised about Tables 1, 2 and 3 additives, indicates the need for more clarification for different yeast forms requesting information on the technological need for these additives.

Conclusion and Considerations

Yeast is a fundamental ingredient widely used in daily food preparation, where it plays a crucial role in the production of bread and related products, which are staple foods in the region. Beyond its role as a leavening agent, yeast also offers several beneficial effects in food technology.

Given the substantial value of the yeast market and the expected increase in global demand, the proposed Codex standard for yeast is necessary. This initiative aims to harmonize production practices, ensure consumer health safety, and foster fair international trade by removing trade barriers that currently exist due to differing national standards. It will also promote better food safety protocols and enhance the consumer's confidence in the quality of yeast products.

Given the significant role yeast plays in food systems, it is likely that Codex delegations might give their support to advancing this work. However, it is essential that this standard covers all necessary health safety requirements.

To advance the work on the standard for baker's yeast, it is essential that CCFA addresses the limitations raised by the EWG regarding food additives by clearly defining the acceptable forms of yeast for each additive, and should be restricted to essential functional classes, with a requirement for clear justification of their technological necessity. This will ensure that the standard is both scientifically robust and aligned with food safety goals, while promoting transparency and reducing the risk of unnecessary additives.

G. Agenda item 9: Discussion paper on the working practices and the engagement plan to avoid divergence between the GSFA, commodity standards and other related Codex texts

Document Number: **CX/FA 25/55/12**

Background

- Since its **42nd Session (2010)**, the **(CCFA)** has worked toward achieving full alignment between the **General Standard for Food Additives (CXS 192-1995)**, hereafter referred to as the **GSFA**, and the food additive provisions outlined in Codex commodity standards. The ultimate objective is to establish the GSFA as the **single authoritative reference** for food additives across all Codex texts.

- **At CCFA52 (2021)**, the committee agreed to establish an **Electronic Working Group (EWG) on Alignment**. One of the group's core mandates was to evaluate whether the existing guidance in the **Procedural Manual (PM)** is adequate to prevent future divergences or if amendments are needed. This review took into account the **Guideline Document on Avoiding Future Divergence of Food Additive Provisions in the GSFA with Commodity Standards**.
- During **CCFA53 (2023)**, the Chair of the **Physical Working Group (PWG) on Alignment** raised concerns about ongoing divergences between the **GSFA** and Codex commodity standards, despite existing guidelines. In response, **CCFA53** concluded that the **GSFA** should be the **sole reference** for food additive provisions, requiring the removal of provisions from commodity standards and their incorporation into the **GSFA** with necessary amendments and notes. **China**, supported by **Canada** and the **EU**, was tasked with preparing a **discussion paper** to identify unresolved issues and propose solutions for long-term alignment.
- At **CCFA54 (2024)**, the discussion paper emphasized the need for a broader, future-focused approach to alignment, particularly in fostering closer cooperation between the **CCFA** and the relevant **Commodity Committees** once the current alignment efforts are finalized.

  The following key objectives were agreed upon:

  - Strengthen the **GSFA** as the **single authoritative standard** for all food additive provisions.
  - Minimize the inclusion of specific food additive provisions directly in commodity standards.
  - Ensure that new provisions developed by **Commodity** or **Regional Committees** are incorporated into the **GSFA** without delay.

Analysis

- The proposed discussion paper on the working practices and engagement plan to avoid divergence between the GSFA, commodity standards and other related codex texts, as outlined in the **CX/FA 25/55/**12 aims to prevent future divergences between the **General Standard for Food Additives (GSFA)** and the **Codex commodity standards**. It proposes developing working practices and an engagement plan, that ensure all food additive provisions are consistent across Codex standards.

Key Issues Identified

- Persistent misalignments between the GSFA and commodity standards despite ongoing alignment efforts.
- Potential inadequacies in the current guidance of the **Procedural Manual (PM)**.
- The risks of new divergences emerging as new commodity standards are developed.

Key Principles

The document highlights several core principles to guide alignment efforts:

- The **GSFA** should remain the **single authoritative reference** for all food additives.
- Divergences must be minimized by incorporating provisions directly into the GSFA.
- Early collaboration between committees is necessary to avoid delays.

Proposed Solutions

The document prepared by China as author, and Australia, Brazil, Canada, the European Union, Senegal and the United States of America as co-authors proposes two main strategies for ensuring alignment:

- In **Option 1**, the responsibility for drafting amendments to the **General Standard for Food Additives (GSFA)** lies primarily with the **Commodity/Regional Committees**. These committees develop the initial draft of food additive provisions relevant to their specific commodities. Once the draft is prepared, it is submitted to the **Codex Committee on Food Additives (CCFA)** for review, endorsement, and incorporation into the GSFA. This process emphasizes collaboration between the committees and **GSFA experts** to ensure consistency and prevent divergence.
- **In Option 2**, the **Codex Committee on Food Additives (CCFA)** takes primary responsibility for drafting amendments to the **General Standard for Food Additives (GSFA)**. This process is based on requests and information submitted by **Commodity/Regional Committees**. The goal is to streamline the alignment process by leveraging the CCFA's technical expertise to draft food additive provisions more efficiently and minimize divergence.
- The table below provides a clear comparison of the advantages and disadvantages of the two proposed options for aligning food additive provisions between the **General Standard for Food Additives (GSFA)** and **Codex commodity standards**. Each option offers distinct benefits and challenges based on the level of technical expertise required, the complexity of the provisions, and the collaboration needed between the **Codex Committee on Food Additives (CCFA)** and **Commodity/Regional Committees**.

Table 3: Strengths and Weaknesses of the Two Proposed Options

Option	Description	Strengths	Weaknesses
Option 1: Commodity/ Regional Committees Prepare Provisions	The Commodity/Regional Committees draft the initial provisions, which are then reviewed, endorsed, and incorporated into the GSFA by the CCFA. Requires collaboration between GSFA experts and commodity committees to reduce delays.	▪ Utilizes commodity-specific expertise for drafting provisions. ▪ Promotes collaboration between committees for more comprehensive standards.	▪ Potentially slower due to repeated revisions and feedback loops. ▪ Higher risk of initial divergence before achieving alignment with the GSFA.
Option 2: CCFA Prepares Provisions	The CCFA drafts the provisions based on information submitted by the Commodity/Regional Committees. Drafts are then reviewed and endorsed by both committees before adoption.	▪ Faster process due to CCFA's technical expertise. ▪ Reduces the risk of initial divergence with the GSFA.	Risk of overlooking commodity-specific details unless strong collaboration is maintained with commodity committees.

- **Option 1** allows the **Commodity/Regional Committees** to take the lead in drafting food additive provisions, ensuring that commodity-specific needs are fully addressed. However, this approach can be slower due to the need for multiple rounds of feedback and revisions from the **CCFA**. Close collaboration with **GSFA** experts is essential to minimize delays and reduce the risk of divergence during the alignment process
- **Option 2** offers a more centralized approach, leveraging the **CCFA's** technical knowledge to streamline the development of food additive provisions. While it is more efficient for simple cases, strong collaboration with **Commodity/Regional Committees** remains essential to ensure that commodity-specific needs are fully addressed, particularly for complex amendments.

Recommendations

Given the analysis of both **Option 1** and **Option 2**, a hybrid approach that leverages the strengths of both models while mitigating their weaknesses would be the most effective strategy.

Recommended Approach: Adopt a Hybrid Model Combining Options 1 and 2

1. **Initial Drafting by Commodity/Regional Committees (Option 1) for Commodity-Specific Expertise**
   - The **Commodity/Regional Committees** should take the lead in drafting food additive provisions specific to their commodities. This approach ensures that the unique technical, cultural, and market-specific factors of each commodity are appropriately considered from the outset.
2. **Early Collaboration with CCFA and GSFA Experts to Prevent Divergence**
   - From the early stages of drafting, **CCFA** and **GSFA experts** should be actively involved, offering technical guidance to minimize divergence and ensure alignment with the GSFA's requirements.
3. **CCFA Final Review and Endorsement (Option 2) for Technical Consistency**
   - Once the draft provisions are complete, the **CCFA** should review, endorse, and finalize the provisions, ensuring that all amendments comply with the existing GSFA framework and Codex procedural guidelines.
4. **Strengthened Communication and Engagement Plan**
   - Develop a formal **Engagement Plan** to improve coordination between committees and ensure that all stakeholders are informed and involved throughout the amendment process.

Conclusion

The document presents a clear and structured framework for addressing divergences in food additive provisions between the General Standard for Food Additives (GSFA), commodity standards, and other Codex texts. While **Option 2** offers a more efficient and technically sound solution due to the CCFA's expertise in handling complex GSFA amendments, it may overlook commodity-specific nuances without strong collaboration.

A hybrid approach emerges as the most balanced and practical solution, effectively combining the specialized knowledge of Commodity/Regional Committees with the technical rigor of the CCFA. This model minimizes the weaknesses of both options, ensuring an efficient, collaborative, and technically consistent process for aligning food additive provisions.