



PREPARATION FOR THE 55th SESSION OF THE CODEX COMMITTEE ON FOOD ADDITIVES

(CCFA55)



March 18, 2025



CODEX ALIMENTARIUS COMMISSION



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Agenda item 1

CX/FA 25/55/1
January 2025

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-fifth Session
Seoul, Republic of Korea
24-28 March 2025



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

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



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Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4(b)
CX/FA 25/55/6



Alignment of the food additive provisions of commodity standards:
Report of the Electronic Working Group on Alignment

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

Background : Agenda Item 4.b

PRELIMINARY WORK BY IDF

International Dairy Federation (IDF) conducted initial alignment technical work.

ENDORSEMENT AT CCFA53 (2023):

- i. Alignment deferred to CCFA54.
- ii. Establishment of an EWG chaired by Canada, co-chaired by USA and Japan.
- iii. Update the work plan for future alignment of food additive provisions

ALIGNMENT AT CCFA54 (2024)

- i. The committee advanced the alignment of food additive provisions across Codex standards, forwarding updates on fermented milks, cream, table olives, and regional products for adoption by CAC47.
- ii. An Electronic Working Group (EWG), led by Canada with co-chairs from the USA and Japan, was established to align regional standards, verify GSFA color provisions for vegetable oils, and address the use of methacrylate copolymer in fortified rice.

ALIGNMENT AT CCFA (2025)

- i. Consideration of EWG report
- ii. A Physical Working Group (PWG) will convene before CCFA55 to finalize recommendations and ensure consistent application of these provisions across Codex texts.

Key Objectives of the EWG Report on Alignment (CX/FA 25/55/6)

01

Clarifying additive usage restrictions to avoid misinterpretations

Ensuring consistency across commodity and regional standards in alignment with GSFA.

03

02

Addressing discrepancies in food category classifications and functional class limitations.

Introducing and refining Table 3 notes to improve regulatory clarity and applicability.

04

Summary of Key Amendments Across Annexes (CX/FA 25/55/6)

Annex	Scope of Amendments
Annex 1	Explanatory document detailing EWG discussions, key issues, and chair's proposals.
Annex 2	Amendments to CCASIA regional commodity standards, including alignment with GSFA Tables 1, 2, and 3.
Annex 3	Adjustments to CCNE regional commodity standards with updated MLs and clarifications on permitted additives.
Annex 4	Modifications to CCSCH standards for herbs, spices, and dried seeds, Addressed inconsistencies in additive use for spices versus herbs and refined functional classifications aligning with GSFA classifications.
Annex 5	Revisions to edible fats and oils (CXS 19-1981), including removal of outdated additives and alignment with GSFA.
Annex 6	Introduction of food additive section in the Rice Standard (CXS 198-1995), Introduced food additive provisions, aligning fortified rice with global safety standards, including the approval of Methacrylate Copolymer (INS 1205) as a carrier for nutrients.
Annex 7	Development of Table 3 notes for consistency and clarity across regional commodity standards.

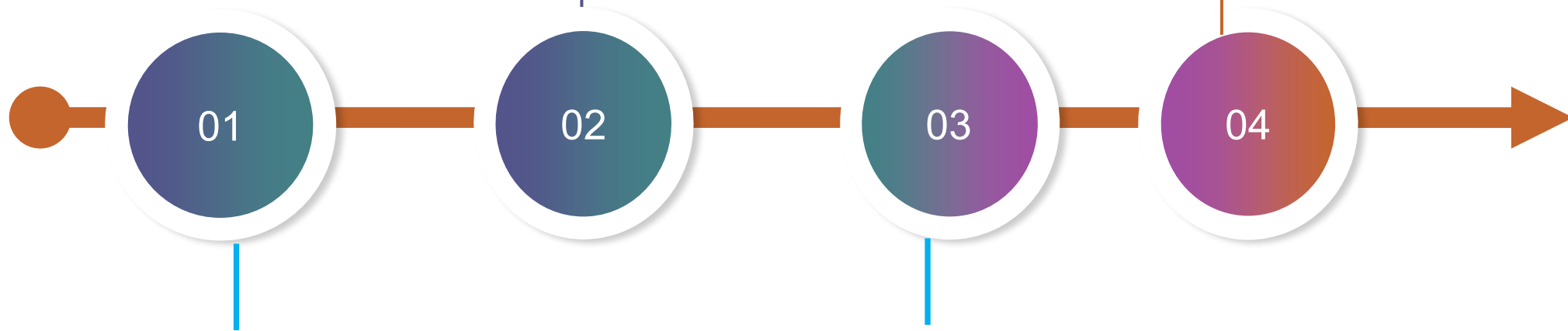
Key Updates to Food Additive Provisions and GSFA Alignment

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

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




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

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

Analysis



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.

Recommendations for the CCFA55

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**.



01

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**.

02



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Agenda Item 4(b)



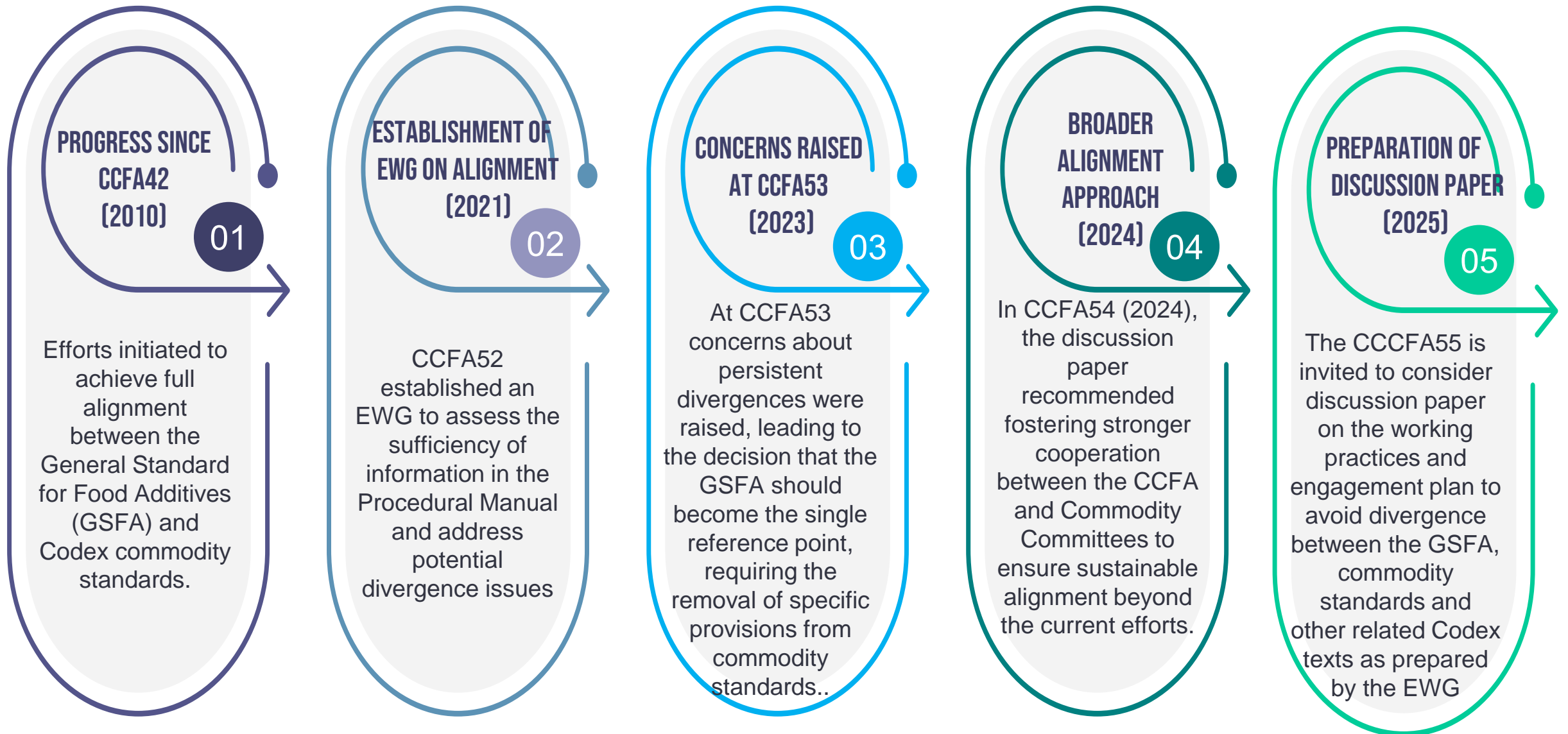
Alignment of the food additive provisions of commodity standards:
Report of the Electronic Working Group on Alignment

Agenda Item 9
CX/FA 25/55/12



Discussion paper on the working practices and the engagement plan
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Background : Agenda Item 9



Principles Guiding Alignment

GSFA as the Single Reference Point

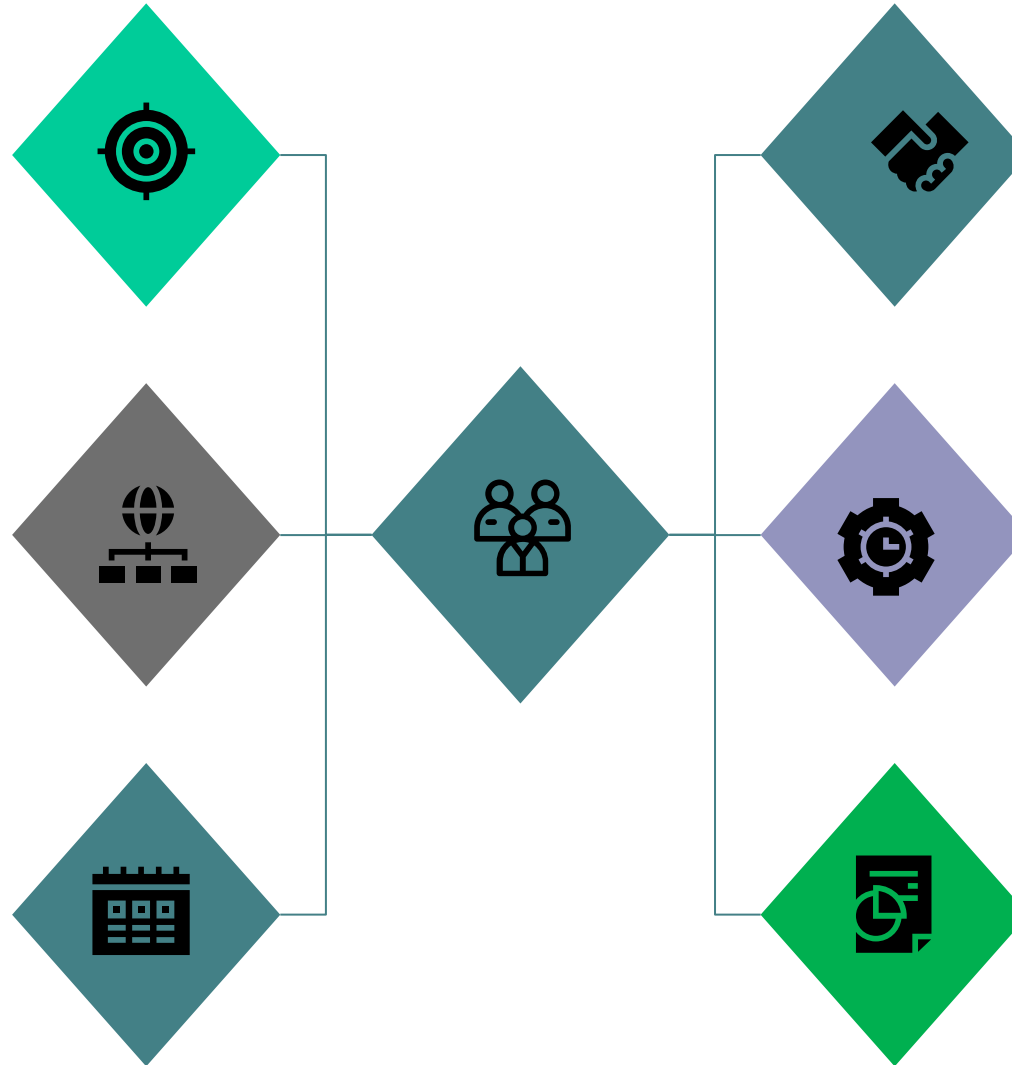
The General Standard for Food Additives (GSFA) should be strengthened as the sole authoritative reference for all food additive provisions in Codex standards.

Prevention of Future Divergence

No new divergences between the GSFA and commodity standards should be created, ensuring that the ongoing alignment process can be completed effectively.

Minimization of Specific Provisions in Commodity Standards

Specific food additive provisions should be minimized in commodity standards, with a general reference to the GSFA being the preferred approach.



Collaborative Engagement Between Committees

The CCFA should engage collaboratively with Commodity/Regional Committees to ensure that food additive provisions are developed efficiently, with timely and appropriate outcomes.

Concurrent Amendment of the GSFA

Amendments to the GSFA should occur simultaneously with the endorsement of food additive provisions in commodity standards to ensure consistency.

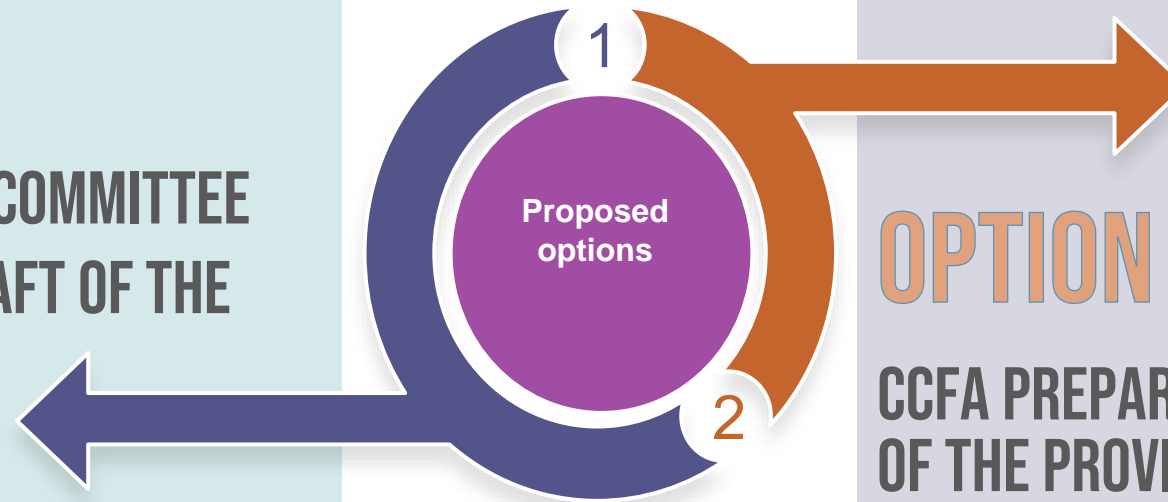
Mandatory Endorsement by CCFA

All food additive provisions in commodity standards must be endorsed by the Codex Committee on Food Additives (CCFA) in accordance with the Procedural Manual

Proposed Options for Alignments

OPTION 1.

COMMODITY/REGIONAL COMMITTEE
PREPARES THE FIRST DRAFT OF THE
PROVISIONS

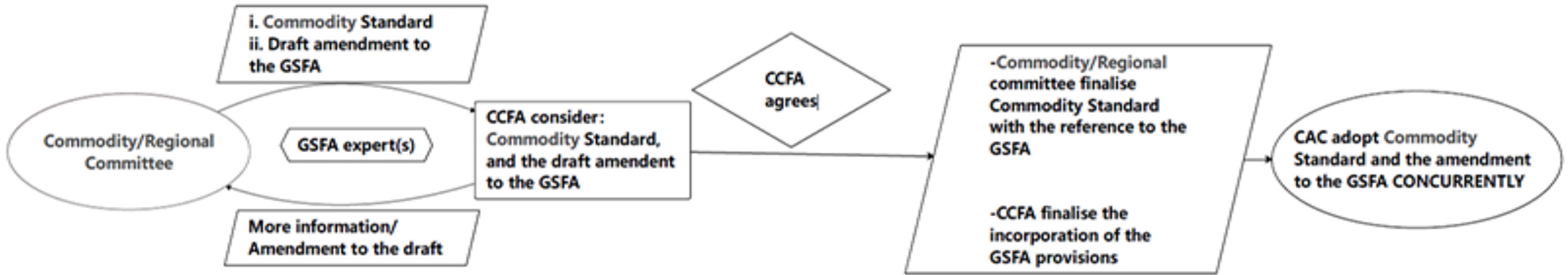


OPTION 2.

CCFA PREPARES THE FIRST DRAFT
OF THE PROVISIONS

Option 1 - Commodity/Regional Committee prepares the first draft of the provisions

The flowchart for Option 1



01

Initial Draft Preparation

- ▶ The **Commodity/Regional Committees** draft the initial provisions for the relevant commodity standard.
- ▶ Proposed amendments to the **GSFA** are also prepared by the committee

02

Collaboration between GSFA Experts and commodity committees to reduce delays.

- ▶ While the Commodity/Regional Committees provide commodity-specific knowledge, GSFA experts ensure technical accuracy and consistency with existing standards.

03

Submission to CCFA for Review and Endorsement

The **CCFA** reviews, endorses, and incorporates these provisions into the **GSFA**.

Revision by Commodity/Regional Committee (if needed)

04

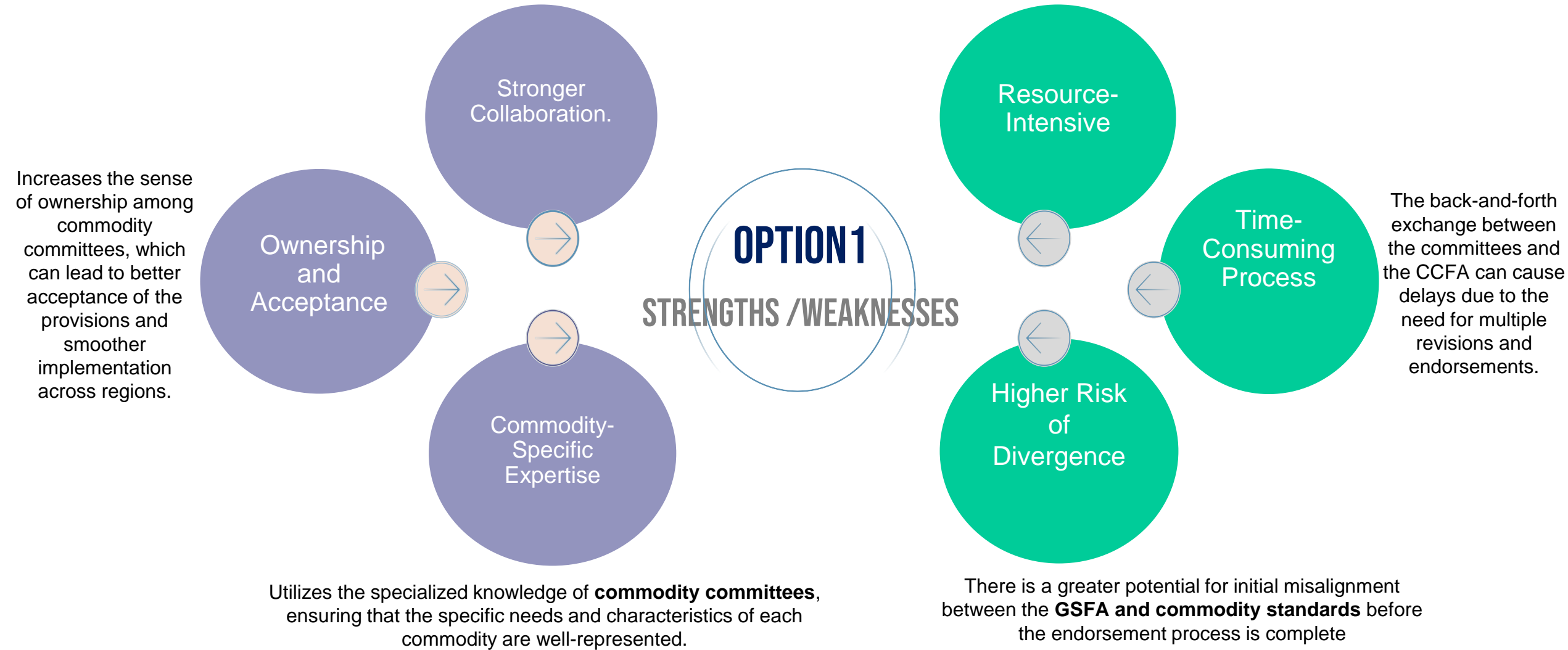
Final Endorsement and Adoption by CAC

- Once fully endorsed by the CCFA, both:
- ▶ The amended GSFA provisions.
 - ▶ The finalized commodity standard.

Option 1 - Commodity/Regional Committee prepares the first draft of the provisions

Promotes active collaboration between **Commodity/Regional Committees** and the **CCFA**, leading to more comprehensive and balanced food additive provisions.

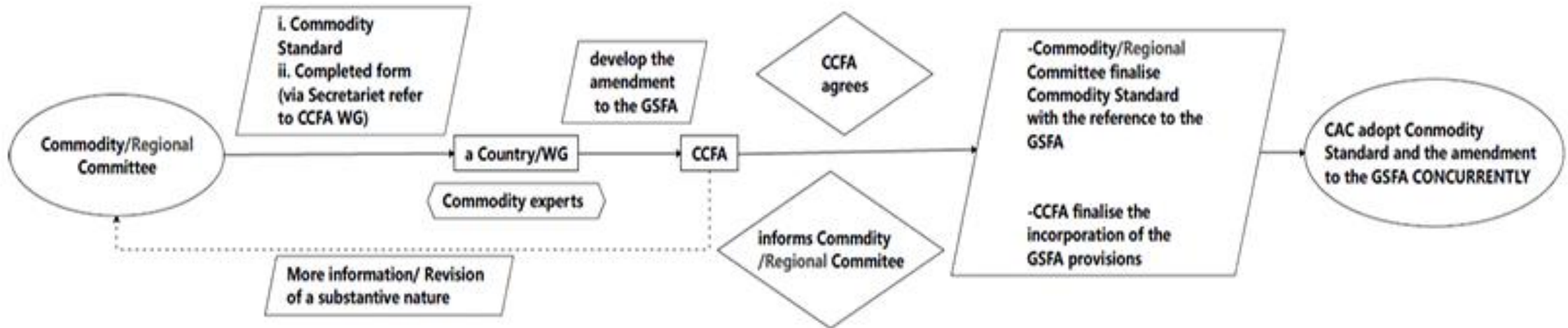
Requires more time, effort, and coordination from both the **commodity committees** and the **CCFA**, making it resource-intensive for all parties involved.



Option 2 – CCFA prepares the first draft of the provisions



The flowchart for Option 2



01

Submission of Requests by Commodity/Regional Committees

The **Commodity/Regional Committees** submit detailed information supporting their requests for new or amended food additive provisions.

02

Drafting by CCFA Working Group (WG)

The group will assess the **safety** and other technical considerations of the proposed additives and draft the necessary amendments to the GSFA.

03

Approval by CCFA

After endorsement by the CCFA, the relevant **Commodity/Regional Committee** is notified of the amendments.

04

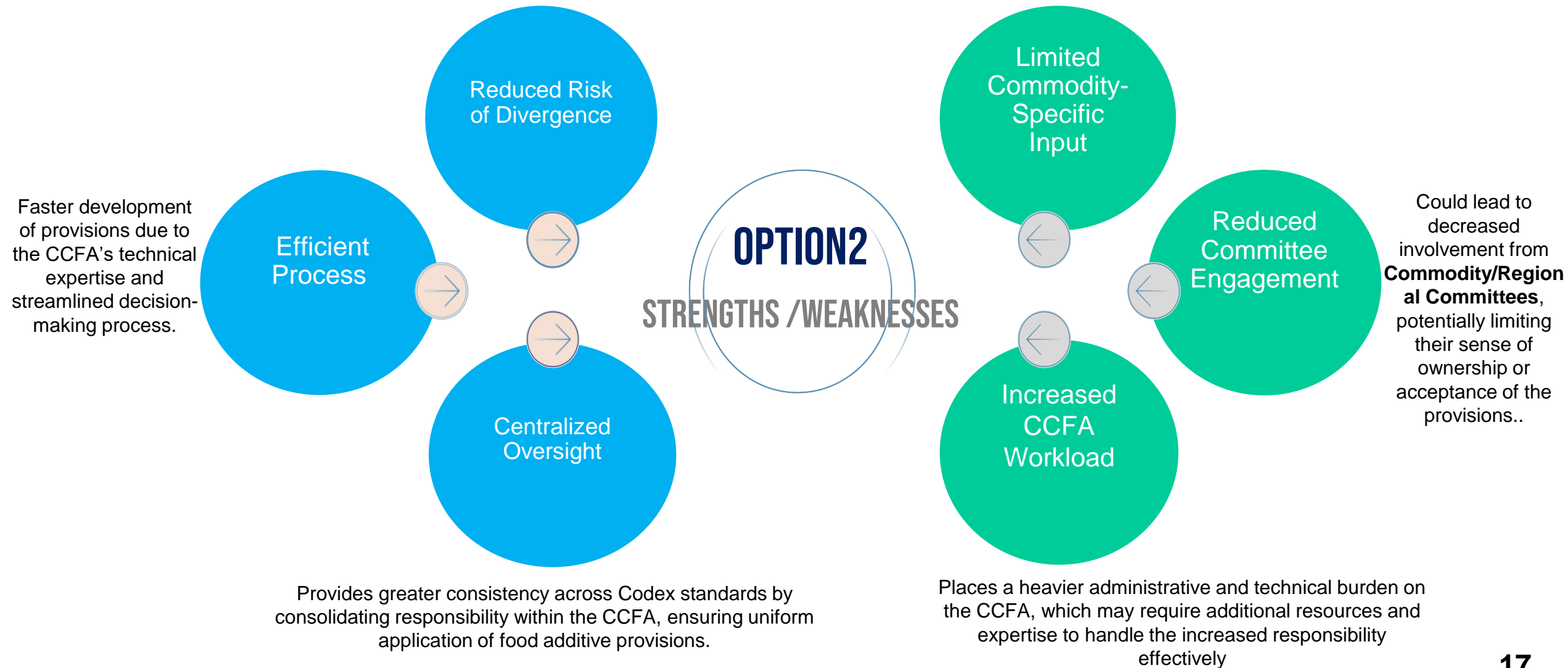
Final Adoption by CAC

Once approved by all relevant committees, the amendments are formally incorporated into the **GSFA and adopted by CAC**.

Option 2 – CCFA prepares the first draft of the provisions

Minimizes the chances of misalignment between the **GSFA** and commodity standards since the CCFA directly handles drafting and endorsement.

May overlook unique needs or technical aspects of specific commodities unless strong collaboration with commodity committees is maintained.



Key Recommendations

EWG Recommendations

- Suggests moving forward with either Option 1 or Option 2 as the basis for future working practices.
- Calls for the development of a Communication and Engagement Plan to guide interactions between committees.

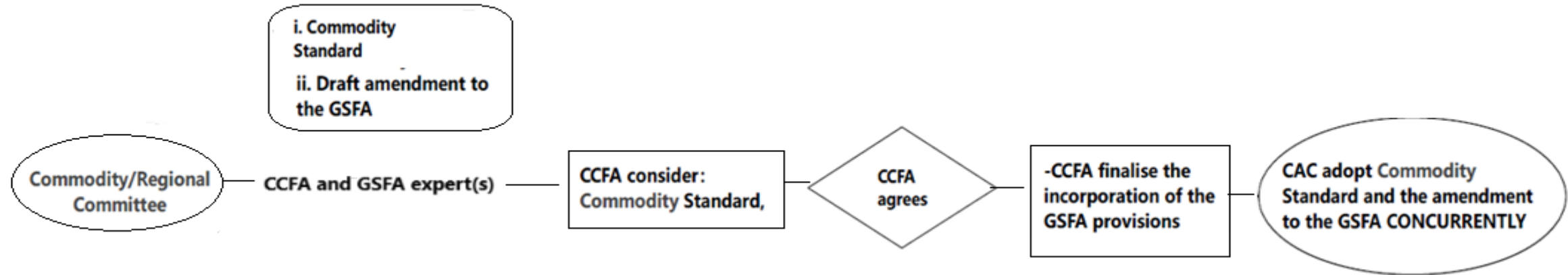


Additional Recommendations

- Implement a hybrid model combining both options for maximum efficiency and consistency.
 - ✓ **Balances expertise:** Combines the commodity-specific knowledge of regional committees with the technical expertise of the CCFA.
 - ✓ **Reduces delays:** Early collaboration prevents lengthy back-and-forth revisions.
 - ✓ **Ensures consistency:** Final review by the CCFA keeps standards aligned with the GSFA.
 - ✓ **Flexible:** Works for both simple and complex amendments

Recommended Approach

Proposed Option - Hybrid Model Combining Options 1 and 2



01

Drafting by Commodity/Regional Committees (Option 1) for Commodity-Specific Expertise

This approach ensures that the unique technical, cultural, and market-specific factors of each commodity are appropriately considered from the outset.

02

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.

03

CCFA Final Review and Endorsement (Option 2) for Technical Consistency

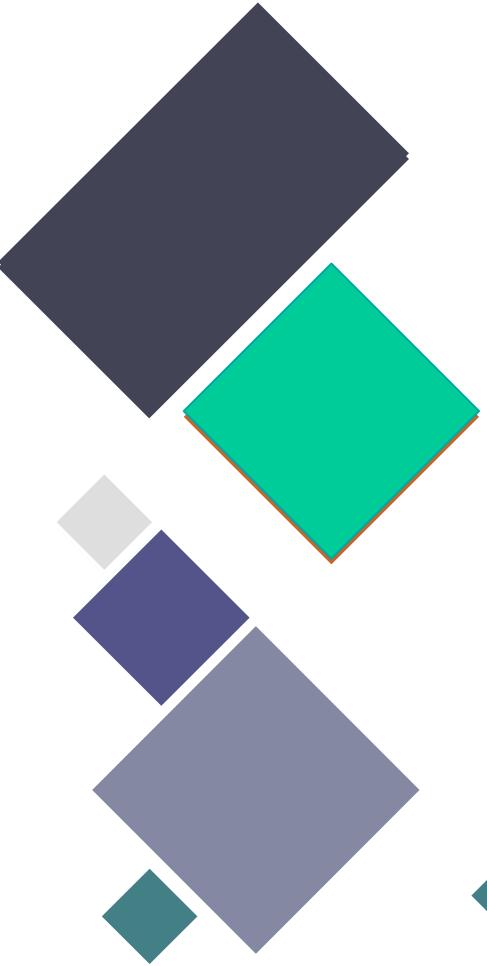
Once the draft provisions are complete, the **CCFA** should review, endorse, and finalize the provisions

04

Final Adoption by CAC

Once approved by all relevant committees, the amendments are formally incorporated into the **GSFA and adopted by CAC**.

Conclusion

- 
- **Option 1** is **most effective** for handling complex cases that require in-depth knowledge of specific commodities and regional nuances.
 - **Option 2** is **more efficient** for addressing technically straightforward provisions, ensuring quick and consistent alignment with GSFA standards.
 - A **Hybrid Approach** could combine the strengths of both options, **balancing the need for technical consistency with the importance of commodity-specific expertise.**
- 