

**European Union Comments**  
**CODEX COMMITTEE ON FOOD ADDITIVES**

**Forty-ninth Session**

**Macao SAR, China, 20-24 March 2017**

**AGENDA ITEM 4(b)**

**ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS  
AND RELEVANT PROVISIONS OF THE GSFA**

**(CX/FA 17/49/6)**

*European Union Competence*  
*European Union Vote*

The European Union (EU) would like to thank Australia and the United States of America for chairing the electronic Working Group and developing the discussion paper.

The EU appreciates the work on the alignment between provisions on commodity standards and relevant provisions of the GSFA. The EU recognises the complexity and the extent of this work and is supportive to the approach taken as outlined in the discussion paper.

***Appendices 1, 2 and 3***

The EU generally supports the chair's proposals as outlined in Appendix 1 and the proposals for the revision of the relevant food categories of the GSFA and of the food additive sections of the commodity standards as outlined in Appendices 2 and 3.

***Appendix 4***

Appendix 4 reproduces the information contained in CX/FA 16/48/6. The EU would like to reiterate some of its comments expressed on CX/FA 16/48/6.

**Addition of XS notes**

The EU appreciates the work to consider specific food additive provisions which, according to the CCPFV, are not technologically justified for certain standardised products. The EU supports the addition of "XS" notes to the draft provisions as suggested in Appendix 4.

**Standards in Appendix 4 are not fully aligned with the GSFA**

The EU would like to note that the proposed amendments cannot be regarded as a full alignment as it was done for other standards in the past and as it is proposed for 10 standards for frozen fish products under categories 9.2.1 and 9.2.2 since it does not address the adopted provisions in the corresponding GSFA food categories. Therefore, the Committee should consider whether it is appropriate to include now the standards to Section 2 of Table 3. In the EU's view such step would be more appropriate only when the work on the alignment for those CCPFV standards is completed.

**Amendments to Section 2 of Table 3**

If the Committee decides to progress with the amendments to Section 2 of Table 3 the EU has the following comment as regards the entry for category 04.2.2.4 for CS 13-1981 (CX/FA 17/49/9, page 50): "*A# firming agents listed in Table 3 and certain other Table 3 additives (as indicated in Table 3) are acceptable for use in foods conforming to the standards.*"

The EU suggests deleting the word "all" for the sake of consistency with the wording already used in Section 2 of Table 3 (see e.g. category 12.2 and CS 117-1981).

Amendments to the food additive sections of CS 13-1981 and CS 57-1981

The EU offers for consideration the following wording for the food additive sections:

1. Standard for Preserved Tomatoes (CODEX STAN 13-1981)

*“Firming agents listed in Table 3 of the General Standard for Food Additives (CODEX STAN 192-1995) and certain other Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to this Standard.”*

The EU wonders whether the reference to the corresponding GSFA category is necessary taking into account that the standard permits only (certain) Table 3 additives. The wording on certain Table 3 additives is suggested for consistency with standards already aligned.

2. Standard for Processed Tomato Concentrates (CODEX STAN 57-1981)

*“Only certain Table 3 food additives (as indicated in Table 3) are acceptable for use in foods conforming to this Standard.”*

The suggested wording reflects that the standard allows only certain Table 3 additives. The same wording for the Table 3 additives was used in food additive sections of the standards already aligned.