

05/02/2013

**European Union comments on  
Codex Circular Letter CL 2012/35-CS  
Request for Comments at Step 3 of the Procedure on the Proposed Draft  
Codex Standard for Non-Centrifugated Dehydrated Sugar Cane Juice**

The European Union and its Member States (EUMS) are offering the following comments:

The EUMS take note of the difficulties related to the clear placement of the product in the food category system of the General Standard for Food Additives (GSFA). In this regard the EUMS maintain their position as expressed in Annex II to the CL 2012/35-CS.

In addition the EUMS would like to point out that the classification in the food category system should take into consideration not only the product description but also the similarities in the technological need since the GSFA food category system is used also to simplify the reporting of food additive uses.

For the time being only INS 526 Calcium Hydroxide is proposed as an acidity regulator for the standard under consideration. The EUMS are of the view that firstly it has to be clarified whether Calcium Hydroxide is used as a food additive or as a processing aid (as indicated by one Codex Member in Annex II to the CL 2012/35-CS). It has to be noted that acidity regulators are not currently permitted in the GSFA food subcategories falling under the head category "11.0 Sweeteners, including honey" and there is also no proposal for the inclusion of acidity regulators in the step procedure with the exception of the subcategory "11.4 Other sugars and syrups". The EUMS suggest that only when the status of Calcium Hydroxide has been clarified the discussion on the Options under the section 4 of the draft standard would be relevant.

Nevertheless, as for the options themselves (and only if it is confirmed that Calcium Hydroxide is used as a food additive) the EUMS would prefer the Option 1 – i.e. to list Calcium Hydroxide in the Commodity Standard. This would allow better progress of the standard development in the situation when Calcium Hydroxide is neither permitted nor in the step process of the subcategories falling under the GSFA head category 11. As for the Option 2 in the EUMS view it is not appropriate to refer to acidity regulators listed in the GSFA Table 3 since all subcategories of the category 11 (except for 11.6 Table-top sweeteners) are listed in the Annex to Table 3 – i.e. Table 3 does not apply to these subcategories and the use of additives listed in Table 3 is governed by the provisions in Tables One and Two.