

European Union comments
**CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL
DIETARY USES**

Thirty-ninth Session

Berlin, Germany

4-8 December 2017

Agenda Item 9:

**FOOD ADDITIVES – MECHANISM / FRAMEWORK FOR
CONSIDERING TECHNOLOGICAL JUSTIFICATION
AND OTHER MATTERS**

*European Union Competence
European Union Vote*

The European Union (EU) supports the development of a consistent approach for appraisal of the technological need for the use of food additives in the CCNFSDU standards.

As regards the three recommendations outlined in CX/NFSDU 17/39/8 the EU has the following comments:

Recommendation 1

The EU is of the view that the framework should be used as a general tool for appraising the technological need for food additives intended for use in any food or food ingredient within the mandate of the CCNFSDU.

The EU takes note that the framework would need to reflect the specific considerations applicable to foods intended for infants and young children. A careful approach is especially important for infants under twelve weeks of age since the JECFA ADI is generally not applicable for this age group and the use of food additives would require a specific risk assessment.

Recommendation 2

The EU supports the recommendation.

The EU supports that the criteria are based on checking the eligibility and intended use and the verification of the compliance with section 3.2 of the Preamble to the GSFA.

As for foods intended for infants and young children the EU strongly supports that the criteria also include the principle that “*baby foods should be prepared without food additives whenever possible. Where the use of a food additive becomes necessary in baby foods, great caution should be exercised regarding both the choice of additive and its level of use*”.

Recommendation 3

The EU supports continuation of the work on the framework including its testing with the food additives referred to in parts b) and c) of the EWG mandate and if possible also those listed in CRD 15 of the CCFA49.

The EU is concerned that there is no appropriate safety assessment for several adopted food additive provisions for infant formula and formula for special medical purposes intended for infants as outlined by JECFA in CRD 15 of the CCFA49.

The EU is looking forward for a further exchange of views on this matter at the upcoming CCNFSDU Plenary session.