

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

**Fiftieth Session**

**Xiamen, China, 26-30 March 2018**

**AGENDA ITEM 5(b)**

**GENERAL STANDARD FOR FOOD ADDITIVES (GSFA): PROPOSALS FOR  
NEW AND/OR REVISION OF FOOD ADDITIVE PROVISIONS**

**(CX/FA 18/50/8)**

*European Union Competence*  
*European Union Vote*

The European Union (EU) would like to thank the Codex Secretariat for compiling the replies to CL 2017/47-FA.

**General comments**

The EU would like to express its concern as regards several proposals included in CX/FA 18/50/8.

For many proposed provisions the EU is concerned about the poor quality and adequacy of the information provided. The EU is of the view that the adequacy of the information submitted should be screened by the Committee before deciding to enter the provisions in the step process. A lot of resources could be saved if the Committee does not need to discuss further the provisions for which no adequate information was submitted. The EU encourages the Committee to consider drafting a guidance which would provide more clarity about the adequacy of the information to be provided in reply to the CL. This would clarify what are the expectations of the Committee and make the process more transparent.

**Specific comments**

The EU observes that proposals were submitted for several provisions which have already been entered in the step process. In addition, some proposals were submitted for the categories wherein (or in its subcategories) there are adopted provisions, however, no appropriate justification for the proposed revisions was provided. In many cases no information on the justification for use was provided for the food categories for which the use was requested. The use at 'GMP' was requested for food additives with numerical ADIs thus not allowing the Committee to verify whether the proposed use is of no safety (exposure) concern. In some cases the information/references on the dietary intake assessment and its relevancy for the proposed uses was not provided. Finally, to the EU's understanding proposals for new provisions should not substitute the alignment which might be needed for certain food categories.

The EU would be happy to provide more specific comments on the individual proposals during the discussion of the Working Group on the GSFA.