

European Union Comments
CODEX COMMITTEE ON FOOD ADDITIVES

Forty-Seventh Session

Xi'an, China, 23-27 March 2015

AGENDA ITEM 4(b)

**Alignment of the Food Additive Provisions of Commodity Standards and
Relevant Provisions of the GSFA**

(CX/FA 15/47/6)

European Union Competence

European Union Vote

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

General comment

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 generally supportive to the approach taken and the recommendations as outlined in the discussion paper.

Specific comments on the Recommendations

Revisions of the “Principles”, presented in Appendix 1

The EU fully supports the proposed revision as presented in Appendix 1. In the EU's view the proposed revision provides further clarity and consistency for the alignment.

Issues arising from the e-WG discussions in Appendix 2

The EU appreciates a clear explanation provided for the issues arising from eWG discussions as well as providing the list of the draft provisions in the food categories corresponding to the commodity standards under discussion. The EU in general supports the chair's proposals as outlined in sections A and B. However, the EU has certain specific comments as regards the draft GSFA provisions in the step process and butylated hydroxytoluene.

- Alignment of the draft GSFA provisions in the step process

The EU fully supports that only adopted GSFA food additive provisions are considered in the current alignment exercise (as outlined in CX/FA 15/47/6) in order to facilitate and simplify the alignment process.

Indeed, the alignment should be consistent and while discussing the GSFA draft provisions at a certain point in time it is crucial that the draft provisions which are to be forwarded for adoption are also aligned according to the agreed principles (i.e. decision tree and principles that have guided the direction and development of the Decision Tree).

The EU pointed out in its comments to the eWG that there is a substantial difference between the already adopted provisions (in both GSFA and commodity standards) and the draft provisions which are still under discussion by the Committee and for which no final decision has been taken. Therefore, the alignment should not result in an automatic endorsement of the GSFA draft provisions falling under the categories which are being aligned. The draft provisions should be still discussed in view of the criteria for the inclusion of food additive provisions in the GSFA.

The EU considers appropriate and in line with the alignment principles to accept the MLs of the adopted provisions in commodity standards as a default ML in the GSFA when such provisions are still in the step process. For example, this approach was followed for phosphates and nitrites in case of the meat standards aligned at the 46th CCFA session (see Appendix IX, Part D, REP14/FA).

- Butylated hydroxytoluene (INS 321), section A, point 6

The EU supports the chair's proposal. However, the EU would like to note that the difference in the maximum use level for INS 321 (100 mg/kg) in comparison to INS 310 (propyl gallate), INS 319 (tertiary butylhydroquinone), and INS 320 (butylated hydroxyanisole) (200 mg/kg) might not be due to an error even if the note 130 is considered. The EU would like to note that INS 321 has the lowest ADI (0.3 mg/kg bw/day) when compared to the other mentioned additives. Therefore, there might have been a safety reason behind the lower level for the use of INS 321.

Draft criteria for the prioritization listed in Appendix 3

The EU supports the proposed prioritisation criteria as drafted in Appendix 3.

Proposals for the revision of the GSFA categories, and of the food additive sections of the Standard for bouillons and consommés (CODEX STAN 117-1981) and the standards related to chocolate and cocoa products contained in Appendices 4 and 5

The EU supports the proposed amendments to the food additive sections of the mentioned commodity standards as laid down in Appendix 4.

The EU supports the proposed amendments to the food additive provisions in the corresponding GSFA food categories as laid down in Appendix 5.

Association of new functional classes with glycerol (INS 422) and pectin (INS 440)

As a general approach, the EU supports that the INS WG considers whether it is appropriate to associate new functional classes which are not currently associated with certain food additives in CAC/GL 36-1989.

General reference to the use of flavourings in all future alignment work

The EU supports the inclusion of the general reference to the use of flavourings **in those commodity standards in which the use of flavourings is referred to.**

As regards the five meat standards the following standards refer to the use of flavourings: CS 89-1981, CS 96-1981, CS 97-1981 and CS 98-1981.

On the other hand the general reference to the use of flavourings should not be included in CS 88-1981 which does not refer to the use of flavourings.

Establishment of an eWG to continue work on alignment

The EU supports that the eWG is re-established to continue work on alignment and on developing a draft list of prioritised commodity standards to guide future work.