

Codex Committee on Processed Fruits and Vegetables

(27th Session)

Philadelphia, United States of America, 8-12 September 2014

European Union comments on

Agenda Item 7

**Request for comments and information on food additive provisions of
certain processed fruits and vegetables**

(Codex Circular Letter CL 2014/17-PFV)

European Union Competence

European Union Vote

The European Union (EU) would like to submit the following comments:

Pickled fruits and vegetables (CODEX STAN 260-2007)

The EU is of the view that the general reference to the GSFA would not serve the purpose of the standard and that the list of the individual food additives should be maintained within the standard.

Reasoning:

The Standard for Pickled Fruits and Vegetables (CODEX STAN 260-2007) currently lists individual food additives. The EU is of the view that it is necessary to maintain that list taking into account the difficulties as regards the cross-reference to the GSFA (see explanation below) and the impact which such cross-reference would have. The list of individual food additives better reflects the needs and characteristics of the standardised products. In this regard the EU would like to note that in the alignment exercise (alignment between the commodity standards and the GSFA) the Codex Committee on Food Additives (CCFA) recognises that commodity standards have legitimate reasons for a reduced set of additive provisions.

The general reference to the GSFA works well for commodity standards having one-to-one relationship with a GSFA food category. However, the same does not apply to the situations (1) when a commodity standard corresponds to much broader GSFA food category (i.e. a food category covering many different commodity standards as well as non-standardised products) or (2) when a commodity standard contains products falling under several GSFA food categories.

The example of the latter situation relates to CODEX STAN 260-2007. Whilst the food additive uses are well defined in CODEX STAN 260-2007 tailored to the standardised products, the standard falls under four different GSFA food categories namely:

04.1.2.3 Fruit in vinegar, oil, or brine

04.1.2.10 Fermented fruit products

04.2.2.3 Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soybean sauce

04.2.2.7 Fermented vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3

The mentioned food categories assemble a broad spectrum of products with a different needs for food additives. The cross-reference to the GSFA would in this case mean an acceptance of many food additive provisions for which no technological need has been identified for the standardised products. Such broadening of possible food additive uses could have a significant impact not only on the quality and identity of the standardised products but would not be reasonable from a safety point of view as well.

For example, CCFA invested a lot of efforts in reducing the use of aluminium-containing food additives based on the recommendation of the 67th JECFA and the revised provisional tolerable weekly intake for aluminium. No need for the aluminium-containing food additives was identified for CODEX STAN 260-2007 by the CCPFV reflecting the food additives listed in the standard. However, INS 523 Aluminium ammonium sulphate would be permitted in CS 260-2007 if a general reference to the GSFA were made (INS 523 is permitted as an acidity regulator and a firming agent in the GSFA FC 04.2.2.3). Similar examples could be given for food additives with low Acceptable Daily Intakes (ADIs) the use of which should be carefully considered (e.g. INS 127 Erythrosine, INS 385-6 Ethylene diamine tetra acetates, Sulfites etc.). The technological need also differs significantly for some food additives permitted in both CODEX STAN 260-2007 and corresponding GSFA food categories (e.g. Caramel IV is permitted at 50 000 mg/kg in FC 04.2.2.3 and 04.2.2. but only at 500 mg/kg in CODEX STAN 260-2007).

As for the use of colours, the EU could accept the use of colours only to restore the original appearance of the products covered by the Standard.

As for sweeteners, the EU does not support their use in products other than sweet sour preserves of fruit and vegetables and/or products energy-reduced or with no added sugar.

Canned Bamboo Shoots (CODEX STAN 241-2007)

The EU does not have any strong view as regards the use of other tartrates. In this respect it should be noted that whilst the GSFA refers to all tartrates (INS 334-337) only tartaric acid is permitted for use according to the provisions currently included in the GSFA (see note 128 in the GSFA). However, the EU could accept the use of other tartrates if such uses are requested by the countries producing canned bamboo shoots.

As regards the reporting basis, the EU supports the reporting basis “as tartaric acid” for consistency with JECFA’s ADI.

Canned Vegetables (mushrooms) (CODEX STAN 297-2009)

The quality criteria section of the standard (page 28) stipulates that the mushroom portion of the product shall have normal colour characteristics of the variety of the canned mushrooms (i.e. white or cream as provided in the section 1.2.1 on page 27 of the standard). The liquid medium shall be either clear or slightly turbid and yellow to light brown in colour.

Taking into account the characteristics of the products the EU is of the view that other colours listed in the GSFA food category 04.2.2.4 are not applicable (not technologically justified) to the annex on mushrooms in CODEX STAN 297-2009.

As regards flavour enhancers, the EU considers that other flavour enhancers listed in food category 04.2.2.4 might be applicable to the annex on mushrooms.