

European Union Comments
CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-first Session

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AGENDA ITEM 4(b)

**ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY
STANDARDS: REPORT OF THE EWG ON ALIGNMENT**

(CX/FA 19/51/6)

European Union Competence
European Union Vote

The European Union (EU) would like to thank Australia, the United States of America and Japan for chairing the electronic Working Group and preparing the report.

The EU appreciates the work on the alignment and recognises the complexity and extent of this work. The EU is generally supportive of the approach being taken and the chair's proposals as outlined in the report.

The EU would like to make the following comments which are related to two particular issues identified in the report:

Safety concerns on Azodicarbonamide (INS 927a)

Azodicarbonamide is not authorised as a food additive in the EU. The EU takes note of comments made by New Zealand noticing that a number of countries have discontinued the use of azodicarbonamide due to safety concerns. Semicarbazide can be formed as a decomposition product of azodicarbonamide in food products made using flour in which azodicarbonamide has been added as a dough improver. The EU strongly supports further discussion on this matter and approaching JECFA to re-evaluate safety of this food additive with a high priority due to existing safety concerns.

Enzymes listed in CXS 152-1985 and in the GSFA category 06.2 and 06.2.1

As a general comment the EU notes that the alignment exercise should respect the intentions of the commodity standard and the scope of the provisions listed therein.

CXS 152-1985 currently lists four enzymes under the Section 4 'Food additives' and sub-section 4.1 'Enzymes'. At the same time there are adopted provisions for two of those enzymes in the GSFA FC 06.2 and 06.2.1 (INS 1100(i) and INS 1101(i)). It can be assumed that those provisions were entered into the GSFA for use as flour treatment agents.

Taking the above considerations into account the EU is of the view that enzymes listed in CXS 152-1985 also act as flour treatment agents and for consistency shall be captured in the GSFA.

Therefore, the EU does not support addition of XS152 note to the provision for alpha amylase from *Aspergillus oryzae* var. INS 1100(i) in FC 06.2 and protease from *Aspergillus oryzae* var. INS 1101(i) in FC 06.2.1.

Similarly, the EU does not support the proposed amendments for section 4 in CXS 152-1985 suggesting the inclusion of sub-section 4.2 'Processing Aids – Enzyme preparations' and the reference to the Guidelines on Substances used as Processing Aids (CAC/GL 75-2010).