

07/01/2020

**European Union comments on
Codex Circular Letter CL 2019/117-FA**

**Request for comments at Step 3 on the proposed changes and/or addition to
the *International Numbering System for Food Additives* (CXG 36-1989)**

*Mixed Competence
European Union Vote*

The European Union and its Member States (EUMS) would like to thank Belgium and Iran for chairing the electronic Working Group and preparing the discussion paper CX/FA 20/52/11.

The EUMS have the following comments on the conclusion and recommendations:

CX/FA 20/52/11, para 24

The EUMS support the changes to the INS list as presented in the annex 1 to CX/FA 20/52/11.

CX/FA 20/52/11, para 25

The EUMS agree with the approach to wait for the JECFA assessment and proposal for a name before including riboflavin from *Ashbya gossypii* and fungal amylase from *Aspergillus niger* in CXG 36-1989.

CX/FA 20/52/11, para 26

The EUMS support keeping the overview of deleted INS numbers and names, including an overview of re-used numbers, as a separate information document that shall be updated when CXG 36-1989 is changed. It would be similar to the “Information document to the discussion on the GSFA” or “Information document on food additive provisions in commodity standards” that are updated and made available for information prior to the CCFA sessions.

The EUMS support that the information on the functional classes and technological purposes is retained in the information document together with the year of deletion. The EUMS also agree with a careful re-use of the numbers that the system in which certain range of numbers corresponds to a particular functional class(es) is maintained (e.g. INS No 100-199 for colours).

CX/FA 20/52/11, para 27

The EUMS support that the next EWG continues working on a mechanism to keep track of deleted INS numbers.