

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

**Fifty-second Session**

**Virtual**

**1, 2, 3, 6, 7 and 10 September 2021**

**AGENDA ITEM 4a**

**ENDORSEMENT AND/OR REVISION OF MAXIMUM LEVELS FOR FOOD  
ADDITIVES AND PROCESSING AIDS IN CODEX STANDARDS OF THE  
FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS**

**CRD03 - REPORT OF THE 52ND CCFA'S VIRTUAL WORKING GROUP ON  
ENDORSEMENT AND ALIGNMENT**

**(CX/FA 21/52/5, CRD03)**

*Mixed Competence*  
*European Union Vote*

The European Union and its Member States (EUMS) would like to thank Australia for chairing the VWG. The EUMS would like to submit the following comments:

The EUMS strongly object to the endorsement of the use of Calcium oxide (INS 529) as a processing aid with a maximum level of 2.5 % on dry basis by mass within the Draft Standard for Dried Roots, Rhizomes and Bulbs – dried or dehydrated ginger. As pointed out in CX/FA 21/52/5 Add.2, the EUMS are of the view that Calcium oxide (INS 529) is used as a food additive in dried or dehydrated ginger.

The discussion in the CCSCS suggests that Sulfur dioxide (INS 220) and Calcium oxide (INS 529) are used as 'bleaching agents' in the production of dried and dehydrated ginger according to an ISO-standard (REP19/SCH, para 36).

In CRD12 it is further clarified that Calcium oxide (INS 529), when used during the processing of ginger, gives ginger a 'brighter' appearance, minimizes shrinkage, improves quality and causes it to be less susceptible to attack by pests during storage and transport.

The VWG on Endorsement acknowledged that the use of Sulfur dioxide (INS 220) is that of a food additive.

As Calcium oxide (INS 529) is used for a similar purpose there is no reason why it should be classified as a processing aid.

Calcium oxide (INS 529) is already authorized according to Table Three of the GSFA and hence also for spices. However, only the functional classes 'acidity regulator' and 'flour treatment agent' are assigned to it (not yet 'bleaching agent'). There is no justification that the same food additive shall be considered differently, as a food additive versus processing aid, depending on its various technological functions. There is no justification that a food additive shall be considered as a processing aid in cases as far as its technological function has not been assigned (yet) to it within the INS-list.

The EUMS take note that Calcium oxide (INS 529) is added in the processing of ginger for a technological purpose and affects the characteristics of the product. Further, the EUMS are of the view that the maximum level of 2.5 %, i. e. 25,000 mg/kg, cannot be considered as "*the non-intentional but unavoidable presence of*

*residues or derivatives*” in the meaning of that term within the definition of processing aid laid down in the Procedural Manual<sup>1</sup>.

Therefore, the EUMS are of the view that the envisaged use of Calcium oxide (INS 529) shall be considered as a food additive use in line with the definition of food additive in the Procedural Manual<sup>2</sup>.

Finally, the EUMS observe that there is no information on the functional class for Sulfur dioxide (INS 220) in the proposed new text (table) in CRD03 (page 107). The EUMS note that according to the Procedural Manual<sup>3</sup>, the text on food additives in commodity standards should refer to functional classes. Therefore, the EUMS suggest adding the functional class ‘bleaching agent’ to the table on page 107 of CRD03.

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<sup>1</sup> **Processing Aid** means any substance or material, not including apparatus or utensils, and not consumed as a food ingredient by itself, intentionally used in the processing of raw materials, foods or its ingredients, to fulfil a certain technological purpose during treatment or processing and which may result in the non-intentional but unavoidable presence of residues or derivatives in the final product (Procedural Manual, 27<sup>th</sup> edition, page 24).

<sup>2</sup> **Food Additive** means any substance not normally consumed as a food by itself and not normally used as a typical ingredient of the food, whether or not it has nutritive value, the intentional addition of which to food for a technological (including organoleptic) purpose in the manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food results, or may be reasonably expected to result, (directly or indirectly) in it or its by-products becoming a component of or otherwise affecting the characteristics of such foods. The term does not include “contaminants” or substances added to food for maintaining or improving nutritional qualities (Procedural Manual, 27<sup>th</sup> edition, page 23).

<sup>3</sup> The Procedural Manual, 27<sup>th</sup> edition, page 56-57.