

The European Union as chair of the e-WG is pleased to submit a draft project document on new work on secondary food additives for consideration at the 47th session of the CCFA. The project document shall be revised on the basis of the outcome of the discussions.

DRAFT PROJECT DOCUMENT

Secondary Food Additives

1. Purpose and scope

The proposed new work would provide clarity, legitimacy, consistency and certainty for the use of secondary food additives. It would also establish a uniform approach on how the use of secondary additives should be addressed by the CCFA.

2. Relevance and timeliness

Food additives are normally incorporated in preparations of food additives, enzymes, flavourings and nutrients to perform technological functions in those preparations (i.e. to be used as secondary food additives). The Codex General Standard for Food Additives (GSFA) should be the single authoritative reference point for food additives. However, so far, it does not provide any specific guidance on how to address the use of secondary additives. The absence of clarity has created misunderstandings and complicated discussions on the food additive provisions proposed for inclusion in the GSFA.

3. Main aspects to be covered

This section shall be revised based on the outcomes of the discussion at the 47th CCFA session.

The proposed new work should cover the following aspects:

- (i) *Establishment of a uniform approach to address the use of secondary food additives*

[Establishment of a new category in the GSFA food category system to address the use of secondary additives – i.e. “Preparations of food additives, enzymes, flavourings and nutrients”]

OR

[Develop notes within the current GSFA food category system to address the use of secondary additives]

AND

- (ii) *Revision of the Preamble to the GSFA to improve clarity as regards the use of secondary additives.*

[Consider the need to revise Section 3.2 to clarify the conditions under which the use of secondary food additives is justified]

AND/OR

[Consider the need to revise Section 4.1 to clarify the conditions applying to carry-over of (secondary) food additives from preparations into foods]

AND

- (iii) *Providing further guidance for the use of secondary food additives*
 [Develop a “*Guideline for the Use of Secondary Food Additives*” to further explain the use of secondary additives in various preparations and its relationship to the relevant provisions in the GSFA]

]

4. Assessment against the criteria for the establishment of work priorities

General criterion - Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs of developing countries:

The proposed work will provide clarity, legitimacy, consistency and certainty for safe and justified use of food additives in preparations. Applying a uniform and transparent approach to secondary food additives is desirable not only from a food safety point of view but also to ensure fair practices in the food trade.

Criteria applicable to general subjects:

(a) Diversification of national legislations and apparent resultant or potential impediments to international trade.

It is expected that the use of secondary food additives is addressed differently by various Codex Members. Therefore, it is necessary to ensure a common understanding of the issue and to agree on a uniform approach at the international level. The current unclear/unsolved situation could create impediments to international trade.

(b) Scope of work and establishment of priorities between the various sections of the work.

The scope of the envisaged work is outlined in part 3 of the project document. Points (i), and (ii) should be addressed simultaneously.

(c) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies).

None identified.

(d) Amenability of the subject of the proposal to standardization.

None identified.

(e) Consideration of the global magnitude of the problem or issue.

Currently, there is no single consolidated source of information on secondary additives in the existing Codex texts. Also no harmonised principles and rules to deal with secondary additives have been developed by Codex.

5. Relevance to the Codex strategic objectives

The proposal for new work is related to the following strategic goals of the Codex Alimentarius Commission Strategic Plan 2014 – 2019 (<http://www.codexalimentarius.org/procedures-strategies/strategic-planning/en/>;

ftp://ftp.fao.org/codex/Publications/StrategicFrame/Strategic_plan_2014_2019_EN.pdf):

- Goal 1 (Establish international food standards that address current and emerging food issues), specifically Objective 1.1 (Establish new and review existing Codex standards, based on priorities of the CAC); and
- Goal 2 (Ensure the application of risk analysis principles in the development of Codex standards), specifically Objective 2.1 (Ensure consistent use of risk analysis principles and scientific advice.

6. Information on the relation between the proposal and other existing Codex documents

The proposal is linked with the GSFA and its relation to secondary food additives.

However, there are other relevant existing Codex documents which refer to secondary food additives and which will be taken into account:

- General Specifications and Considerations for Enzyme Preparations used in Food Processing;
- Guidelines for the Use of Flavourings (CAC/GL 66-2008);
- JECFA specifications of food additives and enzymes.

7. Identification of any requirement for and availability of expert scientific advice None identified.

8. Identification of any need for technical input to the standard from external bodies so that this can be planned for

None identified.

9. **Proposed time-line for completion of the new work, including the start date, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission; the time frame for developing a standard should not normally exceed five years.**

Proposed time-line:	Precondition
July 2015	Approval as new work by the 38 th session of the CAC
March 2016	Proposed draft amendments considered at Step 4 by the 48 th session of the CCFA
July 2016	Adoption by CAC at Step 5/8 (with the omission of Steps 6 and 7) or at Step 5
March 2017	Draft amendments considered at Step 7 by the 49 th session of the CCFA
July 2017	Adoption by CAC at Step 8