

30/03/2020

**European Union comments on  
Codex Circular Letter CL 2019/97/OCS-CCSCH  
Request for Comments at Step 6 on the Draft Standard for dried roots,  
rhizomes and bulbs–dried or dehydrated ginger**

*Mixed Competence  
European Union Vote*

The European Union and its Member States (EUMS) would like to provide the following comments:

The Circular Letter CL 2019/97/OCS-CCSCH refers to document REP19/SCH para. 39, and Appendix III, and REP19/CAC para 85.

The EUMS take note that CCSCH4 requested the Codex Committee on Food Additives (CCFA) to clarify how processing aids could be addressed under the Section 4 “Food additives” in accordance with relevant provisions in the Codex Procedural Manual (REP19/SCH, para. 39ii).

The EUMS observe that CCFA51, while considering the above request, noted that two substances (i.e. calcium oxide and sulphur dioxide) included in Chemical Requirements Section of the draft standard are associated with the functional class of bleaching agents and could potentially be considered as food additives rather than processing aids. Consequently, CCFA51 requested CCSCH to clarify this matter (REP19/FA, paras. 28-30).

Taking into account that “bleaching agents” is a recognised functional class within the Codex Alimentarius, the EUMS are of the view that INS 529 calcium oxide and INS 220-539 sulfites, if used for bleaching, are used as food additives and the draft standard shall be amended accordingly.