

**European Union Comments**  
**CODEX COMMITTEE ON FATS AND OILS**  
**25<sup>th</sup> Session**

**Kuala Lumpur, Malaysia, 27 February- 03 March 2017**

**Agenda Item 2:**

**Matters referred by the Codex Alimentarius Commission and**  
**other subsidiary bodies (CX/FO 17/25/2)**

**Part B: 70th Session of the Executive Committee (CCEXEC70)**

*Member State Competence*  
*Member State Vote*

The Member States of the European Union do not see a need to develop an approach for the management of the work of CCFO similar to that used by CCFH. The Procedural manual provides the Committee with sufficient guidance on prioritization and management of its work.

**Part C: Matters arising from other subsidiary bodies**

**The 47<sup>th</sup> and 48<sup>th</sup> Session of the Codex Committee on Food Additives (CCFA47/48)**

**Technological Justification for food additives**

*European Union Competence*  
*European Union Vote*

The European Union (EU) would like to submit the following comments:

**Antioxidants in general and lecithin (INS322(i)) in particular in food category 02.1.2 “Vegetable oils and fats”**

The technological need for antioxidants in vegetable oils and fats might vary depending on the fatty acids composition of oils and fats (saturated vs. unsaturated fatty acids) and their intended use (table or salad oils vs. oils intended for frying).

Some oils (i.e. virgin oils, cold pressed oils) do not require addition of any food additives (including antioxidants) which is indicated in the commodity standards falling under the category 02.1.2 – i.e. CS 19-1981, CS 33-1981 and CS 210-1999. The use of food additives in such oils is not needed. It could change the nature of oils and mislead the consumer.

For the same reason the addition of tocopherols, only to restore natural tocopherol lost in the refining process, is permitted in refined olive oil, olive oil, refined olive-pomace oil and olive-pomace oil according to CS 33-1981, i.e. in products for which certain technological need for antioxidants is recognised.

The EU would like to notice that the above mentioned restrictions of the commodity standards are not reflected (except for tocopherols) in the food additive provisions of the GSFA category 02.1.2. The EU recommends that the Committee passes this message to the CCFA.

Generally, the EU recognises technological need for antioxidants in vegetable oils and fats but considers that such a need should be assessed on a case by case basis. As regards lecithin, lecithin could act efficiently as an antioxidant in vegetable oils and fats especially in synergy with tocopherols. The EU considers that the use of lecithin in vegetable oils and fats is justified (except for virgin oils and olive oils) up to 30.000 mg/kg.

Tricalcium citrate (INS 333(iii)), tripotassium citrate (INS 332(ii)) in products conforming to the Standards for *Edible Fats and Oils not Covered by Individual Standards* (CODEX STAN 19-1981), for *Olive Oils and Olive Pomace Oils* (CODEX STAN 33-1981) and for *Named Vegetable Oils* (CODEX STAN 210-1999)

The EU could support the use of INS 332(ii) and INS 333(iii) in products conforming to CS 19-1981 and CS 210-1999. Both aforementioned standards already include citric acid (INS 330), sodium dihydrogen citrate (INS 331(i)) and trisodium citrate (INS 331(iii)) as antioxidant synergists. Therefore, the EU could accept the extension of use to other citrates in those standards. The EU would like to note that the functional class “antioxidant” (or the technological purpose “antioxidant synergist” respectively) is currently not associated with any citrates (INS 331-333) in CAC/GL 36-1989. Therefore, CAC/GL 36-1989 needs to be either updated or the function of citrates in CS 19-1981 and CS 210-1999 clarified (it seems that citrates act rather as sequestrants in the mentioned standards).

The EU does not support the use of INS 332(ii) and INS 333(iii) in CS 33-1981. No other citrates are permitted in the standard and the standard explains why only tocopherols could be added to certain products.

Lecithin (INS 332(i)) in products conforming to the Standards for *Edible Fats and Oils not Covered by Individual Standards* (CODEX STAN 19-1981) and for *Named Animal Fats* (CODEX STAN 211-1999)

The EU could support the use of lecithin in CS 19-1981 (except for virgin and cold pressed oils) and in CS 211-199. Both standards include various types of fats and oils and lecithin could be used as an alternative to other antioxidants or for its synergic effect with other antioxidants.

Mono- and diglycerides of fatty acids (INS 471) in products conforming to the Standard for *Edible Fats and Oils not Covered by Individual Standards* (CODEX STAN 19-1989) and in fish oils

To the EU’s knowledge INS 471 could act as an antifoaming agent. The EU could support its use in CS 19-1989 for oils and fats for deep frying as an alternative to polydimethylsiloxane (INS 900a). As regards fish oil, the draft standard is under discussion. A technological justification for the use of antifoaming agents and INS 471 in particular should be provided. If provided, the EU could accept such use.

Potassium dihydrogen citrate (INS 332(i)), sodium dihydrogen citrate (INS 331(i)), tricalcium citrate (INS 333(iii)), tripotassium citrate (INS 332(ii)), trisodium citrate (INS 331(iii)) and sodium alginate (INS 401) in fish oils

Technological justification for the use of the mentioned additives should be provided. Taking into account that some citrates are permitted in other CCFO standards the EU could support their use if appropriate justification is provided. The EU is not aware of any technological need for sodium alginate in fish oil.

## **Use of specific food additives in food categories relevant to CCFO**

Emulsifiers in general and polyglycerol esters of fatty acids (INS 475), polyglycerol esters of interesterified ricinoleic acid (INS 476), propylene glycol alginate (INS 405), sorbitan esters of fatty acids (INS 491- 495) and stearyl lactylates (INS 481 (i), 482 (i)) specifically in 02.1.2 “Vegetable oils and fats”

The EU is of the view that emulsifiers are not technologically justified in oils and fats which are essentially free from water. The EU is not aware of any technological need for the specific additives listed.

Acidity regulators in general and tartrates (INS 334, 335 (ii), 337) specifically in 02.1.2 “Vegetable oils and fats”

The EU is not aware of any technological need for acidity regulators in vegetable oils and fats.

Emulsifiers in general and polyglycerol esters of fatty acids (INS 475), polyglycerol esters of interesterified ricinoleic acid (INS 476) and propylene glycol alginate (INS 405) specifically in 02.1.3 “Lard, tallow, fish oil, and other animal fats”

The EU is of the view that emulsifiers are not technologically justified in oils and fats which are essentially free from water. The EU is not aware of any technological need for the specific additives listed.

Tartrates (INS 334, 335 (ii), 337) as acidity regulators in 02.1.3 “Lard, tallow, fish oil, and other animal fats”

The EU is not aware of any technological need for acidity regulators in lard, tallow, fish oil, and other animal fats.

## **Inconsistent terminology related to the term flavour and flavourings in Codex Texts**

All 3 standards referred to in CX/FO 17/25/2 permit the use of flavourings. Therefore, the EU could support revising the text to ensure consistency with the *Guidelines for the Use of Flavourings* (CAC/GL 66-2008). However, the revision shall not affect the restriction “No additives are permitted in virgin or cold pressed oils” (which includes flavourings as well) as laid down in CODEX STAN 19-1981 and CODEX STAN 210-1999.