

European Union Comments
CODEX COMMITTEE ON FOOD ADDITIVES

Fiftieth Session

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AGENDA ITEM 5(d)

**DISCUSSION PAPER ON THE USE OF THE TERMS “UNPROCESSED”
AND “PLAIN” IN THE GSFA**

(CX/FA 18/50/10)

European Union Competence
European Union Vote

The European Union (EU) would like to thank the Russian Federation for developing the discussion paper.

General comments

The EU welcomes the discussion paper. The EU shares many of the concerns raised especially as regards a trend to expand the use of food additives in foods that do not undergo a technological treatment or processing or are processed only to a limited extent. It is the EU's view that food additives shall not be used in unprocessed/ minimally processed foods (e.g. in fresh fruits and vegetables, milk, fresh meat and fish and fishery products etc.) apart from well-defined and justified exceptions.

To the EU's understanding this is the reason why certain food categories are included in Annex to Table 3. Generally, for those food categories the EU does not support any horizontal justification for food additives. For many foodstuffs falling under Annex to Table 3 no additives are needed and technologically justified for others the use of food additives needs to be considered on a case-by-case basis.

The EU acknowledges the importance of protecting the interests of consumers as regards misleading as well. The EU agrees that misleading might be an issue in particular for unprocessed or minimally processed foods since it often relates (although it is not limited) to the nature, freshness, quality of ingredients used, the naturalness of a product or of the production process, or the nutritional quality of the product, including its fruit and vegetable content. Therefore, in general the EU does not support any food additive uses which might affect natural and typical characteristics of foods (colour, texture etc.), or facilitates intentional adulteration of foods or damage consumer confidence related to the true nature of the food and the condition or type of treatment it has undergone.

Section 3.2 of the GSFA Preamble lays down the criteria for the use of additives. Even if it does not directly address the issue under consideration the adherence to those criteria could mitigate, to a certain extent, some

of the concerns raised (note: misleading, preservation of the nutritional quality, consideration of other economically and technologically practicable means are listed in section 3.2). Indeed, as outlined in CX/FA 18/50/13 some terms are not defined, e.g. misleading, and therefore their understanding and risk management approaches could differ.

In addition, as indicated in the EU's comments on CX/FA 18/50/13 the EU believes that a further guidance on the information required in reply to the CLs for the submission of proposals for new provisions would be beneficial that all the criteria of Section 3.2 are appropriately scrutinised. This will allow the Committee to check not only the completeness but also the adequacy of the information provided and save the resources by not discussing the provisions for which no adequate information was provided.

Specific comments

Recommendations 1, 2 and 3

In the EU's view firstly more general discussion on the topic is needed before considering any further specific steps to be taken.