

Welcome to the electronic working group (eWG) on matters referred from the Codex Committee on Food Additives (CCFA). I look forward to your comments on the following nine (9) items.

The working language is English. Please reference the item numbers (e.g., Item 1a, Item 1b., etc.) when providing comments. When there is more than one expert, each country or observer organization shall designate one official representative to post comments on the eWG platform.

Please do not hesitate to contact me if you have any questions.

Best regards,

Part I. Technological justifications (Items 1-6)

Items 1, 2, 3, and 4 were discussed at the CCPFV28 in 2016 without definitive conclusions (see [CCPFV28 report](#)).

CCFA49 (2017) requested CCPFV to provide more conclusive replies (see [CCFA49 report](#), paras 14(ii) and (iii)).

Items 5 and 6 are new matters referred from CCFA50 (2018) (see [CCFA50 report](#), paras 86 (ii) and (iii)).

Guidelines for Providing Comments Related to Technological Justifications

- When providing technological justifications, comments should adhere to the *Procedures for consideration of entry and review of food additive provisions in the General Standard for Food Additives* (GSFA)¹. Section 3.2 of the Preamble to the [GSFA](#) establishes the criteria for justifying the use of a food additive. Section 3.2 is copied below for your reference:

“3.2 Justification for the Use of Additives

The use of food additives is justified only when such use has an advantage, does not present an appreciable health risk to consumers, does not mislead the consumer, and serves one or more of the technological functions set out by Codex and the needs set out from (a) through (d) below, and only where these objectives cannot be achieved by other means that are economically and technologically practicable:

a) To preserve the nutritional quality of the food; an intentional reduction in the nutritional quality of a food would be justified in the circumstances dealt with in subparagraph (b) and also in other circumstances where the food does not constitute a significant item in a normal diet;

b) To provide necessary ingredients or constituents for foods manufactured for groups of consumers having special dietary needs;

c) To enhance the keeping quality or stability of a food or to improve its organoleptic properties, provided that this does not change the nature, substance or quality of the food so as to deceive the consumer;

d) To provide aids in the manufacture, processing, preparation, treatment, packing, transport or storage of food, provided that the additive is not used to disguise the effects of the use of faulty raw materials or of undesirable (including unhygienic) practices or techniques during the course of any of these activities.”

¹ Codex Procedural Manual, 26nd Ed. (2018), pp. 62-70.

- For those who support the use of certain functional classes or certain specific food additives, please provide technological justification for such use. The justification should include supporting information based on the criteria in Section 3.2 of the Preamble of the [GSFA](#). The eWG also encourages information related to the current use in international trade.
- For those who do not support the use of certain functional classes or certain specific food additives, please provide discussion as to why such use would not be technologically justified. The discussion should be presented in the context of the criteria in Section 3.2 of the Preamble of the [GSFA](#).
- Comments with no justification (for example, simply “yes” or “no” responses) will be given low priority in determining the consensus recommendation of the eWG.

Item 1:

Topic:

CCFA49 (2017) requested CCPFV to provide more conclusive replies concerning the technological justification for the use of “emulsifiers, stabilizers, thickeners” in general, and xanthan gum (INS 415) in particular, in food category (FC) 14.1.2 “Fruit and vegetable juices” and FC 14.1.3 “Fruit and vegetable nectar” generally and in specific sub-categories (see [CCFA49 report](#), para 14(ii)).

Background:

At CCPFV28 (2016), the Committee noted that some delegations reported that xanthan gum (INS 415) was not used, as there was no technological need for its use under food categories 14.1.2 and 14.1.3. These delegations were of the view that only pectin (INS 440) was technologically justified for use in certain products in food categories 14.1.2 and 14.1.3. The Committee also noted that other delegations reported that xanthan gum, carboxymethyl cellulose, and gellan gum (INS 418) were technologically justified and being used as a thickener and stabilizer in juices (see [CCPFV28 report](#), paras 70 and 71).

The FC 14.1.2 and 14.1.3 include the following sub-categories (See [GSFA](#), pages 16, 41-43)

- 14.1.2 Fruit and vegetable juices
 - 14.1.2.1 Fruit juice
 - 14.1.2.2 Vegetable juice
 - 14.1.2.3 Concentrates for fruit juice
 - 14.1.2.4 Concentrates for vegetable juice
- 14.1.3 Fruit and vegetable nectars
 - 14.1.3.1 Fruit nectar
 - 14.1.3.2 Vegetable nectar
 - 14.1.3.3 Concentrates for fruit nectar
 - 14.1.3.4 Concentrates for vegetable nectar

The eWG Chair notes that pectin (INS 440) has the functional classes of “emulsifiers, stabilizers, thickeners” and is already permitted in FC 14.1.2 and FC 14.1.3. Specifically, the GSFA permits the use of pectin in all of the above eight sub-categories except 14.1.2.2 (Vegetable juice) and 14.1.2.4 (Concentrates for vegetable juice). This suggests there is technological justification for the use of “emulsifiers, stabilizers, thickeners” in at least two sub-categories under FC 14.1.2 and in all sub-categories under FC 14.1. 3 (See [GSFA](#), pages 177-178).

The eWG Chair also notes that the Codex Standard for Fruit Juice and Nectars ([Codex Stan 247-2005](#)) has been aligned to include a general reference to food additive provisions in the corresponding FC in Tables 1 and 2 of the [GSFA](#); therefore, standardized fruit juices and nectars

currently already permits the use of “emulsifiers, stabilizers, thickeners” in the form of pectin (INS 440).

Request for comments:

- Item 1a. Request information on the technological justification for the use of “emulsifiers, stabilizers, thickeners” in FC 14.1.2 “Fruit and vegetable juices” and its sub-categories and FC 14.1.3 “Fruit and vegetable nectars” and its sub-categories.
- Item 1b. Request information on the technological justification for the use of pectin in products under sub-categories 14.1.2.2 (vegetable juice) and 14.1.2.4 (concentrates for vegetable juice).
- Item 1c. Request information on the technological justification for the use of xanthan gum as an “emulsifiers, stabilizers, thickeners” in FC 14.1.2 “Fruit and vegetable juices” and its sub-categories and FC 14.1.3 “Fruit and vegetable nectars” and its sub-categories.

Important:

Please see pages 2-3 for Guidelines for Providing Comments Related to Technological Justifications.

Comments with no justification (for example, simply “yes” or “no” responses) will be given low priority in determining the consensus recommendation of the eWG.

Item 2

Topic:

CCFA49 requested CCPFV to provide more conclusive replies concerning the technological justification for the use of acidity regulators in general, and tartrates specifically (INS 334, 335(ii), 337) in FC 04.1.2.2 “Dried fruit” (see [CCFA49 report](#), para 14(ii)).

Background:

FC 04.1.2.2 (Dried Fruit) covers fruit from which water is removed to prevent microbial growth and includes dried fruit leathers (fruit rolls) prepared by drying fruit purees. Examples include dried apple slices, raisins, dried shredded or flaked coconut, and prunes. (See [GSFA](#), page 23).

At CCPFV28 (2016), a delegation reported that tartaric acid was used both as an antioxidant and acidity regulator in desiccated coconut to control rancidity. However, tartrates were not listed for use in food products conforming to the Standard for Desiccated Coconut ([CODEX STAN 177-1991](#)). (see [CCPFV28 report](#), para 74).

The eWG Chair notes that CCPFV has established three standards for food products using food additives in FC 04.1.2.2 (Dried fruit): Standard for Desiccated Coconut ([CODEX STAN 177-1991](#)), Standard for Raisins ([CODEX STAN 67-1981](#)), and Standard for Dried Apricots ([CODEX STAN 130-1981](#)). Acidity regulators and tartrates are not currently listed in these standards.

Request for comments:

- Item 2a. Request information on the technological justification for the use of acidity regulators in FC 04.1.2.2 (Dried fruit) (not limited to standardized food products).

- Item 2b. Request information on the technological justification for the use of tartrates (INS 334, 335(ii), 337) in FC 04.1.2.2 (Dried fruit) (not limited to standardized food products).

Important:

Please see pages 2-3 for Guidelines for Providing Comments Related to Technological Justifications.

Comments with no justification (for example, simply “yes” or “no” responses) will be given low priority in determining the consensus recommendation of the eWG.

Item 3

Topic:

CCFA49 requested CCPFV to provide more conclusive replies concerning the technological justification for the use of tartrates (INS 334, 335(ii), 337) in FC 04.1.2.6 (Fruit based spreads (e.g. chutney), excluding products in food category 04.1.2.5) (see [CCFA49 report](#), para 14(ii)).

Background:

The descriptor for FC 04.1.2.6 (Fruit based spreads (e.g. chutney), excluding products in food category 04.1.2.5) is provided in [GSFA](#) (page 24).

At CCPFV28 (2016), a delegation reported that tartrates were used in mango chutney as both acidity regulators and antioxidants. The Committee noted that tartrates (INS 334, 335(ii), 337) were not listed in the Standard for Mango Chutney ([CODEX STAN 160-1987](#)). The Committee informed CCFA that these additives were used in standardized food products; however, there could be uncertainty on the technological function (acidity regulators and/or antioxidants) based on the information provided by one delegation (see [CCPFV28 report](#), paras 78-80).

The eWG Chair notes that INS 335(ii) and 337 have the assigned functional classes of acidity regulator, emulsifying salt, sequestrant and stabilizer and INS 334 has the assigned functional classes of acidity regulator, antioxidant, flavour enhancer and sequestrant.

Request for comments:

Item 3. Request information on the technological justification for the use of tartrates (INS 334, 335(ii), 337) in FC 04.1.2.6 (Fruit based spreads (e.g. chutney), excluding products in food category 04.1.2.5) (not limited to standardized food products).

Important:

Please see pages 2-3 for Guidelines for Providing Comments Related to Technological Justifications.

Comments with no justification (for example, simply “yes” or “no” responses) will be given low priority in determining the consensus recommendation of the eWG.

Item 4

Topic:

CCFA49 indicated that the technological justification for the use of colors in French fried potatoes was in the purview of CCPFV (see [CCFA49 report](#), para 14(iii)).

Background:

At CCPFV28 (2016), the Committee discussed the technological justification for the use of colors in French fried potatoes (see [CCPFV28 report](#), para 56-61). Delegations supporting the use of coloring agents in French fried potatoes expressed concern that omission of “colors” from the Annex on French Fried Potatoes did not reflect their current industry practice. These delegations further noted that coloring agents were currently used to restore color and to facilitate the reduction of acrylamide in frozen French fried potatoes in a manner that did not mislead consumers. Therefore, the omission would be counter-productive to governments and industry efforts to minimize acrylamide formation and thereby mitigate human health risks.

Those delegations not supporting the use of coloring agents in French fried potatoes were of the view that such use was not technologically justified and could mislead the consumer. Regarding the formation of acrylamide, they noted that the education of consumers to accept a lighter color of French fried potatoes might be more appropriate and that other means to achieve reduced acrylamide formation existed.

The Committee agreed: (1) not to include the provision for use of coloring agents in the Annex; (2) to ask CCFA to clarify on the possible use of colors in French fried potatoes in connection with the reduction of acrylamide. The use of colors in French fried potatoes as a way to reduce acrylamide was subsequently discussed at CCFA49 (2017). CCFA49 noted that the technological justification of the use of color in French fried potatoes was in the purview of CCPFV.

Request for comments:

Item 4. Request information on the technological justification of the use of colors in French fried potatoes for the purpose of acrylamide reduction.

Important:

Please see pages 2-3 for Guidelines for Providing Comments Related to Technological Justifications.

Comments with no justification (for example, simply “yes” or “no” responses) will be given low priority in determining the consensus recommendation of the eWG.

Item 5

Topic:

CCFA50 requested guidance from CCPFV regarding the use of acidity regulators in general, and calcium lactate (INS 327) specifically, in FC 14.1.2.1 (Fruit juice) generally, and in Chinese plum juice specifically (see [CCFA50 report](#), para 86 (ii) and [CCFA50, CRD 2](#), page 12).

Background:

The description of FC 14.1.2.1 (Fruit juice) is provided in [GSFA](#) (page 42). The CCFA50 physical working group (pWG) on the GSFA discuss the use of calcium lactate (INS 327) in FC 14.1.2.1 (Fruit juice). The pWG noted that the Codex General Standard for Fruit Juices and Nectars ([CODEX STAN 247-2005](#)) had been aligned to include a general reference to food additive provisions in the corresponding FC in Tables 1 and 2 of the [GSFA](#). However, calcium lactate (INS 327) was not been listed in the commodity standard prior to alignment. Therefore, the pWG on the GSFA recommended that CCFA50 request guidance from CCPFV on the technological justification for calcium lactate (INS 327) used as an acidity regulator in fruit juice in general and in Chinese plum juice specifically, as well as the use level at GMP (see [CCFA50, CRD 2](#), Report of the 50th CCFA's Physical Working Group on the Codex General Standard for Food Additives (GSFA)).

The eWG Chair notes that acidity regulators are already permitted in FC 14.1.2.1 (Fruit juice) (e.g., ascorbic acid, L- (INS 300), malic acid, DL- (INS 296), citric acid (INS 330), tartrates (INS 334, 335(i), 337), and phosphates (INS 338; 339(i)-(iii); 340(i)- (iii); 341(i)-(iii); 342(i)- (ii); 343(i)-(iii); 450(i)- (iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542)) (see [GSFA](#), page 423). This suggests there is a technological justification for the use of acidity regulators in FC 14.1.2.1 (Fruit juice).

Request for comments:

- Item 5a. Request information on the technological justification for the use of acidity regulators in general in FC 14.1.2.1 (Fruit juice) (not limited to standardized food products).
- Item 5b. Request information on the technological justification for the use of calcium lactate in FC 14.1.2.1 (Fruit juice) and its use level (not limited to standardized for products).
- Item 5c. Request information on the technological justification for the use of calcium lactate in Chinese plum juice and its use level.

Important:

Please see pages 2-3 for Guidelines for Providing Comments Related to Technological Justifications.

Comments with no justification (for example, simply “yes” or “no” responses) will be given low priority in determining the consensus recommendation of the eWG.

Item 6

Topic:

CCFA50 requested guidance from CCPFV regarding the use of acidity regulators in general and phosphates (INS 338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542) and tartrates (INS 334, 335(ii), 337) specifically in FC 14.1.2.2 (Vegetable juice), FC 14.1.2.4 (Concentrates for vegetable juice), FC 14.1.3.2 (Vegetable nectar), and FC 14.1.3.4 (Concentrates for vegetable nectar) and the maximum use levels needed to achieve the intended technological effect (see [CCFA50 report](#), para 86 (iii) and [CCFA50, CRD 2](#), page 13).

Background:

The descriptors of FC 14.1.2.2 (Vegetable juice), FC 14.1.2.4 (Concentrates for vegetable juice), FC 14.1.3.2 (Vegetable nectar), and FC 14.1.3.4 (Concentrates for fruit nectar) are provided in [GSFA](#) (pages 42-43). The CCFA50 pWG on GSFA discuss this topic (see [CCFA50, CRD 2](#), Report of the 50th CCFA's Physical Working Group on the Codex General Standard for Food Additives (GSFA)).

The eWG Chair notes that acidity regulators are already permitted in FC 14.1.2.2 (Vegetable juice), FC 14.1.2.4 (Concentrates for vegetable juice), FC 14.1.3.2 (Vegetable nectar), and FC 14.1.3.4 (Concentrates for vegetable nectar) (e.g., ascorbic acid, L- (INS 300), malic acid, DL- (INS 296), and citric acid (INS 330)) (see [GSFA](#), page 423-426). This suggests there is a technological justification for the use of acidity regulators in FC 14.1.2.1 (Fruit juice).

The eWG chair also notes that phosphates (INS 338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v); 542) and tartrates (INS 334, 335(ii), 337) are recognized to have the functional class of acidity regulator for use in FC 14.1.2.1 (Fruit juice), FC 14.1.2.3 (Concentrates for fruit juice), FC 14.1.3.1 (Fruit nectar), and FC 14.1.3.3 (Concentrates for fruit nectar). Fruit juices and vegetable juices or fruit nectars and vegetable nectars often share similar food product characteristics and manufacturing processes.

Request for comments:

- Item 6a. Request information on the technological justification for the use of acidity regulators in general in FC 14.1.2.2 (Vegetable juice), FC 14.1.2.4 (Concentrates for vegetable juice), FC 14.1.3.2 (Vegetable nectar), and FC 14.1.3.4 (Concentrates for vegetable nectar).
- Item 6b. Request information on the technological justification for the use of phosphates (INS 338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-

(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v);542) in FC 14.1.2.2 (Vegetable juice), FC 14.1.2.4 (Concentrates for vegetable juice), FC 14.1.3.2 (Vegetable nectar), and FC 14.1.3.4 (Concentrates for vegetable nectar) and the maximum use levels needed to achieve the intended technological effect.

Item 6c. Request information on the technological justification for the use of tartrates (INS 334, 335(ii), 337) in FC 14.1.2.2 (Vegetable juice), FC 14.1.2.4 (Concentrates for vegetable juice), FC 14.1.3.2 (Vegetable nectar), and FC 14.1.3.4 (Concentrates for vegetable nectar) and the maximum use levels needed to achieve the intended technological effect.

Important:

Please see pages 2-3 for Guidelines for Providing Comments Related to Technological Justifications.

Comments with no justification (for example, simply “yes” or “no” responses) will be given low priority in determining the consensus recommendation of the eWG.

Part II. Revocations of certain food additives (Items 7-9)

CCFA50 (2018) recommends that CCPFV consider the revocation of certain food additives in three standards (items 7-9), taking into consideration the lack of JECFA specification for these additives (see [CCFA50 report](#), paras 48(v)(a), 48(v)(b), and 134(vi)).

Items 7 and 8

Topic:

CCFA50 recommends that CCPFV consider the revocation of potassium hydrogen malate (INS 351(i)), potassium malate (INS 351(ii)), monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)) and dipotassium tartrate (INS 336(ii)) in the Standard for Canned Bamboo Shoots ([CXS 241-2003](#)) and in the Standard for Jams, Jellies and Marmalades ([CXS 296-2009](#)).

Background:

Following considerations at CCFA45, CCFA46, and CCFA47, potassium hydrogen malate (INS 351(i)), potassium malate (INS 351(ii)), monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)) and dipotassium tartrate (INS 336(ii)) were removed from the GSFA due to a lack of JECFA specifications. However, at CCFA50, it was noted that revocation of the provisions relating to those food additives in commodity standards had not been considered (see [CCFA50, CRD 29](#), item 4b)

The eWG chair notes that potassium hydrogen malate (INS 351(i)) and potassium malate (INS 351(ii)) are not limited in the Standard for Canned Bamboo Shoots ([CXS 241-2003](#)) or the Standard for Jams, Jellies and Marmalades ([CXS 296-2009](#)).

Request for comments:

Item 7. The eWG Chair proposes to revoke monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)) and dipotassium tartrate (INS 336(ii)) from the Standard for Canned Bamboo Shoots ([CXS 241-2003](#)) since these additives have already been removed from GSFA due to lack of JECFA specification.

The eWG Chair seeks comments on this proposal.

Item 8. The eWG Chair proposes to revoke monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)) and dipotassium tartrate (INS 336(ii)) from the Standard for Jams, Jellies and Marmalades ([CXS 296-2009](#)) since these additives have already been removed from GSFA due to lack of JECFA specification.

The eWG Chair seeks comments on this proposal.

Item 9

Topic:

CCFA50 recommends that CCPFV consider the revocation of the provision for sodium sorbate (INS 201) from the Standard for Jams, Jellies and Marmalades ([CXS 296-2009](#)) (see [CCFA50 report](#), para 134(vi)).

Background:

CCFA50 agreed to remove sodium sorbate from the JECFA Priority List as no confirmation of data availability had been provided and noted that relevant provisions of sodium sorbate in both the GSFA and relevant commodity standards would be revoked (see [CCFA50 report](#), para 132 and [CCFA50, CRD 29](#), item 7). Please note, the online version of the GSFA may have not been updated to reflect the revocation of sodium sorbate (INS 201) from the GSFA.

Request for comments:

Item 9. The eWG Chair proposes to revoke sodium sorbate (INS 201) from the Standard for Jams, Jellies and Marmalades ([CXS 296-2009](#)).

The eWG Chair seeks comments on this proposal.